

Job Applicant Privacy Notice

1. Introduction

- 1.1 Radius Housing is required to collect and process personal data relating to job applicants as part of the recruitment process. This privacy notice describes how we collect and use personal information about you, in accordance with data protection law, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data Use and Access Act 2025. We are providing you with a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal information will be used, namely for the purposes of the recruitment process, and how long it will usually be kept for.

2. Personal Data

- 2.1 When applying for a job with Radius Housing you will be providing your personal data, which will be used to process your job application with a view to entering into an employment contract with you.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

- 2.2 Data will be stored in a range of different places, including the application records, HR management systems and on other IT systems or platforms (including email).

3. Who do we collect data from?

- 3.1 We collect personal information about candidates from the following sources:
- You, the candidate.
 - Recruitment agencies, from which we collect the following categories of information:
 - first name, surname, postal address, telephone numbers, personal email address, national insurance number, employment references (where applicable).

4. What data do we collect?

- 4.1 In connection with your application for work with us, we will collect, store and use the following categories of personal information about you:
- **Identity information:** first name, last name, any previous names, marital status, title, date of birth and gender]
 - **Contact information:** addresses, telephone numbers, personal email addresses to arrange or coordinate meetings, interviews, tests or assessments using communications channels including email, telephone or text

- **Recruitment information:** copies of right to work documentation, copies of passport or other photo ID, copies of proof of address documentation (for example, bank statement or utility bill), background screening including references, and information included in an application form / CV (for example, prior employment, education or qualifications), or cover letter or as part of the application process or examples of work (for example, written materials or photos)
- **Third party information:** shared by parties including education or training establishments, previous employers, recruitment agencies, head-hunters and third party platforms including background and vetting, recruitment, testing, assessment, social media or networking platforms.
- **Selection and assessment information:** information recorded as part of the recruitment process, including candidate selection, profiling and data analytics, interview and assessment information including notes.

4.2 We **may** also collect, store and use the following types of special category information:

- **Race, religion, beliefs and sexual orientation:** information about your race or ethnicity, religious or philosophical beliefs, sexual orientation and political opinions.]
- **Health and medical:** information about and connected with your health, any medical condition or disability.
- **Criminal offences:** We **may** also collect, store and use **criminal offence information** about you. This is information about criminal convictions and offences, including information about the alleged commission of offences, proceedings for an offence committed (or alleged to have been committed) and the disposal of those proceedings, including sentencing.

You will receive more information about how we use certain types of information when we collect it and at the relevant stage in the recruitment process.]

5. How we will use information about you

5.1 We will only use your personal information when we have a lawful basis to do so. Our lawful basis for each purpose for which we use your information is set out below. Most commonly, we will use your information to:

- Assess your skills, qualifications, and suitability for the role OR work.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

5.2 It is in our legitimate interests to decide whether to appoint you to the role you have applied for, since it would be beneficial to our business to appoint someone to that role.

5.3 We may sometimes use your personal information because we have a recognised legitimate interest. Where we rely on a recognised legitimate interest, we will ensure the use is strictly necessary and only use or share the minimum information required.

5.4 We also need to process your personal information to decide whether to enter into a contract [of employment] with you.

- 5.5 Having received your CV and covering letter OR your application form] [and the results from the assessments AND/OR test(s) which you took, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references AND/OR carry out a criminal record AND/OR carry out ANY OTHER check before confirming your appointment.

6. Using personal information for new purposes

- 6.1 Before we use your personal information for any new purpose, we will ensure the processing is fair and lawful. In particular, we will confirm that an appropriate lawful basis applies to the new purpose and (where relevant) that any additional requirements for special category information or criminal offence information are met. We will carefully consider whether any new use is compatible with the original purpose for which your information was collected. In making that assessment, we take into account several factors, including:
- How closely connected the new purpose is to the original one.
 - The context in which your information was collected, including your reasonable expectations at the time.
 - The nature and sensitivity of the information involved.
 - The potential impact on you.
 - The safeguards we have in place to protect your information.
- 6.2 We will not use your personal information in ways that are unexpected, unfair, or that could have an unjustified negative impact on you.
- 6.3 In certain circumstances, the law treats further processing as compatible without requiring a full compatibility assessment, for example, where processing is carried out for archiving in the public interest, scientific or historical research, or statistical purposes, provided appropriate safeguards are in place.
- 6.4 Where we do intend to use your information for a new purpose, we will inform you and provide any relevant information before doing so. In some cases, you will have the right to object to that use, and we will make you aware of this right whenever it applies.

7. If you fail to provide personal information

- 7.1 In some cases, providing your personal information to us is a statutory or contractual requirement. For example, if we require a credit check or references for this role and you do not provide us with relevant details, we will not be able to take your application further.
- 7.2 Where we ask you for personal information for these purposes, we will make clear why we need it. If you do not provide it, we may be unable to carry out our legal or contractual obligations which may affect you. For example, if you do not provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

Where providing your information is voluntary, we will tell you this and explain any consequences of not doing so.

8. How we use Information about criminal offences

8.1 We envisage that we will process information about criminal convictions.

8.2 We will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are required to carry out a criminal records check to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- We are required by RQIA to carry out criminal record checks for those carrying out the Care roles
 - The role of is one which is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and is also included in the Police Act 1997 (Criminal Records) Regulations 2002 so is eligible for a [standard **OR** enhanced] check from the Disclosure and Barring Service.
- 8.3 We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such information.]

10. Cookies and similar technologies

10.1 Our recruitment portal uses cookies and similar technologies (cookies). Some cookies are essential for functionality and security. We also use cookies (including those set by trusted third parties) to help us understand how candidates use our recruitment pages, improve the website, and measure the effectiveness of our recruitment activity. For analytics and optimisation cookies, we provide clear information and an easy way to opt out through our cookie settings. Some cookies, particularly those set by third parties for advertising or tracking purposes, require your consent before we place them on your device. For more information about what cookies are, how we use them, including which third parties may set cookies and their purposes, please see our Cookie Notice You can change your cookie preferences at any time through our cookie settings.

12. Data sharing

Why we might share your personal information with third parties

12.1 We will only share your personal information with the following third parties to process your application. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal information for their own purposes. We only allow them to process your personal information for specified purposes and in accordance with our instructions.

13. Cross-border data transfers

- 13.1 We will not transfer your personal information outside the UK.

14. Data security

- 14.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
- 14..2 In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.
- 14.3 Details of these measures may be obtained from our data protection officer (DPO).
- 14.4 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

15. Data retention

How long will you use my information for?

- 15.1 We will retain your personal information for 12 months after we have communicated to you our decision about whether to appoint you to the role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment process in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy **OR** applicable laws and regulations.
- 15.2 If we would like to retain your personal information on file, on the basis that we might be able to consider you for an opportunity that may arise in future, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period for that purpose.

16. Your rights in relation to your information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as making a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. We will conduct a reasonable and proportionate search for your personal information.
- **Request rectification** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.

You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party, please contact our data protection officer (DPO).

18. Questions or complaints

- 18.1 If you have any questions or concerns about this privacy notice or how we handle your personal information, please contact our data protection officer (DPO).
- 18.2 You have the right to complain to us if you consider that there has been an infringement of your rights in relation to your personal information.
- 18.3 You can submit a complaint using the following channels:
- Email: data.protection@radiushousing.org
 - Post: Radius House, 3-7 Redburn Square, Holywood, BT 18 9HZ
 - Telephone: 03330 123 0888
- 18.4 When we receive a data protection complaint, we will:
- Acknowledge receipt no later than 2 days from receiving it.
 - Take appropriate steps to respond without undue delay, which may include making enquiries into the subject matter of the complaint and, where appropriate, keeping you informed about the progress of our handling of the complaint.
 - Inform you of the outcome without undue delay.
- 18.5 You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), who is responsible for data protection issues in the UK and whose contact details are available from <https://ico.org>.