

# Privacy Notice - Recruitment via E-Recruiter

The wording in this document reflects the requirements of the General Data Protection Regulation (GDPR), which will come into effect in the UK on 25 May 2018.

As part of any recruitment process, the University collects and processes personal data relating to job applicants. The University is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

## **What information does the University collect?**

The University collects a range of information about you. This may include:-

- your name, address and contact details, including email address and telephone number; details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements; whether or not you have a disability for which the University needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

The University collects this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other accepted right to work documents, or collected through interviews or other forms of assessments.

The University will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks from for example, the Disclosure and Barring Service (DBS). The University will normally only seek information from third parties only once a job offer has been made to you. In all circumstances you will be advised in advance that references are being taken up.

Data will be stored in a range of different places, for example on your application record and in the HR E-Recruiter system.

## **Why does the University process personal data?**

The University needs to process data to progress your application prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, the University needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The University has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the University to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The University may also need to process data from job applicants to respond to and defend against legal claims.

Where the University relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

The University processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where the University processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

For some roles, the University is obliged to seek information about criminal convictions and offences. Where the University seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

The personal data that the University collects about you will be used for the purposes of processing your application for a post at Aberystwyth University and for the completion of anonymous statistics. If your application is successful, it will be used to form the basis of your employee record.

The personal data provided by you will only be disclosed to third parties if necessary for recruitment purposes. The following is a non-exhaustive list of examples where your data may be shared with third parties for recruitment purposes: taking up references, and where an external body is party to the recruitment process e.g. research councils for externally funded posts, external panel members in accordance with the university's Composition of Appointing Panels.

Special category equality data is collected for the purpose of monitoring the effectiveness of the University's Equal Opportunities Policy and to provide anonymised statistical reports. The data will not be disclosed to those panel members involved within the recruitment and selection process unless you have disclosed a disability and the panel members need to know the details for the purposes of implementing any adjustments to the recruitment and selection process that may reasonably be required to prevent you from suffering substantial disadvantage as a result of your disability.

### **Who has access to the data?**

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process and managers in the business area with a vacancy if access to the data is necessary for the performance of their roles.

The University will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The University will then share limited personal data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

Aberystwyth University will not transfer your data in respect of its vacancies outside the European Economic Area.

### **Applications for posts at Aberystwyth University Mauritius Ltd (AUM) Ltd**

Aberystwyth University hosts AUM Ltd. vacancies on its E-Recruiter system. If you wish to submit an application, that application, together with any supporting information that you provide and any information provided by third parties in support of your application, will be received by Aberystwyth University and will be transferred electronically to AUM Ltd in Mauritius, for the purposes of processing your application and engaging in the recruitment exercise.

### **How does the University protect data?**

The University takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

### **For how long does the University keep data?**

If your application for employment is unsuccessful, the University will hold your data on file in line with the HR Retention Schedule (insert link). At the end of that period your data will be anonymised and retained for the purposes of statistical reporting. Alternatively, you may contact [hr@aber.ac.uk](mailto:hr@aber.ac.uk) to withdraw your consent. For externally funded roles and for vacancies where a NON EEA applicant requires sponsorship, the University will retain your information until an audit has taken place either by the funding body or the Home Office and/or in line with current legislation.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your electronic personnel file and retained during your employment. Please refer to the following Privacy Notice for staff for details (insert link)

### **Your rights**

As a data subject, you have a number of rights.

You can:

- access and obtain a copy of your data on request;
- require the University to change incorrect or incomplete data;
- require the University to delete or stop processing your data, for example where the data is no longer necessary for the purposes of collection;
- object to the processing of your data where the University is relying on its legitimate interests as the legal ground for processing; and ask the University to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the University's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact [hr@aber.ac.uk](mailto:hr@aber.ac.uk). You can make a subject access request by completing the University's form for making a data subject access request (insert link).

If you believe that the University has not complied with your data protection rights, you can complain to the Information Commissioner.

### **What if you do not provide personal data?**

You are under no statutory or contractual obligation to provide data to the University during the recruitment process. However, if you do not provide the information, the University may not be able to process your application properly or at all.

Data controller: Aberystwyth University

Data protection officer: Jonathan Davies, Data Protection Manager

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