



Website - Recruitment Privacy Notice

Recruitment Privacy Notice

Introduction

This notice explains how Havebury Homes collects, uses, and protects personal data during the recruitment process. We are committed to ensuring fairness, transparency, and compliance with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018** [as amended by the **Data Use and Access Act 2025 (DUAA)**].

We take privacy seriously and apply robust controls to ensure that all candidate data is handled lawfully, securely, and respectfully.

What We Collect

As a part of the recruitment process, we may collect and process the following categories of personal data:

- Full contact details (name, address, phone number, email)
- Application forms, CVs, cover letters, and supporting documents
- Interview notes, scoring sheets, and assessment results
- Right to work documentation and identity verification
- References and referee contact details
- Health information (where relevant to the role or for reasonable adjustments)
- Disclosure and Barring Service (DBS) check information (where applicable)
- Equality and diversity monitoring data (optional and anonymised)
- Any correspondence or communications relating to your application

We do not collect more than is necessary, and we do not retain data longer than required.

Why We Collect It

We collect your personal data to:

- Assess your suitability for employment
- Take steps prior to entering into a contract
- Comply with legal and regulatory obligations (e.g. right to work checks, DBS)
- Monitor and promote equality, diversity, and inclusion
- Make reasonable adjustments where required
- Maintain a fair, consistent, and transparent recruitment process
- Ensure compliance with Havebury's internal governance and audit requirements

Commented [CS1]: Saying "and the Data Use and Access Act 2025 (DUAA)" implies it's a completely new law alongside GDPR and DPA 2018, rather than an amendment. If your intention is to reflect that it updates existing law, your phrasing should make that clear. I would suggest: "We are committed to ensuring fairness, transparency, and compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended by the Data Use and Access Act 2025 (DUAA)."

Commented [RN2R1]: Agreed - Just that the ico kept repeating throughout DPPC that DUAA is not a replacement of DP 2018 and other legislation but, just anew piece of legislation. That said, I agree including the word amended.



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Lawful Basis for Processing

We rely on the following lawful bases under UK GDPR: Article 6(1)(b) – Necessary for entering into a contract

- Article 6(1)(c) – Legal obligation (e.g. right to work checks)
- Article 6(1)(f) – Legitimate interests (e.g. recruitment management)
- Article 9(2)(b) – Employment obligations (e.g. diversity monitoring)
- Article 9(2)(h) – Occupational health (e.g. reasonable adjustments)

We ensure that personal data collected during recruitment is used strictly for the purposes outlined in this notice and is not repurposed without a lawful basis or the candidate's informed awareness, in line with our obligations under UK GDPR.

You may in some instances be contractually obliged to provide information for the purposes of providing you with an employment contract failing to provide this may lead to us being unable to proceed with the recruitment process.

How We Store and Protect Your Data

All candidate data is stored securely on Havebury's Applicant Tracking System. Access is strictly limited to authorised staff within the People & Organisational Development team and relevant recruiting managers.

We use encryption, multi-factor authentication, and role-based access controls. All systems are subject to regular security audits and penetration testing.

Who We Share It With

We may share your data with:

- Occupational health providers (for pre-employment checks)
- DBS services (where required)
- Recruitment platforms and software providers
- Referees (with your consent)
- Internal stakeholders involved in the recruitment decision-making process

All third parties are subject to data processing agreements and must comply with Havebury's data protection standards.

Retention Period

We retain recruitment records for up to one year following the conclusion of the recruitment process, unless a longer period is required by law or regulatory guidance. Data is securely deleted or anonymised once retention periods expire.

Commented [RN3]: @Tracey Roach - I think this needs to be tweaked in line with the current processes?

Commented [TR4R3]: Yes I agree, I think we would refer to this as Havebury's ATS (applicant tracking system) as this would be a broader description in case we move away from Goodman Masson and Workable software.

The second part is correct and this is limited to those stated.

Commented [RN5]: @Jim Overy While working on the Recruitment Policy, we noticed that Havebury doesn't currently have a Recruitment Privacy Notice published on the website. This is standard practice, so I'm drafting one to go live with the launch of the new site. From an IT perspective, could you confirm whether applicant data is securely deleted or anonymised once the recruitment process concludes?

@Tracey Roach - Do we separate the successful and unsuccessful candidates?

Commented [JO6R5]: My understanding was that unsuccessful candidates details were only kept for 6 months then deleted

Commented [TR7R5]: We would need to check the deletion process at Goodman Masson via the Workable system as I am unsure.

Commented [TR8R5]: We will advise GM that this is the standard to be adopted @Rashmi Nadig



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Speculative applications: If you send us your CV when no role is advertised, we'll use it only to consider you for suitable opportunities. We'll keep speculative CVs for up to 3 months, then delete them securely. Our lawful basis is legitimate interests. You can ask us to delete your CV sooner.

Automated Decision-Making and Profiling

Havebury does **not** use automated decision-making or profiling in recruitment. All decisions are made by trained staff using structured, objective criteria. If automation is introduced in future, it will be subject to human oversight and transparency obligations.

Your Rights

Under UK GDPR and the Data Protection Act 2018, you have the right to:

- Access your personal data
- Rectify inaccurate or incomplete data
- Request erasure of your data (where applicable)
- Object to or restrict processing
- Withdraw consent (where applicable)
- Lodge a complaint with the Information Commissioner's Office (ICO)

To exercise your rights, please contact: data.protection@havebury.com

Updates to This Notice

This notice may be updated periodically to reflect changes in legislation, recruitment practices, or organisational policy. The most current version will always be available on Havebury Homes's careers webpage. We encourage applicants to review this notice regularly to stay informed about how their personal data is handled.

Commented [RN9]: @Tracey Roach and @Lauren Eden - As discussed last week, I have included this clause

Commented [TR10R9]: Thanks @Rashmi Nadig . Once this has all been approved at LT I will ensure I update Goodman Mason with a copy of the agreed process.