



Recruitment Privacy Notice



Who are we?

Cantium Business Solutions (Cantium) are a Local Authority Trading Company owned by Kent County Council. Cantium collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws. Our Data Protection Officer is iSystems.

About the information we collect and hold

The table set out below summarises the information we collect and hold for each stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Up to and including the shortlisting stage

Information we collect	How we collect the information	Why we collect the information	How we use and share the information
Your name, email address and job preferences	From you	For the performance of a contract or in order to take steps at your request prior to entering into a contract: to enable you to sign up to and receive job alerts	To enable us to notify you of job opportunities in line with your job preferences
Your name and contact details (ie address, home & mobile phone numbers, email address)	From you	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	To enable the Recruitment Team or the recruiting manager to contact you to progress your application, arrange interviews and inform you of the outcome and issue any other correspondence required To inform the recruiting manager of your application
Your reason for application / CV and covering letter, details of your qualifications, experience, employment history (including job titles, salary, working hours) and interests	From you, in your completed application form and interview notes if relevant	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	To make an informed recruitment decision
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you, in a completed, anonymised equal	To comply with our legal obligations and for reasons of substantial public interest	To comply with our equal opportunities monitoring

	opportunities monitoring form	(equality of opportunity and fair treatment)	obligations and to follow our equality and other policies For further information, see below*
Declaration of disability	From you in your completed application form	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity and fair treatment) Legitimate interest: to carry out a fair recruitment process	To comply with our equal opportunities monitoring obligations and to follow our equality and other policies To carry out a fair recruitment process including provision of reasonable adjustments at interview if required Shared with recruiting managers For further information see below*
Your information regarding your criminal record	From you, in your completed application form or pre-employment tasks	To comply with our legal obligations and for reasons of substantial public interest (preventing or detecting unlawful acts, protecting the public against dishonesty)	To make an informed recruitment decision To carry out statutory checks Information shared with the DBS and other regulatory authorities as required For further information see below*
Details of your referees	From you, in your completed application form	Legitimate interest: to carry out a fair recruitment process For positions in the regulated sector, to comply with our legal obligations to obtain regulatory references	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel Information shared with the referee(s) via ReferenceExpert (a third party supplier) in order to request references - please see their website for their privacy policy

Before making a final decision to recruit

Information we collect	How we collect the information	Why we collect the information	How we use and share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers and/or personal referees **	From your referees (details of whom you will have provided on your completed application form)	<p>Legitimate interest: to make an informed decision to recruit</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To obtain the relevant reference about you</p> <p>To comply with legal/regulatory obligations</p> <p>Information shared with relevant managers and HR personnel</p>
Information regarding your academic (and professional) qualifications **	From you, from your education provider (from the relevant professional body)	Legitimate interest: to verify the qualifications information provided by you	<p>To make an informed recruitment decision</p> <p>Information shared with relevant managers and HR personnel</p>
Information regarding your personal reference **	From you, from the personal referee (details of whom you will have provided on your completed application form)	Legitimate interest: to make an informed decision to recruit	<p>To make an informed recruitment decision</p> <p>Information shared with relevant managers and HR personnel</p>
Information regarding your professional registrations**	From you, from the registration body	<p>To comply with our legal obligations</p> <p>Legitimate interest: to verify the professional registration information provided by you</p>	<p>To make an informed recruitment decision</p> <p>To carry out statutory checks</p> <p>Information shared with registration bodies as required</p>
Information regarding your criminal record, in criminal records disclosure certificates and enhanced criminal records disclosure certificates **	From you and from the Disclosure and Barring Service (DBS)	<p>To perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interest: to verify the criminal records information provided by you</p>	<p>To make an informed recruitment decision</p> <p>To carry out statutory checks</p> <p>Information shared with DBS and other regulatory authorities as required</p>

		For reasons of substantial public interest (preventing or detecting unlawful acts) and protecting the public against dishonesty	For further information see below*
Your nationality and immigration status and information from related documents such as your passport or other identification and immigration information **	From you	To enter into/ perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office
A copy of your driving licence **	From you if you are appointed to a driving position	To enter into/ perform the employment contract To comply with our legal obligations To comply with the terms of our insurance	To make an informed recruitment decision To ensure that you hold a clean driving licence Information may be shared with our insurer
Information regarding your occupational health clearance**	From Staff Care Services	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations For occupational health assessment purposes	To make an informed recruitment decision Information shared with relevant managers and HR personnel

Before issuing a contract of employment

Information we collect	How we collect the information	Why we collect the information	How we use and share the information
Your emergency contact details	From You	To enter into/ perform the employment contract To comply with our legal obligations Legitimate interest: to maintain good employment records and good employment practice	To ensure that we hold contact details in the event of an emergency Information shared with relevant managers and HR personnel
Financial information including Bank Details, Tax Information, Student Loan Status and NI number	From You	To enter into/ perform the employment contract To comply with our legal obligations	To set up your payroll record, enrol you in the appropriate pension scheme and issue a contract of employment

			Information shared with HMRC, Student Loans Company
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* We will comply with the additional conditions set out in the Data Protection Act which relate to criminal convictions and other special categories of personal data (sensitive personal information). Further details on how we handle sensitive personal information (and information relating to criminal convictions and offences) are set out in our Data Protection Policy and DBS Procedure (Criminal Records Policy).

**You are required by law or in order to enter into your contract of employment to provide the categories of information marked ** above to enable us to verify your right to work and suitability for the position

It is a legitimate interest of the recruiting employer to follow recruitment best practice, to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice - but only if these are not overridden by your interests, rights or freedoms. This means we will not use your data in any way that you would not reasonably expect.

As we have a statutory and contractual basis for collecting your personal data if you do not provide the following we may be unable to progress your job application or employ you.

- Personal Data: Title, Name(s), Address, Contact Details, Date of Birth, NI Number, Employment History, Qualifications/Memberships/Professional Registrations, Referee Details, Driving Licence Details, Bank Details, Tax Information, Student Loan Status, ID documents
- Personal Sensitive Data: If any Convictions, Cautions, Reprimands or Warnings, Nationality and Immigration Status, Occupational Health Information

We may share your personal data and sensitive personal data with other departments within Cantium Business Solutions Ltd as required for the purpose of your application and employment.

We will share personal information with law enforcement or other authorities if required by applicable law.

We will share personal information with our professional advisers and use your information if it is necessary for the purposes of bringing or defending legal proceedings.

How long your personal data will be kept

We will hold your personal information for no longer than the statutory period in which a claim arising from the recruitment process may be brought unless there is a clear business or legal reason for exceeding this period. Upon expiry any personal data will be securely destroyed.

If your application is successful, we will keep the information that is necessary in relation to your employment. Further information can be found in our employee privacy notice.

Your Rights

Under the GDPR you have a number of rights which you can access free of charge which allow you to:

- Know what we are doing with your information and why we are doing it
- Ask to see what information we hold about you
- Ask us to correct any mistakes in the information we hold about you
- Object to direct marketing
- Make a complaint to the Information Commissioners Office

Depending on our reason for using your information you may also be entitled to:

- Ask us to delete information we hold about you
- Have your information transferred electronically to yourself or to another organisation
- Object to decisions being made that significantly affect you
- Object to how we are using your information
- Stop us using your information in certain ways

We will always seek to comply with your request however we may be required to hold or use your information to comply with legal duties. Please note: your request may delay or prevent us delivering a service to you.

For further information about your rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioners Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise a right, please contact dataprotection@cantium.solutions or write to Data Protection Officer, Cantium Business Solutions, Worrall House, 30 Kings Hill Avenue, West Malling, ME19 4AE.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Who to Contact

Please contact dataprotection@cantium.solutions to exercise any of your rights, or if you have a complaint about why your information has been collected, how it has been used or how long we have kept it for.

You can contact our Data Protection Officer, iSystems at dataprotection@cantium.solutions or by writing to Data Protection Officer, Cantium Business Solutions, Worrall House, 30 Kings Hill Avenue, West Malling, ME19 4AE

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone 03031 231113.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.