



Our privacy promise to job candidates and third parties

We ask that you read this recruitment privacy promise carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and other organisations in the event you have a complaint.

Please see the section on **Your rights** for more information.

You may also be interested in our:

- **Main privacy promise**
- **Employee privacy promise**
- **Website privacy policy**

Introduction

We are Case Management Cymru Ltd. In order to identify, select, train and recruit new employees we collect and process personal information about you.

Personal information means any information about you from which you can be identified, but it does not include information where your identity has been removed (anonymous data).

As the 'controller' of personal information, we are responsible for how that data is managed. The **General Data Protection Regulation** (GDPR), which applies in the United Kingdom and across the European Union, sets out our obligations to you and your rights in respect of how we manage your personal information.

As the 'controller' of your personal information, we will ensure that the personal information we hold about you is:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes

- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

If you have any questions about this privacy promise or would like further explanation as to how your personal information is managed then please contact us (see **How to contact us** below).

This document provides the information as required by GDPR under your right to be informed.

Personal data we process

There are two main ways we collect personal data about you:

- **Directly from you** by registering an interest via our website, submitting a CV or registering an interest directly to us, applying for jobs through a third-party website, etc.
- **From third parties** such as your referees or third-party sources such as job sites or LinkedIn.

We will only collect the information that we require at specific times during the recruitment process, such as:

- Name
- Contact details (postal address, phone number, email address)
- Age / date of birth
- Gender
- Marital status
- Your CV (including education details, employment history)
- Vehicle registration number
- Details of your Right to Work (immigration status)
- Driving licence number
- National Insurance number
- Bank details
- Proof of identity (passport, driving licence, identity card)
- Proof of address
- Next of kin contact details
- Referee contact details
- Information collected within interview notes
- Photograph
- Extra information that you choose to tell us (in writing or verbally)
- Extra information that your referees choose to tell us about you

Certain information that we process is classed as 'special category data'. This means it is sensitive by nature and we therefore have a higher duty of care in how we process this data:

- Criminal cautions or convictions
- Religion
- Nationality or ethnicity
- Medical information
- Motoring convictions

When using our website, we collect standard internet log information (otherwise known as cookies) including:

- IP address
- Details of the pages you visit
- General details about the type of computer or device that you are using

This is statistical information only which we collect in order to find out the numbers of visitors to our site and the pages they have visited. This information collected in such a way that it is not used to identify individuals. Where we do collect personal information on the website, this will be made obvious to you through the relevant pages. See our full **website privacy policy** for more information.

Please be aware that our website may provide you with links to other websites. If you follow a link to any other website please note they have their own privacy promises. We do not accept any responsibility or liability for the privacy and security practices of such third-party websites and your use as such is at your own risk.

Whether information has to be provided by you, and if so why

The provision of certain personal data is necessary to enable us to fulfil our contractual and legal duties as part of the recruitment process. Depending on the type of personal data, and the grounds for which we are processing it, should you decline to provide us with such data we may not be able to fulfil our contractual requirements, and in extreme cases may not be able to continue with our relationship.

Purposes of processing your personal information

In order to provide you with the best possible employment opportunities for a Case Management Cymru client we will process personal data.

Purpose of processing	Examples
Screening of applications	<ul style="list-style-type: none">• To assess and shortlist candidates as part of the recruitment process for our clients (including telephone interviews)• To receive, process and assess criminal convictions and cautions of candidates as part of the employment process• To receive, process and assess details of motoring offences on candidates driving license (UK Only), as part of the screening process
Interview and selection	<ul style="list-style-type: none">• To receive, record and process applications for employment with Case Management Cymru clients• To schedule interviews with the relevant case manager and client or their representative• To conduct and record details of interviews with candidates for employment with CMC clients
Plan and deliver training during recruitment	<ul style="list-style-type: none">• To schedule any required training with candidates as part of the recruitment process
Communicate about the progress of your application	<ul style="list-style-type: none">• To maintain communication with candidates in relation to their ongoing application• To process withdrawal requests from candidates or to process rejection notices to candidates
To take up references	<ul style="list-style-type: none">• To receive and record contact details for Referees as provided by the candidate• To attain and verbally confirm employment and / or character references for employment
To make a job offer	<ul style="list-style-type: none">• To offer a successful candidate employment on behalf of the CMC client or their representative

	<ul style="list-style-type: none"> • To create and update the system with the details of a new recruit to enable them to start work and ensure pay • To receive and record contact details for Next of Kin as provided by the candidate
To keep records to demonstrate our compliance to relevant laws	<ul style="list-style-type: none"> • To review, verify and take appropriate copies of relevant documentation for the recruitment process
To monitor the operational effectiveness of our recruitment process	<ul style="list-style-type: none"> • To monitor and report on the effectiveness and compliance of the recruitment process
Sourcing appropriate candidates	<ul style="list-style-type: none"> • To maintain communication with prospective candidates who may have withdrawn or not started to market job opportunities we believe may be of interest • To source and contact prospective candidates via third party recruitment platforms to market job opportunities we believe may be of interest

Who has access to your personal data

In order to operate our business and run our recruitment we rely on third parties to provide specialist support to us. To provide this support they will have access to, or a duty of care over your personal information. These third parties are:

- Your independent Case Manager – to ensure you are provided with a safe and effective services
- IT and Telecoms Support companies – to ensure the safe, secure and resilient operation of our IT infrastructure including computers, servers, phones and mobile devices
- Software support companies – to provide specialist support and resolve issues with the software that we run, for example the systems we use to store and manage your customer records
- Marketing systems providers – to organise marketing communications and for the delivery and analysis of email communications
- Payroll companies – to manage the payroll element of your team of carers

- Data archiving companies – responsible for the secure storage and destruction of records.
- Relevant authorities – such as the DVLA, HMRC
- Applicant screening service providers – for checking criminal records
- Referees – to confirm character and employment details

We will share relevant information within Case Management Cymru during the recruitment process, for example with the case manager.

We will not share, sell or trade your personal information with any other third party without your consent, unless there is a legal reason to do so.

International transfer

All your personal data is stored and processed on systems that are within the European Economic Area (EEA) and offer the same level of legal protection and rights over your data.

In certain situations, we transfer your personal information to the following countries which are located outside the European Economic Area (EEA):

- A country where you are resident or located in temporarily

This will be for the purposes of communicating with you about your recruitment process when you are based in a country outside of the EEA.

This international transfer is under Article 49(1)(b) – the transfer is necessary for the performance of a contract between the data subject and the controller.

Such countries do not have the same data protection laws as the United Kingdom and EEA. Any transfer of your personal information will be subject to appropriate or suitable relevant safeguards that are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal information.

If you would like further information please contact us (see **How to contact us** below).

Retention schedule

Type of data	Retention period
Application details for successful candidates	This data will become part of your employee file and are retained in line with the information within our employee privacy promise.

Application details for candidates	This data is deleted automatically after 6 months from the date of interview
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Legal basis for processing

We rely on the following grounds within the GDPR:

- Article 6(1)(b) – processing is necessary for the **performance of a contract** to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
- Article 6(1)(c) – processing is necessary for us to demonstrate **compliance with the law** or regulatory frameworks
- Article 6(1)(f) – in pursuit of **legitimate interests**
 - To review and make informed decisions on the re-employment of a previous employee
 - To monitor and track the effectiveness and compliance of the recruitment process
 - To contact prospective candidates to market job opportunities we believe may be of interest

GDPR recognises that additional care is required when processing special category (sensitive) data such as your health, religious views. We process this under the following grounds within GDPR:

- Article 9(2)(b) – **Legal obligations** under employment or social benefit law

Your rights

Under the GDPR you have important rights free of charge. In summary, those include rights to:

- Fair processing of information and transparency over how we use your personal information
- Access to your personal information and to certain other supplementary information that this Privacy Promise is designed to address
- Require us to correct any mistakes in your information which we hold
- Require the erasure (i.e. deletion) of personal information concerning you, in certain situations. Please note that if you ask us to delete any of your personal information which we believe is necessary for us to comply with our contractual or legal obligations, this may affect our ability to provide employment or to fulfil our contractual duties with you

- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- Object at any time to processing of personal information concerning you for direct marketing
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- Object in certain other situations to our continued processing of your personal information
- Otherwise restrict our processing of your personal information in certain circumstances
- Claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on **individuals' rights under the GDPR**.

Keeping your personal information secure

The confidentiality and security of your information is of paramount importance to us. We have appropriate organisational and technical 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.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit **www.getsafeonline.org**. Get Safe Online is supported by HM Government and leading businesses.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information. The GDPR also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at **ico.org.uk/concerns/** or by phoning **0303 123 1113**.

Data Protection Officer/Data Controller

The Operations Director
Case Management Cymru
Miskin Manor Business Centre
Pendoylan Road
Pontyclun
RCT
CF72 8ND
julie@casemanagementcymru.co.uk

How to contact us

You can contact us by:

- **Email** – info@casemanagementcymru.co.uk
- **Post** – The Operations Director, Case Management Cymru, Miskin Manor Business Centre
Pendoylan Road, Pontyclun, RCT, CF72 8ND
- **Telephone** – 01443 805268

If you would like to exercise any of those rights, please:

1. Contact us using the details above – making clear that you wish to exercise one of your privacy rights
2. Let us have enough information to identify you (e.g. your name and address)
3. Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill)
4. Let us know the information to which your request relates, including any account or reference numbers, if you have them

If you would like to unsubscribe from our recruitment contact you can either delete your candidate profile on our careers site or contact us, as above, to request to unsubscribe from recruitment contact. It may take up to 14 days for this to take place.