



## UCG HR Applicants Privacy Notice

This notice describes how the College processes personal data collected in the framework of its recruitment process (for City of Westminster College and the College of North West London).

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## Introduction

United Colleges Group is a leading not-for-profit education and training provider located in London, focused on educating and training the capital's diverse workforce. The College's website is <https://www.ucg.ac.uk/>

Data which is provided by applicants in the framework of a recruitment process will be stored electronically by the College for the purpose of recruitment administration and Equal Opportunities Monitoring. The College will process the data in line with the UK General Data Protection Regulation tailored by the Data Protection Act 2018 (UK GDPR).

## What is personal data?

Personal data is any information that relates to an identified or identifiable individual. It includes information relating to you, from which we can identify you directly or indirectly. When considering whether information relates to you for the purposes of Data Protection Legislation, we take into account a range of factors, including the content of the information, the purpose for which we are processing it, and the likely impact or effect of that processing on you.

## Purpose and lawful basis for processing

Our purpose for processing this information is to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process.

The lawful basis we rely on for processing your personal data is based on the UK GDPR provision, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract.

If you provide us with any information about reasonable adjustments, you require under the Equality Act 2010, the lawful basis we rely on for processing this information is the UK GDPR provision which enable us to process the data to comply with our legal obligations under the Act.

The lawful basis we rely on to process any information you provide as part of your application which is special category data, such as health and religion, we rely on consent to process your health and information about your religion, we rely on legal obligation to process ethnicity information which is mandatory under the ethnicity data on the 2021 Census in England and Wales to measure equality.

We process information about applicant criminal convictions and offences. The lawful basis we rely on to process this data under the UK GDPR legal obligation which allow us to process the data for employment, social security and social protection law. In addition, we will require your consent to conduct the background check and we rely on the processing condition set out in the DPA 2018 Schedule 1 part 1 paragraph 1(1)(a) on employment, social security or social protection condition.

## What will we do with the information you give us?

We'll use all the information you provide during the recruitment process to progress your application with a view to offering you an employment contract with us, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide with any third parties for marketing purposes.

We'll use the contact details you give us to contact you to progress your application. We may also contact you to request your feedback about our recruitment process. We'll use the other information you provide to assess your suitability for the role.

### **What data do we ask for, and why?**

For candidates applying for roles the personal details we collect include name and contact details, previous work experience, education, referees contact details, answers to questions relevant to the role, disability details, and any relevant correspondence.

For successful candidates the personal and demographic data we collect include passport/ID documents, contact information, education certificates, training and skills, health, safety and wellbeing, previous employment information, professional experience and affiliations, background checks, P45 documentation, referees, financial/payments, legal and compliance, user account information, disability details, emergency contacts, user account information and any relevant correspondence.

We do not collect more information than we need to fulfil our stated purposes and will not keep it longer than necessary.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for, but it may affect your application if you don't.

We will use any feedback you provide about our recruitment process to develop and improve our future recruitment campaigns.

### **How do we ensure your personal data is safe and secure?**

We will take appropriate security measures against unlawful or unauthorised processing of, or the accidental loss or damage to your personal data.

We have put in place procedures and technologies to maintain the security of your personal data from the point of collection to the point of destruction. Personal data will only be transferred to a third-party data processor (see "Do we use any data processors?") if they agree to comply with the College's procedures and policies or put in place their own adequate security measures.

We will maintain data security by protecting the confidentiality and availability of your personal data. Only people who are authorised to use your personal data can access it and authorised users can only access personal data for authorised purposes.

We do not transfer data outside of the UK and EU. If, we may be required to transfer the data to countries outside of the UK or the European Economic Area, we will ensure that the recipient of your Personal Data offers an adequate level of protection and security through an appropriate legal mechanism a data processing agreement, standard contractual clause agreements or any other relevant standards, agreements or safeguards that will ensure that the information is adequately protected in line with Art. 46 of the GDPR or other applicable regulations and legislation in the countries in which we operate.

We will only process your personal data in a way that is consistent with your relationship with us, and the practices described in this privacy notice.

We also minimize the risk to your rights and freedoms by not collecting, storing or transferring more information than is absolutely necessary.

## **Application stage**

If you use our online application system, your details will be collected in our HR and payroll system, iTrent.

To access a copy of your completed application form you can login to your applicant account [here](#) or email us at [hr@ucg.ac.uk](mailto:hr@ucg.ac.uk) to request a copy.

We ask you for your personal details including name and contact details. We'll also ask you about previous experience, education, referees and for mandatory declarations and answers to questions as outlined in the Keeping Children Safe in Education guidelines. Our HR team will have access to all this information.

You will also be asked to provide equal opportunities information. This is not mandatory – if you don't provide it, it won't affect your application. We won't make the information available to any staff outside our HR team, including hiring managers, in a way that can identify you. Any information you provide will be used to produce and monitor equal opportunities statistics.

## Shortlisting

Our hiring managers and advisory panel shortlist applications for interview. They will not be provided with your name or contact details or with your equal opportunities information if you have provided it.

## Assessments

We may ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; attend an interview; or a combination of these. Information will be generated by you and by us. For example, you might complete a written test, or we might take interview notes. This information is held by us.

If you are unsuccessful after assessment for the role, and you have not previously expressed your consent, we may ask if you would like your details retained in our talent pool. If you say yes, we will proactively contact you should any further suitable vacancies arise.

## Conditional offer

If we make a conditional offer of employment, we'll ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We must confirm the identity of our staff and their right to work in the United Kingdom, and seek assurance as to their trustworthiness, integrity and reliability.

You must therefore provide:

- Proof of your identity - you will be asked to attend our office with original documents. We'll take copies and these will be kept on your electronic employee file.
- Proof of your qualifications - you will be asked to attend our office with original documents. We'll take copies and these will be kept on your electronic employee file.
- Your email address, which we'll pass to our pre-employment screening provider in order to comply with the Department of Education's regulatory checks. Our screening provider will contact you to complete an application for a Disclosure and Barring Service check.
- We'll contact your referees directly, using the details you provide in your onboarding form, to obtain references.
- We'll also ask you to complete a questionnaire about your health to establish your fitness to work.
- We'll also ask you about any reasonable adjustments you may require under the Equality Act 2010. This information will be shared with relevant College staff to ensure these are in place for when you start your employment.
- Bank details – to process salary payments.
- Emergency contact details – so we know who to contact in case you have an emergency at work.
- Any membership of the Local Government Pension Scheme or Teachers Pension Scheme.

Please note that the United College Group have a duty to comply with the Department for Education's guidelines around pre-employment checks. Should any changes be made to the requirements of staff

working in close contact young people the college hold the rights to request further information at any time.

### **Your duty to inform us of changes to your personal data**

It is important that the personal data we hold about you is accurate and current. Please contact [hr@ucg.ac.uk](mailto:hr@ucg.ac.uk) if your personal information changes during the recruitment process.

### **How long is the information kept for?**

We will retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements.

In completing your application, you have registered to have an applicant account with the College, enabling you to access a copy of your application and to apply for other jobs with the College. After 12 months of no activity on your applicant account, your account will be erased. This includes any job alerts you have setup. You may contact [hr@ucg.ac.uk](mailto:hr@ucg.ac.uk) at any point in time to request your applicant account and information provided in your applications be deleted.

### **How we make decisions about recruitment**

Final recruitment decisions are made by hiring managers, interview panel and members of our HR team. We take account of all the information gathered during the application process.

Any online English and Math functional skills testing is marked, and a result is generated automatically. Any other assessments relevant to a particular role will be manually assessed.

You can ask about decisions on your application by contacting our HR team or by emailing [hr@ucg.ac.uk](mailto:hr@ucg.ac.uk)

### **Processing the Personal Data of Third Parties**

In some limited circumstances, and for specified purposes, we will also process personal data relating to third parties, such as your emergency contact details or referees. Where this occurs, we may contact the named persons to explain why we need to process their personal data unless the law permits us not to.

### **Your rights**

As an individual, you have certain rights regarding your own personal data. For more information on your rights, please see Appendix 1.

### **Do we use any data processors?**

Any activity that involves the use of your personal data is referred to as processing. We use third party processors to provide elements of our recruitment service, to complete pre-employment checks and manage elements of the subsequent employment relationship.

We permit the following third parties to process your personal data (this is a non-exhaustive list):

- Our English and Math assessments are provided by BKSb tests. The BKSb privacy notice is available [here](#).

If you accept an offer from us:

- Some of your personnel records will be held on iTrent, which is an internally used HR and payroll system provided by MHR. Here is a link to the [MHR privacy notice](#).
- Our screening provider Security Watchdog will contact you to complete an application for a Disclosure and Barring Service check. You can read the Security Watchdog privacy notice [here](#).
- We use Cope to provide our Occupational Health service. We will send you a questionnaire to complete. The information you provide will be held by Cope, who will give us a fit to work certificate or a report with recommendations. You can request to see the report before it is sent to us. If an occupational health assessment is required, this is likely to be carried out by Cope. Their Privacy notice can be accessed [here](#).
- Your details will be provided to either the London Pension Fund Authority (LPFA) or Teachers' Pension Scheme (TPS), of which we are a member organisation. You may be auto enrolled into the relevant pension scheme and relevant personal and employment information will be passed to the provider.
- Your details will be provided to HM Revenues & Customs (HMRC), Department for Work & pensions (DWP), Department of Education and the Home Office for compliance with our legal obligations.
- Your details will be provided to CybSafe for the purposes of completing mandatory training. The CybSafe privacy notice is available [here](#).
- You will be asked to register an online account with the Education and Training Foundation to complete online training. The Education and Training Foundation's privacy notice is available as part of your account registration process.
- You will be asked to complete the Prevent E-Learning package provided by the Home Office.
- You will be asked to register an online account with My Concern, a reporting system for safeguarding. The My Concern privacy notice is available [here](#).

## Changes to this privacy notice

We keep our practices and policies regarding the collection, processing and security of personal data under continual review and may update them from time to time. We therefore reserve the right to change this privacy notice at any time. We will notify you of any changes made at the appropriate time and may re-issue a new privacy notice if appropriate.

## Contact us

Any comments, questions or suggestions about this privacy notice or our handling of your personal data should be emailed to [hr@ucg.ac.uk](mailto:hr@ucg.ac.uk)

Alternatively, you can contact us at using the following postal address or telephone number:

**Postal address:** Human Resources, United Colleges Group, Paddington Green Campus, Paddington Green, London, W2 1NB

**Tel:** 020 7258 2772



## Complaints

Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to the supervisory authority. For the UK, this is the ICO (Information Commissioner's Office). The ICO's contact information can be found at <https://ico.org.uk/global/contact-us/>.

## Appendix 1 – Your Rights

As a data subject whose personal information we hold, you have certain rights. Some of these rights are dependent on the nature and purpose of the processing. If you wish to exercise any of these rights, please email [hr@ucg.ac.uk](mailto:hr@ucg.ac.uk) or use the information supplied in the **Contact us** section above. To process your request, we will ask you to provide two valid forms of identification for verification purposes. Your rights are as follows:

- **The right to be informed**

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.

- **The right of access**

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- The purposes of the processing.
- The categories of personal data concerned.
- The recipients to whom the personal data has been disclosed.
- The retention period or envisioned retention period for that personal data.
- When personal data has been collected from a third party, the source of the personal data.

If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If answering requests is likely to require additional time or occurs unreasonable expense (which you may have to meet), we will inform you.

- **The right to rectification**

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.

- **The right to erasure (the ‘right to be forgotten’)**

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.

- **The right to restrict processing**

You may ask us to stop processing your personal data. We will still hold the data but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

- The accuracy of the personal data is contested.
- Processing of the personal data is unlawful.
- We no longer need the personal data for processing, but the personal data is required for part of a legal process.
- The right to object has been exercised and processing is restricted pending a decision on the status of the processing.

- **The right to data portability**

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

- **The right to object**

You have the right to object to our processing of your data where:

- Processing is based on legitimate interest.
- Processing is for the purpose of direct marketing.
- Processing is for the purposes of scientific or historic research.
- Processing involves automated decision-making and profiling.

- **The right to withdraw**

You have the right to withdraw your consent to processing at any time (but only where we have relied on your consent as the lawful basis to conduct the processing).