



RECRUITMENT PRIVACY NOTICE

Introduction – please read me

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the recruitment and application process.

We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy policy') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

This Privacy Notice supplements the other notices and is not intended to override them.

Who we are

We are the Oxford Group; however, you may be more familiar with us as Initiatives of Change UK (referred to as “we”, “us” or “our” in this privacy notice).

We are a charity incorporated and registered in England and Wales with company number 355987, whose registered office is at 24 Greencoat Place, London, SW1P 1RD, United Kingdom. We are registered with the charity commission of England and Wales under registration number 226334.

We are the Controller of the data we collect about you during our recruitment process (registered with the ICO under number ZA332332) and are responsible for your personal data under this privacy notice. This means we decide why we collect your data, how we collect it, what data is collected, how this data is going to be used and how this data is protected.

Our Data protection officer (DPO)

We have appointed GRCI Law Limited as our data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

How to Contact our DPO or us

If you have any questions about this privacy notice or our privacy practices, please contact us directly or our DPO:

You can contact our DPO by emailing dpoaas@grcilaw.com or telephoning 03339005555.

Alternatively, you can contact us directly at uk@iofc.org or telephone 0207 798 6000

About the information we collect and hold

The table set out in Part A of the schedule below summarises the information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part B of the schedule below summarises the additional information we collect before making a final decision to recruit, i.e., before making an offer of employment unconditional, 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.

Where information may be held

Information may be held at our offices, third-party recruitment agencies and with our service providers such as Peninsula UK who provides us with HR services.

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an interview.

Where we are processing your Special Category Personal Data, we must, in addition to the Lawful Basis in the Lawful Basis table, process your Special Category Personal Data because of an additional condition, including You have given us your explicit consent to process that data.

For more information about us using your Special Category Personal Data, please contact us at uk@iofc.org

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

Information about criminal convictions

We will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We carry out DBS check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.]

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Will you share my personal information with third parties?

Building trust across the world's divides

We will only share your personal information with third parties for the purposes of processing your application. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Using your data for other reasons

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the Lawful Basis that allows us to do so.

Sharing your Personal Data safely

We may share your personal information with the following organisations that help us manage our business and deliver our products, applications, or services, or where we are legally obliged to share information, including with:

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law.

We do not allow our third-party service providers to use your Personal Data for their own purposes. We only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

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.

How long we keep your information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful, and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment.

Your Rights

You have several rights under Data Protection Law. The rights available to you depend on our reason for processing your information and are set out in the Table below. Information on your rights under Data Protection Law can also be found at <https://ico.org.uk/for-the-public/>.

Table of your data protection rights

YOUR RIGHT	DETAILS
Right to be informed	We have a legal obligation to provide you with concise, transparent, intelligible, and easily accessible information about your personal information and our use of it. We have written this notice to do just that, but if you have any questions or require more specific information, you can contact us at uk@iofc.org .
Right of access	You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information. When you request this data, this is known as making a data subject access request (DSAR). In most cases, this will be free of charge; however, in some limited circumstances, for example repeated requests for further copies, we may apply an administration fee. You can contact us at uk@iofc.org for more information.
Right to rectification	You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. You can contact us at uk@iofc.org for more information.
Right to erasure	You have the right to ask us to erase your personal information in certain circumstances. We have the right to refuse to comply with a request for erasure if we are processing the Personal Data for one of the following reasons: <ul style="list-style-type: none"> • To exercise the right of freedom of expression and information. • To comply with a legal obligation. • To perform a task in the public interest or exercise official authority. • For archiving purposes in the public interest, scientific research, historical research or statistical purposes. • For the exercise or defence of legal claims. <p>You can contact us at uk@iofc.org for more information.</p>
Right to restriction of 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: <ul style="list-style-type: none"> • The accuracy of the Personal Data is contested. • Processing of the Personal Data is unlawful.



	<ul style="list-style-type: none"> 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. <p>You can contact us at uk@iofc.org for more information.</p>
Right to object to processing	<p>You have the right to object to processing in certain circumstances. You can also object if the processing is for a task carried out in the public interest, the exercise of official authority vested in you, or your legitimate interests (or those of a third party).</p> <p>You can contact us at uk@iofc.org for more information.</p>
Right to data portability	<p>This right only applies if we are processing information based on your consent or for the performance of a contract and the processing is automated.</p> <p>You can contact us at uk@iofc.org for more information.</p>

How to exercise your rights

In most circumstances, you do not need to pay any charge for exercising your rights. We have one month to respond to you.

To exercise your rights or get more information about exercising them, please contact us at uk@iofc.org giving us enough information to identify you.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information. Please contact us first and title your email “**Complaint**”. All complaints will be treated in a confidential manner, and we will try our best to deal with your concerns.

You have the right to lodge a complaint with a supervisory authority in the EEA member state where you work or normally live, or where any alleged infringement of Data Protection Law occurred.

The supervisory authority in the UK is the ICO, which may be contacted at <https://ico.org.uk/concerns> or by telephone on 0303 123 1113.

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

THE SCHEDULE
ABOUT THE INFORMATION WE COLLECT AND HOLD

Part A
Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (i.e. address, home and 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 manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome To inform the relevant manager or department of your application
Details of your qualifications, experience, employment history including job titles, and working hours) and interests	From you, in the 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 if you are invited for interview, the interviewer will receive non-anonymised details
Details of your referees	From your completed application form	Legitimate interest: to carry out a fair recruitment process	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the referee

If your application is unsuccessful at this stage, we will keep your information, in pseudonymised form, for the purpose of establishing, exercising and/or defending any legal claims, in accordance with our legitimate interests.

Part B
Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may 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	From your referees (details of whom you will have provided)	<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	To make an informed recruitment decision
Information regarding your criminal record, in a criminal records certificate (CRC) or enhanced criminal records certificates (ECRC) as appropriate <input type="checkbox"/>	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>For reasons of substantial public interest (preventing or detecting unlawful acts)</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>



<p>Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information <input type="checkbox"/></p>	<p>From you and, where necessary, the Home Office</p>	<p>To enter into/perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interest: to maintain employment records</p> <p>To carry out obligations and exercise rights in employment law</p> <p>For reasons of substantial public interest (preventing or detecting unlawful acts)</p>	<p>To carry out right to work checks</p> <p>Information may be shared with the Home Office</p>
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If your application is unsuccessful at this stage, we will keep your information, in pseudonymised form, for the purpose of establishing, exercising and/or defending any legal claims, in accordance with our legitimate interests.

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