

SPORT & RECREATION ALLIANCE (“The Alliance”)
PRIVACY NOTICE FOR JOB APPLICANTS, INCLUDING APPLICANTS FOR UNPAID POSITIONS

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect during the process of you applying for a role with the Alliance. This notice explains how we comply with the law on data protection and what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

This notice applies to anyone making an application for employment or a non-executive role at the Alliance, but prior to being formally engaged by the Alliance.

If you are successful in your application and are appointed to a position you will receive details of our data protection policy and privacy notice.

References to **we**, **our** or **us** in this privacy notice are to the Alliance.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Data Protection Compliance Team has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

1. PERSONAL INFORMATION

When you interact with us in relation to your application, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses and emergency contact details;
- date of birth;
- gender, marital status and dependants;
- referee details;
- identification documents and information such as passport, utility bills, identity cards, signature etc;
- recruitment (including copies of right to work documentation, past employment history, references and other information included in a CV or cover letter or as part of the application process);
- evidence of qualifications or professional memberships;
- your photograph and any video or sound recordings you might submit as part of your application;
- records of enquiries and other correspondence with you.

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following “**special categories**” of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and
- biometric information about you, for example fingerprints, retina scans.

We may not collect all of the above types of special category information about you. In relation to the special category personal data that we do process we do so on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;

- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

In the table below we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information from you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent. We will only collect criminal convictions data where it is appropriate given the nature of your role (for example, if the role has a safeguarding dimension or if there is financial responsibility within the role’s duties) and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your engagement should you be successful.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about employees, workers, directors and consultants through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies. We will also collect additional personal information in the course of job-related activities throughout the period of you working for us.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “Your rights in relation to personal information” section below.

4. USES MADE OF YOUR PERSONAL INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

<i>Purpose</i>	<i>Personal information used</i>	<i>Lawful basis</i>
Non- ‘special categories’ of Personal Information		
Making a decision about your recruitment or appointment and managing the recruitment process and determining the terms on which you work for us	All the personal information we collect for the purposes of the application and recruitment process	We need this information to be able to perform and administer the recruitment process
Checking you are legally entitled to work in the UK	Personal contact details and identification documents and right to work documentation	We have a legal obligation to do so.
Business management and planning, including accounting and auditing, conducting our normal business operations and managing our relationship with you	All your personal information excluding ‘special categories’ of personal information and criminal records information	We have a legitimate interest to run and manage our business

Assessing qualifications for a particular job or task, including decisions about promotions and ascertaining your fitness to work, education, training and development requirements	All the personal information we collect for the purposes of the application and recruitment process	We may be legally obliged to do so We have a legitimate interest to ensure we recruit suitably qualified and skilled people
Complying with health and safety obligations	Personal identifiers, CCTV footage and other information obtained through electronic means such as swipecard and key fob records, working environment information including any home-working assessment records	We have a legal obligation to comply with Health and Safety laws We also have a legal obligation to report any accidents at work in accordance with health and safety laws
Dealing with legal disputes involving your application	All your personal information excluding 'special categories' of personal information and criminal records information	We have a legitimate interest to ensure that all legal claims are managed effectively
For the purposes of equal opportunities monitoring	Name, title, date of birth; gender; marital status; salary, annual leave, pension and benefits; location of employment or workplace	We may have a legal obligation to do so and we have a legitimate interest in doing so to make sure our business is a fair place to work
Storage of records relating to you and also records relating to our business	All non-'special categories' of personal information	To be able to manage and fulfil our relationship with you. We also have a legitimate interest to keep proper records
For the purpose of complying with any regulatory requirements	All the personal information about you excluding special category information and criminal records data	We may have a legal obligation to comply with regulatory requirements and we have a legitimate interest in complying with regulatory requirements
'Special categories' of Personal Information or criminal records		
Storage of records relating to you and also records relating to our business.	All 'special categories' of personal information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above For criminal records information we process it on the basis of legal obligations or based on your explicit consent.
We will use information about your physical or mental health to provide you with benefits under your contract	Information about your health, including any medical condition, health and sickness records, medical records and health professional information;	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.

<p>We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to provide appropriate workplace adjustments</p>	<p>Information about your health, including any medical condition, health and sickness records, medical records and health professional information;</p>	<p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p>We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation or political beliefs, to ensure meaningful equal opportunity monitoring and reporting.</p>	<p>Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;</p>	<p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above</p>
<p>We will use and retain information about criminal convictions to comply with law and in order to determine your eligibility to undertake particular types of work.</p>	<p>Information about your criminal convictions and offences</p>	<p>For criminal records information we process it on the basis of legal obligations or based on your explicit consent.</p>

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to engage you or we may not be able to properly perform our contract with you as a future employee or comply with legal obligations. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our potential future contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "**Contacting us**" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain benefits to you.

5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Any party approved by you.**
- **Other service providers to our business and advisors:** for example, payroll, pension administration, benefits provision, professional advisors and administration, CCTV contractors and IT services. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information.
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives for the financial services industry, including but not limited to the Financial Conduct Authority and Prudential Regulation Authority;

- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above.

6. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union.

7. HOW LONG WE KEEP PERSONAL INFORMATION FOR

If your application is not successful and you have not provided consent to keep your data for the purpose of future suitable job vacancies, we will keep your data for not more than 12 months once the recruitment exercise ends.

If we have sought your consent to keep your data on file for future job vacancies, and you have provided consent, we will keep your data for 2 years once the recruitment exercise ends. At the end of this period, we will delete or destroy your data, unless you have already withdrawn your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent.

If your application is successful, your data will be kept and transferred to the systems we administer for employees. We have a separate data protection compliance statement (privacy notice) for employees, workers and contractors which will be provided to you when applicable.

Information that may be relevant to personal injury claims, employment claims, discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have worked for us.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you move home or change your phone number or email address.

8. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

9. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

10. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email dataprotectionteam@sportandrecreation.org.uk or write to us at Holborn Tower, 137-144 High Holborn, London, WC1V 6PL.

Version dated 18 May 2018