

# Recruitment Privacy Policy

## Policy Objective

At Henderson Group, we understand your concerns about what happens to information which you provide to us and we are dedicated to protecting your privacy.

Henderson Group provides this Privacy Policy in its role as data controller in order to explain how your information is collected and used.

We acknowledge and agree that any personal data of yours that we handle will be processed in accordance with all applicable data protection laws in force from time to time including the General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018.

This means that the personal information we hold about you must be:

- 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.

## Collecting Personal Data

There is a minimum of 2 stages to our recruitment process. Stage 1 consists of an initial application process which takes place via a third-party supplied recruitment system. 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.

Stage 2 usually consists of a face to face interview conducted by Henderson Group. During this process, we may access and view any of the information described in the following section - excluding information relating to your sex, community background, school, date of birth, race, marital status / family status, dependents, sexual orientation, nationality, health information, criminal convictions, disability. We always take notes at these interviews, recording information relating to the interview(s). As part of the recruitment process we may ask you to complete assessments relevant to the job.

Other stages in the recruitment process may include any or a combination of the following: video, presentation, second interview, online tests, work sample or assessment centre including group activity with other candidates. We always take notes at these interviews / activities, recording information relating to the recruitment process.

## Types of Personal Data Collected

The information about you we may collect, hold and process as part of the initial application process is set out below.

“Personal data” is any information about a living individual from which they can be identified such as:

- Name;

- Address;
- Email address;
- Telephone\Mobile numbers;
- National Insurance number;
- Qualifications / training;
- Employment history including information about your current level of remuneration & benefits;
- Whether or not you have a disability;
- Criminal convictions declaration;
- CV;
- Information about your entitlement to work in the UK;
- Equal opportunities monitoring information, including information about your community background, sex, age, racial group, sexual orientation, marital status/civil partnership status, dependents/caring responsibilities and disability information. This information is kept separate to the selection process and not reviewed by anyone involved in selection assessment;
- Health Questionnaire. This information is not viewed by anyone involved in the selection process and considered only at the 'offer subject to pre-employment check' stage.

If you are successful at interview/assessment stage, we would then make a conditional offer of employment and we will ask you for further information in order to complete pre-employment checks as follows:

- Proof of your right to work in the UK: you will be asked to come to the office with your original passport; we will take copies of these;
- Proof of your qualifications: you may be asked to come to the office with your original documents; we will also take copies of these;
- Referees: we will contact your referees using the details provided in your application;
- Bank and Tax Details Form: confirmation of your bank and tax details will be requested; this is to enable us to process wages/salary;
- Personal Details Form: you will be asked to complete a form with personal details including address, emergency contact details and next of kin details. This is so we have a contact in case you have an emergency at work;
- Criminal Record Check: for some roles, there will be a requirement to carry out a Criminal Record Check. This will be made clear as soon as practicable and you will be required to complete an application form, which will be sent to Access NI.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during our recruitment process.

If you do not provide all information required, we may not be able to offer you a contract of employment.

### **Storing Your Information**

The personal information set out above is stored on a third-party supplied recruitment system which is accessed by authorised Henderson Group employees for the purposes of recruitment.

Any interview notes taken by Henderson Group employees are stored and maintained by Henderson Group for the purposes of recruitment in line with Data Retention Policies.

The data we collect from you will not be transferred outside the European Economic Area (“EEA”). If we do have to transfer your personal information outside the EEA, we will ensure that it is protected in a manner consistent with how your personal information will be protected by us in the EEA with applicable data protection law.

## Using Your Information

The information (in “Types of Personal Data Collected”) is used to find you suitable work at Henderson Group.

Examples are:

- To find out more about your skills and experience;
- To match your skill sets with job vacancies to assist in finding you the positions that most suit you;
- Where you agree that we may do so to keep your information on our files to keep you informed of available opportunities as they arise;

The information relating to whether you need permission to work in the UK is used to decide whether we are able to lawfully employ you to work in the UK.

The information relating to community background or school is to enable us to comply with our legal obligations under the Fair Employment (NI) Act 1989 – extended from the Fair Employment (NI) Act 1976.

The information about sex, date of birth, race, marital status / family status, dependents, sexual orientation, nationality, are only used for the purposes of equal opportunities monitoring.

The information regarding your health is used for the purposes of considering your suitability for the role and consider whether there are any workplace adjustments that are reasonably required.

The information as to any relevant criminal convictions is used in order to assess your suitability to carry out work at Henderson Group. We only consider criminal convictions that are not spent under the Rehabilitation of Offenders Act.

The information relating to whether you consider yourself as disabled is used for the purposes of considering whether there are any workplace adjustments that are reasonably required.

## Using Automated Decision Making

Automated decision-making takes place when an electronic system uses information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration. If an applicant wishes to appeal a decision where they have not been shortlisted for interview, they may appeal through [careers@henderson-group.com](mailto:careers@henderson-group.com).

2. Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

As part of the recruitment process, automated decision-making is based on candidate availability/flexibility to work the required hours for the post advertised and the candidate's answers to the multiple choice situational judgement questions we ask. We do not use personal information for automated decision-making.

## **Holding your Information**

If you are unsuccessful, the information you have provided us with, along with the information generated through interview/assessment, will be retained for a period of 12 months from the end of the recruitment campaign.

There are instances when we are required by law to retain your information for a longer period.

If you are successfully appointed, the information you have provided us with at application stage along with the information generated through interview/assessment and appointment stage will be retained in line with our Employee Privacy Policy which shall be issued to you at that time.

## **Legal Basis for Processing your information**

The legal bases Henderson Group relies on for processing your personal data, are that it is necessary for:

- The performance of a contract or entering into a contract with you;
- Compliance to meet legal obligations; and
- Purposes of legitimate interests pursued by Henderson Group (such interests being the recruitment of qualified and competent staff).

## **Providing your information to Others**

Your information will not be disclosed to any organisation outside of Henderson Group except for any third-party service providers noted in this document or involved with our recruitment activities. However, it may also be necessary to share your data with UK government agencies such as the Equality Commission for Northern Ireland, HM Revenue & Customs or The Home Office.

## **Finding out what information we hold about you**

If at any time, you wish to know what information we hold about you, please contact Henderson Group at:

Data Compliance Officer c\o Human Resources,  
Henderson Group Ltd, PO Box 49,  
Hightown Avenue, Newtownabbey BT36 4RT  
Telephone: (028) 90343316  
E-mail: [DCO@henderson-group.com](mailto:DCO@henderson-group.com)

If you wish to withdraw from the application process at any stage, and cease the processing of your personal information, please liaise with our recruitment team at [careers@henderson-group.com](mailto:careers@henderson-group.com).

## Your other rights over the information

Depending on the information we are using and under certain circumstances, you have rights under data protection laws in relation to some of the information you provide that can identify you (which is known as personal data under data protection laws).

You have the right to:

- Request access to your personal data;
- Request correction of your personal data;
- Request erasure of your personal data;
- Object to processing of your personal data;
- Request restriction of processing your personal data;
- Request transfer of your personal data; and
- Right to withdraw consent.

If you want to exercise any of the above rights, please contact us at the address or email address in the previous section and let us know.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

## Your right to lodge a complaint

Please lodge a complaint in the first instance to: [DCO@henderson-group.com](mailto:DCO@henderson-group.com)

If, however, you are unhappy with how we have addressed your concerns, you have the right to lodge a complaint with a supervisory authority. The UK supervisory authority for data protection issues is the *Information Commissioner's Office* (ICO) ([www.ico.org.uk](http://www.ico.org.uk)).

## Henderson Group Address

Henderson Group, PO Box 49, Hightown Avenue, Mallusk, Newtownabbey, BT36 4RT

## Changes to this Privacy Policy

This notice does not form part of any offer of employment and we may amend it at any time to reflect any changes in the way in which we process your personal data. If you are in the application process when any changes or updates are made to this notice, we will bring any such changes to your attention as soon as is practicable. We may also notify you in other ways from time to time about the processing of your personal data.

The recruitment privacy policy will be available to you through the Group website (careers section):

<https://henderson-group.com/careers/>