



Data controller: The Brooke Hospital for Animals, 5th Floor, Friars Bridge Court, 41-45 Blackfriars Road, London, SE1 8NZ

In this notice The Brooke Hospital for Animals will be referred to as 'the charity'.

Please address any queries about this notice to the Head of HR (UK) in the first instance.

The charity collects and processes personal data relating to job applicants in order to manage the recruitment process. The charity is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does the charity collect?

The charity collects a range of information about you via the online applications form. This information could include:-

- your name, title, address and contact details, including personal email address and telephone numbers;
- details of your qualifications, education, skills, experience, employment history and references;
- any supporting statement or cover letter;
- whether you were referred by anyone currently working for The Brooke;
- source of application and any attached CV;
- information about medical or health conditions, including whether or not you have a disability for which the charity needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK;
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, religion/belief, age, marital status, gender, and any disability which is anonymised; and
- If you have an unspent criminal conviction.

If you apply through a third party such as an employment agency or business or if you forward your details to us in the event of a speculative approach the charity will collect a range of information from your CV or cover letter/supporting statement.

Your data might be contained in application forms, CVs/resumes, obtained from your passport or other identity documents such as your birth certificate, collected through interviews, meetings or other forms of assessment, including testing both manual and online and references, and from correspondence with you.

The charity may also collect personal data about you from third parties, such as references supplied by current and former employers. The charity will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including in our online recruitment portal (WCN), in HR management systems such as our recruitment email inbox and on other IT systems (including the charity's email system).

Why does the charity process personal data?

The charity needs to process data to screen and select applications based on the requirements of the role during the recruitment process. It may also need to process your data to make a decision about your recruitment or appointment into a role and/or to enter into a contract with you. We also need to determine the terms on which you work for us and check you are legally entitled to work in the U.K.

In some cases, the charity needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The charity has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the charity to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The charity may also need to process data from job applicants to respond to and defend against legal claims.

The charity may process information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. This is to carry out its legal obligations and exercise specific rights in relation to employment.

Where the charity processes other special categories of data, such as information about gender, ethnic origin, sexual orientation, health, religion/ belief, nationality, age and marital status this is for equal opportunities monitoring purposes. This data is anonymised when applying via the online application portal at the application stage. The charity is obliged to seek information about criminal convictions and offences and the charity seeks this information in the application form in the online recruitment portal or in the new joiner form prior to starting. The charity does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

On some occasions a role may require the charity to undertake prior checks e.g. with the Disclosure and Barring Service and for senior members of staff prior checks with the charity's regulators, the Insolvency Service and via our online general compliance tool which will be carried out at the application stage on the basis that the charity has a legal obligation to complete these checks.. Any data collected will be processed on the basis of the charity's legal obligations.

Any information about criminal convictions or which the charity obtains via the checks referred to in the previous paragraph will be kept subject to appropriate legal and confidentiality safeguards.

The charity will not use your data for any purpose other than the recruitment exercise for which you have applied unless your application is successful and you are offered and accepted employment with the charity.

Who has access to data?

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

The charity will not share your data with third parties other than the relevant branch if you have applied for a role with them, unless your application for employment is successful and it makes you an offer of employment. The charity will then share your data with current and former employers to obtain references for you.

The charity will transfer your data to countries outside the European Economic Area and in some cases the transfers will be to countries who are not deemed to provide an adequate level of protection for personal data. This will be the case where you have applied for a role at one of the charity's affiliates or branches and could include your CV, application form and any covering letter or supporting information in an email. Very rarely your data could be transferred to one of our suppliers who processes data outside the European Economic Area but if this is done the charity will ensure that it has appropriate contractual safeguards in place with that supplier. Please see the next section for further information.

How does the charity protect data?

The charity takes the security of your data seriously. The charity has internal policies and controls in place with system restrictions to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

In order to ensure that your data does receive an adequate level of protection we are entering into agreements with our affiliates and binding rules with our branches. Where the charity engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data. This means that your data should be treated by all of these parties in a way that is consistent with and respects all relevant European and UK laws on data protection.

The charity has put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

For how long does the charity keep data?

If your application for employment is unsuccessful, the charity will hold your data on file for 6 months after the end of the relevant recruitment process. At the end of that period your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

Your rights

Please get in touch with the HR department in the first instance if you have administrative requests or queries such as those relating to change of contact details.

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the charity to change incorrect or incomplete data;
- require the charity to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- the right to ask for restrictions in a number of different areas;
- object to the processing of your data where the charity is relying on some grounds for processing;
- request to not being party to automated decision making and profiling;
- request that your data is put into a standard format when provided to you; and
- the right to be informed; and
- request the transfer of your data to another party.

If you would like to exercise any of these rights, please read the section in our privacy statement which deals with these rights¹ and contact the charity via the email address given in that section. It would assist us if you could use the form provided on the website when making your request but this is not mandatory.

You also have the right to contact the [Information Commissioners Office](#) (ICO) if you have any concerns about how your personal data has been handled. You can use the link above or call them on 0303 123 1113.

¹www.thebrooke.org/about-brooke/privacy-statement/subject-access-rights

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the charity during the recruitment process. However, if you do not provide the information, the charity may not be able to process your application form or CV properly or if at all.

Right to withdraw consent

In the limited cases where you have provided or will provide your consent to the processing of your data for a specific purpose you have the right to withdraw your consent to that processing at any time. Please contact any member of the HR team if you wish to do this.

Automated decision-making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Changes to this privacy notice

The charity reserves the right to update this privacy notice at any time and we will provide you with a new privacy notice as and when we make any substantial changes. The charity may also notify you in other ways from time to time about the processing of your data.