

Data Privacy Notice (Job applicants)

Data Controller: Chief Operating Officer
Data Protection officer: Chief Operating Officer

The Lloyds Bank Foundation ("The Foundation") for England and Wales collects and processes personal data relating to its job applicants. The Foundation is committed to being transparent about how it collects and uses that data and we will process your data according to the principles of the Data Protection Act 2018 (DPA) and, the UK General Data Protection Regulation (UK GDPR) hereafter referred to as UK Data Protection law.

1.0 What information does the Foundation collect?

The organisation collects a range of information about you. This includes:

- your name, contact details, including email address and any other personal information you have provided on your cv;
- details of your qualifications, skills, experience and employment history;
- whether you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

The organisation collects this information in a variety of ways. For example, data might be contained in application forms, CVs, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment (including online or in person tests, presentations etc.).

The Foundation 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 on your application record, in HR management systems and on other IT systems (including email).

2.0 Why does The Lloyds Bank Foundation process personal data?

The Foundation needs to process data to take steps at your request prior to entering into a contract with you. It also needs to process your data to enter into a contract with you. For the purposes of data protection law, this is referred to as a contractual obligation.

In some cases, the Foundation 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 or to account for taxation matters.

The Foundation 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 Foundation to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide whom to offer a job. The Foundation may also need to process data from job applicants to respond to and defend against legal claims.

Where we rely on legitimate interests as a reason for processing data, it has considered whether those interests are overridden by the rights and freedoms of job applicants, employees or workers and has concluded that they are not. However, where we undertake such processing activities, you may object.

The Foundation processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where the Foundation processes other special categories of data, such as information about ethnic origin, sexual orientation, health, religion or belief, age, gender or marital status, this is done using the exemption to the provisions of the law which permits such processing to ensure equality of opportunity and racial and ethnic diversity.

If your application is unsuccessful, the Foundation will keep your personal data on file for 6 months in case there are future employment opportunities for which you may be suited. The organisation will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time by contacting the Human Resources department

3.0 Who has access to data?

Your information will 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 Foundation will not share your data with third parties unless your application for employment is successful and it makes you an offer of employment. The Foundation will then share your data with an external agency, CV Insight, who will contact former employers to obtain references for you, and complete other background checks. If necessary for the role, data will be shared with the Disclosure and Barring Service (DBS) to obtain necessary criminal records checks. DBS checks are carried out in the legitimate interest of the Foundation. For the avoidance of doubt, a DBS check is a criminal record whether there is a record or 'none recorded'. As such, we will process the information using the exemption to the provisions of the law 'preventing and detecting unlawful acts'. An appropriate policy document will be relied upon in such circumstances.

The Foundation may transfer your data outside the UK and the European Economic Area (EEA). In such circumstances the Foundation may undertake a transfer risk assessment and implement appropriate UK safeguards.

Please note that some personal data may be exempt from the right of access.

4.0 How does the Foundation protect data?

The Foundation takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

5.0 For how long does the Foundation keep data?

If your application for employment is unsuccessful, the organisation will hold your data on file for 3 months (where you have not been shortlisted for a particular vacancy) or 12 months after the end of the relevant recruitment process if you were shortlisted but are unsuccessful. We will ask you during the application process if you agree to allow the organisation to keep your personal data on file, for consideration for future employment opportunities. At the end of the 12 month period, (or once you withdraw your consent), 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 period for which your data will be held will be provided to you in a new privacy notice.

5.1 Your rights

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

- access your personal data upon request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing; and
- ask the organisation to stop processing data for a period if data is inaccurate or there is a dispute about whether your interests override the organisation's legitimate grounds for processing data.
- Question automated decision made about you
- Be informed about the processing activities concerning your personal data.

If you would like to exercise any of these rights, or wish to make a subject access request you can do this by contacting the Chief Operating Officer by telephone on 0370 411 1223, by email at enquiries@lloydsbankfoundation.org.uk or in writing at Society Building, 8 All Saints Street, London, N1 9RL. Regardless of this, you have the right to complain about our processing activities to the information regulator. In the UK this is the Information Commissioners Office (ICO); their details are;

<https://ico.org.uk/concerns> or call them on 0303 123 1113

If you reside outside of the UK, you can complain to your national regulator.

5.2 Automated decision-making

Recruitment processes are not based solely on automated decision-making but where they are, you may have the decision reviewed by a member of the team.

6.0 What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the Foundation during the recruitment process. However, if you do not provide the information, the organisation may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence of your right to work in the UK and satisfactory references.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

7.0 Monitoring

The Chief Operating Officer has overall responsibility for monitoring this policy, which will be reviewed on a regular basis following its implementation and it may be changed from time to time