

JOB APPLICANT PRIVACY NOTICE

1. Identity and contact details of controller and data protection officer

Black Country Housing Group Ltd. is the controller for the purposes of the DPA 18 and UK-GDPR.

Our data protection practices comply with the UK GDPR, DPA 2018 and incorporate relevant amendments introduced by the Data (Use and Access) Act 2025 (DUAA).

If you have any concerns as to how your data is processed, you can contact:

Sharon Woods, Data Protection Officer (DPO) at data@bchg.co.uk or you can write to the DPO at:

Sharon Woods,
Data Protection Officer,
Black Country Housing Group
134 High Street,
Blackheath,
West Midlands,
B65 0EE

This privacy notice should be read in conjunction with the [Group's Data Privacy Policy](#) which is [available on our website](#).

As part of any recruitment process, the Group [collects and processes personal data relating to job applicants](#). The Group is [committed to being transparent](#) about how it collects and uses that data and to meeting its obligations under data protection legislation and regulation.

2. What information does the Group collect?

The Group collects a range of information about you, this includes:

- Your name, address and contact details, including email address and telephone number as well as contact details for referees
- Details of your qualifications, skills, experience and employment history
- Information about your current salary
- Whether or not you have a disability for which the Group needs to make reasonable adjustments during the recruitment process
- Information about your entitlement to work in the UK, including copies of identity documents such as passport, driving licence or birth certificate and details of any criminal record through DBS checks for relevant posts
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief

The Group 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 documentation or collected through interviews or other forms of assessment including online tests.

The Group will also collect personal data about you from third parties, such as references supplied by former employers and information from criminal records checks. The Group 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.

Where we use automated processes to support recruitment decisions, we will ensure appropriate safeguards are in place, including the right to request human review, make representations, and challenge decisions.

An example of automated decision making used in the recruitment process is the use of questions about mandatory requirements for a role, such as the ability to drive, where the mandatory requirements are not met, the application will be automatically rejected. Notification emails at various stages of recruitment e.g. being shortlisted or rejected, are also automatically sent out to candidates.

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.

3. Why does the Group process personal data?

The Group needs to process your data to be able to enter a contract of employment with you. In some cases, the Group needs to process data to ensure that it is complying with its legal obligations. For example, it is legally required to check a successful applicant's eligibility to work in the UK before employment starts.

The Group has a legitimate interest in processing personal data during recruitment and for keeping records of the process. Processing data from job applicants allows the Group to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide whom to offer a job. The Group may also need to process data from job applicants to respond to and defend any legal claims. We may rely on legitimate interests to use automated tools that inform or support significant decisions during recruitment, where appropriate safeguards are applied.

Where the Group relies on legitimate interests as a reason for processing data, it has considered whether those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not. However, the Data (Use and Access) Act 2025 introduces a list of 'recognised legitimate interests' that reduce the requirement to conduct balancing tests such as for security purposes and fraud prevention.

Where personal data is used for research or statistical purposes related to improving recruitment processes, we may rely on DUAA provisions that allow proportional notice delivery while maintaining safeguards.

The Group processes health and wellbeing 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 Group processes other special categories of data, such as information about ethnic origin or gender, this is for equal opportunities monitoring purposes.

For some roles, the Group is obliged to seek information about criminal convictions and offences. Where the Group seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

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

4. 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. It will also be shared with the IT team if access to the data is necessary for the performance of their roles in setting up accounts for new starters.

The Group will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The Group will then share your data with former employers to obtain references for you and the Disclosure and Barring Service (DBS) to obtain any necessary criminal records checks. More details can be found in the Employee Privacy Notice on the Black Country Housing Group intranet.

Where data is transferred outside the UK, we will follow updated DUAA-aligned transfer rules and ensure an adequate level of protection..

5. How does the Group protect data?

The Group 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. All the systems used to store your data use unique password identifiers and are subject to security checks. The Group has policies and procedures in place relating to data protection and these will be complied with in the processing of your data.

6. How long does the Group keep data for?

Retention is reviewed periodically in accordance with the UK GDPR, DPA 2018 and DUAA updates to accountability requirements.

If your application for employment is unsuccessful, the Group will hold your data on file for up to twelve months after the end of the relevant recruitment process. At the end of that period or once you withdraw your consent for Black Country Housing Group to keep your data, it will be securely disposed of.

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 and for a period of six years after your employment ends. All documentation related to DBS checks, other than the DBS number, date of issue and expiry, which are retained for 3 years, are deleted within a period six months from receipt.

The periods for which your data will be held are set out in the Group's Data Retention Schedule as part of our Data Retention and Disposal Policy. The schedule is based on legal and regulatory requirements and good practice and is available on the Black Country Housing Group website and intranet.

7. Your rights

As a data subject, you have several rights. These are:

- The right to be informed about what data is collected and how it is used. This notice helps comply with this right
- The right to request access to your data and other information held about you
 - In limited cases permitted by DUAA, we may extend response times or refuse manifestly excessive Subject Access Requests, following ICO guidance,
- The right to have any mistakes or inaccuracies in your data put right
- The right to request the deletion or removal of data where there is no compelling reason for its continued use
- The right to restrict the processing of data where it is inaccurate, or consideration of the lawful basis or legitimate interest is on going
- The right to portability, which ensures data is provided in a readily usable format
- The right to object to processing in certain circumstances such as direct marketing, profiling or scientific research

- The right to be informed about and object to data being used for some automated decision making, such as profiling.
- You have rights concerning automated decision-making, including the right to request a human review and to express your views, in line with the DUAA.

If you would like to exercise any of these rights, please contact the data controller via: data@bchg.co.uk.

If you believe that the Group has not complied with your data protection rights, you can make a complaint to the Information Commissioners Office (ICO) via their website www.ico.org.uk or by calling 0303 123 1113.

8. What if you do not provide personal data?

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