



The Children's Investment Fund Foundation (UK)

Privacy Notice

for Job Applicants applying to CIFF (UK)

Edition Date: 23 May 2018

What is the purpose of this document?

The Children's Investment Fund Foundation (UK) (CIFF) ("we", "our" or "us") is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after the recruitment process, in accordance with the General Data Protection Regulation (GDPR).

It applies to anyone applying for a role at CIFF.

This notice explains what personal data CIFF holds about you, how we share it, how long we keep it and what your legal rights are in relation to it.

CIFF is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under the GDPR to notify you of the information contained in this privacy notice.

You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor).

This notice applies to potential employees, consultants or contractors applying for a role at CIFF ("you" or "your"). This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Contact Details

If you need to contact us about your data, please contact, the Data Protection Manager, the contact details of which are:

Name:	Shalin Punn
Email:	dataprotection@ciff.org
Phone:	+44 788 0062 122

Data protection principles

We will comply with GDPR. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information relating to you as a living individual from which you can be identified. It does not include data where the identity has been removed (anonymous data)

There are "special categories" of more sensitive personal data which require a higher level of protection.

The categories of personal information that we may collect, store, and use about you include (but are not limited to):

- The information you have provided to us in your curriculum vitae and covering letter.
- Any information that you provide to us in an interview or telephone conversations.
- Any information sourced through LinkedIn or other recruitment channels.
- Any information required for the purpose of carrying out a background check including DBS (or their equivalent) and financial misconduct checks.
- Copies of passports, driving licence and driving history, right to work documents, visas and other immigration data.
- Learning and development records, including your attendance, completions, accreditations and certifications.

We will during the course of your application process with us potentially also collect, store and use the following "special categories" of more sensitive personal information:

- Details of any relevant criminal convictions or charges that we ask you to declare to us, or that you declare to us.

- Information about your race, ethnicity (including nationality), religious or philosophical beliefs, sexual orientation or political opinions (this information will only be collected during the appointment process).
- Information about your health, including any medical condition or disability required during the recruitment process.
- Information about your political views, when you share this information openly with us.

How is your personal information collected?

We typically collect personal information about candidates through the application and recruitment process, either directly from candidates or sometimes from a recruiter, employment agency or background check provider (including your previous educational establishments and/or employers if they provide references to us). We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies. We may also collect personal information from publically available sources such as LinkedIn.

How we will use information about you

We will use your personal information as follows:

- To assess your skills, qualifications and suitability for the role.
- To carry out any background and reference checks, where applicable.
- To keep records relating to our hiring process.
- To communicate with you about the recruitment process.

It is in our legitimate interests to decide whether to appoint you to the role

- Comply with legal or regulatory requirements.

Our lawful basis for these activities above is necessity for CFFF to comply with its legal obligations.

We also need to process your personal information to decide whether to enter the contract of employment with you.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Having received your CV and covering letter, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide you are suitable to go through the interview process, we will use the information you provide to us during this process to decide whether to offer you the role. If you are the successful applicant

and we offer you the role, we will then take up references and carry out a criminal record check.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application, we will not be able to process your application successfully. For example, if we require a background check or references and you fail to provide us with relevant details, we will not be able to take your application further.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations.
3. Where it is needed in the public interest, such as for equal opportunities monitoring.
4. Where it is needed to assess your disability status to consider whether we need to provide appropriate adjustments during the recruitment process.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Our obligations

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process.
- We will use information about your race or national or ethnic origin, religious beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

- We may use details of your nationality (racial or ethnic origin) to check your entitlement to work at CIFF and to ensure that we do not discriminate.

Criminal convictions and allegations of criminal activity

Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. We may process such data on the same grounds as those identified for “special categories” referred to above.

Automated decision-making

Automated decision-making takes place when an electronic system uses personal 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.
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.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

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.

Data sharing

We do not, and will not, sell your data to third parties.

We may have to share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

Why might you share my personal information with third parties?

We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents).

Examples of bodies to whom we are required by law to disclose certain data include, but are not limited to:

Organisation	Why?
Disclosure and Barring Service (DBS) / Hireright	Required for certain posts to assess an applicant's suitability for positions of trust and if employed to comply with statutory reporting obligations.

Examples of bodies to whom we may voluntarily disclose data, in appropriate circumstances, include but are not limited to:

Organisation	Why?
Third party service providers	To facilities activities of CIFF including activities that are carried out by third-party service providers: recruitment agencies, building facilities providers, payroll, benefits provision and administration, IT services. Any transfer will be subject to an appropriate, formal agreement between CIFF and the third party service provider.

Where information is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the purpose.

How secure is my information with third-party service providers?

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 (as written in the contract between us) and in accordance with our instructions.

Data security

We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business requirement to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Data Protection Manager.

We have 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.

Sharing your data outside the European Union

The law provides various further safeguards where data is transferred outside of the EU.

CIFF has offices registered in Kenya and India which are part of CIFF. CIFF may share your personal data with other colleagues within CIFF who are based in Kenya or India. All employees of CIFF are under an obligation to handle data in accordance with the GDPR, where one person in CIFF (based in London) passes personal data to another person in CIFF (for example to a colleague working in CIFF's Indian office). In these circumstances, the handing of your personal data will be in accordance with CIFF's data protection policy and with the protections of GDPR.

Otherwise, your personal information will not be transferred outside of the EU.

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. In line with our document retention policy, we will keep your personal data for 6 months from the date in which the role you applied for was awarded.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Retention periods may increase as a result of legislative changes, e.g. an increase in limitation periods for legal claims would mean that CIFF is required to retain certain categories of personal data for longer.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. We may keep anonymised statistical data indefinitely.

Once you are no longer an employee, worker or contractor of the company we will retain and securely destroy your personal information in accordance with our data retention policy.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

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 your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Suspend processing of your personal information**, for example if you want us to establish the accuracy of the data we are processing.
- **Object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- **Object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.
- **Request the transfer** of your personal information to another party.

Please be aware that these rights are subject to certain conditions and exceptions as set out in the data protection legislation.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Manager in writing and they will explain any conditions that may apply.

No fee usually required

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.

What we may need from you

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.

Right to withdraw consent

In the limited circumstances where we are relying on your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk>). You have the right to complain to the UK's supervisory office for data protection, the Information Commissioner's Office at <https://ico.org.uk/concerns/> if you believe that your data has been processed unlawfully.

Changes to this privacy notice

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes or to make CIFF's operations and procedures more efficient.

If you have any questions about this privacy notice, please contact the Data Protection Manager, whose details are listed on page 1.