

**Dated**

**July 2020**

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**GDPR DATA PROTECTION  
PRIVACY NOTICE  
(RECRUITMENT)**

**DIOCESE OF BRECHIN**

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## DIOCESE OF BRECHIN

### Data protection privacy notice (recruitment)

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

### Who collects the information

Diocese of Brechin ('Diocese') is a 'data controller' and gathers and uses certain information about you. This information is also used by our affiliated entities, namely the Cathedral Church of St Paul, Dundee and the Scottish Episcopal Church (our 'Affiliated Entities') and so, in this notice, references to 'we' or 'us' mean the Diocese and our Affiliated Entities.

### Data protection principles

We will comply with the data protection principles when gathering and using personal information.

### About the information we collect and hold

The table set out in Part 1 of schedule 1 below summarises the information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part 2 of schedule 1 below summarises the additional information we collect before making a final decision to recruit, i.e. before making an offer of appointment unconditional, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

### Where information may be held

Information may be held at our offices and those of our Affiliate Entities, and third party agencies, service providers, representatives and agents as described above.

### How long we keep your information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you are appointed as Rector & Provost of the Cathedral Church of St Paul, Dundee, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as unlawful discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear legitimate reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your appointment as Rector & Provost.

## Your right to object to us processing your information

Where our processing of your information is based solely on our legitimate interests (or those of Affiliated Entities or a third party), you have the right to object to that processing if you give us specific reasons why you are objecting, which are based on your particular situation. If you object, we can no longer process your information unless we can demonstrate legitimate grounds for the processing, which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

Please contact the Rt Rev Andrew Swift, Bishop of Brechin, who can be contacted on [bishop@brechin.anglican.org](mailto:bishop@brechin.anglican.org) if you wish to object in this way.

## Your rights to correct and access your information and to ask for it to be erased

Please contact the Bishop's PA, who can be contacted on [office@brechin.anglican.org](mailto:office@brechin.anglican.org) or 07444161300 if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have the right to ask the Bishop's PA for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. The Bishop's PA will be your first point of contact for further information about the right to be forgotten, if you ask for it.

## Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine and legitimate need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## How to complain

We hope that the Bishop's PA can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

## Schedule 1

### About the information we collect and hold

#### Part 1 - Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p><b>Your name and contact details (i.e. address, home and mobile phone numbers, email address)</b></p>	<p>From you</p>	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages</p>	<p>To enable the Bishop, the Bishop's PA or members of the Cathedral Vestry to contact you to progress your application, arrange interviews and inform you of the outcome</p> <p>To inform the Cathedral Vestry / Recruitment Committee of your application</p>
<p><b>Details of your qualifications, experience, ministry &amp; employment history (including job titles, salary (if applicable) and working hours) and interests</b></p>	<p>From you, in the completed application form and interview notes (if relevant)</p>	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit</p>	<p>To make an informed recruitment decision</p> <p>The person making the shortlisting decision will receive pseudonymised or anonymised details only; if you are invited for interview, the interview panel and Bishop will receive non-anonymised details</p>
<p><b>Your name, contact details and details of your qualifications, experience, ministry &amp; employment history and interests</b></p>	<p>From you, in the completed application form and interview notes (if relevant)</p>	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: if you are unsuccessful in your application, your details may be passed on to another charge within the Diocese to see if your application would be suitable for any other suitable vacancy</p>	<p>To see whether any other Charge within the Diocese has any other suitable vacancy</p>
<p><b>Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs</b></p>	<p>From you, in a completed anonymised equal opportunities monitoring form</p>	<p>To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)</p>	<p>To comply with our equal opportunities monitoring obligations and to follow our equality and other policies</p> <p>For further information, see * below</p>
<p><b>Details of your referees</b></p>	<p>From your completed application form</p>	<p>Legitimate interest: to carry out a fair recruitment process</p>	<p>To carry out a fair recruitment process</p>

			<p>To comply with legal/regulatory obligations</p> <p>Information shared with the Bishop, the Interview Panel and/or Cathedral Vestry and the referee</p>
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If your application is unsuccessful at this stage, we will keep your information, in pseudonymised form, for the purpose of establishing, exercising and/or defending any legal claims, in accordance with our legitimate interests.

### Part 2 - Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p><b>Information about your previous academic and/or ministry &amp; employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers <input type="checkbox"/></b></p>	<p>From your referees (details of whom you will have provided)</p>	<p>Legitimate interest: to make an informed decision to recruit</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain appointment records and to comply with legal, regulatory and corporate governance obligations and good appointment practice</p>	<p>To obtain the relevant reference about you</p> <p>To comply with legal/regulatory obligations</p> <p>Information shared with the Bishop, the Interview Panel and/or Cathedral Vestry</p>
<p><b>Information regarding your academic and professional qualifications <input type="checkbox"/></b></p>	<p>From you, from your education provider, from the relevant professional body</p>	<p>Legitimate interest: to verify the qualifications information provided by you</p>	<p>To make an informed recruitment decision</p>
<p><b>Information regarding your criminal record, in a criminal records certificate (CRC) or enhanced criminal records certificates (ECRC) as appropriate <input type="checkbox"/></b></p>	<p>From you and from the Disclosure and Barring Service (DBS) or the PVG Scheme in Scotland</p>	<p>To be instituted to the office of Rector &amp; Provost</p> <p>To comply with our legal obligations</p> <p>Legitimate interest: to verify the criminal records information provided by you</p> <p>For reasons of substantial public interest (preventing or detecting unlawful acts,</p>	<p>To make an informed recruitment decision</p> <p>To carry out statutory checks</p> <p>Information shared with DBS and other regulatory authorities as required</p> <p>For further information, see * below</p>

		and protecting the public against dishonesty)	
<b>Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information</b> <input type="checkbox"/>	From you and, where necessary, the Home Office or UKVI	To be instituted to the office of Rector & Provost  To comply with our legal obligations  Legitimate interest: to maintain appointment records  To carry out obligations and exercise rights in employment law  For reasons of substantial public interest (preventing or detecting unlawful acts)	To carry out right to work checks  Information may be shared with the Home Office
<b>Information relating to your health</b> <input type="checkbox"/>	<b>From you and/or as appropriate, e.g. your medical practitioner, a doctor instructed to advise the Diocese</b> <input type="checkbox"/>	To be instituted to the office of Rector & Provost  To comply with our legal obligations  Legitimate interests: to ensure you are fit to perform the duties  For the purposes of obligations and rights in employment and social security law	To make an informed recruitment decision

If your application is unsuccessful at this stage, we will keep your information, in pseudonymised form, for the purpose of establishing, exercising and/or defending any legal claims, in accordance with our legitimate interests.

You are required (by law) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position.

\* Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in our [set out details of policy on processing special categories of data, and, where relevant policy on criminal records information, as required under DPA 2018, available from the Bishop's PA on [office@brechin.anglican.org](mailto:office@brechin.anglican.org) or 07444161300.