



## Applicant Privacy Notice

Active Humber is aware of its obligations under the General Data Protection Regulation (GDPR) and domestic data protection legislation and is committed to processing your data securely and transparently. This privacy notice sets out, in line with current data protection obligations, the types of data that we hold on you as a candidate applying for employment with Active Humber. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

### Privacy Notice (How we use candidate information)

As part of any recruitment process, Active Humber collects, holds, uses and shares information relating to job applicants. This is known as “personal data” and you have rights around that data, including knowing how and why we are processing the data. “Processing” data means everything from collecting, to storing, using, sharing and disposing of it.

The term ‘job applicants’ includes all those individuals who apply for a position with Active Humber.

Active Humber is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations. For the purposes of Data Protection legislation Active Humber is a data controller and is registered as such with the Information Commissioner’s Office.

### The categories of school workforce information that we process include:

- Personal information (such as name, address and contact details, including email address and telephone number, date of birth and national insurance number)
- Details of your qualifications, skills, experience and education and employment history, including any breaks;
- Information about your current level of remuneration, including benefit entitlements;
- 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.
- Equalities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief
- References supplied by former employers
- Information from employment background checks

### Why we collect information about job applicants

We use data from job applicants to:

- Undertake the recruitment process and, for the successful applicant, to enter into a contract of employment. In particular it is used to:
  - Administer the application, shortlisting and selection process
  - Assess your suitability to work with children and young people
  - Inform the development of recruitment and retention policies
  - Defend legal claims

Under the UK General Data Protection Regulation (UK GDPR), the legal basis for processing your personal information include:

- Article 6(c) - Compliance with our legal obligations. For example, it is a requirement to check a successful applicant’s identity and eligibility to work in the UK before employment starts. It is our policy, in line with this statutory guidance to request references at the shortlisting stage, in advance of interview.
- Article 6(f) – For legitimate Interests. Active Humber 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 Active Humber to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. Active Humber may also need to process data from job applicants to respond to and defend against legal claims.

- Article 6(a) – Your consent (for any processing which does not fall into the other bases explained above). For example, if your application is unsuccessful, the organisation may keep your personal data on file 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.

The ways we collect and use *sensitive* data about job applicants is lawful based on Articles 9 and 10 which include:

- Your explicit consent
- For compliance with certain legal obligations
- For exercising certain legal rights;
- For health and public health reasons

Active Humber 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.

We do not make recruitment decisions based on automated decision making or profiling.

### **How we collect information about job applicants**

We collect this information in a variety of ways. For example, data is collected through application forms; from your passport or other identity documents such as your driving licence; from correspondence with you, through interviews or other assessments and from previous employers.

You are under no statutory or contractual obligation to provide data to the organisation 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 to enable us to process all required pre-employment checks.

### **How, where and for how long we store workforce information**

Data will be securely stored in our Google Workspace and MS Office systems. We also use email to enable authorised users to transfer information to one another.

We only keep the information for the length of time we need it for, this is 6 months. If you commence employment, there is a separate Employee Privacy Notice explaining how that data will be managed. We dispose of personal information securely when we no longer need it.

Active Humber 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.

### **Who we share your data with**

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR team, interviewers involved in the recruitment process, and other colleagues where access to the data is necessary for the performance of their roles.

The organisation will share your data with former employers to obtain references for you.



Your personal information will not be transferred outside the UK and the European Economic Area ('EEA'), including to the United States.

### **Why we share information about job applicants**

We do not share information about job applicants with anyone without consent unless the law and our policies allow us to do so. However, we will never disclose personal data in our responses to these requests where to do so would contravene the principles of data protection.

### **Requesting access to your personal data**

Under data protection legislation, you have the right to request access to information about you that we hold. Individuals wishing to make a request should contact Active Humber's Data Protection Officer using the contact details provided below.

You also have the right to:

- Be informed about the collection and use of your personal data.
- Rectification, i.e. to have inaccurate personal data rectified, or completed if it is incomplete.
- Erasure, often known as the 'right to be forgotten'; however this does not apply where, amongst other things, processing is necessary to comply with a legal obligation.
- Restrict processing, although, as above this is a limited right.
- Object; though other than for marketing purposes, this is also limited as above.

Where we rely on your consent to process your data, you have the right to withdraw that consent. If you do change your mind, or you are unhappy with our use of your personal data, please let us know

You also have rights in relation to automated decision making and profiling, though these are not currently relevant

Finally, you have the right to seek redress, either through the ICO, or through the courts.

If you make a request, we will keep a record of the request and any personal data supplied for a suitable period after its fulfilment, in order to deal with any questions you, your representatives or regulators may have about it.

### **Last updated**

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated in April 2026.

### **Contacts**

If you have a concern about the way we are collecting or using your personal data or you would like to discuss anything in this privacy notice, we ask that you raise your concern with us in the first instance. Active Humber's Data Protection Officer is the Director of Development

### **Making a complaint**

The supervisory authority in the UK for data protection matters is the Information Commissioner's Office (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.

Information Commissioners' Office Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF  
Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number  
Website: <https://ico.org.uk/concerns/>