

Introduction

COPE is committed to transparency and to complying with the GDPR in relation to prospective COPE employees and ‘associates’ (self-employed consultants) at job application stage and beyond.

We issue this ‘Privacy Notice’ at recruitment stage to demonstrate our commitment to compliance with the GDPR. The GDPR (in force from 25th May 2018) ensures that we obtain, process, store and retain your personal data in line with certain purposes, principles and restrictions. ‘*Personal Data*’ is any information relating to an identified or identifiable natural person (‘data subject’).

What are your legal grounds for processing my data?

COPE’s legal grounds for processing your data are our *legitimate interests* as an employer/potential employer. For example we need to manage our recruitment exercises effectively in order to decide to whom we offer a role with COPE and we might need to refer to interview notes in the event of a complaint about our recruitment procedure. However, we also need to obtain and process some data in order to satisfy certain *legal requirements*, for example your ability to practice your profession. COPE does not use automated selection software or decision-making in recruitment.

For what purposes will you process my data and what kind of data will you process?

We ensure that any data we process is necessary for conducting a fair, legally compliant and equitable recruitment process which provides COPE with the right person for the role. When you apply for a role with COPE we need to obtain and process your personal data in order to communicate with you and to assess your suitability for a role with COPE. We will not *forward* a hard copy or electronic copy any of your data during the interview/selection process to a third party (however, see section below ‘**Who can access your data?**’)

Types of data we will process during the recruitment process

Personal data includes:

- your contact details – email address, home address and telephone numbers
- your CV and any cover letter or information you supply to us in support of your application
- evidence of your qualifications and membership of professional bodies
- your driver status and your right to work in the UK
- current remuneration
- interview notes

This data will be stored securely in both electronic and hard copy format and will include any relevant email correspondence between us where you have provided us with relevant information in relation to your application. References are not sought until a job offer is made, unless you provide a reference by choice with your application information. We source data in relation to assessing your skills and experience and short listing you for interview based on your CV and cover letter and information you provide to us by email.

Special categories of data

During the recruitment process, until we make you an offer of employment, we do not ask you to provide data relating to ‘special categories’ under the GDPR, specifically health related data or information about your ethnic origin.

Who can access your data?

Human Resources staff and the relevant line manager(s) for the role advertised will have access to the data you supply if they are involved in the recruitment and selection process. On some occasions client representatives, such as a client HR Manager, will attend an interview panel in order to meet prospective applicants and add input to the selection process. They will usually *view* your CV to assist in the selection process *on the day of the interview* but will not be given their own copy of your CV nor will they retain your personal data. Interview notes are held by COPE only. Our internal controls mean that we will not misuse or disclose *or* give others access to your data except where the aforementioned categories of staff need access to it during the proper performance of their duties.

Retaining your data

If you are unsuccessful in your application:

We will retain your application details i.e. CV and cover letter along with a record of your interview for a period of **one year** after the date of your interview so that we are. After this time we will seek your consent to retain your data for a further period to be agreed with you.

If you are appointed to a role with COPE:

You will receive a *separate* 'Privacy Notice' which is applicable to COPE employees or associates (self-employed consultants) if you are offered a role with COPE. This is because we will need a greater amount of personal data from you in order to manage your employment with us.

Managing your data

As a 'data subject' you can access and obtain a copy of your data upon request, require us to change data which is incorrect or incomplete; require us to stop processing your data and request that we delete your data. In these circumstances please email your request to data.protection@copeohs.com.

Complaints

COPE Occupational Health and Ergonomics Ltd (COPE) is the Data Controller. In the first instance we ask that you contact us with any concerns by emailing data.protection@copeohs.com.

You are also entitled to complain to the Information Commissioner if you believe that we have not complied with the GDPR.