



PRIVACY NOTICE

RECRUITMENT AND SELECTION PROCESS

FOR JOB APPLICANTS AND PROSPECTIVE EMPLOYEES, WORKERS AND CONTRACTORS

The Fashion Retail Academy (“FRA”, “We”, “Us”) collects, processes, retains and in some instances shares personal information in a range of formats about job applicants and prospective employees, workers and contractors as part of our recruitment and selection process.

Please read the following Privacy Notice that outlines how we use and safeguard your personal information in accordance with the General Data Protection Regulations (GDPR).

We are committed to the safe and secure handling of all personal information we hold for individuals and we are transparent about why we need and how we use and store your personal information.

The FRA is registered as a Data Controller for the purposes of the GDPR and UK data protection laws.

If you have any queries about any aspect of how we handle your personal information please contact us at dpo@fra.ac.uk.

1. Our commitment to protecting your information:

We will comply with data protection law. That means, personal information we hold about you must be:

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

2. We collect the following information at the job application stages:

- Your title, name and surname;
- Contact details (address, telephone numbers, email address);
- Employment history;
- Educational history and professional qualifications;
- Training qualifications and professional memberships;
- Details about any gaps in employment/education history;
- A supporting statement;

- Any other information you have provided to us in your curriculum vitae, covering letter or application form;
- Details about your right to work in the UK status;
- A declaration regarding any conflict of interests in relation to your application; and
- Equal opportunities monitoring information requesting special characteristics information that we use for monitoring and reporting purposes only and in the case of disability information, to put in place reasonable support during the recruitment process if necessary.

3. Why we need this information:

It allows us to consider, assess and progress your job application and to inform our selection decision against the requirements of a job.

We use your contact details to contact you about the status of your application.

We also use the information collected to carry out the requisite background and reference checks, where applicable.

We will also need to process your personal information to decide whether to enter into a contract with you.

We monitor and report on special categories of information such as ethnicity etc. This data are not considered during the assessment and selection decision making process. It is only seen by our Human Resources department during the recruitment process and subsequently only shared in sets of anonymised data with key decision makers in the FRA to help inform, review and improve our recruitment and retention strategies in particular in relation to promoting equality of opportunity initiatives.

We only ask for information that is essential to our recruitment process or information that will help us improve our recruitment process. Whilst you may choose to withhold any personal information during our job application stage it will however impact on our ability to adequately consider and assess your application against our requirements and/or to contact you to progress your application.

4. We collect the following information at interview and assessment stages:

Should you be invited to an interview or other assessments, we will ask you to provide the following documentation:

- Due the nature of our work and our exemption from the provisions of Section 4 (2) of the Rehabilitation of Offenders Act 1974 by virtue of the Rehabilitations of Offenders Act 1974 (Exemptions) Order 1975, a declaration of any convictions;
- An acceptable document or combination of documents for right to work checks as prescribed by the Home Office (such as a valid passport, EEA/Switzerland national identity card, biometric residence permit/card, etc.).
- Your original qualification certificates and/or professional certifications essential for the job or as required by government, regulatory bodies, agencies or other institutions whose authorisation is required for business activities you may perform.

5. Why we need this information:

Some of this information is required for us to fulfil certain legal obligations and regulatory or contractual requirements with respect to the safeguarding of young people and vulnerable adults,

the prevention of illegal working or to meet requirements of external bodies that authorise business activities you may be involved with.

We will need to verify your identity, essential qualifications and right to work in the UK status.

When we invite you to interview we will send you a complete list of acceptable documentation as prescribed by the Home Office for right to work checks. We will need to check their validity and take copies of your documents.

In the event that your interview is conducted virtually we will ask you to email a scan or clear photograph of these documents. We may then request to verify your original documents over video call should your application progress to the next stage.

6. Lawful basis for collecting and processing your information:

We will only collect, process, store and in some instances share your personal information when there is a lawful basis to do so. Most commonly, we will use your personal information in the following circumstances:

- Where we need to comply with a legal obligation.
- For the purposes of our legitimate interests and your interests and fundamental rights do not override those interests.
- Where it is necessary for the purposes of entering into or to perform a contract we have entered into with you.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your vital interests (or someone else's vital interests).
- Where it is needed in the public interest or in the exercise of official authority.

7. If you fail to provide personal information:

If you fail to provide information when requested which are necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to adequately assess or process your application successfully.

8. Storing your information:

If you are successful at our interview and assessment stages, we will use the information you have provided us to start our pre-employment checks and to enter into an employment relationship with you if we offer you a job. We will retain your information in accordance with our Records Retention Policy.

In the event that you are unsuccessful at the interview and assessment stages, we will securely and confidentially destroy all personal documentation we copied and retained. This excludes your application form, interview notes, and any other assessment and selection records, which we retain for up to six months in accordance with our Records Retention Policy.

9. Sharing and keeping your information safe:

Your information may be shared between internal FRA colleagues who legitimately need such information to carry out their duties as part of our recruitment and selection process or other business activities.

We have appropriate and proportionate security policies and organisational and technical measures in place to help protect and keep your information secure.

Your personal information is only accessible by appropriately trained employees and other types of workers and stored on secure servers with features enacted to prevent unauthorised access. All physical documentation are safely and securely stored with restricted access.

The FRA uses a data processor to administer and provide DBS checks services to us. We conduct DBS checks on individuals we have made a conditional job offer to. We only share information that is necessary and for the particular purpose of provision of the services we require and where we have lawful grounds and a legitimate business reason to do so. We have in place robust secure information transferring processes and strict data and privacy protection requirements in our contracts with suppliers that are reviewed regularly.

We do not share information with suppliers who fall outside the scope of European Economic Area data protection legislation and regulations or who do not have strict data and privacy protection measures and practices in place.

None of our suppliers can share any of the information we provide them with any other parties for marketing purposes or store any of your information outside of the European Economic Area.

We are required by law to share some information with the Department of Education, National Statistics Office and other government bodies. We may also, for a variety of purposes including fraud prevention or detection or in connection with immigration and nationality, or illegal or criminal activities, and safeguarding concerns, supply information to organisations such as the police, DBS, Home Office, Local Authorities, the Department for Works and Pensions and its Agencies, the Department of Education and other similar governmental bodies and agencies.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing any data requested by an official authority in respect of criminal convictions.

We will not share any sensitive personal information with anyone without obtaining your explicit consent. There are exceptions to this, which we will only apply if the processing or sharing of such information is absolutely necessary:

- To protect your vital interests and you cannot give your consent or your consent cannot be reasonably obtained;
- To protect another person's vital interest and you have unreasonably withheld your consent;
- To meet any statutory obligations;
- The disclosure is made for the purpose of prevention or detection of crime and/or the apprehension or prosecution of offenders and we have received a notice from the police confirming that the disclosure is required for these purposes; or/and in pursuant to a Court Order requiring disclosure.

10. Your rights:

Under certain circumstances, you have the following rights in connection with the processing of your personal information:

- **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.
- **Request the transfer** of your personal information to another party.

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 dpo@fra.ac.uk.

11. How to contact us:

If you would like to discuss anything in this Privacy Notice or you have a concern about the way we are collecting or using your personal information, you can raise the matter with us in the first instance by contacting dpo@fra.ac.uk.

Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Standard communication, requests for information and/or corrections in relation to our recruitment and selection process can be addressed to recruitment@fra.ac.uk
