

# PRIVACY STATEMENT – JOB APPLICANTS, STAFF AND VOLUNTEERS

## 1. INTRODUCTION

Caritas Anchor House (“we”) is a registered charity with registered charity number 1147794 and registered address at 81 Barking Road, London E16 4HB. Our website can be found here: [caritasanchorhouse.org.uk](http://caritasanchorhouse.org.uk)

This Privacy Statement explains how we will collect, use and store your personal data. Please read it carefully. We may update this statement from time to time, if there are any significant updates, we will contact you. We promise to respect any personal data you share with us and keep it safe. We aim to be clear when we collect your data about how it will be used, and not to do anything you wouldn’t reasonably expect.

If you have any queries about how we use your data, please speak to our Data Protection Lead, email at [businessservices@caritasanchorhouse.org.uk](mailto:businessservices@caritasanchorhouse.org.uk), or write to: FREEPOST HOMELESS, Caritas Anchor House, 81 Barking Road, London, E16 4HB.

### Our Privacy Statement covers the following:

1. Introduction
2. What personal data we collect and how we use it
3. When we collect personal data about you
4. What lawful bases we rely on to use your personal data
5. Direct Marketing and Communications
6. Data sharing
7. Children’s data
8. How we keep your personal data safe and who has access to it
9. Keeping your personal data up to date
10. Your rights
11. Complaints
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## 2. WHAT PERSONAL DATA WE COLLECT AND HOW WE USE IT

This section aims to set out the types of personal data which we collect and hold about you, as well as explaining to you how we will use this personal data.

### *o What personal data do we collect?*

The type and quantity of personal data we collect and how we use it depends on why you are providing it.

### **Those applying for an employment or volunteering opportunity:**

If you apply for an employment or volunteering opportunity at Caritas Anchor House, we will usually collect:

- Your full name
- Your contact details
- Your employment history including current employment
- Your education and training history
- Details of your experience and/or skills
- Details of two referees we can contact, should your application be successful
- Right to work in the UK

We may also ask you to complete an optional Equal Opportunities Form, asking for information relating to applicants gender, age, ethnicity, disabilities, dependants, religion or beliefs. We may also ask where you found out about the employment or volunteering opportunity. We will never make these questions mandatory, and only want to know the answer if you're to tell us.

If you are unsuccessful in your employment or volunteering application, we will hold your personal information for six months after we've finished recruiting the post you applied for. After this date we will destroy or delete your information.

**Those employed by or volunteering for Caritas Anchor House:**

If you begin employment with Caritas Anchor House, you will be asked to sign a contract of employment. Similarly, volunteers will be asked to sign a volunteer agreement. By signing, you acknowledge that in order for Caritas Anchor House to fulfil their role as your employer, the charity will be required to use and disclose personal data relating to yourself where necessary and lawful. You also acknowledge that you may have access to personal and sensitive data and confidential information, and agree to comply at all times with the charity's Data Protection policies and procedures.

We will ask for further personal information which can include:

- Proof of ID
- Your bank details, so that your salary or expenses can be paid to you
- Tax details (NI number, P45, details of student loans, tax code) to ensure that tax is paid accurately
- Emergency/next of kin contact details
- A DBS Certificate showing history of criminal offences
- Evidence of the right to work in the UK

We will create a personal file about your employment with Caritas Anchor House. We will keep this file secure, and only use it for matters that apply directly to your employment. Once you stop working for us, we will keep this file according to our retention guidelines. This will be no longer than is lawful and necessary.

***o How will we use this personal data?***

Caritas Anchor House will only ever use the information received through an application to:

- Process your application
- Assess your suitability for the role
- Monitor recruitment statistics

All information collected via Equal Opportunities Forms will be treated as confidential and will only ever be used internally for monitoring purposes, to ensure our equality and diversity policy is operating effectively.

We will only process sensitive personal data, also known as special categories of data (e.g. in relation to your health), with your explicit consent, for reasons of substantial public interest, legal obligation or where necessary for establishment, exercise or defence of legal claims.

We may contact you about administrative issues if needed. We may also collect and retain your personal data if you send feedback about our services or make a complaint.

Caritas Anchor House also uses CCTV to support the safety of service users, staff, volunteers and visitors to the building. We will securely retain CCTV records for up to one year and thereafter securely delete it, in line with our Data Protection Policy and the General Data Protection Regulations.

### 3. WHEN WE COLLECT PERSONAL DATA ABOUT YOU

We collect information in the following ways:

***o When you give it to us directly:***

You may give us your personal data in order to apply for a job or volunteering opportunity, during your employment at Caritas Anchor House, or once you have left.

***o When you give it to us indirectly:***

Your information may be shared with us by recruitment agencies or job advertising websites. These independent third parties will only do so when you have indicated that you wish to apply for a role at Caritas Anchor House and with your consent. You should check their Privacy Policies when you provide your information to understand fully how they will process your personal data. Your line manager or colleagues may also share information with us about you, such as your attendance or performance.

***o When you give permission to other organisations to share personal data or it is available publicly:***

The information we get from other organisations may depend on your privacy settings so you should regularly check them. Depending on your settings or the privacy policies for social media and messaging services like Facebook or Twitter, you might give us permission to access personal data from those accounts or services when you interact with us via these channels.

***o When we collect data from our website:***

The Caritas Anchor House website does not collect personally identifiable data such as name or email address when someone visits it. However, it does collect anonymised data and uses “cookies” to enable us to understand our website users and to enhance our website and experience for users. Please refer to our [Cookies Statement](#) on our website for details on how and why we use this data.

### 4. WHAT LAWFUL BASES DO WE RELY ON TO USE YOUR PERSONAL DATA?

The legal bases that we rely on for processing your personal data are:

***o You have provided your consent to us using your personal data for a specific purpose:***

We will always ask for your consent to use your personal data where it is necessary, for example, to send it to third parties to refer you to their services, or to use your personal data for marketing purposes. You have the right to withdraw your consent at any time.

***o It is necessary in connection with the performance of a contract with you:***

Sometimes it is necessary to process your personal data due to contractual relationships. Caritas Anchor House is required to process your personal data in order to deliver its contractual obligations as your employer.

***o It is necessary for the performance of a task carried out in the public interest:***

This applies where it is necessary for us to process personal data to carry out a specific task in the public interest, or where we are exercising official authority. Caritas Anchor House's supported accommodation is commissioned by the local authority, the London Borough of Newham and we are also regulated by the Regulator of Social Housing and the Charities Commission.

***o It is necessary for compliance with a legal obligation to which we are subject:***

This would include where we have to retain certain records, for example, because we are under a direct legal obligation.

***o It is in the vital interests of the data subject or another person:***

We rely on vital interests to process personal data where necessary to protect someone's life or wellbeing.

***o It is within our legitimate interests:***

We can process personal data if it is reasonably necessary for our legitimate interests or a third party's legitimate interests (as long as the processing is fair, balanced and does not unduly impact individuals' rights). We will rely on this ground to process your personal data when it is not practical or appropriate to ask for your consent, and where we are confident that this will not impact your rights.

Our legitimate interests include carrying out our charitable objects and working with those affected by homelessness, and monitoring and improving our service. We also rely on our legitimate interests for the proper administration of Caritas Anchor House, and to manage our operations (for example, maintaining appropriate records and databases).

When we process your personal data to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal data for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

## **5. DIRECT MARKETING AND COMMUNICATIONS**

Our marketing and communications include information about Caritas Anchor House's latest news, successes, campaigns and life-changing work, and how people can donate and otherwise participate in our fundraising activities.

Employees work email addresses will be subscribed to receive Caritas Anchor House's monthly e-newsletter, which you can opt out of at any time. This is so that you are able to keep updated with the latest progress and successes at Caritas Anchor House. We will never subscribe your personal email address, unless you ask us to or you do this independently.

We make it easy for you to tell us how you want us to communicate with you whenever we send marketing. If you want to change your communication preferences, let us know by emailing [communications@caritasanchorhouse.org.uk](mailto:communications@caritasanchorhouse.org.uk).

### ***Sharing your story***

Some people choose to contribute to our marketing activities, either by taking part in photographs at events, being interviewed by the press or featuring in stories on our website or newsletter. This information will only be made public by us, for marketing purposes, with the explicit and informed consent of the individuals.

## **6. DATA SHARING**

We will never sell or share personal data to third parties for marketing purposes. However, we may need to share your personal data with third parties, but will only do so where it is lawful and responsible.

For example, if you attend an event with or on behalf of Caritas Anchor House, your details may need to be shared with the event organisers or venue. In such circumstances, we will be very clear what will happen to your personal data when you register for that event.

If we want to disclose information to someone outside of Caritas Anchor House – for example, if we need to seek references – we will make sure we seek your consent beforehand, unless we are required to disclose this information by law. We will need to get a 'disclosure' from the Disclosure and Barring Service (DBS) as a condition of your employment contract/volunteering agreement. There may also be times where we have to disclose information about you to the emergency services, where your life is at risk – in these circumstances, we will only provide information that is necessary for the emergency services to care for you.

We may allow our staff, consultants and/or external service providers acting on our behalf to access and use your personal data for the activities we have described above. We will only permit them to use it to deliver the relevant service and in line with appropriate data security measures.

We may need to disclose your personal data upon request to regulatory and government bodies as well as law enforcement agencies or legal advisors. We may also partner with other organisations and in doing so, acquire or transfer personal data, but your personal data would continue to be used for the purposes set out above.

## 7. CHILDREN'S DATA

Occasionally, we process personal data about children, and aim to manage it in a way which is responsible and appropriate to the age of the child. Information is usually collected when children get in touch to fundraise for us through schools or youth groups, or if people accessing our services share views about their own children. Where consent is required to process children's personal data and the child is under 13 years old, we will seek consent from a parent or guardian. We will only hold personal data about children where this is absolutely necessary for the purpose of the activity they are participating in or to provide support services to Caritas Anchor House service users.

## 8. HOW WE KEEP YOUR PERSONAL DATA SAFE AND WHO HAS ACCESS TO IT

We are committed to maintaining confidentiality at all times, and we aim to ensure your personal data is held securely in accordance with the Data Protection Act and General Data Protection Regulation and any subsequent legislation. We ensure that there are appropriate technical controls in place to protect your personal data. For example, our IT network is protected and routinely monitored.

We undertake regular reviews, at least annually, of who has access to personal data that we hold to ensure that your personal data is only accessible by appropriately trained staff.

## 9. KEEPING YOUR PERSONAL DATA UP TO DATE

Please let us know if your contact details change. You can do this by contacting our HR Manager.

## 10. YOUR RIGHTS

You have a range of rights in relation to your data. These are:

### ***o Right to restrict processing***

You have a right to request that we stop processing your personal data, and if it's not necessary for the purpose you provided it to us for we will do so. Contact us on [businessservices@caritasanchorhouse.org.uk](mailto:businessservices@caritasanchorhouse.org.uk) or 020 7476 6062 if you have any concerns.

### ***o Right of access***

You have a right to ask for a copy of the personal data we hold about you, which we will provide promptly and in any event within 28 calendar days of receiving the request. We will not charge you for these requests. If there are any discrepancies in the personal data we provide, please let us know and we will consider correcting it.

If you want to access your personal data, send a description of the personal data you want to see and proof of your identity (including a passport, driving license or utility bill) by post or by handing it to reception at Caritas Anchor House, addressed to Business Services Unit, Caritas Anchor House, 81 Barking Road, London E16 4HB. We do not accept these requests by email so we can ensure that we only provide personal data to the right person.

### ***o Right to erasure***

You have the right to request that your personal data is erased from our database in certain circumstances.

#### ***o Right to rectification***

We also want to make sure that your personal data is accurate and up to date. Please let us know if your details change. You may also ask us to correct or remove personal data which is inaccurate.

#### ***o Right to object***

You can also opt-out of receiving all or some of our marketing/fundraising communications or request that we stop processing personal data about you for certain purposes at any time by contacting us using the details below.

#### ***o Right to data portability***

In certain circumstances you have a right to data portability which means we will provide you (or a third party you nominate) with your personal data in a structured, commonly-used and machine-readable format.

To exercise these rights or if you have any questions, please contact us.

Please note that you may only use/benefit from some of these rights in limited circumstances. For more information, we suggest that you consult guidance from the Information Commissioner's Office (ICO) – <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/> - or please **contact us** using the details below.

## **11. COMPLAINTS**

If you are unhappy with the way in which we have handled your personal data please contact us in the first instance.

You can let us know if you have any queries or concerns about the way that your personal data is being processed by us by **contacting us** on the details below. You are also entitled to make a complaint to the Information Commissioner's Office. For further information see the Information Commissioner's guidance here: <https://ico.org.uk/for-the-public/personal-information>.

## **12. DATA RETENTION**

We keep personal data for as long as there is a need to keep it in connection with the purposes for which it was collected and subject to any legal obligation we are required to comply with or in order to protect or defend our legal rights.

If you have any questions about our data retention policy, please contact us using the details in section 13 below.

## **13. CONTACT**

If you have any questions, comments or suggestions, please let us know by emailing [businessservices@caritasanchorhouse.org.uk](mailto:businessservices@caritasanchorhouse.org.uk), calling 020 7476 6062 or writing to the Business Services Unit, Caritas Anchor House, 81 Barking Road, London E16 4HB.