

# **Office of the Police and Crime Commissioner for Gwent Police**

## **Recruitment Privacy Notice**

### **Who we are**

The Office of the Police and Crime Commissioner for Gwent (OPCC) provides support to the Police and Crime Commissioner (PCC) in carrying out his duties and responsibilities which include holding the Chief Constable for Gwent to account for the delivery of local policing, setting and updating a police and crime plan, setting the budget and the precept and engaging with the public and communities within Gwent.

The Chief Executive of the OPCC is the data controller for the personal information we process, unless otherwise stated.

You can contact us in a number of ways

By email: [Commissioner@gwent.pnn.police.uk](mailto:Commissioner@gwent.pnn.police.uk)

By telephone: 01633 642200

By post: Office of the Police and Crime Commissioner for Gwent  
Police Headquarters  
Turnpike Road  
Croesyceiliog  
Cwmbran  
NP44 2XJ

The Data Protection Officer (DPO) is Joanne Regan. She can be contacted via the details above. Please mark all correspondence for the attention of the DPO.

### **Purpose of this privacy notice**

This privacy notice is to advise you of how your personal information will be dealt with (processed) by the OPCC and your rights in relation to that processing.

This notice covers information processed for recruitment purposes. It does not cover the recruitment of Joint Audit Committee members, Independent Custody Visitors, Animal Welfare Volunteers, Legally Qualified Chairs or Misconduct Panel Members. A separate privacy notice has been drafted in respect of these recruitment process.

As part of any recruitment process, we collect and processes personal data relating to job applicants. We are committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

It is important to note that in most circumstances Gwent Police undertakes the recruitment process on behalf of the Office of the Police and Crime Commissioner for Gwent Police (OPCC). As such, your personal data will be shared between both organisations. Your personal data will be processed on behalf of the OPCC in the

same way as that of a Gwent Police employee; therefore the information contained within the [Gwent Police Recruitment Privacy Notice](#) will also apply. For further information on Gwent Police and their Data Protection Officer, please visit their [website](#).

## **Chief Constable recruitment process**

The OPCC is responsible for the recruitment of the Chief Constable. The information in this privacy notice also applies to this process. No information will be shared with any member of Gwent Police during the recruitment process unless we are required. Once the appointment of the successful candidate has been approved by the Police and Crime Panel, personal details will then be passed to Human Resources in order for the successful candidate to be added to the required systems such as payroll and IT.

## **What information do we collect?**

We collect a range of information about you. This can include:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK;
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief;
- Criminal record information; and
- External business interests in line with our *business interests policy*.

We collect this information in a variety of ways. For example, data might be contained in application forms, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

We will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, and information from vetting and criminal records checks. (We will only seek information from third parties once you have passed the interview process and will inform you that we are doing so).

## **What is the legal basis for processing your personal data?**

We need to process personal data prior to entering into a contract with you. We also need to process your data when entering into a contract with you.

In some cases, we need to process data to ensure that we are complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

Where we rely on legitimate interests as a reason for processing data, we have considered whether or not those interests are overridden by the rights and freedoms of the individual and has concluded that they are not.

We also process health information if we need to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to meet our legal obligations under the Equality Act 2010 and to exercise specific rights in relation to employment. We also process information to check that an applicant is fit to undertake the intrinsic functions of the role applied for.

We also process other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, for equal opportunities monitoring purposes.

As part of the application process you will be required to undertake a vetting check, commensurate with the role you are applying for. We will conduct checks on you in line with the College of Policing, Vetting Approved Professional Practice and, depending on the vetting clearance level required for your role, we may ask you to provide your personal details as well as details of your partner, any children over the age of 10 years, your parents, siblings and co-residents.

We may also carry out checks for any previous criminal convictions or local intelligence, a search of the Police National Database, open source checks and credit reference agency checks.

We will not use your personal data for any purpose other than the recruitment exercise for which you have applied.

### **Sharing your personal data**

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the Human Resource and Recruitment team, staff and managers involved in the recruitment process, professional standards department, and where applicable, occupational health staff.

We will not share your data with third parties, unless your application for employment is successful and we make you an offer of employment. We will then share your data with former employers to obtain references for you. If your role requires wider government vetting we will also provide your email address and other personal information such as your name, date of birth and passport number to United Kingdom Security Vetting (UKSV) who will contact you to complete the appropriate vetting application, UKSV will be the data controller for any additional information you provide to them. Your personal data will also be shared with the Shared Resource Service, an external organisation who provide our IT services and to the Greater Gwent

Pension Fund hosted by Torfaen County Borough Council in order to meet the legal requirement to enrol you in a workplace pension scheme, although you will have the opportunity to 'opt out' of this service.

We will not share your information with any third parties for the purposes of direct marketing.

### **How long do we keep your personal data?**

Personal Data is kept in line with our *retention policy*.

If your application for employment is unsuccessful, we will hold your data on file for 1 year after the end of the relevant recruitment process. At the end of that period (or once you withdraw your consent), your data will be deleted and/or destroyed.

Vetting records will be retained in line with the National Police Chiefs Council Guidance on the minimum standards for the retention and disposal of police records. These are:

- Successful applicants – until 6 years after leaving or 1 year after death.
- Vetting refusals – 6 years

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held are detailed within our retention schedule.

### **How do we keep your information secure?**

We take the security of your data seriously and have 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.

### **Your rights in relation to your personal data**

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

- Your right of Access
- Your right to rectification
- Your right to erasure
- Your right to restriction of processing.
- Your right to object to processing
- Your right to data portability

Further information in relation to these rights can be found in our *general privacy notice*.

If you would like to exercise any of these rights, please contact the Central Recruitment team via [CentralRecruitment@gwent.pnn.police.uk](mailto:CentralRecruitment@gwent.pnn.police.uk) .

### **What if you do not provide personal data?**

You are under no statutory or contractual obligation to provide data to us during the recruitment process. However, if you do not provide the information, we may not be able to process your application.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

### **Changes to this Privacy Notice**

We keep our privacy notice under regular review to make sure it is up to date and accurate.

### **If you are not satisfied**

We set very high standards for the collection and appropriate use of personal data and take any complaints very seriously. We would like you to bring to our attention any instance where you believe the use of data is unfair, misleading or inappropriate. We also welcome any suggestions for improvement. Please contact our Data Protection Officer for the OPCC in the first instance.

If you remain dissatisfied after contacting our Data Protection Officer, you can lodge a complaint with the Information Commissioner:

Information Commissioner's Office – Wales  
2nd Floor, Churchill House  
Churchill Way  
Cardiff  
CF10 2HH

Telephone: 01625 545297

Fax: 029 2067 8399

Email: [wales@ico.org.uk](mailto:wales@ico.org.uk)

**Updated 10<sup>th</sup> January 2019**