



## Privacy Notice - Recruitment

The Data Controller of the information being collected is: Sabhal Mòr Ostaig, Teangue, Isle of Skye, IV44 8RQ. Tel: 01471 888 000.

For any queries or concerns about how your personal data is being processed you can contact the Data Protection Administrator at [gdpr@smo.uhi.ac.uk](mailto:gdpr@smo.uhi.ac.uk) or the Data Protection Officer at [dataprotectionofficer@uhi.ac.uk](mailto:dataprotectionofficer@uhi.ac.uk).

This privacy statement relates to the following processing:

### Recruitment

The administration of Sabhal Mòr Ostaig's job application process, including selection and onboarding new staff. To facilitate a fair and transparent recruitment process that meets our obligations under the Equality Act 2010.

### Your information will be used for the following purposes:

|                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Purpose 1:<br/>Administering job applications</b>                           | Receiving and processing job applications, including: <ol style="list-style-type: none"><li>1. Initial assessment of applications</li><li>2. Selection for each phase of the application/recruitment process</li><li>3. Arrangements for interview</li></ol>                                                                                                                                                                                                                                            |
| <b>Purpose 2:<br/>Selection to offer process</b>                               | This process continues where purpose 1 ends, and includes: <ol style="list-style-type: none"><li>1. Selection of preferred candidate</li><li>2. Offer of employment</li></ol>                                                                                                                                                                                                                                                                                                                           |
| <b>Purpose 3:<br/>Onboarding and induction (includes purpose 5)</b>            | This process continues where purpose 2 ends, and includes: <ol style="list-style-type: none"><li>1. Administration of hiring, including collecting further details for HR and finance records (ID checks and bank details for payment)</li><li>2. Undertaking any relevant assessments (may involve SMO's occupation health service) and making any accessibility changes</li><li>3. All relevant checks (see purpose 5)</li></ol>                                                                      |
| <b>Purpose 4:<br/>Administration of agency workers (may include purpose 5)</b> | Receiving and processing candidate information from employment agency including: <ol style="list-style-type: none"><li>1. Initial assessment of candidates, as provided by the agency</li><li>2. Selection for each phase of the application/recruitment process</li><li>3. Arrangements for interview (may be informal, or may not take place)</li><li>4. Administration of hiring</li></ol> All of these processes may involve your data being shared between SMO and the relevant employment agency. |
| <b>Purpose 5:<br/>Relevant ID, PVG/disclosure, and right to work checks</b>    | Undertaking all necessary checks on employees or agency workers. <ol style="list-style-type: none"><li>1. All jobs require ID and right to work checks</li><li>2. Some jobs require PVG and/or enhances disclosure checks (you will be advised in the job advert)</li><li>3. Some positions may require additional checks – these will be detailed in the job advert</li></ol>                                                                                                                          |

Our legal reason for using the data are:



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**To achieve the following purpose:**

Purpose 1: Administering job applications  
Purpose 2: Selection to offer process  
Purpose 3: Onboarding and induction

**Our legal reason to use the data is:** Use is necessary for the performance of a contract with you or to take steps, at your request before entering into such a contract. That contract being the relevant employment contract.

**To achieve the following purposes:**

Purpose 1: Administering job applications

**Our legal reason to use the data is:** Use is necessary for us to comply with legal obligations such as to monitor and enhance equality of opportunity and treatment and ensure the job application process is fair and equitable in line with the Equality Act 2010.

**To achieve the following purposes:**

Purpose 4: Administration of agency workers  
Purpose 5: Relevant ID, PVG/disclosure, and right to work checks

**Our legal reason to use the data is:** Use is necessary for the performance of a contract with you or to take steps, at your request before entering into such a contract. That contract being the relevant agency work contract.

**To achieve the following purpose:**

Purpose 5: Relevant ID, PVG/disclosure, and right to work checks

**Our legal reason to use the data is:** Use is necessary to comply with legal obligations such as to undertake relevant regulatory checks on identity of applicants and staff, PVG or disclosure checks (you will be informed in the job advert if this is necessary) and right to work checks.

**The data we use includes special category (sensitive) data. You are not obliged to provide this information. Our legal reasons for using this sensitive data, as provided, are:**

**To achieve the following purposes:**

Purpose 1: Administering job applications

**We use special category data to achieve this purpose, that being racial or ethnic origin, religion/beliefs, health data, sexual orientation**

**Our special category conditions for using this data for this purpose is:**

Use is necessary for us to comply with legal obligations such as social protection and employment law to monitor and enhance equality of treatment and ensure the job application process is fair and equitable in line with the Equality Act 2010.

**To achieve the following purposes:**

Purpose 3: Onboarding and induction  
Purpose 4: Administration of agency workers

**We use special category data to achieve this purpose, that being accessibility or health information to make sure your working environment and responsibilities are suitable for you. This may involve referral to SMO's occupational health service.**



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### **Our special category conditions for using this data for this purpose is:**

Use is necessary for us to comply with legal obligations such as social protection and employment law to monitor and enhance equality of opportunity and treatment and ensure the job application process is fair and equitable in line with the Equality Act 2010.

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#### **To achieve the following purposes:**

Purpose 5: Relevant ID, PVG/disclosure, and right to work checks

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**We use special category data to achieve this purpose, that being potentially, personal data relating to criminal convictions and offences, or related security measures.**

### **Our special category conditions for using this data for this purpose is:**

Use is necessary for compliance with employment law and social protection law and statutory purposes in the public interest, in this case the provisions of the Protecting Vulnerable Groups (Scotland) 2007 Act and SMO's Duty of Care. Checks will only be undertaken when they are required by law and are in the public interest.

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### **Your data will, or may, be shared with the following recipients or categories of recipient:**

#### **Referees / references**

If you provide a referee for a reference, we may contact your referee asking for a reference relating to your work history. SMO may also check your credentials with relevant bodies such as professional regulatory bodies or educational establishments.

#### **Relevant agencies for PVG/disclosure and right to work checks**

Some checks have to be undertaken, administered, recorded or verified by external bodies such as Disclosure Scotland, Disclosure and Barring Service or the UK Visa and Immigration Service.

#### **External members of selection panels**

Your application data may be shared with external members sitting on the selection panel. These members will be invited by Sabhal Mòr Ostaig to sit on the panel due to their expertise and relationship with Sabhal Mòr Ostaig.

#### **Sabhal Mòr Ostaig HR System**

Data of all staff will be held in Sage.

### **Your data will be retained for the following length of time:**



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Two years from the end of the selection process to allow you to access and re-use your data for future applications and to allow us to respond to statutory reporting requests.

If you are a successful candidate and accept a position at Sabhal Mòr Ostaig your data will be held for longer – please see the Sabhal Mòr Ostaig HR Privacy Notice or contact your recruiting manager.

### **The following rights are rights of data subjects:**

- The right to access your personal data
- The right to rectification if the personal data we hold about you is incorrect
- The right to restrict processing of your personal data

The following rights apply only in certain circumstances:

- The right to withdraw consent at any time if consent is our lawful basis for processing your data
- The right to object to our processing of your personal data
- The right to request erasure (deletion) of your personal data
- The right to data portability

You also have the right to lodge a complaint with the Information Commissioner's Office about our handling of your data.

The Information Commissioner's Office is UK's independent authority set up to uphold information rights in the public interest. Their website is [www.ico.org.uk](http://www.ico.org.uk)