

## Malvern Hills Trust privacy policy – volunteers (including trustees) and job applicants

Malvern Hills Trust (MHT) treats the privacy of volunteers (including Trustees) and job applicants very seriously and takes appropriate security measures to safeguard their privacy. This Policy explains how MHT protects and manages any personal information (data)\* shared with it and that it holds, including how MHT processes and protects that data.

Readers of this policy are also referred to MHT's 'Data Protection Statement'.

*\* Personal information (data) means any information that may be used to identify an individual, including, but not limited to, a first and last name, a home or other physical address, email address or other contact information.*

### How MHT uses personal information

This privacy policy tells volunteers and job applicants what to expect when MHT collects personal data. It applies to information MHT collects about:

1. Job applicants,
2. Volunteers,
3. Trustees.

A separate privacy policy is available to employees.

#### 1. Job applicants

MHT is the data controller for the information provided during the job application process unless otherwise stated. If job applicants have any queries about the process or how MHT handles information submitted as part of the application please contact MHT at [info@malvern hills.org.uk](mailto:info@malvern hills.org.uk).

##### 1.1 What will MHT do with the information provided to it?

All of the information provided during the job application process will only be used for the purpose of progressing the application, or to fulfil any necessary legal or regulatory requirements.

MHT will not share any of the information provided during the recruitment process with any third parties or store any of that information outside of the European Economic Area. The information provided will be held securely by MHT whether the information is in electronic or physical format.

MHT will use the contact details provided to it to contact applicants to progress their application. MHT will use the other information provided to assess the applicant's suitability for the role they have applied for.

##### 1.2 What information does MHT ask for and why?

MHT does not collect more information than it needs to fulfil its stated purposes and will not retain it for longer than is necessary.

The information asked for is used to assess the applicant's suitability for employment. The applicant does not have to provide what MHT asks for but it might affect their application if all information is not provided.

##### 1.3 Application stage

MHT asks for personal details including name and contact details. MHT will also ask about previous experience, education, referees and for answers to questions relevant to the role applied for. Our recruitment team will have access to all of this information.

Applicants will also be asked to provide equal opportunities information. This is not mandatory information – if applicants don't provide it, it will not affect their application. This information will not be made available to any staff outside the recruitment team in a way which can identify applicants. Any equal opportunities information provided will be used only to produce and monitor equal opportunities statistics.

#### **1.4 Conditional offer**

If MHT makes a conditional offer of employment MHT will ask for information so that it can carry out pre-employment checks. Successful applicants must successfully complete pre-employment checks to progress to a final offer. MHT is required to confirm the identity of its staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

Successful applicants will therefore be required to provide:

- Proof of identity – original documents to be brought into the office, copies will be taken and kept on a personnel file in a locked cabinet,
- Proof of qualifications – original documents to be brought into the office. Copies will be taken and kept on a personnel file in a locked cabinet,
- MHT will contact referees, using the details provided in the application, directly to obtain references. References will be kept on a personnel file in a locked cabinet.

MHT may also ask successful applicants to complete a questionnaire about their health or to attend a medical, to establish their fitness to work.

If MHT makes a final offer, the following details will be needed:

- Bank details – to process salary payments. These will be held on the computerised payroll system, access to which is password controlled,
- Emergency contact details – so MHT knows who to contact in the event of an emergency at work. These are stored on an excel spreadsheet with restricted access and on personnel files.

Further details are available in the Employee Privacy Policy.

#### **1.5 How MHT makes decisions about recruitment?**

Final recruitment decisions are made by the members of the recruitment team. All of the information gathered during the application process is taken into account.

Applicants are able to ask about decisions made about their application by speaking to the contact within the recruitment team or by emailing [info@malvern hills.org.uk](mailto:info@malvern hills.org.uk).

#### **1.6 People's Pension**

Employees' details will be provided to People's Pension who provide MHT's auto enrolment pension scheme. Employees will be auto-enrolled into the pension scheme after a qualifying period. The details provided to People's Pension will be name, date of birth, National Insurance number and salary. Bank details will not be passed to People's Pension.

#### **1.7 How long is the information retained for?**

For successful applicants who go on to become employees, the information provided during the application process will be retained by MHT as part of the employee file for the duration of the employment plus 6 years following the end of the employment (or for information required under

Health and Safety legislation and to be consistent with employer's liability insurance requirements). This includes the fitness to work, records of any security checks and references.

For unsuccessful applicants, the information provided and that generated through the assessment process (for example interview notes) will be retained for 6 months from the closure of the recruitment process.

## **2. Volunteers including Trustees**

MHT is fortunate to benefit from the help of many volunteers. Personal information held on volunteers includes:

- Name,
- Address,
- Telephone numbers,
- Email address,
- Emergency contact details.

The information is held to enable MHT to contact volunteers or for use in an emergency involving the volunteer and for volunteers who are not trustees is not shared with anybody else.

The information is deleted 40 years after a period of inactivity (to be consistent with employer's liability insurance requirements) or earlier if requested by the volunteer.

## **3. Trustees**

In addition to the information in 2 above, Trustee information is published in the MHT 'year card' which is available to the public and is published on MHT's website. The details included are:

- Name,
- Address,
- Telephone number,
- Email address.

Trustees' specific consent will be sought for this at the time of their appointment.

The Trustee details as above plus date of birth are also filed with the Charity Commission, as required under Charity law.

## **Complaints or queries under the GDPR**

MHT tries to meet the highest standards when collecting and using personal information. For this reason, MHT takes any complaints received about this very seriously. MHT encourages people to bring it to their attention if they think that MHT's collection or use of information is unfair, misleading or inappropriate.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of MHT's collection and use of personal information. However, MHT is happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

If a person wishes to make a complaint about the way MHT has processed their personal information, they can contact the ICO as the statutory body which oversees data protection law.

[www.ICO.org.uk/concerns](http://www.ICO.org.uk/concerns).

## **Access to personal information**

MHT tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if MHT holds any personal information by making a 'subject access request' under the GDPR. If MHT does hold information about an individual it will:

- give the individual a description of it;
- tell the individual why MHT is holding it;
- tell the individual who it could be disclosed to; and
- let the individual have a copy of the information in an intelligible form.

To make a request to MHT for any personal information please put the request in writing to the address provided below.

If the individual agrees, MHT will try to deal with their request informally, for example by providing them with the specific information requested over the telephone.

If MHT does hold information about an individual, s/he can ask MHT to correct any mistakes by contacting the address below.

## **Changes to this privacy policy**

MHT keeps its privacy policy under regular review. This privacy policy was last updated on 10th May 2018.

## **How to contact MHT**

To request information about MHT's privacy policy email [info@malvern hills.org.uk](mailto:info@malvern hills.org.uk) or write to:

Malvern Hills Trust  
Manor House  
Grange Road  
Malvern WR14 3EY