

Privacy Notice – Candidates

1. **About the Privacy Notice**

1.1 The Football Foundation (“**the Charity**”) and Football Stadia Improvement Fund (“**the Company**”) are committed to complying with privacy and data protection law and to safeguarding the privacy and security of information concerning our potential, current and former employees, workers and contractors.

1.2 We are sharing this privacy notice with you because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

2. **Background**

The Charity is authorised by the Company, in respect of any employment with the Company, to act at all times as its agent. Accordingly all acts of the Charity should be seen also as acts of the Company.

3. **Data protection principles**

3.1 Anyone processing personal data must comply with the six data protection principles set out in the GDPR. We are required to comply with these principles (summarised below), and show that we comply, in respect of any personal data that we deal with as a data controller.

3.2 Personal data should be:

- (a) processed fairly, lawfully and transparently;
- (b) collected for specified, explicit and legitimate purposes and not further processed in a way which is incompatible with those purposes;
- (c) adequate, relevant and limited to what is necessary for the purpose for which it is held;
- (d) accurate and, where necessary, kept up to date;
- (e) not kept longer than necessary; and
- (f) processed in a manner that ensures appropriate security of the personal data.

4. **The kind of information we hold about you**

4.1 In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- (a) The information you have provided to us in your curriculum vitae and covering letter.

- (b) Where applicable, the information you have provided on our application form, which may include your name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications and skills, training and professional development data, current or most recent salary.
- (c) Any information you provide to us during an interview.
- (d) Any identification and right to work information.
- (e) Any other information useful for managing the recruitment process or potential employment relationship.

4.2 We may also collect, store and use the following types of more sensitive personal information:

- (a) Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- (b) Information about your health, including any medical condition, health and sickness records.

5. **How is your personal information collected?**

We collect personal information about candidates from the following sources:

- (a) You, the candidate.
- (b) Any recruitment agencies that we may use from which we may receive your CV, and if applicable, a covering letter, as well as details concerning your employment history, qualifications and skills, training and professional development data, current or most recent salary, and any identification and right to work information.
- (c) Your named referees, from whom we collect information concerning your employment history, such as employment dates, salary, periods of absence, disciplinary records, qualifications, training and professional development data, details around your skills and qualities and suitability for the work.

6. **How we will use information about you**

6.1 We will use the personal information we collect about you to:

- (a) Assess your skills, qualifications, and suitability for the work.
- (b) Carry out background and reference checks, where applicable.
- (c) Communicate with you about the recruitment process.
- (d) Keep records related to our hiring processes.
- (e) Comply with legal or regulatory requirements.

6.2 It is in our legitimate interests to decide whether to appoint you to work since it would be beneficial to our business to appoint someone to that work.

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

6.4 Having received your CV and covering letter, and where applicable, your application form, we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the work. If we decide to offer you the work, we will then take up references before confirming your appointment.

7. **If you fail to provide personal information**

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

8. **How we use particularly sensitive personal information**

8.1 We will use your particularly sensitive personal information in the following ways:

- (a) We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process.
- (b) We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

9. **Information about criminal convictions**

We do not envisage that we will process information about criminal convictions.

10. **Automated decision-making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

11. **Data sharing - why might you share my personal information with third parties?**

We will only share personal information with the recruitment agency that processed your application. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

12. **Data security**

- 12.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.
- 12.2 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

13. **Data retention - how long will you use my information for?**

- 13.1 If you are successful in your application, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment, plus six years following the end of your employment.
- 13.2 If you are unsuccessful at any stage of the process, we will retain your personal information for a period of six months after we have communicated to you our decision about whether to appoint you to work. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations.
- 13.3 If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

14. **Your rights in relation to your data**

- 14.1 Under the Legislation, you have a right to request a copy of the personal information the Foundation holds about you. You also have a right to correct inaccurate data, and, in some circumstances, may have a right to request erasure of data, data transfer (or “data portability”), and to object to or restrict processing.

To find out more about your rights, or to exercise any of these, please contact a member of the Foundation’s HR team.

15. **Compliance**

- 15.1 Please let us know if you have any questions or concerns about this notice or about the way in which the Foundation uses your personal information by contacting us using the following channels. Please ask for/mark messages for the attention of Head of Business Services.

Email: data.enquiries@football.foundation.org.uk

Telephone: 0345 345 4555

Post: Football Foundation, 10 Eastbourne Terrace, Paddington, London, W2 6LG.

16. Data protection regulator

16.1 If you have any concerns or comments about how the Foundation handle information, we would like to hear from you. Alternatively, you may contact the Information Commissioner's Office (ICO) for guidance and advice, or to lodge a complaint. The ICO can be contacted at:

- (a) www.ico.org.uk;
- (b) Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF;
- (c) 0303 123 1113 (local rate) or 01625 545 745 (national rate).