

Job Applicant Privacy Notice

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1. Purpose of this Notice

This notice sets out how the Commonwealth War Graves Commission will handle personal data relating to job applicants that is collected and processed during the recruitment process.

2. Identity of the Data Protection Officer and UK Regulator

Should you have any concerns about the processing of your data please contact the Commissions Data Protection Officer at dpo@cwgc.org or you may write to:

Data Protection Officer
Commonwealth War Graves Commission
2 Marlow Road
Maidenhead
Berkshire SL6 7DX

The UK Information Commissioner's Office is the supervisory authority for all matters concerning the processing of your personal data within the Commission, where our Headquarters is located. If you have any concerns regarding the processing of your data you may contact the Information Commissioners Office (ICO) by writing to the address below. **You should usually have exhausted our internal review procedures in the first instance.**

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

If you live outside the UK, please contact the Data Protection Officer (dpo@cwgc.org) for details of your local regulatory authority.

3. Identity of the Data Controller

The Commonwealth War Graves Commission is a Data Controller. It is the body responsible for determining the means and purposes of processing your personal data. The Commission collects and processes personal data relating to its employees to manage the employment relationship. The Commission is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

4. What information do we collect?

The Commission collects and processes a range of information about you. This includes:

- your name, title, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlement;
- information about your nationality and entitlement to work in the UK or elsewhere;
- any unspent criminal offences;
- information about any voluntary/work commitments (non-mandatory);
- your current notice period/availability to start work;
- whether or not you have a disability for which the Commission needs to make reasonable adjustments during the recruitment process.

In addition, for some roles, we may deem it appropriate to complete enhanced background screening as part of the pre-employment checks, including DBS or PVG (for Scotland) or local equivalent. Any necessary background checks will be made clear to you in the offer of employment.

The above list is not exhaustive and the type of data held will be subject to business need to enable us to manage the recruitment process.

5. How do we collect personal data

The Commission collects personal data in a variety of ways. For example, data is collected through application forms or CVs; obtained from your passport or other identity documents such as your driving licence; from correspondence with you; or through interviews, meetings or other assessments.

In a limited number of cases, the Commission collects personal data about you from third parties, such as employment agencies or references supplied by former employers. The Commission will seek references from third parties only if a job offer to you has been made and will inform you that it is doing so.

Data is stored in a range of different places, including in the Commission's HR management systems and in other secure IT systems (including the Commission's email systems).

6. On which basis does the Commission process personal data?

The Commission needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract.

In some cases, the Commission needs to process data to ensure that it is complying with its legal obligations. For example, the Commission is required to check an employee's entitlement to work

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

Where the Commission relies on legitimate interests as a reason for processing personal data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

The Commission processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

7. Who has access to data?

Your information will be shared internally for the purposes of the recruitment process. This includes members of the HR teams, interviewers, managers in the business area with a vacancy and IT staff if access to the data is necessary for performance of their roles.

The Commission will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. We will then share your data with your chosen referees to obtain references for you.

Your data may be transferred to countries outside the UK and European Economic Area (EEA) when it is necessary for the recruitment exercise, for example when the vacancy is based outside the EEA; or where it is necessary for the establishment, exercise or defence of legal claims.

8. How does the Commission protect your data?

The Commission takes the security of your data seriously. The Commission has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where the Commission engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are

obliged to implement appropriate technical and organisational measures to ensure the security of data.

9. For how long does the Commission keep data?

If your application for employment is unsuccessful, the Commission will hold your data on file for 6 to 12 months after the end of the relevant recruitment process depending on which country you are recruited in. At the end of that period, your data is deleted or destroyed.

You should note that, as the Commission is a global organization, data retention periods may vary depending on local laws and recognized best practice.

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.

10. Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Commission to change incorrect or incomplete data;
- require the Commission to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Commission is relying on its legitimate interests as the legal ground for processing; and
- ask the Commission to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Commission's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Commission's Data Protection Officer at dpo@cwgc.org.

If you believe that the Commission has not complied with your data protection rights, you can complain to the Information Commissioner in the UK or your local regulator. Details are available from the Commission's Data Protection Officer at dpo@cwgc.org.

11. What if you do not provide personal data?

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

12. Automated decision-making

Recruitment decisions within the Commission are not based on automated decision-making. However, should this be used, you will be informed.

Version Control

Version	Date Effective	Change Summary	Reviewed / Approved by
1.0	25/05/2018	Published on HUB	DPO
2.0	13/01/2021	Review and reformat	ISO
2.1	17/02/2022	Review	ISO/DPO
3.0	24/03/2022	Review and Publish	DPO
3.1	18/3/2025	Review	ISO/DPO
4.0	March 2025	Review and Publish	DPO

Document Owner	Effective Date	Date for Review
Data Protection Officer	March 2025	March 2027