

ETF RECRUITMENT PRIVACY NOTICE

1 Introduction

1.1 This Privacy Notice provides individuals that engage with Education and Training Foundation's (ETF, we, us, our) recruitment processes with information about how your personal data will be used, in compliance with the UK General Data Protection Regulations (GDPR) and the Data Protection Act (DPA) 2018. ETF is a registered charity (registration no: 1153859) and a company limited by guarantee (company registration number (England and Wales): 08540597). When referring to ETF, we also include our professional membership organisation, the Society for Education and Training (SET).

1.2 We process personal data required for recruitment activities (see section 2 for further details).

1.2.1 Personal data refers to any information relating to a living individual who could be directly or indirectly identified through their information (examples include, but are not limited to: date of birth, address, phone number, job title, previous employment information, e-mail address).

1.2.2 Personal data can be stored electronically or in paper records within a structured filing system.

1.2.3 Processing relates to collecting, storing, sharing, accessing, altering, retaining and deleting personal data.

1.2.4 For further information about our practices in relation to data processing, data protection, guidance on complying with the UK GDPR and key terminology, please contact our [Data Protection Officer \(DPO\)](#).

2 Our lawful basis for processing your personal data

2.1 We use Contractual Necessity as our lawful bases to process your personal data for the purpose of enacting our contractual obligations with you, including (but not limited to):

- job applications
- verification (e.g., checking for accuracy, like qualifications)
- short-listing
- interviews

- pre-employment vetting (e.g., employer making its own enquiries to third parties about a candidate's background and circumstances)
- record retention.

3 What personal data do we process?

3.1 We are committed to being transparent about what and how we collect and use your personal data to meet our data protection obligations (see also your 'Right to be informed' in section 7). Throughout your engagements during recruitment at ETF, we collect and hold a range of data about you that may be able to identify you directly or indirectly.

3.2 Most data provided to us is obtained during our recruitment process via applications either directly or through recruitment agencies.

3.3 The following list outlines the range of the personal data we process:

- name and contact details
- terms and conditions of any offer made to you if successful in your application including entitlement to benefits such as pensions or insurance cover and your bank account and national insurance number
- details of your qualifications, skills, experience, and employment history, including start and end dates, with previous employers and with ETF
- information about your nationality and entitlement to work in the UK
- information about medical or health conditions, including whether you have a disability for which we need to make reasonable adjustments for recruitment activities
- equality and diversity monitoring information, including information about your race, sex, sexual orientation, gender reassignment, religion of belief, marital or civil partnership status, age, disability or pregnancy and maternity and socio-economic background including class.

3.4. We may, on occasion, carry out Disclosure Barring Service (DBS) checks to ensure we safeguard our staff, stakeholders, and assets. This will only be where there are regulatory or contractual requirements and will be set out in the job advertisement. Please refer to ETF Policy on Recruiting Ex-Offenders for further information (this can be accessed from the [ETF website](#)).

4 Who has access to your personal data?

4.1 **Internal:** Information will be shared with our HR team. Some information will be shared with our IT team, and in some instances, where necessary, the recruiting manager and members of our Senior Leadership team. It may also be shared with Finance for management accounting purposes.

4.2 **External:** We may need to share your data with third parties, such as to obtain pre-employment references from other employers and to obtain background checks. ETF may need to share data with external parties for the purpose of enforcing legal rights. These third parties include:

- [LinkedIn](#)
- [Personio](#)
- [National Audit Office](#) to supply visitor building passes during face-to-face interviews and to facilitate fire/health and safety records.

5 How do we protect your personal data?

5.1 We take the security of our employees' data seriously. Where we engage third parties to process personal data, they do so under a duty of confidentiality. Details of how information is kept secure can be found in our **Information Security Policy**, which is available on request.

5.2 Whilst we don't actively transfer personal data outside of the EEA (European Economic Area), our third-party HR system provider Personio may do so as part of processing carried out by their own third-party processors. The security of the transmission is ensured by EU adequacy decisions and standard contractual clauses, which guarantee that this processing of personal data is subject to a security level that corresponds to that of the GDPR. Further details can be found in [Personio's privacy policy](#).

6 What are our data retention periods?

6.1 Personal data information will be stored for as long as necessary to carry out the recruitment process and if a job offer is made to you and you accept, then our Staff Privacy notice will apply, which contains additional detail on personal data retention.

7 What are your individual rights?

7.1 As a data subject, you have a number of rights. These include the:

- **Right to be informed.** This policy addresses that right by detailing to you, as an applicant for an ETF job, how your personal data is being used.
- **Right to access.** Including a right to obtain a copy of your personal data by making a Subject Access Request (SAR). Guidance for applicants on how to make a DSAR can be found [here](#).
- **Right to portability.** If you do make a SAR, we will provide you with your information in a way that is accessible and machine-readable. We will also, on request as part of this right, transfer your data to another organisation as long as the transfer is technically feasible, the data is held electronically, and you personally provided us with the information.
- **Right to rectification.** To request that we correct or updates incomplete data held about you.
- **Right to erasure in certain circumstances.** You may request that the organisation deletes or stops processing your data (also known as the 'Right to be forgotten'). Certain data deletion restrictions may apply, however, for example, if the ETF is legally obliged to keep hold of your data such as to comply with financial or other regulations; when keeping your data is necessary for the purposes of occupational health or when it is for the assessment of the working capacity of the employee. Details on data deletion can be found [here](#). If you would like any of the above rights exercised, where applicable to do so, please contact the Recruitment team (recruitment@etfoundation.co.uk)

8 Contacting us

8.1 ETF is located at the premises of The National Audit Office at:
Third Floor, 157-197 Buckingham Palace Road London SW1W 9SP.
We can be contacted via phone; 020 3740 8280 and by email at recruitment@etfoundation.co.uk.

8.2 ETF's Data Protection Officer (DPO) can be contacted directly for further information and advice at the above address and number, or by emailing dataprotection@etfoundation.co.uk

Version 1.0 authorisation and approval:		
Drafted by: Isabella Aridas	Title: Senior HR Advisor	Date: 06.01.23
Approved by: Charlotte Razzell	Title: Director of Corporate Services	Date: 23.01.23

Revision History:					
Timing of revision and outline of frequency of revision required					
Version	Date	Description of changes	Reason	Reviewed / updated by	Approval from
2.0	27.06.23	Change of HR system from Teamtailor to Personio	New system	Head of HR	People Director
3.0	07.09.23	Addition of lawful bases and DPO contact details	Bring in line with ETF Privacy Notice updates	Head of Legal and Compliance	People Director (Interim)

Policy Owner:
Director of Corporate Services

Due Date for Review:
3 August 2026