

Privacy Notice for Job Applicants

Author: Stuart Shepherd

Version: 1.0

Published: 7 June 2018

This Privacy Notice explains the reasons why Manchester Cathedral collects personal information during the recruitment process, the types of personal information collected, how it is used and data subjects' legal rights regarding this use. This document is not intended for children.

1. Manchester Cathedral's Privacy Notice

Manchester Cathedral is committed to respecting your privacy and protecting your personal information; the Cathedral Chapter welcomes the improvements to data protection brought about by the General Data Protection Regulation 2016/679 (the "GDPR") in May 2018.

This Privacy Notice explains the reasons why Manchester Cathedral collects personal information, the types of personal information collected, how it is used during the recruitment process and thereafter, and your legal rights regarding this use. This Privacy Notice is not intended for children.

This Privacy Notice applies to all job applicants, whether they apply for a role directly or indirectly through an employment agency. It is non-contractual.

2. Who are we?

The Dean and Canons of the Cathedral and Collegiate Church of St Mary, St Denys and St George in Manchester (known as "Manchester Cathedral") is the data controller. This means that Manchester Cathedral decides how your personal data is processed and for what purposes.

Manchester Cathedral comprises a number of legal entities: Dean and Canons Manchester Cathedral; Manchester Cathedral Hire Ltd.; Manchester Cathedral Development Trust (MCDT); Friends of Manchester Cathedral; Dean of Manchester Crosland Fund; Manchester Cathedral Visitor Centre; Manchester Cathedral Ventures Ltd. and Volition.

3. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the GDPR. Personal data doesn't include anonymised data, i.e. where all identifying particulars have been removed. There are also "special categories" of personal information and personal information on criminal convictions and offences, which require a higher level of protection due to its sensitive nature. The special categories of personal information comprise information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data.

4. How do we collect personal data?

Generally, Manchester Cathedral receives personal data from the individual directly. We recognise the need to collect data in an appropriate way for the situation so utilise different methods, namely online; email; paper documents; telephone and on some occasions whilst you are visiting the Cathedral or attending a service. When collecting personal data online we use third-party providers embedded securely on our website (Jotform and Campaign Monitor) and data protection agreements are in place; these providers have adopted GDPR best practices and their policies can be reviewed on their respective websites.¹

¹ <https://www.jotform.com/gdpr-compliance/>
<https://www.campaignmonitor.com/trust/gdpr-compliance/>

We may also collect personal information from other external third parties, such as references from current and former employers, information from background check providers, information from credit reference agencies and criminal record checks from the Disclosure and Barring Service (DBS). Other than employment agencies, Manchester Cathedral will only seek personal information from third parties during the recruitment process once an offer of employment or engagement has been made to you and we will inform you that we are doing so. You are under no statutory or contractual obligation to provide personal information to Manchester Cathedral during the recruitment process. Your personal information may be stored in different places, including on your application record, in Manchester Cathedral's HR management system and in other IT systems, such as the e-mail system and Dropbox.

Visitors to Manchester Cathedral should be aware that CCTV cameras are located around the building for the purposes of prevention and detection of crime.

Photographs and recordings are occasionally taken at Cathedral services and events – on these occasions attendees are informed by way of clear signage and by messaging inside the order of service.

5. What personal information do we collect?

Manchester Cathedral collects, uses and processes a range of personal information about you during the recruitment process. This includes (as applicable):

- your personal contact details, including your full name, address, telephone number and personal e-mail address;
- personal information included in a CV, any application form, cover letter or interview notes;
- references;
- information about your right to work in the UK and copies of proof of right to work documentation;
- copies of qualification certificates;
- copy of driving licence (if appropriate to the role);
- other background check documentation;
- details of your skills, qualifications, experience and work history with previous employers;
- information about your current salary level, including benefits and pension entitlements;
- your professional memberships.

Manchester Cathedral may also collect, use and process the following special categories of your personal information during the recruitment process (as applicable):

- whether or not you have a disability for which Manchester Cathedral needs to make reasonable adjustments during the recruitment process;
- information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation;
- information about criminal convictions and offences.

For most other business purposes outside of the recruitment process we only need to collect your name and contact details. There are times when we need to collect additional information for example:

- Requirements and statutory information for people arranging religious ceremonies and services such as weddings, baptisms, memorial services and confirmations;
- Requirements for people booking an educational visit to Manchester Cathedral;
- Payment details for visitors pre-booking a tour visit around Manchester Cathedral;
- Payment details for visitors pre-booking tickets for an event;
- Payment details and gift aid records for people who make donations;
- Requirements and payment details for hiring a room or space;
- Areas of expertise for people working in partnership with Manchester Cathedral to either contribute to, support or organise Manchester Cathedral services and events;
- Areas of expertise for people providing goods and services to support the work of Manchester Cathedral.

6. Automated technologies or interactions

As you interact with our website, we automatically collect technical data about your equipment, browsing actions and patterns to help our website operate efficiently and to give you the best online experience. We collect this data by using cookies and other similar technology. Further information about how we use cookies is available on our website.²

We may also receive personal data about you from various third parties or publicly available sources for example, analytics providers such as Google and ticket sales engines such as Eventbrite.

7. Why do we process your personal data?

Manchester Cathedral complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. We use your personal data for the following purposes:

- To manage the recruitment process and assess your suitability for employment or engagement;
- To decide to whom to offer a job;
- To comply with statutory and/or regulatory requirements and obligations, e.g. checking your right to work in the UK;
- To comply with the duty to make reasonable adjustments for disabled job applicants and with other disability discrimination obligations;
- To ensure compliance with your statutory rights;
- To ensure effective HR, personnel management and business administration;
- To monitor equal opportunities;
- To enable us to establish, exercise or defend possible legal claims.

² <http://www.manchestercathedral.org/cookies>

Please note that we may process your personal information without your consent, in compliance with these rules, where this is required or permitted by law.

Beyond the recruitment process, Manchester Cathedral only uses personal data for the following purposes:

- To enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our Constitution;
- To administer the Cathedral Community records (also known as the electoral roll) and benefactor membership records;
- To provide pastoral care to Manchester Cathedral's congregations;
- To fundraise for, promote the interests of, and administer the business of Manchester Cathedral, its charitable trusts and its trading entities;
- To manage our clergy, employees, volunteers and tenants;
- To maintain and audit our own financial accounts and records and process gift aid applications;
- To inform you of news, events, activities and services at Manchester Cathedral;
- To share your contact details with the Diocesan office so they may assist with the processing of gift aid applications;
- To contact individuals via surveys to conduct research about their opinions of current services and facilities or of potential new fabric developments that may be offered;
- To operate the Manchester Cathedral web site and deliver the services that individuals have requested online;
- To operate the Manchester Cathedral Online Shop and deliver the products that individuals have purchased online;
- To administer responses collected via the third-party platform 'Jotform' and deliver the services that individuals have requested online;

Our processing also includes the use of CCTV systems for the prevention and detection of crime.

8. What is the legal basis for processing your personal data?

- Explicit consent of the data subject so that we can keep you informed about Cathedral news, events, activities and services and keep you informed about other events and activities hosted or arranged by Manchester Cathedral or its entities;
- Processing is necessary for carrying out legal obligations in relation to the Cathedrals Measure 1999, Gift Aid or under employment, social security or social protection law, or a collective agreement;
- Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and there is no disclosure to a third party without consent.

9. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared within Manchester Cathedral for the purposes of the recruitment exercise and in order to carry out a function or service as outlined above. We will not share your personal information with third parties during the recruitment process unless your job application is successful and we make you an offer of employment or engagement. At that stage, we may share your personal information with third parties (and their designated agents), including:

- external organisations for the purposes of conducting pre-employment reference and employment background checks;
- the DBS, to obtain a criminal record check (if appropriate to the role);
- former employers, to obtain references;
- professional advisors, such as Manchester Cathedral lawyers or Sage HR Advice.

10. How long do we keep your personal data?

We keep data in accordance with the guidance set out in the Church of England Record Centre Records Management Guide “Chapter and Verse: The Care of Cathedral Records” which is available from the Church of England website [see footnote for link]³.

Specifically, we retain Cathedral Community data while it is still current; gift aid declarations and all other financial paperwork for up to 6 years after the calendar year to which they relate; and parish registers (baptisms, marriages, funerals etc.) permanently.

Personnel records relating to clergy and employees are presently being held indefinitely for safeguarding investigation purposes relating to the Independent Inquiry into Child Sexual Abuse (IICSA).

11. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which Manchester Cathedral holds about you;
- The right to request that Manchester Cathedral corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for Manchester Cathedral to retain such data;
- The right to withdraw your consent to the processing at any time;
- The right to request the transfer of your data to a third party;
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data;
- The right to lodge a complaint with the Information Commissioners Office.

³ <https://www.churchofengland.org/more/libraries-and-archives/records-management-guides>

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

13. Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Cathedral Administrator on 0161 833 2220 or via email cathedral.administrator@manchestercathedral.org or at Manchester Cathedral Office, Manchester Cathedral, Victoria Street, Manchester, M3 1SX .

We hope to be able to resolve any complaints about our Privacy Notice directly with you. However, if you feel this has not been achieved, you can contact the Information Commissioner's Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.