

# WWT Privacy Policy – Applicants for Paid and Volunteer Opportunities

Wildfowl and Wetlands Trust (WWT) is committed to protecting candidates' personal information. For the purpose of this policy, applicants are those who have applied for an employed, casual or volunteer position with WWT, or who have registered via our recruitment system regardless of whether they have applied or been offered a role.

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# **About WWT**

Wildfowl and Wetlands Trust is a charity (1030884 in England and Wales, SCO39410 in Scotland and a company limited by guarantee (2882729 England). VAT number 618368028.

The registered address is Wildfowl & Wetlands Trust, Slimbridge, Gloucestershire GL2 7BT.

This Privacy Policy relates to personal information allowing an individual to be identified directly or indirectly that is obtained and stored by WWT and for which WWT is the Data Controller.

# Why WWT holds and processes applicant's personal data

- To enable WWT to process recruitment applications
- To enable individuals to register with WWT's recruitment system (they may or may not sign up for opportunity alerts, or apply for specific roles of any kind)
- To enable WWT to respond to requests for vacancy/opportunity alerts
- To enter into correspondence with applicants via any offline or online channel regarding any aspect of the recruitment and selection process
- To provide applicants with information that is directly relevant to their application
- To complete statutory returns

Please note: In the event that an applicant is also a member or supporter of WWT, their personal details may also be held in a member or supporter context, in which case the Privacy Policy for members and supporters who have provided their personal details will also apply.

In the event that an applicant is an existing employee, casual worker or volunteer, the relevant privacy policy will also apply.

# The personal information WWT captures and retains

WWT captures and stores personal information as follows for applicants.

Applicant's information is kept for up to one year after unsuccessful application, in line with WWT's Data Retention Policy. There are exceptions to this policy:

- If an applicant has another application in process
- If an applicant has successfully been appointed to a position of any kind

Personal details	Use
Title/full name/full postal	Used for contact regarding a specific recruitment application
address	or in response to request for vacancy/opportunity alerts
Phone number (landline	Used for contact regarding a specific recruitment application
and/or mobile)	or in response to request for vacancy/opportunity alerts
E-mail address	Used for contact regarding a specific recruitment application
	or in response to vacancy/opportunity alerts, or to send

	information regarding data protection rights and preferences.
Contact details for	Used for contact regarding a specific application
referees	Osed for contact regarding a specific application
Contents of application	Used to assess suitability for the role applied for, from both
and results of any tests,	the organisation's and individual's perspective. With consent
or outcomes of any	or upon request, the candidate's details may be transferred
conversations or taster	to another vacancy/opportunity if the circumstance arises.
sessions included in the	
recruitment process	
Criminal records	Used to assess suitability for a role, in line with WWT's
information (i.e. Self-	Recruitment of Ex-Offenders policy.
declaration of criminal	
convictions collected at application)	

Application forms for successful applicants are kept on their employment or volunteer file for the length of their service and then according to the WWT Privacy Policy for staff/volunteers and WWT's Data Retention Policy.

# The rights of individuals

## Subject access

Individuals have the right to request at any time the information WWT holds about them, as subject access requests. Such requests should be submitted by contacting WWT's People team at <a href="mailto:recruitment@wwt.org.uk">recruitment@wwt.org.uk</a>

Depending on the nature of the request, WWT may seek a form of identification to verify the identity of the person making it. The information will be supplied within 30 calendar days of the request or the verification, whichever is the latter, in accordance with regulations.

#### Rectification

If individuals believe the information WWT holds about them is incorrect or incomplete, they have the right to ask the organisation to correct it. WWT must respond within one month of the request being received. Requests can be made by contacting WWT's People Team at <a href="mailto:recruitment@wwt.org.uk">recruitment@wwt.org.uk</a>

#### Objection

Individuals have the right to ask WWT to stop processing their personal data. In this situation, WWT can continue to store the data to ensure the request can be respected in the future, but all processing must cease, unless there is a legal purpose. Requests can be made by contacting WWT's People Team at <a href="mailto:recruitment@wwt.org.uk">recruitment@wwt.org.uk</a>

#### **Portability**

Where they have given consent to WWT processing their data, individuals have the right to ask WWT to provide their personal details to another organisation via a commonly used open format such as a CSV file. Requests can be made by contacting WWT's People Team at <a href="mailto:recruitment@wwt.org.uk">recruitment@wwt.org.uk</a>

## Erasure

Individuals have a right to have personal data erased and to prevent processing by WWT in the following circumstances:

 Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed

- When the individual withdraws consent
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed (i.e. otherwise in breach of the GDPR)
- The personal data has to be erased in order to comply with a legal obligation
- The personal data is processed in relation to the offer of services to a child.

WWT can refuse to comply with a request for erasure where the personal data is processed for legal reasons or other scenarios that may be in the public interest as specified by the ICO.

Erasure requests can be made by contacting WWT's People Team at <a href="mailto:recruitment@wwt.org.uk">recruitment@wwt.org.uk</a>

# Querying automated decisions

Individuals can ask WWT not to make automated decisions based on their personal data; can expect to be advised if the organisation may use automated processes to make such decisions; and challenge the results of automated decisions if they believe them to be inaccurate.

Questions and requests regarding automated decisions can be submitted by contacting WWT's People Team at <a href="mailto:recruitment@wwt.org.uk">recruitment@wwt.org.uk</a>

# Data security

WWT ensures that there are appropriate controls in place to protect personal details provided to the organisation.

In full compliance with GDPR, scanned and other digital recruitment records are stored securely on a third party server and, where paper records are retained, in locked cupboards and cabinets in secure offices at WWT, with access limited to designated staff.

Online forms are processed and stored securely, and access limited to designated staff.

#### Cookies

Cookies are small text files stored on computer by the websites individuals visit. They are standard across all websites and help website owners deliver a better experience to their users. Further details about managing cookies on all types of devices can be found here: www.aboutcookies.org.

Please see the WWT Privacy Policy for more detail about cookies used across WWT's website, including recruitment pages.

# Sharing information with others

# **Suppliers**

WWT sometimes uses external companies to process personal data on WWT's behalf, for example to manage the recruitment process. In these circumstances, with reference to GDPR, WWT is the Data Controller and these suppliers are Data Processors.

The security practices of supplier companies are checked before WWT appoints them and then on a regular basis. WWT puts contracts in place that set out the organisation's expectations and requirements, especially regarding how suppliers store and process the personal data provided by WWT.

## Third party marketing

WWT will only use personal information within the organisation for the purposes for which it was obtained, in this case explicitly to manage recruitment applications from candidates.

WWT will not, under any circumstances, share personal data with any third party organisations for their use or sell it to them for their own marketing purposes, and individuals will not receive marketing communications from any other companies, charities or other organisations as a result of providing their details.

## Legal requests

WWT will comply with legal requests where disclosure is required or permitted by law and a written request is received, for example, to government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime.

## Processing within the EU

WWT does not process data outside the EU, unless roles are specifically based outside the EU (most commonly WWT offices in Cambodia and Madagascar).

In the event that duties would require an individual to work for WWT outside the EU at any time, WWT may provide personal information to partner organisations for administrative use only.

Any data processed outside the EU, will be processed in accordance with UK data protection legislation.

# The length of time personal information will be retained

WWT will hold personal information on its systems for as long as it is necessary for it to carry out the relevant activity, and in line with WWT's Data Retention policy for people data. If an individual asks WWT to cease contact, a record of the request will be kept along with the individual's personal details to enable WWT to comply with the request over time, as per WWT's Data Retention Policy.

#### Comments or questions about WWT's Privacy Policy

Any questions about this Privacy Policy should be addressed as follows:

- Write to: Kirsty Iles, Head of People, Wildfowl & Wetlands Trust, Slimbridge, Gloucestershire GL2 7BT
- Email: kirsty.iles@wwt.org.uk
- Phone: 07584 213065

The UK's data protection authority is the Information Commissioner's Office (ICO). The ICO's website is www.ico.org.uk. The organisation can be contacted at: https://ico.org.uk/global/contact-us/.

#### Changes to WWT's Privacy Policy

This Privacy Policy may be updated from time to time.

If changes are made to the Privacy Policy in the future, a prominent notice will be posted on WWT's website, www.wwt.org.uk.

# Version control

Owner: Kirsty Iles, Head of People: Author: Nicola Stanford, Head of Volunteering

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