

## Applicant Privacy Notice

### 1. Introduction

This privacy notice applies job applicants and applicants for work experience with the Anglian Water Group and its subsidiaries. It also applies to job applicants applying for roles that we advertise on behalf of our Alliance Partners, and to Anglian Water jobs advertised by our Alliance Partners. It tells you how we collect, use and disclose your personal data, as well as your rights in respect of your personal data.

Personal data is any information which can identify you, either on its own or when joined with other information we have.

### 2. Who are we?

Anglian Water Group Ltd is the ultimate parent company of Anglian Water Services Ltd, AWG Group Ltd, AWG Property Ltd, Anglian Venture Holdings Ltd, Celtic Anglian Water Ltd, Tide Ltd, AWG Utilities Ltd and Alpheus Environmental Ltd. All these companies (together with other companies that do not employ or contract with people) form the Anglian Water Group.

Anglian Water Services Ltd also trades under the names of AW Direct, Geodesys, Digdat and Hartlepool Water.

Anglian Water Alliance partners consist of Aiimi Ltd, Atos SE, Barhale plc, Balfour Beatty Utility Solutions Ltd, Capgemini SE, Clancy Docwra Ltd, Claret Civil Engineering Ltd, Cognizant Inc, CSC Inc, Danaher and Walsh Group Ltd, Grontmij Ltd, Kier MG Ltd, Morrison Utility Services Ltd, Mott McDonald Bentley Ltd, Public Sewer Services Ltd, Stantec Inc, and Skanska Construction UK Ltd.

You may contact us about our use of your information at:

Data Protection Officer, Legal Services

Anglian Water Group

Lancaster House, Lancaster Way

Ermine Business Park

Huntingdon

PE29 6XU

Or email us at [HRPayroll@anglianwater.co.uk](mailto:HRPayroll@anglianwater.co.uk)

## 3. When do we collect your personal data?

We will collect your personal data from you in a variety of ways, including directly from you and from third party sources, such as employment agencies, employment search engines and jobs boards, e.g. 1<sup>st</sup> Choice Staff Recruitment Ltd, Carrington West Ltd, Indeed, LinkedIn and Utility Jobs. It is always our preference to collect information from you directly as in doing so we can ensure that you are informed about what we are asking for, why and how we will use that information. It also helps us to ensure that it is as up to date and accurate as possible.

We will collect your personal data:

- When you apply for a job or placement within the Anglian Water Group, its subsidiaries and its Alliance partners (both internal and external applications)
- When you register for job vacancy and recruitment updates
- When you contact us via phone, email, online channels or in writing about a job or placement
- When sharing information with third party data controllers and our data processors as part of the recruitment process e.g. recruitment agencies etc.
- When additional personal data is gathered during the selection process (which may include an assessment centre day, video submissions, psychometric/personality or other testing, interview notes etc.)
- When additional personal data is gathered during pre-employment checks (e.g. right to work verification, national insurance number verification, identity checks, criminal records checks, employment and personal reference checks, financial checks, driving licence checks, qualification & professional membership checks, health questionnaire assessment, etc.)
- When you visit one of our sites (for example, signing into the visitor book, the recording of video images by CCTV systems, etc.)
- When any of our partners collect information on our behalf

## 4. What personal data do we collect and use?

The Anglian Water Group will collect and use personal data throughout the recruitment process which may include:

- Your name, address, contact and personal details, including gender, date of birth, national insurance number, passport number (or other identification and right to work information), email address, social media details and content, and telephone number
- Information about your entitlement to work in the UK, including visa status
- Information about your entitlement to drive
- Details of your qualifications, skills, experience and your employment history
- Information about your current level of remuneration and benefits
- Health information, including whether you have a disability for which the organisation needs to make reasonable adjustments\*
- CCTV, video, audio and photographic images
- Personality and preferences assessment information
- Information about you to enable pre-employment checks to be carried out

During the recruitment process we may collect personal data from third parties (including on your behalf):

- Assessment centre process notes and interview notes
- Psychometric test results, and personality and preferences information
- Right to work information and identity checks
- Driving licence information\*\*

- Employment and personal references
- Criminal convictions and offences information\*\*
- Qualifications and professional membership information
- Security and counter terrorism information

If you are an existing employee applying for an internal position, we may reference and use information we already hold about you (see the Employee Data Privacy Notice).

\* denotes special category personal data for which additional measures apply (see section 6 below)

\*\* denotes criminal offence data for which additional measures apply (see section 7 below)

## 5. Why do we need to collect and use your personal data/the legal basis for using your personal data?

The information we ask for in the recruitment process is to assess your suitability for employment or work experience placement, to select the most appropriate candidate for the role and to make employment and placement offers. You do not have to provide the information we ask for, but it might affect your application if you don't.

Our legal bases for processing your personal data in the recruitment process are set out below (see also provision for special category personal data and criminal offences data):

## Consent

As part of our pre-employment process for applicants who have received a conditional job or placement offer, we may ask you for personal information to complete a variety of checks or clearances, such as from the Disclosure & Barring Service (DBS Checks). We can help you with this process and ask you to note that the third-party supplier will provide you with all appropriate privacy information. Typically, the application will be based on consent which includes sharing the results with us.

## Contract

We will need to process your personal data prior to entering into an employment contract with you and to enter into a contract with you, such as:

- To process your application
- To carry out some of our pre-employment checks and obtain references
- To process records relating to your employment history, such as training records
- To arrange payment of your salary and benefits

## Legal Obligation

There are some circumstances where we need to process your data to comply with a legal obligation such as:

- To confirm your legal right to work in the United Kingdom
- To comply with obligations imposed on us by Employment legislation
- To comply with Health & Safety legislation
- To provide information to legal, regulatory and other authorities
- To provide information to auditors
- To respond to you exercising your rights under data protection law

## Legitimate Interest

Some of the personal data that we collect and use is needed to enable us to pursue our legitimate interests, or those of a third party, in a way which might reasonably be expected as part of running our business and which do not materially impact your rights, freedom or interests.

We set out below some examples where the legal basis for collecting and using your personal data during the recruitment process is that it is necessary for a legitimate interest:

- o Managing our Recruitment Process

We will process your information in the general management of our recruitment processes. This includes responding to application and outcome queries from applicants and agencies.

- o Candidate Search & Research

In some circumstances we carry out searches for suitable candidates for our roles, which will include candidate research. This may be conducted by us online via publicly available resources or by third party providers working on our behalf.

- o Analysis

To analyse the effectiveness and efficiency of our recruitment process, for example to ensure that it aligns with our purpose and values and to ensure there is no bias in favour of or against specific groups of people.

- o Security and Providing a Safe Working Environment

We use CCTV systems and controlled access systems to protect our people, our sites and our systems from security threats, including those arising from unauthorised access, and to detect criminal activity.

## **Vital interests**

In emergency situations we may process your personal data, such as to arrange emergency medical assistance for you.

## **6. What special category personal data do we collect and use and what is the legal basis for processing it?**

Different data protection rules apply to the use of information concerning race, ethnic origin, political opinions, religious or other similar beliefs, trade union membership, physical or mental health and sexual life. These are referred to as special category personal data.

Unless we inform you of another legal basis for using this type of personal data, we process special category personal data when you have provided your explicit consent or when doing so is necessary to comply with employment and social security law in so far as it is authorised by United Kingdom legislation providing for appropriate safeguards for the rights and freedoms of individuals. Special category personal data may also be processed where it is necessary for reasons of public interest in the area of public health.

We will only use this information for the following purposes (or such other purposes as are explained to you at the time of collection):

- Physical and mental health data – for assessing fitness for role and any reasonable adjustments to be made.
- Disability data – used to identify and keep under review equality of opportunity within the Anglian Water Group and (anonymously) for statistical and reporting purposes.
- Race/Ethnicity data–used to identify and keep under review equality of opportunity within the Anglian Water Group and (anonymously) for statistical and reporting purposes.

## 7. What criminal offence data do we collect and use and what is the legal basis for processing it?

Different data protection rules apply to criminal offence data, which is criminal convictions and offences information, including unproven criminal allegations, information about penalties and information relating to the absence of convictions such as clear DBS checks. We use criminal offences data to protect our customers, employees, members of the public and the Anglian Water corporate reputation, purpose and values.

All job applicants are asked to provide details of any unspent convictions. This criminal offence data will be reviewed by HR and in some cases the hiring manager.

For some applicants, where there are gaps within a reference history and/or an unspent conviction has been declared, we may ask the applicant to provide a Basic Disclosure and Barring Service check (BDBS).

The results of the BDBS check will remain on your employment record for the duration of your employment with Anglian Water.

For some roles, which have the potential for involving regular, unsupervised access to vulnerable people, we will ask the applicant to disclose all convictions, whether spent or unspent. We will then ask you to provide an Enhanced Disclosure and Barring Service check (EDBS). The results of the EDBS check will remain on your employment record for the duration of your employment with Anglian Water.

For a number of roles with access to sensitive information we may require counter terrorism checks.

We take personal data relating to criminal offences into account when assessing suitability and making job offers.

We process information relating to criminal offences or related security measures only when you have consented to it or otherwise in accordance with the Data Protection Act 2018.

## 8. Who do we share your personal data with?

Generally, you will provide your personal information directly to the Anglian Water Group and we will process that information.

There may be circumstances when we appoint third party suppliers (data processors) to process personal data on our behalf. This may involve the sharing of data between the organisations, however when this takes place we always have a data processing agreement in place and the supplier can only use the personal data in accordance with our instructions. Suppliers must always comply with all applicable data protection laws.

There may also be circumstances when we are required to share your data with other organisations who are data controllers in their own right, e.g. HMRC.

Organisations that may process your personal data on our behalf or that may share your personal data include:

- Other companies within the Anglian Water Group and its subsidiaries
- Alliance partners



- Organisations providing personal / preferences assessments, such as psychometric testing, e.g. eras Ltd and SHL Group Ltd
- Workday, supplier of HR enterprise management cloud-hosted system
- Organisations providing pre-employment checks, such as Sterling and Experian
- Organisations providing criminal offences data, such as the Disclosure & Barring Service
- Organisations providing vehicle licence checks, such as Driver Check
- Occupational health providers, such as Cohort
- Professional Advisers
- Organisations with whom we have a legal obligation to share your data, such as HMRC and DWP
- Recruitment agencies and professional recruitment advisors

## 9. Where will your personal data be processed?

Your personal data will generally be processed within the UK and European Economic Area (EEA).

Sometimes we appoint third party data processors who process personal data outside the UK and EEA, such as in Canada, India or the USA.

When we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the UK and EEA. We will always ensure that adequate safeguards for your personal data are put in place. If you wish for more information about how your data is processed outside the UK and EEA please contact our Data Protection Officer.

## 10. Profiling and Automated Decision Making

We do not use automated decision making in the recruitment process. Filtering of job applications, assessing applicant suitability and decision making are manual processes.

We may use psychometric, personality and behavioural testing in some recruitment campaigns to support the assessment of suitability for the role, however these are always used in conjunction with other assessment

processes. Where such testing takes place, applicants will have access to the results of the assessments.

## 11. How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected, or for as long as we are legally obliged to.

The retention period for unsuccessful applicant data is 7 months\* from the last interaction with the applicant. At the end of 7 months your data is destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your electronic record and retained during your employment. The periods for which your data will be held will be provided to you in the Employee Data Privacy Notice.

\*Psychometric, personality and behavioural testing data is retained for 6 months before being destroyed.

## 12. What are your personal data rights?

You have rights in relation to the personal data that we hold about you. Specifically, you can:

- Ask for a copy of the information, free of charge in most cases
- Ask for information about how we process your data
- Ask us to change it if it's wrong
- In certain circumstances, ask us for the data to be removed from our records
- In some specific circumstances you can ask us to stop processing your data
- In some circumstances, ask for your data to be given to you in a format that you can use to transfer to another organisation.
- Object to certain types of processing of your data, such as direct marketing which you can object to and stop at any time. You can object to processing carried out on legitimate interest grounds, including

profiling and automated decision making, and we will provide you with our reasons for that processing. If you do not agree with those reasons, you can refer the matter to the Information Commissioner's Office.

If we refuse your request under the above rights, we'll tell you why. You have the right to complain as outlined in section 13 below.

All the above requests may, where necessary, be forwarded on to any third party we use or share data with (see section 8 above) in the processing of your personal data.

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

If you want to exercise your rights, please contact us as set out in section 2 above.

## 13. Complaints

If you wish to raise a concern about how your personal data is being collected and used by us, you can contact our Data Protection Officer using the contact information in section 2 above.

You also have the right to make a complaint to the regulator, the Information Commissioner's Office, which can be contacted by writing to The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF, or by telephone on 0303 123 1113, or online at [www.ico.org.uk](http://www.ico.org.uk).

## 14. Your Responsibilities

You are responsible for checking that any personal data that you provide is accurate and up to date.

## 15. Any Questions

We hope this Applicant Privacy Notice has been helpful in setting out the way we handle your personal data and how you can exercise your data protection rights. If you have any questions that haven't been covered, please contact us using the contact information set out in section 2 above.

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## 1. Document Owner and Approval

The Legal Director is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

### Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Claire Russell	14/12/2021