

WWT Privacy Policy – Candidates

Wildfowl and Wetlands Trust (WWT) is committed to protecting candidates' personal information. For the purpose of this policy, candidates are those who have applied for an employed, casual or volunteer position with WWT.

Contents

About WWT	. 2
Why WWT holds and processes candidates' personal data	. 2
The personal information WWT captures and retains	. 2
The rights of individuals	. 3
Subject access	. 3
Rectification	. 3
Objection	. 3
Portability	. 3
Erasure	. 3
Compensation	. 4
Querying automated decisions	. 4
Data security	. 4
Cookies	. 4
Sharing information with others	. 5
Suppliers	. 5
Third party marketing	. 5
Legal requests	. 5
Processing within the EU	. 5
The length of time personal information will be retained	. 5
Comments or questions about WWT's Privacy Policy	. 5
Changes to WWT's Privacy Policy	. 6
/ersion control	. 6

About WWT

WWT Limited 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 candidates' personal data

- To enable WWT to process recruitment applications
- To enter into correspondence with candidates via any offline or online channel regarding any aspect of the recruitment and selection process
- To provide recruitment candidates with information that is directly relevant to their application
- To complete statutory returns

Please note: In the event that a candidate 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.

The personal information WWT captures and retains

WWT captures and stores personal information as follows for recruitment candidates.

Candidates' information is kept for up to one year after application for paid roles, and 3 months for volunteer roles, in line with WWT's Data Retention Policy.

Personal details	Use
Title/full name/full postal address	Only used for contact regarding a specific recruitment application
Phone number (landline and/or mobile)	Only used for contact regarding a specific recruitment application
E-mail address	Only used for contact regarding a specific recruitment application
Contact details for referees	Only used for contact regarding a specific application
Contents of application and results of any tests included in the recruitment process	Used to assess suitability for the role applied for. With consent or upon request, the candidate's details may be transferred to another vacancy if the circumstance arises.
Criminal records information (i.e. Self-declaration of criminal convictions collected at application)	Used to assess suitability for a role, in line with WWT's Recruitment of Ex-Offenders policy.

Application forms for successful candidates are kept on their employment or volunteer file for the length of their service and then according to the WWT Privacy Policy for staff 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 Supporter Services team on 01453 891194 or e-mailing supporter@wwt.org.uk.

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 later.

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 Supporter Services team on 01453 891194 or e-mailing supporter@wwt.org.uk.

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 Supporter Services team on 01453 891194 or e-mailing supporter@wwt.org.uk.

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 Supporter Services team on 01453 891194 or e-mailing supporter@wwt.org.uk.

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 Supporter Services team on 01453 891194 or e-mailing supporter@wwt.org.uk.

Compensation

If individuals believe they have suffered damage because WWT has behaved in breach of Data Protection law, they are entitled to claim compensation.

This right can only be enforced through the courts.

The law allows WWT to defend a claim for compensation on the basis that the organisation took all reasonable care in the circumstances to avoid the breach, that is, by complying with Data Protection legislation when processing data.

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 Supporter Services team on 01453 891194 or e-mailing supporter@wwt.org.uk.

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.

The cookies WWT uses on the recruitment pages of its website are as follows:

HBR_SITE_SESSID - a temporary cookie that keeps you logged into your site profile(s) within the careers section and Applicant Tracking facility.

media_source_incoming - a 30-day cookie that tracks the original source of your application with our Applicant Tracking facility.

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.

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

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: Sheila Wilcox, Head of People, Wildfowl & Wetlands Trust, Slimbridge, Gloucestershire GL2 7BT

Email: sheila.wilcox@wwt.org.uk

Phone: 01453 891211

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: www.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: Sheila Wilcox, Head of People

Author. Nicola Stanford, Head of Volunteering

Version: 1

Date: July 2018

Review due: July 2019