



RECRUITMENT PROCESS CANDIDATE PRIVACY NOTICE (INTERNAL AND EXTERNAL VACANCIES)

REASON FOR NOTICE

This privacy notice describes how Scottish Water collects and processes Personal Data - meaning any information relating to an identifiable person ("Personal Data") – about recruitment candidates.

We are a public corporation created by the Water Industry (Scotland) Act (2002), which provides water and wastewater services in Scotland. There are a number of other trading companies that form part of Scottish Water's group of companies.

This notice applies to Personal Data we process when you register a candidate profile with us, either to make an application for an existing internal or external vacancy, or so you can be notified of future vacancies.

We collect and use Personal Data across the areas outlined within this document. Some Personal Data will only apply to you if you participate in certain activities, such as video interviews which will only be applicable to some vacancies and may not apply to you.

We also receive and share Personal Data with third parties in order to perform our necessary functions, as outlined in this document, or where required to by law.

This notice demonstrates our commitment to being transparent about how and why we collect and use your Personal Data and your rights in relation to it.

WHEN WE COLLECT YOUR PERSONAL DATA

We collect Personal Data about you during the recruitment process in a number of ways:

- When you register your candidate profile to make an application for an existing vacancy, you will be asked to create an account in our online recruitment system (Workday)
- If you make an application for a vacancy, you may also be invited to complete online skills assessments, video and telephone interviews, face-to-face interviews and behavioural or psychometric assessments. The assessment steps for each vacancy vary so not all the processes set out here will apply to you.
- If you have made an application for a vacancy, we will use the personal data that we collect from you to help us decide if you are a suitable applicant for the position for which you have applied.
- We will also use your personal data to create anonymous recruitment statistics, from which you cannot be identified.

WHAT TYPES OF PERSONAL DATA WE HOLD

Here are some examples of the type of information we may process about you.

Application stage

- Personal details e.g. name, home address and contact details
- Your education level, training, qualifications and professional memberships as applicable
- Your nationality/visa status and eligibility to work in the UK
- Your CV, work history/job data, previous employers, current salary, etc. (not mandatory)
- If you are a current SW employee (as appropriate)



Shortlisting and Assessment

- Assessment results e.g. shortlisting outcome, interview performance, online ability testing, video interview.
- If you are eligible and a claim for expenses has been pre-approved for attending any recruitment assessment (e.g. travel expenses) by the recruitment team or recruiting manager, we ask for you to provide your bank details on a hardcopy claim form with receipts. This is to enable reimbursement via a one-off payment by bank transfer by our Accounts Payable team.

Offer Stage

- If you are conditionally offered a contract, SW will request you to undertake our pre-employment screening process plus any additional checks as stated in the recruitment advert (e.g. security vetting or driving licence checks as appropriate for the role). Employment cannot commence until all pre-employment screening checks have been satisfactorily completed.

During the recruitment process we also request you to provide some sensitive personal data about you:

- Diversity and Inclusion data e.g. age band, gender, ethnicity, sexual orientation and you choose whether to provide it. This data is used anonymously for statistical purposes only and is not shared with the recruiting manager.
- You can choose whether to declare if you have a disability and, if so, whether you need any adjustments to be made to the recruiting process to enable you to fully participate. This information can be accessed by the SW recruitment team and the recruiting manager in order to make reasonable adjustments for you.

WHY WE NEED YOUR DATA –

Scottish Water needs to process data to enter into an employment contract with you and to meet its obligations. For example, it needs to process your data to assess whether you are suitable for the role you have applied for.

In some cases, Scottish Water needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK.

Some special categories of personal data, such as information about a person's disability, is processed to carry out employment law obligations (such as the obligation to make reasonable adjustments to the recruitment process to enable individuals with a disability to fully participate in any process).

Where the organisation processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of diversity and inclusion monitoring with regards to the Equality Act 2010 and associated Scottish Government policy. Data that the organisation uses for these purposes is anonymised and is collected voluntarily.

Processing employee data allows the organisation to:

- manage our recruitment lifecycles and assess suitability when you apply for a job with us;
- enable analysis about our business, such as candidate demographics;
- interact with our people in order to handle any requests or issues.

WHO CAN ACCESS IT –

- We ensure all access to Personal Data within our systems is restricted to the appropriate people where relevant to their job e.g. SW Recruitment team and recruiting manager;
- Controlled access is in place for all relevant staff within our People Directorate who work with Personal Data day to day e.g. Reporting team for diversity statistics;

- Our Internal Audit function has unrestricted access to all Personal Data where appropriate, such as during a fraud investigation;
- Privileged access to Personal Data is enabled for approved staff where they are required to provide systems administration, data management, analytics, security or access management;
- Robust privileged access controls are in place and verified on a regular basis;
- Unstructured digital files, such as documents or spreadsheets, that contain personal or sensitive Personal Data are saved in secure storage and only accessible to people with approved access;
- Recruiting managers are directed to retain relevant physical documents e.g. interview notes, within locked cabinets and access only provided where it is necessary;
- Physical documentation archived into our corporate storage facility is secured and accessible only by approved staff;
- Internal email is password controlled and best practice is actively encouraged to ensure any attached Personal Data is password protected;
- Personal Data sent out with Scottish Water by email has attachments secured.

HOW WE PROCESS PERSONAL DATA

- We include this Personal Data in physical documents such as interview notes;
- We digitally capture your Personal Data and process it in our systems e.g. online application form and CV;
- We use your Personal Data digitally through email and communication tools;
- Verbally when we are interacting with you;
- Through audio when you call our Customer Engagement Centre;
- We may hold images of you e.g. video interviews.

WHO WE SHARE YOUR DATA WITH –

Scottish Water will need to share certain personal data, as appropriate, internally and may require to share some of your personal data, as appropriate, with external third parties. Your information will only be shared if it is necessary or required (for example in order to carry out short-listing or pre-employment screening).

The recruitment process involves assessing your application, suitability for the role (skills, strengths, behaviours) and processing to complete the on-boarding and screening process should your application be successful.

To enable these processes your personal information may be shared internally, but the information shared is limited to what is required by each individual to perform their role in the recruitment process.

Your personal information may be shared internally with the following people:

- Those employees who would have managerial responsibility for you or are acting on their behalf (the “recruiting manager”)
- Employees in the People Directorate administration and recruitment teams within People Connect who have responsibility for relevant HR processes
- System Administrators from within SW or within our third party support providers can access your information
- Employees in Accounts Payable if you have pre-approval and are eligible to be reimbursed for expenses incurred as a result of the recruitment process (as appropriate)

Scottish Water may also need to share your information with external third parties including:

- Companies who provide the software we use to manage our recruitment process
- Third parties who provide candidate interview and assessment services to SW;
 - Shortlisting process – eg. Eden Scott for Graduates
 - Online ability testing – Taleo or YSC
- Third parties who undertake background screening on behalf of SW. These checks are only performed on candidates who are offered a role.



- Health screening - Duradiamond
- Right to work/Reference and Disclosure checks - Security Watchdog
- National Security Vetting – UKSV (UK Government body)
- Driving licence checks - DriverCheck
- The Scottish Government receives anonymised diversity data as part of our statutory obligations under the Public Sector Equality Duty

We aim to ensure that all third parties have appropriate data protection safeguards in place.

HOW LONG DO WE KEEP HOLD OF YOUR DATA –

- We aim to retain Personal Data only for as long as we need it for the purpose it was provided;
- We aim to retain Personal Data for unsuccessful candidates for no longer than one year and will request your explicit consent if we wish to retain your data for longer;
- We may retain certain Personal Data for longer periods, if required e.g. pension details, health and safety;
- We operate a standard retention schedule for our physical records storage facility, which is available on request;
- We and the government sponsored, national security clearance provider retains Personal Data in line with MOD guidelines.

You can request to remove your candidate profile and personal data held on our recruitment system at any point by emailing corporatedatacompliance@scottishwater.co.uk

For successful candidates, when an offer is made, we transfer your contact and diversity personal data from our recruitment system into your permanent employment record within our HR system as part of the onboarding process.

TRANSFERS OF PERSONAL DATA OUTSIDE OF THE UK

Where we transfer Personal Data to third parties to enable them to process it on our behalf we ensure that the providers meet the relevant legal requirements under current UK data protection legislation for transferring data to them and keeping it secure.

We aim to never share your Personal Data with any third party that is not within the European Economic Area (EEA) but where we do we ensure that the agreements contain robust contractual clauses to protect the data. We do have individuals who are out with the EEA who can access our systems that contain Personal Data. This access is only approved for the purposes of system maintenance and support.

We host our Personal Data within Scottish Water data centres or out with Scottish Water on other UK or EEA data centres. We have robust contractual arrangements with third parties addressing data protection.



CHANGES

From time to time, we may amend this notice to reflect changes in our business, changes in the law, or to make it easier to find, or for other reasons. We will do this by posting the amended notice on our intranet or external website. Please check to ensure you are aware of the latest version.

YOUR RIGHTS

Individuals to whom data relates are called “data subjects” and have rights, which includes:

- to request from us a copy of any Personal Data we hold about you;
- to fix Personal Data that is not accurate; and
- to remove Personal Data in certain circumstances, where this does not breach any legal, regulatory, safety, security or core operational requirement.

We aim to meet all data subject rights requests within a 30 day period and we will not charge you for this.

You have the right to make a formal complaint to the Information Commissioner’s Office (ICO). The ICO is the UK data privacy regulator, you can find out more information on your rights on their web page <https://ico.org.uk/your-data-matters/>

CONTACT US REGARDING YOUR DATA

- Email us: corporatedatacompliance@scottishwater.co.uk
- Write to us: Head of Corporate Data & Compliance, Scottish Water, The Bridge, 6 Buchanan Gate, Stepps, GLASGOW, G33 6FB.
- If you have an informal complaint, write to: Data Protection Officer, Scottish Water, The Bridge, 6 Buchanan Gate, Stepps, GLASGOW, G33 6FB or email DPO@scottishwater.co.uk