



Recruitment Privacy Notice



Who are we?

Cantium Business Solutions (Cantium) are a Local Authority Trading Company owned by Kent County Council via Kent HoldCo. Ltd. Cantium delivers a range of IT and related services to organisations including local authorities / public bodies, schools, academies and other educational settings and private companies. We aim to maintain the highest possible standards and seek to adopt best practice with regards to the way in which we manage and process data in the course of our business.

Cantium collects, uses and processes personal information about you. When we do so we adhere to the UK General Data Protection Regulation (GDPR), which was incorporated into UK law following Brexit, and which is supported by the Data Protection Act 2018 (DPA 2018). We are responsible as 'controller' of that personal information for the purposes of those laws.

Should you have any questions about this privacy notice please contact our Data Protection Officer at DPO@csltd.org.uk

About the information we collect, use and retain

The table set out below summarises the information we collect and retain for each stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

1 Abbey Wood Road, Kings Hill, West Malling, England, ME19 4YT
t: 03000 411115 e: info@cantium.solutions

We are Cantium Business Solutions Ltd, registered in England & Wales at 1 Abbey Wood Road, Kings Hill, West Malling, England, ME19 4YT. Company No. 11242115. VAT No. 294 5402 88.

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Up to and including the shortlisting stage

Information we collect	How we collect the information	Why we collect the information	How we use and share the information
Your name, email address and job preferences	From you	For the performance of a contract or in order to take steps at your request prior to entering into a contract: to enable you to sign up to and receive job alerts	To enable us to notify you of job opportunities in line with your job preferences Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium
Your name and contact details (ie address, home & mobile phone numbers, email address)	From you	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to progress your application, arrange interviews and	To enable the Recruitment Team or the recruiting manager to contact you to progress your application, arrange interviews and inform you of the outcome and issue any other

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		inform you of the outcome at all stages	<p>correspondence required</p> <p>To inform the recruiting manager of your application</p> <p>Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium</p>
Your reason for application / CV and covering letter, details of your qualifications, experience, employment history (including job titles, salary, working hours) and interests	From you, in your completed application form and interview notes if relevant	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit</p>	<p>To make an informed recruitment decision</p> <p>Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium</p>

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<p>Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs</p>	<p>From you, in a completed, anonymised equal opportunities monitoring form</p>	<p>To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity and fair treatment)</p>	<p>To comply with our equal opportunities monitoring obligations and to follow our equality and other policies</p> <p>For further information, see below*</p> <p>Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium</p>
<p>Declaration of disability</p>	<p>From you in your completed application form</p>	<p>To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity and fair treatment)</p>	<p>To comply with our equal opportunities monitoring obligations and to follow our equality and other policies</p> <p>To carry out a fair recruitment</p>

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		Legitimate interest: to carry out a fair recruitment process	process including provision of reasonable adjustments at interview if required Shared with recruiting managers For further information see below* Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium
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Following acceptance of employment

Information we collect	How we collect the information	Why we collect the information	How we use and share the information
Your information regarding your criminal record	From you, in your pre-employment tasks	To comply with our legal obligations and for reasons of substantial public interest (preventing or detecting unlawful acts, protecting the public against dishonesty)	<p>To make an informed recruitment decision</p> <p>To carry out statutory checks</p> <p>Information shared with the DBS and other regulatory authorities as required</p> <p>For further information see below*</p> <p>Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium</p>
Details of your referees	From you, in your	Legitimate interest: to carry out a fair recruitment process	To carry out a fair recruitment process

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	pre-employment tasks	For positions in the regulated sector, to comply with our legal obligations to obtain regulatory references	<p>To comply with legal/regulatory obligations</p> <p>Information shared with relevant managers, HR personnel</p> <p>Information shared with the referee(s) via EmploymentCheck (provided by Commercial Services Kent Ltd.) in order to request references</p> <p>Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium</p>
Financial information including Bank Details, Tax Information, Student Loan Status and NI number	From you, in your pre-employment tasks	<p>To enter into/perform the employment contract</p> <p>To comply with our legal obligations</p>	To set up your payroll record, enrol you in the appropriate pension scheme and issue a contract of employment

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			<p>Information shared with HMRC, Student Loans Company</p> <p>Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium</p>
<p>Photograph to be supplied for Cantium ID card (Building access for first day of employment)</p>	<p>From you, in your pre-employment tasks</p>	<p>To perform the employment contract</p> <p>To comply with Health and Safety Regulations</p> <p>Legitimate interests (security): to monitor and manage staff access to our premises, systems and facilities</p>	<p>To ensure secure entry to the building(s) necessary to perform your role</p> <p>To record when you are in a specific area for health and safety (including fire) purposes</p> <p>Information shared with HR, IT and security personnel</p> <p>Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium</p>

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Before making a final decision to recruit

Information we collect	How we collect the information	Why we collect the information	How we use and share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers and/or personal referees **	From your referees (details of whom you will have provided on your completed application form)	<p>Legitimate interest: to make an informed decision to recruit</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To obtain the relevant reference about you</p> <p>To comply with legal/regulatory obligations</p> <p>Information shared with relevant managers and HR personnel</p> <p>Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium</p>
Information regarding your academic (and professional) qualifications **	From you, from your education provider (from the relevant professional body)	Legitimate interest: to verify the qualifications information provided by you	To make an informed recruitment decision

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			<p>Information shared with relevant managers and HR personnel</p> <p>Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium</p>
Information regarding your personal reference **	From you, from the personal referee (details of whom you will have provided on your completed application form)	Legitimate interest: to make an informed decision to recruit	<p>To make an informed recruitment decision</p> <p>Information shared with relevant managers and HR personnel</p> <p>Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium</p>
Information regarding your professional registrations**	From you, from the registration body	To comply with our legal obligations	To make an informed recruitment decision

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		<p>Legitimate interest: to verify the professional registration information provided by you</p>	<p>To carry out statutory checks</p> <p>Information shared with registration bodies as required</p> <p>Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium</p>
<p>Information regarding your criminal record, in criminal records disclosure certificates and enhanced criminal records disclosure certificates</p> <p>**</p>	<p>From you and from the Disclosure and Barring Service (DBS)</p>	<p>To perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interest: to verify the criminal records information provided by you</p> <p>For reasons of substantial public</p>	<p>To make an informed recruitment decision</p> <p>To carry out statutory checks</p> <p>Information shared with DBS and other regulatory authorities as required</p>

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		interest (preventing or detecting unlawful acts) and protecting the public against dishonesty	For further information see below* Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium
Your nationality and immigration status and information from related documents such as your passport or other identification and immigration information **	From you	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium
A copy of your driving licence **	From you if you are appointed to a driving position	To enter into/perform the employment contract	To make an informed recruitment decision

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		<p>To comply with our legal obligations</p> <p>To comply with the terms of our insurance</p>	<p>To ensure that you hold a clean driving licence</p> <p>Information may be shared with our insurer</p> <p>Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium</p>
Information regarding your occupational health clearance**	From Staff Care Services	<p>Legitimate interest: to make an informed decision to recruit</p> <p>To comply with our legal obligations</p> <p>For occupational health assessment purposes</p>	<p>To make an informed recruitment decision</p> <p>Information shared with relevant managers and HR personnel</p> <p>Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium</p>

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Upon Commencement of employment with Cantium

Information we collect	How we collect the information	Why we collect the information	How we use and share the information
Your emergency Contact details including Phone Numbers and addresses.	From you	<p>To enter into/ perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interest: to maintain good employment records and good employment practice</p>	<p>To ensure that we hold contact details in the event of an emergency</p> <p>Information shared with relevant managers and HR personnel</p> <p>Information shared with Commercial Services Kent Ltd. for provision of HR services on behalf of Cantium</p>

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**We will comply with the additional conditions set out in the DPA 2018 and GDPR which relate to criminal convictions and other special categories of personal data (sensitive personal information). Further details on how we handle sensitive personal information (and information relating to criminal convictions and offences) are set out in our Data Protection Policy and Disclosure and Barring Service (DBS) Policy.*

***You are required by law or in order to enter into your contract of employment to provide the categories of information marked ** above to enable us to verify your right to work and suitability for the position*

It is a legitimate interest of the recruiting employer to follow recruitment best practice, to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice - but only if these are not overridden by your interests, rights or freedoms. This means we will not use your data in any way that you would not reasonably expect.

As we have a statutory and contractual basis for collecting your personal data if you do not provide the following, when asked, we may be unable to progress your job application or employ you.

- Personal Data: Title, Name(s), Address, Contact Details, Date of Birth, NI Number, Employment History, Qualifications/Memberships/Professional Registrations, Referee Details, Driving Licence Details, Bank Details, Tax Information, Student Loan Status, ID documents
- Personal Sensitive Data: Any Convictions, Cautions, Reprimands or Warnings, Nationality and Immigration Status, Occupational Health Information

We may share your personal data and sensitive personal data with other departments within Cantium Business Solutions Ltd as required for the purpose of your application and employment.

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We will share personal information with law enforcement or other authorities if required by applicable law.

We will share personal information with our professional advisers and use your information if it is necessary for the purposes of bringing or defending legal proceedings.

How we use your information to make automated decisions

An automated decision is where an electronic system makes a decision using personal information without human intervention (e.g. monitoring your online activities and emails or events which trigger actions such as your sickness absence triggering our capability policy). This helps us to make sure our decisions are quick, fair, efficient and correct, based on what we know. These automated decisions can affect the services we may offer you now or in the future.

Automated decision making is allowed in the following circumstances:

1. Where we have notified you of the decision and given you 21 days to request a reconsideration
2. Where it is necessary to fulfil our contractual obligations and requirements and appropriate measures are in place to safeguard your rights.
3. In limited circumstances, with your explicit consent and where appropriate measures are in place to safeguard your rights.

If an automated decision is made, based on any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must put in place appropriate measures to safeguard your rights.

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How long your personal data will be retained

We will retain your personal information for no longer than the statutory period in which a claim arising from the recruitment process may be brought unless there is a clear business or legal reason for exceeding this period. Upon expiry, any personal data which we are not legally obliged to retain, will be securely destroyed.

If your application is successful, we will keep the information that is necessary in relation to your employment. Further information can be found in our employee privacy notice.

When we will share your information

Other than as stated in the table above, we will share personal information with law enforcement or other authorities if required by applicable law.

We will share your personal information with our professional advisers if required for the purposes of establishing, exercising or defending legal proceedings.

We will also share your personal information with internal departments or external third parties where it is necessary to administer our contractual relationship with you or where we have another legitimate interest in doing so (providing this is not overridden by your interests). Details of third party providers for specific services may be provided on request.

Customer information may be shared within the Kent HoldCo. Ltd. Group (Commercial Services Group) under a Data Sharing Agreement. The Agreement reflects the requirements of the UK GDPR and DPA 2018. Where a customer organisation purchases multiple services from within the Group the following information may be shared where this is required to deliver the services: title, name, email address / contact details, employee number, job title, products/services consumed. For further details, see <https://www.hrconnect.org.uk/privacy>

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Our third-party service providers, with whom data may be shared (as required) to enable the delivery of this service, include:

- [Commercial Services Kent Ltd.](#) (HR services)
- [TribePad](#) (Recruitment platform)
- [Teamtailor](#) (Recruitment platform)
- [UK Fast.Net Ltd](#) (EmploymentCheck system hosting)

Where information may be retained

Information may be retained at our offices and those of our service providers, representatives and agents as described above.

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details see https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection as in Europe. For further details, see <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/international-transfers/>

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the European Economic Area (EEA).

Reliance on UK exemptions from the GDPR

We may use information in reliance on the exemptions under the GDPR where allowed e.g. where a claim to legal professional privilege would apply, in relation to the provision of confidential references or for the purposes of management forecasting (to the extent that such forecasting would be prejudiced by advance notification).

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Your Rights

Under the GDPR you have a number of rights which you can access free of charge which allow you to:

- Know what we are doing with your information and why we are doing it
- Ask to see what information we hold about you
- Ask us to correct any mistakes in the information we hold about you
- Object to direct marketing
- Make a complaint to the Information Commissioners Office

Depending on our reason for using your information you may also be entitled to:

- Ask us to delete information we hold about you
- Have your information transferred electronically to yourself or to another organisation
- Object to decisions being made that significantly affect you
- Object to how we are using your information
- Stop us using your information in certain ways

We will always seek to comply with your request however we may be required to hold or use your information to comply with legal duties. Please note: your request may delay or prevent us delivering a service to you.

For further information about your rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioners Office (ICO) on individuals' rights under the General Data Protection Regulation: <https://ico.org.uk/>

If you would like to exercise a right, please contact DPO@csLtd.org.uk or write to Data Protection Officer, Cantium Business Solutions, 1 Abbey Wood Road, Kings Hill, West Malling, England, ME19 4YT.

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Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Who to Contact

Please contact DPO@csltd.org.uk to exercise any of your rights, or if you have a complaint about why your information has been collected, how it has been used or how long we have kept it for.

You can contact our Data Protection Officer DPO@csltd.org.uk or by writing to Data Protection Officer, Cantium Business Solutions, 1 Abbey Wood Road, Kings Hill, West Malling, England, ME19 4YT.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/> concerns or telephone 03031 231113.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

This document was last reviewed in February 2023.

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