

September 2020

**Privacy Statement: Current, former and prospective employees**

Unless otherwise stated, Unity Trust Bank is the data controller for the information you provide during the recruitment process and any subsequent period of employment. If you have any queries about the process or how we handle your information, please contact us at [hr@unity.co.uk](mailto:hr@unity.co.uk).

**1. What will we do with the information you provide to us?**

The information you provide during the recruitment process will be used for progressing your application and if successful in appointment, to enable the bank to fulfill the performance of the contract of employment or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes, or store any of your information outside of the European Economic Area. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

**2. What information do we ask for, and why?**

We will only process your personal information for the purpose for which we collect it and we will not retain it for longer than necessary.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for, but it might affect your application if you don't.

If we need to use your information for an unrelated purpose, we will contact you and we will explain the legal basis that allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with our obligations in the case of criminal investigation.

**Application stage**

If you are applying directly to the bank or via a third party, we will receive a copy of your CV as part of the recruitment process. This will be stored within the Unity HR system (Unity You) whilst the recruitment process is ongoing.

**Shortlisting**

HR and hiring managers shortlist CVs for interview. If you apply via a third party, the CV will be received and processed as per your agreement with them.

**Assessments**

We might ask you to complete tests or occupational personality profile questionnaires; and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test, or we might take interview notes. This information will be held by Unity Trust Bank. On occasion you may also be required to take a test which involves an outsourced supplier, Eras. If this is the case your name and personal email will be provided to enable this process to happen and the output stored by Unity Trust Bank and Quest. A link to Eras privacy statement is below:

<https://www.eras.co.uk/privacy-policy>

If you are unsuccessful following assessment for the position you have applied for, we will hold your details for a further six months before deletion.

### **Offer - conditional**

If we make a conditional offer of employment, we will ask you for information so that we can carry out pre-employment checks either directly to us or to Experian who carry out our background screening checks. The information required will include contact details, previous employment experience and employment gaps, education, referees and for answers to questions relevant to the role you have applied for. Only our HR team will have access to this information. Sometimes we outsource this activity (e.g. to Experian) and you may be asked to provide your details to them for background checks.

All pre-employment checks must be passed successfully, or we may withdraw the offer or terminate your employment. We are required to confirm the identity of our staff, their right to work in the United Kingdom and to seek assurance as to their trustworthiness, integrity and reliability. *Please note: if you join the bank in a Senior Manager or Certification role, there are several checks which will be repeated during your service with the bank, these are marked below with - \**

To support the background screening, you will be required to provide:

- Proof of your identity and confirmation of right to work in the UK – you will be asked to attend our office with original documents in advance of your start date, we will take copies. *Due to Covid-19, these documents will be viewed via video conference*
- Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies\* *Due to Covid-19, these documents will be viewed via video conference*
- You will be asked to complete a declaration disclosing issues relating to your financial solvency and adverse credit history, court judgments, previous directorships and company filing history. You will also be asked to declare any unspent criminal convictions\*
- Unity Trust Bank uses Experian to complete background screening on individuals. Unity will register your personal details including name, address, personal email. Experian will then carry out:
  - Basic or Standard Criminal Record check via the Disclosure and Barring Service which will verify your declaration of unspent convictions (and spent convictions where a standard check is required).
  - References using the details you provide to Experian. Regulatory references will be sought where your role is subject to the Senior Manager Regime or Certification\*
  - *Experian will also carry out credit and fraud checks using a data processor\* (see Annex 1 for more information on how we work with Cifas) or you can refer to: <https://www.cifas.org.uk/fpn>*
- We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work. This is done through a data processor (please see below).
- Results of these checks from Experian will be seen by the HR team only and retained on your individual file during your employment and for six years after you leave our employment. If the offer is subsequently withdrawn after these checks have been completed, the data will remain on file for 6 months.

*\*Please note, these checks will be repeated on an annual basis to ensure compliance with Senior Manager and Certification Regime guidance. The data collected will be held and stored for the duration of your employment with the bank and six years after your employment has ended.*

### **3. How do we make decisions about recruitment?**

Final recruitment decisions are made by hiring managers and members of our HR team. All information gathered during the application process is considered. Testing is marked manually by the HR team.

If you want further information on the decision taken, you can speak to your contact within our HR team or email [hr@unity.co.uk](mailto:hr@unity.co.uk)

#### **4. What data is collected after I have started with Unity Trust Bank?**

Once you have started with us, we will also ask for some further information from you:

- Bank details – to process salary and expenses payments
- Emergency contact details – so we know who to contact in case you have an emergency at work
- You will also be asked to provide equal opportunities information during the recruitment process or upon your start date with us. This is not mandatory information – if you don't provide it, it will not affect your application or employment with us. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

#### **5. Use of other data processors and data controllers**

During your employment, there may be other occasions when we are collecting or using data to fulfil the performance of the contract and associated benefits either directly within the Bank or via a data processor.

Data processors are third parties who provide elements of our recruitment and other human resource management services relevant to your employment. We have contracts in place with our data processors and only use processors who provide enough guarantees to implement appropriate technical and organisational measures which ensure that processing will meet the requirements of the General Data Protection Regulation and protect your rights as a data subject. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

Data Controllers are third parties to whom we may supply your data to enable them to run a process on our behalf. This can include if you wish to use a staff loan to purchase an annual railway season ticket. For the purposes of these processes, your data may be controlled by a third party not the Bank and you should seek to read the privacy statements of these individual companies where they are identified as the data controller.

#### **Recruitment/Search Agencies**

If you apply via a recruitment agency, they will be the Data Controller for the documents you provide to them and they subsequently forward to us e.g. CV. Please contact the relevant agency and ask to see their privacy notice if you require more information.

#### **Unity You (HR system provided by CiPHR)**

If you accept a final offer from us, your personal details will be held on UnityYou (CiPHR Limited) which is a (UK) cloud based human resources records and software solution for the duration of your employment and six years after your employment ends.

Here is a link to their Privacy Notice.

<https://www.ciphr.com/privacy-notice/>

#### **Blackmountain HR Ltd**

If you are employed by Unity Trust Bank, relevant details about you will be provided to Blackmountain HR Ltd who provide payroll services to Unity Trust Bank. This will include your name, bank details, address, date of birth, hours of work, National Insurance Number and salary.

Here is a link to their Privacy Notice: <https://www.blackmountainglobal.com/our-privacy-notice/>

## **Experian**

Unity uses Experian Background Screening to carry out full screening of new joiners to the bank. Details of what this includes can be found on page 2 of this privacy statement under 'Offer-conditional'. Unity supply data to register you with Experian who then process the data.

<https://www.experian.co.uk/legal/privacy-statement>

## **Unity DC Scheme – Legal & General**

Likewise, your details will be provided to Legal and General who are the administrators of the Unity DC Scheme which is the Pension scheme which Unity Trust Bank participates in. You will be auto-enrolled into the pension scheme and the details provided to Legal and General will be your name, date of birth, address, gender, National Insurance number and salary. On an annual basis, name, date of birth, address and gender of all staff will be reconfirmed to the pension provider to establish accurate pension records and ensure auto enrollment is compliant with regulation.

Here is a link to their Privacy Notice <https://www.legalandgeneral.com/privacy-policy/>

## **Wellbeing Health Benefits**

BHSF provide our Occupational Health service. If we make you an offer, we will ask that you complete a questionnaire which will help to determine if you are fit to undertake the work that you have been offered, or advise us if any adjustments are needed to the work environment or systems so that you may work effectively.

We will send you a link to the questionnaire which will take you to BHSF's website. The information you provide will be held by BHSF who will provide us with a fit to work certificate or a report with recommendations. You can ask to see the report before it is sent to us.

If we need further information either at recruitment stage or during your employment and an occupational health assessment is required, this will also be carried out by BHSF.

BHSF also supply us with a health cash plan. The bank covers a minimum level for all staff within the bank if they wish to join. If you do choose to sign up to the cash plan, you will provide the data directly to BHSF and they will be the data controller.

Here is a link to their Privacy Notice.

<https://www.bhsf.co.uk/privacynotice>

## **Other Wellbeing Benefits providers: Nuffield Healthcare, AXA Healthcare**

Unity offers flexible wellbeing benefits. Once you have passed probation, you can choose which benefit you would like to join. As a result, you will be registered with Nuffield or AXA and Unity will provide personal details to enable this. In registering for BHSF you provide the data to BHSF directly, so they remain the data controller link to privacy statement above.

<https://www.nuffieldhealth.com/privacy>

<https://www.axa.co.uk/privacy-policy/>

### **Perkbox**

Perkbox supply Unity Trust Bank with an online rewards platform which all employees are registered with from their start date. We will supply Perkbox with your full name and unity email address. If you do not wish to be part of this service, please let the HR team know.

Here is a link to their Privacy Notice.

<https://www.perkbox.com/uk/privacy>

### **Skillserve (provided by Unicorn Training)**

To ensure you can complete all mandatory training, we will also supply our online training provider, Skillserve provided by Unicorn Training with your first name, surname and unity email address.

Here is a link to their Privacy Notice.

<https://www.unicorntraining.com/privacy-and-cookie-policy>

### **Transport for West Midlands (TFWM)**

If you choose to purchase a railway pass via staff loan, TFWM will be the data controller. The privacy notice can be located on their website:

<https://www.wmca.org.uk/policies/>

## **6. Other Data Processors**

On occasion the bank may also carry out surveys (such as staff engagement surveys) using external providers. The bank may provide unity email addresses to suppliers to enable them to facilitate these surveys with impartiality.

## **7. Your right to withdraw consent**

You have the right to withdraw your consent to the collection, processing and transfer of your personal information for specific processing at any time., Once we have received notification that you have withdrawn your consent, we will no longer process your information unless we have another legitimate basis to do so in law and/or it is required for the necessary performance of the contract. This will not affect the lawfulness of processing based on consent before its withdrawal.

## **8. How long do we keep your information for?**

If you are successful in joining the bank, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment, plus 7 years following the end of your employment. This includes your criminal records declaration, credit, fraud, fitness to work, qualifications and references.

If you are unsuccessful at any stage of the process, the information you have provided via the candidate portal and up until that point will be retained for 6 months from the closure of the campaign.

## **9. What are your rights?**

At Unity Trust Bank we recognise that your data is important to you and therefore we are committed to supporting you with your data protection rights.

These include:

- (where we rely on your consent to process your personal information) the right to withdraw consent to the processing of your personal information,
- the right to request access to your personal information (a “data subject access request”);
- to correct any mistakes on our records;
- to erase or restrict your personal information where it is no longer needed for the purpose for which they were obtained or used;
- the right to object to our use of your personal information based on legitimate business interests, including for profiling and marketing; and
- the right, in certain circumstances, to receive a machine-readable copy of, the personal information you provided to us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We will handle any request to exercise your rights in accordance with applicable law.

If you wish to exercise any of these rights, please write to us at: [hr@unity.co.uk](mailto:hr@unity.co.uk) or

PO BOX 7207 – HR only  
Planetary Road  
Willenhall  
WV1 9DN

Please ensure you include the subject line ‘Personal information request’ and supply the following details:

- First name(s) & surname
- Address & postcode
- Details of the type of information you are seeking
- Proof of Identity – this needs to be a document containing a photograph and signature such as a driving license.

In your request, please make clear what right you would like to exercise. Providing us with this information will help us to quickly identify and deal with your request.

Please also specify the format you require the information in and be specific about the data you would like to see or have altered/deleted. If this is unclear, we will contact you to discuss your request.

#### **10. What should you do if you wish to make a complaint or raise a query about the way your data is being processed?**

Unity Trust Bank aims to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If you wish to make a complaint about the way we have processed your personal information, you can contact the Data Protection Manager at Unity Trust Bank providing details of your complaint and your full name and contact details. If you are unhappy with the response received or wish to seek further

guidance, you can also raise your concerns with the statutory body which oversees data protection law, Information Commissioners Office – [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns).

#### **11. Changes to our Privacy Statement**

We regularly review our Privacy Statement and will publish any updates on our webpage. This Privacy Statement was last updated on the date as set out at the top of this Privacy Statement.

#### **12. Contacting us?**

If you have any questions, or feedback about this Privacy Statement, please get in touch with our Data Protection Manager:

Email: [us@unity.co.uk](mailto:us@unity.co.uk)

Call: 0345 140 1000

Write to us at: Unity Trust Bank, PO Box 7193, Planetary Road, Willenhall, WV1 9DG

## Annex 1: CIFAS FAIR PROCESSING NOTICE

1. We will check your details against the Cifas databases established for the purpose of allowing organisations to record and share data on their fraud cases, other unlawful or dishonest conduct, malpractice, and other seriously improper conduct (“Relevant Conduct”) carried out by their staff and potential staff. “Staff” means an individual engaged as an employee, director, trainee, homeworker, consultant, contractor, temporary or agency worker, or self-employed individual, whether full or part time or for a fixed-term.
2. The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and other relevant conduct and to verify your identity.
3. Details of the personal information that will be processed include: name, address, date of birth, any maiden or previous name, contact details, document references, National Insurance Number, and nationality. Where relevant, other data including employment details will also be processed.
4. We and Cifas may also enable law enforcement agencies to access and use your personal data to detect, investigate, and prevent crime.
5. We process your personal data on the basis that we have a legitimate interest in preventing fraud and other Relevant Conduct, and to verify identity, in order to protect our business and customers and to comply with laws that apply to us. This processing of your personal data is also a requirement of your engagement with us.
6. Cifas will hold your personal data for up to six years if you are considered to pose a fraud or Relevant Conduct risk.

### CONSEQUENCES OF PROCESSING

7. Should our investigations identify fraud or any other Relevant Conduct by you when applying for or during the course of your engagement with us, your new engagement may be refused or your existing engagement may be terminated or other disciplinary action taken (subject to your rights under your existing contract and under employment law generally).
8. A record of any fraudulent or other Relevant Conduct by you will be retained by Cifas and may result in others refusing to employ you. If you have any questions about this, please contact us using the details provided.

### DATA TRANSFERS

9. Should Cifas decide to transfer your personal data outside of the European Economic Area, they will impose contractual obligations on the recipients of that data to protect your personal data to the standard required in the European Economic Area. They may also require the recipient to subscribe to ‘international frameworks’ intended to enable secure data sharing.

### YOUR RIGHTS

10. Your personal data is protected by legal rights, which include your rights to object to our processing of your personal data, request that your personal data is erased or corrected, and request access to your personal data.
  11. For more information or to exercise your data protection rights, please contact us using the contact details provided.
- You also have a right to complain to the Information Commissioner's Office which regulates the processing of personal data.