Trowbridge Town Council
The Civic Centre · St Stephen's Place · Trowbridge · Wiltshire · BA14 8AH
Tel: 01225 765 072 · Email: info@trowbridge.gov.uk
trowbridge.gov.uk

Privacy Notice for Job Applicants

1. Introduction

Trowbridge Town Council needs to collect and use personal information in order to process applications for employment. This applies to applications for full-time, part-time, casual, voluntary, and work experience positions.

When we collect, use, store, and delete personal data, we do so in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Trowbridge Town Council is the data controller for all personal data collected, stored, and processed by:

- Trowbridge Town Council
- Trowbridge Museum
- The Civic
- Active Trowbridge

Our Data Protection Officer is One West**,** and Trowbridge Town Council is registered with the Information Commissioner's Office (ICO) for the purposes of processing personal data.

This Privacy Notice explains what personal information we collect from job applicants, how we use it, and how it is protected.

Applicants who are successful should refer to the Employee Privacy Notice, which explains how personal data is processed once employment begins. A copy will be provided on commencement of employment and made available via the employee portal YouManage, on the Council's website at click her, or you may request a copy from your manager.

2. Information We Collect

We process personal data relating to individuals applying to work with us. This information is collected through application forms, interviews, and related recruitment processes.

The personal data we may collect, use, store, and share (where appropriate) include:

a) Name
b) Email address
c) Postal address
d) Telephone number
e) Copies of right-to-work and identity documentation
f) Employment and career history, including job titles, training records, and professional memberships
g) References (obtained only as a condition of employment)
h) Evidence of qualifications
i) CCTV footage (see our CCTV Policy)
j) Interview notes for shortlisted applicants

Criminal Convictions and Offences

We may process information relating to criminal convictions or offences where this is necessary to:

- Meet our legal obligations
- Exercise our legal rights
- Safeguard children, young people, vulnerable adults, and staff

Such processing will only take place where permitted by law and is usually based on substantial public interest and safeguarding requirements.

3. Special Category Data

We also collect, store, and use certain information that falls within "special categories" of personal data. This information is anonymised and is **never stored or processed in a way that identifies you**.

This may include:

a) Racial or ethnic origin
b) Gender identity
c) Religious or philosophical beliefs
d) Health data
e) Data concerning sex life or sexual orientation

This information is used solely for equality monitoring purposes. Completion of this information is optional and does not affect the outcome of your application. However, we encourage applicants to provide it to support our monitoring and improvement work.

Reasonable Adjustments

Prior to interview, we will ask whether any reasonable adjustments are required to ensure appropriate access arrangements. This may involve the disclosure of health information.

- This information is processed only for this specific purpose
- It is accessed only by Human Resources
- It is deleted following completion of the interview process

In rare circumstances, special category data may be shared to protect an applicant's vital interests (for example, in a medical emergency where the individual is unable to provide consent).

4. Purpose and Lawful Basis for Processing

We will only use your personal data where the law allows us to and for the purpose for which it was collected. In some cases, more than one lawful basis may apply.

Data / Activity	Purpose	Lawful Basis
Website interactions	Recruitment activity	Consent, Legitimate Interests
Name	Recruitment administration	Contractual
Contact details	Recruitment communication	Contractual
Right-to-work documents	Legal compliance	Legal Obligation
Employment history	Recruitment assessment	Contractual
Qualifications	Recruitment assessment	Contractual
References	Pre-employment checks	Legal Obligation, Contractual
CCTV footage	Safety and security	See CCTV Policy
Criminal convictions	Safeguarding	Legal Obligation, Contractual
Equality monitoring	Monitoring compliance	Legal Obligation

5. Retention of Information

Personal data is retained only for as long as necessary to fulfil the purposes for which it was collected, including legal, regulatory, and reporting requirements.

Retention periods are set out in our Retention Policy and Schedule.

When determining retention periods, we consider:

- The nature, sensitivity, and volume of the data
- The risk of unauthorised access or disclosure
- The purpose of processing
- Legal and regulatory requirements

Where appropriate, data may be anonymised and retained for statistical or monitoring purposes.

Unsuccessful Applicants

- Personal data is retained for six months following the appointment date
- Where we wish to retain data for future vacancies, consent will be sought

Recruitment Log

We maintain a recruitment log for three years, containing:

- Applicant name
- Town of residence at time of application
- Role applied for

The lawful basis for this processing is legitimate interest, having assessed that this does not override the rights and freedoms of applicants.

6. Data Sharing and Transfers

We do not share personal information with third parties without consent unless:

- Required by law, or
- There is another lawful basis for doing so

For successful applicants, we may share information with third parties for:

- Employment references
- Pre-employment checks
- Disclosure and Barring Service (DBS) checks

Applicants will be informed at the appropriate stage, and consent will be obtained where required.

Confidential references are treated as such and requests for access will be handled in accordance with data protection law and the wishes of the referee.

Personal data may be shared where legally required with:

- Other statutory bodies
- Internal officers involved in recruitment
- The Community Engagement & Governance Manager (e.g. for Subject Access Requests)
- Other agencies, including local authorities or the police, for safeguarding purposes. Such disclosures will only take place where necessary and proportionate and in accordance with data protection legislation.

Personal data is not transferred outside the UK GDPR territorial scope. Where international transfers are required, appropriate safeguards will be in place.

7. Your Rights

Under data protection law, you have the right to:

a) Be informed about how your data is used
b) Request erasure of your data
c) Request access to your personal data (Subject Access Request)
d) Request correction of inaccurate or incomplete data
e) Request restriction of processing

f) Request data portability
g) Object to processing
h) Not be subject to automated decision-making
i) Trowbridge Town Council does not use automated decision-making in recruitment. While vacancies may be advertised on third-party platforms (e.g. Indeed), applicants wishing to avoid automated processing should apply directly via the Council's website
j) To exercise your rights, please contact the Community Engagement & Governance Manager
k) There is no charge for exercising your rights. However, a reasonable fee may be charged for multiple copies of the same information.

8. Contact details

Community Engagement & Governance Manager
Trowbridge Town Council
St. Stephens Place
Trowbridge
BA14 8AH

informationgovernance@trowbridge.gov.uk
01225 765072

Data Protection Officer
One West

i-west@bathnes.gov.uk
01225 395959

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. However, they would normally expect you to have raised your complaint with us in the first instance.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

www.ico.org.uk
0303 123 1113