Job Applicant Privacy Notice

Scope

All job applicants/potential data subjects whose data is processed by the Civil Nuclear Constabulary (CNC) on behalf of the employer, the Civil Nuclear Policy Authority (CNPA).

Responsibilities

The Data Protection Officer is responsible for ensuring that this notice is placed in front of potential data subjects/employees prior to the Constabulary collecting/processing their personal data.

All Employees, Officers and Staff of CNC who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention.

Privacy (Fair Processing) Notice

It is important that all prospective officers and staff understand that they must be held to a higher standard of behaviour and accountability than members of the public, and that therefore their right to privacy can be fettered in certain circumstances. These circumstances include, but are not limited to recruitment, vetting, aftercare, transfer, promotion, role change, returning to policing and maintaining standards. This is to ensure that those applying to become members of the police are fully aware and accountable for the unique powers entrusted to them and the standards of professional behaviour they swear to uphold.

As part of the recruitment process the CNC collects and processes personal data relating to job applicants. CNC is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

The CNC does not currently use Generative AI in the recruitment process or to support or enable automated decision-making with significant effects on individuals.

The processing of personal data is lawful if one of the following conditions is met:

- You, as data subject, give explicit consent, which is capable of being easily withdrawn and is for one or more specific purposes only

- Processing is necessary to meet the contractual obligations that you have entered into as data subject
- Processing is necessary to comply with the legal obligations of the CNC as data controller
- Processing is necessary to protect your vital interests
- Processing is necessary for tasks in the public interest or in the exercise of the authority vested in the CNC as data controller
- Processing is for the purposes of the legitimate interests pursued by the CNC as data controller

Read more about how and why we use your data in the CNC Privacy Policy Statement and Privacy Notice Procedure.

What is Personal Data?

Under the UK General Data Protection Regulation:

Personal Data is defined as “any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

Certain data are classified under the Regulation as “special categories”:

- Racial
- Ethnic origin
- Political Opinions
- Religious Beliefs
- Trade-union membership
- Genetic Data
- Biometric Data
- Health Data
- Data concerning a natural person's sex life
- Sexual orientation

Where we ask you for sensitive personal data we will always tell you why and how the information will be used.

Why does CNC need to collect and store personal data?

We need your personal data to take steps at your request prior to entering into a contract of employment with you, and – should your application be successful – we need to process your data in order to enter into that contract of employment with you.

We need to process data to ensure that we are complying with our legal obligations. For example, during the recruitment process we must check eligibility to work in the UK and each candidate has to go through the security vetting process.

The CNC has a legitimate interest in processing personal data during the recruitment process and in keeping records of that processing in order to allow us to manage the recruitment process, assess and confirm a candidate's suitability and to decide to whom a job may be offered. The CNC may also need to process data from job applicants to respond to and defend legal claims.

The CNC processes health information if it needs to make reasonable adjustments to the recruitment process, and to assess fitness for certain positions within the organisation.

Where CNC processes other special categories of data this is done for the purposes of equal opportunities monitoring.

CNC will not use your data for any purpose other than the recruitment exercise for which you have applied OR

If your application is unsuccessful, CNC will keep your personal data on file in case there are future employment opportunities for which you may be suited.

How CNC uses your information

CNC will process – that means collect, store and use – the information you provide in a manner that is compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date and not keep it for longer than is necessary. In some instances the law sets the length of time information has to be kept, but in most cases CNC will use its discretion to ensure that we do not keep records outside of our normal business requirements.

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Access to your personal data

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR recruitment team, interviewers/managers in the area with a vacancy and IT staff where necessary.

We may pass your personal data on to our service providers who are contracted to CNC in the course of dealing with you. Our contractors are obliged to keep your details securely, and use them only to fulfil the service they provide to you on our

behalf. Once your service need has been satisfied they will dispose of the details in line with CNC's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do so.

Protection of your personal data

The CNC takes the security of your data seriously and has policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

Retention of your data

If your application is unsuccessful, the CNC will hold your data on file for a limited period, fixed according to the role applied for but usually no longer than 12 months, after the end of the recruitment process, following which it will be securely deleted.

If your application is successful and you are entered into the vetting process but fail to achieve clearance then those vetting records will be held for 67 + 6 years in accordance with our retention policy.

If your application is successful, personal data gathered during the recruitment process will be transferred into your personnel file and will be retained during your employment. Further information on the periods for which your data will then be held is available to all employees on the corporate intranet.

Your rights

As a data subject you have a number of rights, including the right to access your data and the right to require us to change incorrect or incomplete data.

If at any time you would like to exercise your rights as a data subject please contact the Data Protection Officer data.protection.officer@cnc.pnn.police.uk

If you believe that CNC has not complied with your rights you can complain to the Information Commissioner.

Using your personal data

We will use the information you provide for the following purposes:

- To carry out an initial sift of CVs and Applications for employment
- To invite to interview, record the results of that interview and appoint to post
- For the purposes of security and/or medical vetting
- For the payment of salary
- For Equal Opportunities monitoring
- For the setting up of IT accounts
- For workforce and duty planning purposes

- For initial induction and then ongoing training and development
- For other employee lifecycle events including health and absence monitoring, travel, insurance, transfers and promotions, pay and rewards
- For the optional extra services including Childcare Vouchers and Cycle to Work Scheme.

Document Owner and Approval

The Data Protection Officer is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the corporate intranet.

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue		
2	Review	DPO	28 02 2020
3	Reviewed	DPO	14 04 2023
4	Reviewed and amended following Angiolini Report	DPO	04 03 2024
5	Reviewed to include reference to the use of GenAI and to vetting retention periods	CIPSO	09 10 2026