# Privacy Notice: Applicants/Candidates

## Introduction

This is **Milestones Trust's** Privacy Notice for applicants and candidates. It covers paid and unpaid roles.

Milestones Trust is a charitable trust limited by guarantee, registered in England under company number 2011021. Registered Charity No: 294377

Milestones Trust is the controller for the personal information we process, unless otherwise stated.

Registered address: Unit 10, Eclipse Office Park, High Street, Staple Hill, Bristol BS16 5EL

The Data Protection Officer for Milestones Trust can be contacted by emailing dpo@milestonestrust.org.uk or calling 0117 9079300

## Definitions

We are required to process personal data about our people applying for roles with Milestones Trust.

**'Processing'** can mean collecting, recording, organising, storing, sharing or destroying data.

**'Applicant'** The term 'applicant' applies to anyone applying for a post (paid or unpaid) with Milestones Trust and covers successful and unsuccessful applications.

**'Candidate'** The term Candidate refers to 'active applicants' that have been screened and verified as qualifying for the requirements of the job or role opening and therefore likely to proceed to interview.

**'Personal data'** is defined by Data Protection legislation as "any information relating to an identifiable person who can be directly or indirectly identified". In simpler terms, it is any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers and CCTV images.

**'Special Category data'** is defined as personal data that is likely to be more sensitive and has extra protection under data protection law. It includes personal data about:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data (where used for identification purposes)
- health
- sex life
- sexual orientation

**‘Verification’** The term "verification" refers to the process of checking that details supplied by applicants (e.g. identity, qualifications) are accurate and complete.

We are committed to being transparent about why we need your personal data and what we do with it and this Privacy Notice explains that and advises you of your rights in relation to the information we process. We will only ask you for the information we need from you at each stage of the recruitment process and will securely store it whilst in use then securely dispose of it in line with our retention schedule.

We have a separate Privacy Notice for Employees, Volunteers and Trustees which includes anyone employed by Milestones Trust including on a casual ‘Bank’ contract, volunteers (excluding corporate volunteers) and Trustees, and others. Successful candidates will be issued with the Employee, Volunteer and Trustee Privacy Notice during the onboarding process.

## The Lawful Bases we rely on

As we’re taking steps towards potentially entering into a contract with you, we rely on ‘Contract’ as our lawful basis for much of the recruitment related data processing we carry out (the stages at which you’re an applicant or candidate). We may also have a Legitimate Interest or a Legal Obligation in processing information about you when you apply for a role (paid or unpaid) with Milestones Trust and where that’s the case we use those bases. We may ask for your Consent for some processing.

We process Special Category data and Criminal Conviction data as part of our obligations as an employer and in managing health and social care services and have an Appropriate Policy Document in place.

## What personal data do we process?

As above, in addition to the personal data you provide as part of your application, and give us as part of any interview process, we may also request special category and criminal offence and conviction data from you at certain stages of the application and recruitment process. We will only do this when asking for it is necessary and relevant to the role you’re applying for, and where applicable it’s in line with the Rehabilitation of Offenders Act 1974. We process this data as part of our obligations in managing health and social care services and our legal obligations as employers.

As part of the application and onboarding process (for successful candidates) we may record the following types of data:

- Basic details and contact information about you, e.g., your name, address, contact number/s / email, photo, date of birth, National Insurance number.
- Education and employment history and qualifications as per the job description and person specification requirements
- Financial information so payroll can set successful candidates up on our systems
- Financial details so that we can pay authorised expenses to volunteers and Trustees
- HMRC information (for due diligence purposes – Trustees)

The Special Category data we ask for may include:

- Information about disabilities - to ensure reasonable adjustments are considered at interview and where possible to facilitate adaptations in the workplace/volunteering environment for successful candidates. We will only collect this if it is necessary for us to know and so we can support Occupational Health referral where appropriate for successful candidates
- Evidence of your right to work in the UK
- Whether you've had some vaccinations
- We may also, with your permission, record data about your race, ethnic origin, sexual orientation or religion - to monitor equality of opportunity
- Special category biometric data, that is, biometric data used for unique identification purposes like your passport for identification purposes
- Criminal offences and convictions where necessary to assess suitability in relation to the role you're applying for.
- Depending on the role being applied for you may be required to undergo a Disclosure and Barring Service (DBS) check (Criminal Record Check) as part of the recruitment process and for update checks. We do not keep this data once we've seen it but keep enough so we can evidence we've seen it.

## Why and how we process your personal data

We require personal data about you so that we can facilitate a fair and transparent process of screening applications for role suitability based on the job/role description and person specification, to comply with the law and to make sure we provide safe services to the people we support in line with our contracts and regulations.

We process your data (including special category and criminal conviction data) because:

- We are taking the steps necessary prior to entering into a contract with you and / or entering into a contract with you
- We have Legal Obligations, for example under UK employment law, the Health and Social Care Act and the Charities Act
- We have a Legitimate Interest in asking about vaccinations e.g., because the government ask us to report on how many employees have said they've had these (this is provided in an anonymous format)
- You have chosen to provide us with personal / special category information
- We are required to provide data to our regulator, the Care Quality Commission (CQC), as part of our public interest obligations
- It is necessary to support Occupational Health referrals
- Processing some information e.g., on suitability for trustee roles, is in the substantial public interest
- Dayforce is the system we use for processing information about applicants and candidates
- Some of the systems and processes we use may include the use of Artificial Intelligence (AI). Where this is the case a data protection privacy assessment has been undertaken to ensure the processing is secure and a human always reviews the content.

- We need to undertake continuous reviews of how we perform, using analytics dashboards, reviews, surveys and feedback.
- We need to conduct service improvement studies using data analysis so we can learn how to improve the quality and standards of care provided

## Recruitment Newsletter Sign Up

As part of the registration process for our Recruitment e-newsletters, we collect personal information and, where you've opted in to receive it, use it to let you know about the current Milestones Trust job opportunities. If you no longer wish to receive this you can let us know by clicking 'unsubscribe'.

## Where we process your data

We process your data in the UK. We do this face to face as well as via phone, email, post, online application forms, website and via our systems including the HR 'Dayforce' system. Some of our sites have CCTV.

The personal data we process about you as an applicant/candidate is collected from:

- You - as part of your application and/or newsletter sign up
- Third parties e.g. reference information, government bodies (Home Office) regarding rights to work in the UK

## Who we share your personal data with

In order to process your application, and, where successful to support the onboarding process, the information you provide will be shared with the following:

- Our recruitment team who will liaise with you about the next steps in the process
- Trustee application information is reviewed by the Executive Assistant and then the Recruitment Manager to process DBS applications and refresh applications
- VZLA Ltd. who we use in relation to profiling exercises which are part of selection for some roles
- The person responsible for interviewing you (special category information will not be provided at that point)
- Our onboarding and payroll team if you are successful so we can get you set up on our systems
- Her Majesty's Revenue and Customs (HMRC)
- Home Office in relation to rights to work in the UK. We retain this evidence for the duration of employment and for two years afterwards. It is then securely destroyed.
- BHSF for Occupational Health clearances
- DDC (Due diligence Checking) for our Disclosure and Barring Service (DBS) checks if you are offered a role and the role requires these checks to be carried out
- The police for the prevention and detection of crime

We will not share more information than we need to for the purpose we collect it.

## How we protect your personal data

When we receive your application, we save it in our Dayforce system. We have technical and organisational measures in place to protect your personal data and keep it secure. These include having GDPR compliant contracts in place with processors, like setting controls and permissions to folders and systems, policies and procedures, using password protection, using secure email and making sure everyone is trained to understand their obligations around data protection. Information is stored, retained, and disposed of in line with our policies and Retention Schedule and we do not keep your information any longer than we need to. Milestones Trust has Caldicott Guardians as well as a Data Protection Officer to support the protection of personal data.

## How long we process data for

Our Retention Schedule sets out the retention timescales for the different documents we process. For example, in relation to rights to work in the UK, we retain evidence for the duration of employment and for two years afterwards. It is then securely destroyed. In line with data protection regulations, we will not ask for more information than we need and do not keep data any longer than we have to. All unsuccessful applications will be destroyed after a maximum of 6 months.

## Your rights

You have the following rights when it comes to your data:

1. Right to be informed: We are transparent about how and why we collect and use your data and this Privacy Notice tells you about this

2. Right of access: You have the right to request a copy of the personal data we keep about you and are entitled to information that can be provided based on a reasonable and proportionate search. Requests can be emailed to our Data Protection Officer on dpo@milestonestrust.org.uk. You can ask someone to submit a request on your behalf. You and anyone you ask will need to provide adequate identification, for example, a passport or driver's licence. This is to make sure that data is not shared with the wrong person. If we are not sure of anything related to your request we will 'pause' the request until we receive the confirmations we need and start it again as soon as we have it. We will always respond to your request as soon as possible and at the latest within one month. The information will be provided within a month of receiving the last piece of information we need. If we need to extend that timescale to two months we will tell you why.

3. Right to rectification: You have the right to ask us to correct any data we have which you believe to be inaccurate or incomplete. You can also request that we restrict the processing of your data while we consider your rectification request

4. Right to erasure: You have the right to ask that we erase any of your personal data which is no longer necessary for the purpose we originally collected it for. This is not an absolute right, and we may need to continue using your information. We will tell you if this is the case. You can also ask for your data

to be erased if we have asked for your consent to process any of your data. You can withdraw consent where it has been provided at any time – please contact us to do so

5. Right to restrict processing: You may request that we restrict processing if we no longer require your personal data for the purpose we originally collected it for but you do not wish for it to be erased.
6. Right to portability: You have the right to request personal data you provided us with in a way that is accessible and machine-readable, for example as a csv file. You also have the right to ask us to transfer personal data about you to another organisation
7. Right to object: If we are processing your data as part of our legitimate interests as an organisation or in order to complete a task in the public interest, you have the right to object to that processing. This is not an absolute right and we may need to continue using your information. We will tell you if this is the case
8. Rights related to automated decision-making including profiling: Where any activities involve this, e.g., as part of the recruitment process, we ask for explicit consent and do not rely solely on this information.

## Complaints and Concerns

If you have a complaint or a concern about the way we have dealt with personal data about you please contact the DPO by emailing dpo@milestonestrust.org.uk or phone 0117 9709300. Your complaint will be dealt with in line with our Complaints Procedure.

## Further Information

If you are still unhappy after your complaint or concern has been dealt with, please contact:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
https://ico.org.uk/global/contact-us/

**Changes to this Privacy Notice** We keep our privacy notice under regular review. This privacy notice was last updated in **February 2026**