**Recruitment and GDPR compliance**

This guidance is applicable to those involved in the recruitment process i.e. Recruitment Administrators (RAs), Hiring Managers (HMs), Hiring Chairs (HCs), and Hiring Panels (HPs).

**GDPR Fundamentals**

**Who does it affect?**

**Data Controllers** – as the recruiting organisation, Imperial College, is the data controller. The GDPR requires compliance from any organisation that collects personal data from someone in the EU.

**Data Subjects** – refers to the applicant/candidate who is providing their personal data as part of the Imperial recruitment process.

**Data Processors –** this is applicable anyone involved in the recruitment process such as RAs, HMs, HCs and HPs since they are responsible for processing personal applicant data on behalf of the Data Controller. They have a legal obligation to comply with the GDPR.

**How to be GDPR compliant when recruiting**

**These guidelines are applicable when:**

* Applications are received outside of the College’s Applicant Tracking System (ATS), TalentLink - i.e. applicant data received via referrals, agencies or direct sourcing.
* Shortlisting
* Interviewing
* Referencing
* On-boarding
* Send all applicant/candidate data you receive directly to the Recruitment Hub so they can process the candidate’s information correctly
* If you would like to consider an applicant/candidate for an alternative requisition, **always** check with the Recruitment Hub first.They willensure the necessary consent has been obtained
* Use the shortlisting guidance (supplied by the Recruitment Hub) to login into the College’s ATS (Talentlink) and view all applicant/candidate data (i.e. CV, supporting statement, research papers etc.). This process is compliant since:
  + - It keeps all applicant/candidate information on the ATS
    - It removes the risk/effort of having to archive all applicant/candidate data in line with our [data privacy policy](https://www.imperial.ac.uk/jobs/policies/). All candidate information on the ATS is automatically assigned a 1-year data storage period (from the date the application was last processed)
    - It removes the risk/effort of tracking where the candidate data has been sent. This means we have control over where the data is stored should the candidate raise a [subject access request](https://www.imperial.ac.uk/admin-services/secretariat/information-governance/data-protection/) or right to deletion request
* If applicant/candidate data is downloaded, store it only on secure college drives and archive when it is no longer required. [ICT can recommend where to save personal and sensitive data](https://www.imperial.ac.uk/admin-services/ict/self-service/connect-communicate/saving-my-files/)
* Only send applicant/candidate data to those recipients who are directly involved in the recruitment
* If sharing candidate information for shortlisting or interview purposes, include wording within your email signature and relevant templates to advise recipients to delete applicant/candidate data once processed (see the additional guidance table below) or if data is sent in error
* Delete all copies of applicant/candidate data from email chains when no longer required
* Regularly cleanse all files which may contain expired applicant/ candidate data
* Dispose of all hard copy applicant/candidate data in confidential waste when no longer required

**Additional guidance**

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| **Forwarding applicant/candidate data recommended wording** | *This paperwork contains personal data concerning (potential) applicants / candidates for this role. As such, we request that it is treated with confidentiality at all times and is not distributed to a wider group of individuals than has previously been agreed. To be GDPR compliant, please delete this email when the applicant data is no longer relevant.* |
| **Email signature confidentiality recommended wording** | *Any information contained herein is intended only for the named recipient and is to remain confidential and under no circumstances be distributed, disclosed, copied or transmitted to other parties without the express permission of Imperial College London. If you are not the intended recipient please notify the sender immediately and delete this email from your system.* |

For any help and advice please contact the Recruitment Hub: [recruitmenthub@imperial.ac.uk](mailto:recruitmenthub@imperial.ac.uk)