

The VGC Group (VGC) includes V G Clements Contractors Ltd, VGC Clements Ltd, VGC Construction Ltd, VGC Personnel Ltd, VGC Services Ltd and Cole Services Ltd.

VGC provides work-finding services to its clients and work-seekers and must collect and process personal data so that it can provide these services. You may give your personal details to the company directly, such as on an application or registration form or via our website, or we may collect them from another source such as job boards.

As a data controller, VGC is committed to being transparent about how it collects and uses that data and will comply with its data protection obligations under the General Data Protection Regulations (GDPR) at all times.

Data Protection officer

VGC's data protection officer is Ciara Pryce, chief operating officer; email:ciara.pryce@vgcgroup.co.uk, postal address: VGC Group, Cardinal House, Bury Street, Ruislip, HA4 7GD.

Data protection principles

VGC will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes and not used in any way that is incompatible with those purposes
- Accurate and kept up to date
- Kept only as long as necessary
- Kept securely

What data do we collect about you?

VGC collects and processes a range of information about you. This includes:

- information you have provided to us in our application form including name, address and contact details, including email address, telephone number, date of birth and gender;
- information you have provided in your CV such as details of qualifications, skills, experience and employment history
- information about your current and previous level of remuneration, including benefit entitlements
- information about your nationality and entitlement to work in the UK
- information about your driving licence and driving offence records
- special category data such as
 - equal opportunities monitoring information, including ethnic origin, sexual orientation, health and religion or belief
 - information about criminal convictions and offences
 - information on whether or not you have a disability or medical condition for which the organisation needs to make reasonable adjustments during the recruitment process

How is this information collected?

VGC collects this information in a variety of ways, through registration forms, CVs, information on your passport or other identity documents such as driving licence; or from you, as the candidate in interviews, telephone calls, meetings or other internal assessments.

VGC may also collect personal data about you from third parties, such as references supplied by former employers, qualification awarding bodies, information from the UKBA Home Office, information from the DVLA and information from disclosure and barring service in respect of criminal records checks permitted by law.

Any information that you supply to VGC or data that VGC collects will be processed by VGC.

Reasons for processing personal data?

VGC must have a legal basis for processing your personal data. The legal basis we rely upon to offer our work-finding services to you are;

- Consent
 - by applying for a role you have provided consent for VGC to process your personal data for the purpose of work-finding services.
- Legitimate Interest
 - manage our database and keep work-seekers records up to date
 - provide work-finding services to you and our clients
 - to communicate with you about the recruitment process

- manage the recruitment process, assess and confirm suitability for employment based on skills and qualifications.
- to process your data to enter into a contract with you.
- Statutory/contractual requirements
 - to ensure that we are complying with its legal obligations. For example, eligibility to work in the UK before employment starts.
 - carry out background checks and reference checks
 - to respond to and defend against legal claims.
 - processes health information - if needed to make reasonable adjustments to the recruitment process for a disability.

VGC has considered whether or not our legitimate interests to process your personal data are overridden by the rights and freedoms of employees or workers and have concluded that they are not.

Where the organisation processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. Job applicants are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

It may be necessary for certain roles to process information about criminal convictions where the role involves working in a highly secure environment such as an airport or nuclear infrastructure or requires a high degree of trust and integrity.

We have in place appropriate policy and safeguards in place when processing data on criminal convictions.

Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise, with members of HR, the recruitment team, interviewers involved in the recruitment process and managers in the business area with a vacancy.

Recipients of data

VGC will only share your personal information with third parties for the purposes of processing your application.

VGC will process your personal data and/or sensitive personal data with the following recipients:

- Clients
- Former employers whom we may seek references from
- Employment background check providers to obtain necessary background checks
- Disclosure and Barring Service to obtain necessary criminal records checks.

VGC do not allow third parties to use your personal data for their own purposes.

The organisation will not transfer your data outside the European Economic Area.

How does VGC protect data?

VGC is committed to protecting and respecting your privacy and we take the security of your data very seriously. VGC has organisational and security measures in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by VGC employees in the performance of their duties.

VGC have in place procedures to deal with a suspected data security breach and will notify you and any applicable regulator where we are legally required to do so.

Where is data stored?

Data is stored in a range of different places;

- company servers;
- third party servers;
- email accounts;
- HR and payroll systems
- backup storage
- paper and electronic personnel files.

How long does VGC keep data?

If your application for employment is unsuccessful, VGC will hold your data on file for 5 years after the end of the relevant recruitment process unless you request your data is deleted prior to this date. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

If your application for work is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your contractual relationship with VGC. The periods for which your data will be held will be provided to you in a separate worker/employee privacy notice and GDPR procedure.

Your rights

As a data subject, you have a number of rights.

- access and obtain a copy of your data on request;
- require VGC to amend information or change incorrect or incomplete data;
- require VGC to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where VGC is relying on its legitimate interests as the legal ground for processing;
- restrict processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.
- Right to withdraw consent at any time

If you would like to exercise any of these rights, please contact the data protection officer in writing. You can make a subject access request by completing the subject access form (3.HR.ADM.043) which can be found in our website.

What if you do not want to provide personal data to VGC?

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, the organisation may not be able to successfully provide work-seeking services or process your application successfully or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

Automated decision-making

VGC do not use automated decision-making to make employment decisions.

Right to withdraw consent

By applying for a role you have provided consent for VGC to process your personal data for the purpose of work-finding services. You have the right to withdraw your consent for processing for that purpose at any time.

To withdraw consent please contact the data protection officer in writing. Once VGC has received notification that you have withdrawn consent we will no longer process your application and subject to our retention policy we will dispose of your personal data securely.

There may be circumstances where VGC will still need to process your data for legal or official reasons. We will inform you if this is the case. Where this is the case, we will restrict the data to only what is necessary for the purpose of meeting those specific reasons

Changes to our privacy policy

VGC keep our policy under regular review. This privacy policy was last updated in May 2018.

Complaints

If you believe that VGC has not complied with your data protection rights or wish to complain about this privacy notice, you should inform the data protection officer in the first instance. You have the right to lodge at any time a complaint to the Information Commission Office (ICO).