

Recruitment and Data Protection at the Globe

Data processing policy

As part of any recruitment process, the Globe will collect personal data relating to job applicants. The Globe is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does the Globe collect?

The Globe will collect a range of information about you. This includes

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the Globe needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

We collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessments.

We will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers where appropriate, and information from criminal records checks if and when appropriate for certain roles. We will seek information from third parties only once a job offer to you has been made and will inform you that we are doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email) and secure data stores that are only accessible to the HR team and the manager responsible for your appointment.

Why does the Globe process personal data?

The Globe needs to process data that you provide prior to and at the point of entering into a contract with you.

In some cases, the Globe needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the Globe to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Globe may also need to process data from job applicants to respond to and defend against legal claims.

The Globe processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where we process other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is only for equal opportunities monitoring purposes.

For some roles, the Globe is obliged to seek information about criminal convictions and offences. Where the Globe seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

The Globe will not use your data for any purpose other than the recruitment exercise for which you have applied.

If your application is unsuccessful, the Globe will keep your personal data on file in case there are future employment opportunities for which you may be suited. We will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR team and interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

We will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. We will then share your data with former employers to obtain references for you, and we may share your data with employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks where necessary for particular roles.

We will only transfer your data outside of the EEA if you are a foreign national or have previously worked internationally. Any data transfer will be for the sole purpose of obtaining a reference from a referee outside of the EEA, in order to undertake a necessary background check from a country outside of the EEA or for the purposes of facilitating a visa application where necessary. Any data transfers outside of the EEA are subject to internal review and are only carried out with the express authorisation of our Data Protection Officer.

How does the Globe protect data?

The Globe takes the security of your data seriously. It has internal 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. Applications may only be accessed by the HR team and the hiring team responsible for a particular vacancy. Your data will not be shared with any other third party and will not be shared internally other than for the processing of your application for employment.

For how long does the Globe keep data?

If your application for employment is unsuccessful, the Globe will hold your data on file for 6 months after the end of the relevant recruitment process. If you agree to allow the Globe to keep your personal data on file, the Globe will hold your data on file for a further 12 months for consideration for future employment opportunities. At the end of that period (or once you withdraw your consent) your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

Your rights

The Globe's policies do not affect your rights under the Data Protection Act 2018. Under the Data Protection Act you can:

- access and obtain a copy of your data on request;
- require the Globe to change incorrect or incomplete data;
- require the Globe 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 the Globe is relying on its legitimate interests as the legal ground for processing; and
- ask the Globe to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Globe's legitimate grounds for processing data.

[If you would like to exercise any of these rights, please contact Data.P@shakespearesglobe.com.

If you believe that the Globe has not complied with your data protection rights, you can complain to the Information Commissioner (www.ico.org.uk)

What if you do not wish to provide personal data?

You are under no statutory or contractual obligation to provide data to the Globe during the recruitment process. However, if you do not provide the information, the Globe may not be able to process your application properly or at all.

Automated decision making

Recruitment processes are not based solely on automated decision making.