

ZSL Privacy Policy for Job Applicants (Compliant with GDPR)

Privacy notice statement

We're ZSL, an international conservation charity, and our vision is a world where wildlife thrives. We're working every day to achieve this, through our science, our field conservation around the world and engaging millions of people through our two zoos, ZSL London Zoo and ZSL Whipsnade Zoo. Our registered charity number is 208728.

ZSL is committed to being transparent about how it collects and uses the data you provide, protecting your privacy in accordance with their obligations under the data protection legislation.

If you have any queries regarding this privacy policy, please contact:

The Data Protection Lead
The Zoological Society of London "ZSL"
Regent's Park, London, UK NW1 4RY
E-mail: dataprotection@zsl.org

Last Updated: 13.11.2023

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- a) Used lawfully, fairly and in a transparent way.
- b) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- c) Relevant to the purposes we have told you about and limited only to those purposes.
- d) Accurate and kept up to date.
- e) Kept only as long as necessary for the purposes we have told you about.
- f) Kept securely.

Information we may collection from you or about you

As part of any recruitment process ZSL collects and processes personal data relating to job applicants. Personal data is collected to facilitate the recruitment process and for anonymised reporting purposes. **For example:** the personal data entered during your application, interview, tests or assessments is to support our hiring managers assess your suitability for a position. Further ways we will use the personal information we collect about you are:

- Assess your skills, qualifications, and suitability for the role you are applying for;
- Carry out background checks and reference checks, where applicable;
- Communicate with you about the recruitment process;
- If your application is unsuccessful we may wish to retain your information so we can invite you to apply for alternative roles that we think you may be suitable for (see 'For how long does ZSL keep data?' below);
- Keep records related to our hiring processes; and
- Comply with legal or regulatory requirements

Under the Immigration, Asylum and Nationality Act 2006, applicants for UK-based roles are required to provide evidence of their right to work in the UK to ensure the company complies with current UK legislation. Applicants will be asked to upload copies of this documentation as part of the application process. These will only be held on the application system and will be retained in line with ZSL's data retention policies described at the end of this document. Successful applicants will be required to bring in original documentation on their first day, which will be verified, copied, and stored in the new employee's personnel file. Data entered as part of an application

is stored in the system (Eploy) and will be made available to an applicant to 're-use' as part of a future application if they wish.

Once an offer to a candidate has been issued, ZSL will require the person to complete a confidential questionnaire regarding their disability status and health/wellbeing needs. This information is collected so that, upon beginning employment with ZSL, any reasonable adjustments or occupational health assessment that may be required can be implemented. Collection of this data requires a two-stage legal basis under data protection law. The first of these is legitimate interests [see above] and the second is "processing necessary for the purposes of occupational medicine and for the assessment of the working capacity of the employee". This latter type of processing is permitted by Article 9(2)(h) of GDPR and section 10 and Schedule 1, Part 1, paragraph 2 of the Data Protection Act 2018. This information is not available to hiring managers until after employment has begun, and the employee has provided permission for it to be shared. As a result, this information is required after the offer has been made and so plays no part in our decision-making process on offering a role.

As part of your application, ZSL may collect other special categories of sensitive or personal data, such as information about ethnic origin, sexual orientation, medical conditions, health, and sickness records, religion or belief, and/or information about criminal convictions. Data collected for the purposes of equality, diversity, and inclusion monitoring is entirely optional and so is processed on the legal basis of "consent".

How we use 'special categories' of more sensitive personal information

We will use your sensitive information in the following ways:

- We will use information about your disability status gained in the application form to consider whether or not we need to provide appropriate reasonable adjustments during the recruitment process, for example, whether adjustments need to be made during a test or interview
- We will use information about medical/wellbeing needs and your disability status gained during the onboarding process (after a job offer is sent, if applicable) to ensure that any reasonable workplace adjustments required are implemented when successful applicants begin work.
- We may use your sensitive personal information to create aggregate, anonymised insights and reports on our applicants for diversity and inclusion monitoring purposes. Where we do this we will ensure that no individuals are identifiable from such insights or reports.
- Applicants are entirely free to decide whether or not to provide such data, by selecting the appropriate preference or 'opt-out' option at the relevant application stage, and there are no consequences of declining to do so.

Information about criminal convictions and offences

We envisage that we will process information about criminal convictions if the role you are applying for involves working with children or vulnerable adults. If the role you are applying for does not involve working with children or vulnerable adults we do envisage that we will process information about criminal convictions.

Where required we will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are required to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular, we are legally required to carry out criminal record checks for those carrying out roles that involve working with children.

ZSL promises to respect any personal data you share with us, or that we get from other organisations and keep it safe. We aim to be clear when we collect your data and not do anything you would not reasonably expect. We want to provide a safe and secure user experience and are committed to protecting the privacy of all staff members. We will ensure that the information you submit to us via website, online systems or e-mail address is only used for the purposes set out in this policy. If you would like a copy of this Privacy Policy, please contact ZSL's Data Protection Lead through the contact information provided at the beginning of this document.

Please note: The online systems are provided and hosted by the ZSL and its third-party supplier (Eploy). By submitting your personal information, you are consenting to ZSL holding and using it in accordance with this policy. Eploy does not have access to your personal data. You can review their statement on this [here](#). Sometimes we use external companies to collect or process your personal data on behalf of ZSL. We carry out thorough checks on any companies we work with and have a contract in place with each of these companies to

ensure that they process your information in line with our expectations. We may make changes to this privacy policy. If we do make any significant changes to the way we collect and process your personal information we will make this clear on this page or by contacting you directly. We do however recommend that you read the privacy policy each time you visit the site.

If you fail to provide personal information

You are under no statutory or contractual obligation to provide data to ZSL during the recruitment process. However, if we request information that is necessary for us to consider your application (such as work history or evidence of qualifications) and you fail to provide such information when requested, we will not be able to process your application successfully. For example, if we require a background check or references for this role and you fail to provide us with the relevant details, we will not be able to take your application further.

We may request additional information that is not necessary for us to consider your application but is useful to ZSL for some other purpose. For example, we may request additional information on candidates' ethnicity, gender, sexual orientation or religion which is used for our diversity and inclusion monitoring. If we request such additional information and you do not provide it this will not affect your application. We ask that if you have any concerns about providing any information that we have requested from you please let us know via dataprotection@zsl.org so we can discuss these concerns with you as required.

<mailto:dataprotection@zsl.org>

Where and how we collect your information

ZSL collects and processes 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 (job) history;
- Information about your current level of remuneration, including benefit entitlements;
- Equal opportunities monitoring information (where you choose to provide it), including information about your ethnic origin, sexual orientation, health and religion or belief.
- Whether or not you have a disability or a health/wellbeing need for which the organisation needs to make reasonable adjustment during the recruitment process and potential employment with ZSL; and
- Information about your entitlement to work in the UK (and or in the country of the role's contractual base location if not the UK).

ZSL may collect this information in a variety of ways. **For example:** data might be contained in online application forms, CVs, obtained from your passport or other identity documents such as your driving licence, or collected through interviews or other forms of assessment.

This is to enable you to submit your CV for general applications, to apply for specific jobs or to subscribe to our job alerts. We may match your details with job vacancies to assist you in finding a position within the organisation.

In some cases, ZSL will collect personal data about you from trusted third parties, such as references supplied by former employers, information from employment background check (DBS) providers, information from credit reference agencies and information from criminal records checks permitted by law. **Please note:** ZSL will ask for your expressed consent first before contacting any third-party organisation for personal data.

Data will be stored and centralised within either our online recruitment applicant tracking system (Eploy) whereby you will have created a profile in order to apply for vacant positions, in our HR management system (if you're hired and become an employee) or on other IT systems (including e-mail), if you sent a query or request for information.

Cookies

We use 'cookies' to enhance your experience on our website. Cookies mean that the ZSL website will remember you for a particular purpose and for a particular length of time. [To see our cookies policy, please click here.](#)

When you're accessing our website and apps, your device may provide us with information about the device you're using, this could include the type of device, what operating system you're using and may report any

details of a website or app crash. Your device manufacturer or operating system provider will be able to provide you with more details about the information your device makes available to us.

What information do we collect and how do we use it

The type of personal information we will collect about you will depend on the purpose of collecting the information.

Legal basis for processing your personal data

ZSL needs to process data to take steps at your request prior to entering into a contract with you. ZSL may also need to process your data to enter into an employment contract with you and to ensure we are complying with our legal obligations under employment law. **For example:** Under the Immigration, Asylum and Nationality Act 2006, it is mandatory for ZSL to check an applicant's eligibility to work in the UK before entering into a contract and employment starts. Pre-screening to verify these details happens during the application, shortlisting and interview stages of our process before making a copy of the original which we store in your electronic file if you are hired as an employee.

Additionally, for certain positions, it is necessary for the organisation to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question. **For example:** Working with children or vulnerable adults.

Legitimate Interests

In other circumstances, ZSL has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. **For example:** Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment and to decide whom to contact for interview, offer a job. We may also need to process data from job applicants to respond to and defend against a legal claim.

Please note: Where ZSL relies solely on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not. However in irregular circumstances, we will rely on your expressed consent when using your personal data. An example of this would be when we request your consent to contact your referees (usually current or previous employers) for references.

Expressed Consent

ZSL may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics and equal opportunity monitoring. **For example:** to support our application for organisational awards such as Stonewall, Athena Swan, Investors or People which demonstrates ZSL intentions to uphold a high standard for people management, diversity and inclusion.

We may also collect information about whether or not applicants are disabled or have a health/wellbeing need to make reasonable adjustments for candidates who have a disability.

Data that ZSL uses for these purposes is anonymised during the application / interview stage and is collected with the express consent of the applicant, which can be withdrawn at any time. Applicants are entirely free to decide whether or not to provide such data by selecting the appropriate preference or 'opt-out' option at the relevant application stage, and there are no consequences of failing to do so. We process such information to carry out its obligations and exercise specific rights in relation to employment.

Please note: Although special category data is collected during the application stage, hiring managers are not privy to this information) and it is stored separately from the information hiring managers or the interview panel have access to see when reviewing applicants (shortlisting people for interview).

Who has access to data?

Personal data should be limited to what we need to know and who needs to know it. However if access to the data is necessary for the performance of the recruitment exercise, relevant information may be shared internally with members of the HR team, hiring manager and staff involved with the recruitment of the position the applicant has applied to. Your information may be shared internally for the purposes of the recruitment exercise. For example: a member of HR may shortlist and interview with the hiring manager and therefore the staff members will have access to your data.

Third Parties

The organisation shares your data with trusted third party organisations in order to obtain pre-employment references from other employers, obtain employment background checks from third-party providers and where applicable criminal records checks from the Disclosure and Barring Service (DBS). These third party organisations comply with similar undertaking of privacy and confidentiality as ZSL.

Please note: When you apply for a job, login to your candidate homepage or register for e-mail alerts you are entering the web site of a third party supplier. ZSL is not responsible for the cookies set on these pages by the third party supplier. However, you can check how the third party supplier uses cookies by clicking on the following [link](#).

How do we keep your personal information secure

ZSL has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by relevant employees in the performance of their duties. We carry out regular audits of who has access to data so that we can ensure your information is securely stored.

Sometimes we use external companies to collect or process your personal data on behalf of ZSL. We carry out thorough checks on any companies we work with and have a contract in place with each of these companies to ensure that they process your information in line with our expectations.

Some of our suppliers may run their operations outside the European Economic Area (EEA). Although they may not be subject to the same data protection laws as companies based in the UK, we will take the steps to make sure they provide an adequate level of protection in accordance with the UK data protection law. By submitting your personal information to us you agree to this transfer, storing or processing at a location outside the EEA.

If requested we may need to supply your information to the police, regulatory bodies or legal advisors.

Please note: Where the organisation engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does ZSL keep data?

Whilst processing your application we need to process your data so that we may review your application or contact you, if any queries were to arise on the relevant recruitment process. If your application for employment is **successful**, personal data gathered during the recruitment process will be transferred to your staff file (electronic and online HR system based) and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice (applicable to your role).

If your application for employment is **unsuccessful**, the organisation will hold your data on file for 1 (one) year after the end of the relevant recruitment process, if you have agreed to this when you applied. This will enable you to easily complete other applications to jobs opportunities at ZSL, should you want to do so and we will also consider you for future employment opportunities. At the end of that period, your data will be completely anonymised (including the deletion of all identifiable personal information and documents you may have uploaded) and kept for an additional 12 months in its anonymised form. This data will be used to report on our equality, diversity and inclusion statistics as relevant to our recruitment processes. After this additional 12 months, your data will be destroyed completely. If you notify us in writing at any point during the initial 12-

month retention period, when your data is still identifiable, to withdraw your consent for us to keep the data in this way, your data will be completely .

Your rights

Under the General Data Protection Regulation (GDPR) as a data subject, you have a number of rights. For example: you have the right to request a copy of the personal information we hold about you. You also have the right to request that we erase any personal information we hold, where ZSL has no compelling reason to continue processing this data. The below bullet points outline your rights of access, correction, erasure and restriction:

- Access and obtain a copy of your data on request;
- Require the organisation to change incorrect or incomplete data;
- Require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- Object to the processing of your data where ZSL is relying on its legitimate interests as the legal ground for processing.
- Ask the organisation to stop 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.

Raising Queries or Concerns

If you have any questions, comments, or concerns about data protection at ZSL, please contact our Data Protection team on dataprotection@zsl.org. Should you like to exercise any of these rights, you can do so by contacting Human Resources at hr@zsl.org or write to us at:

Human Resources, Zoological Society of London, Regents Park, London, NW1 4RY.

We may require you to provide two forms of identification before processing any requests. Once we have received your information request and proof of your identification we will respond within one month.

If you are not satisfied with the response you have received from us for any reason, then you may wish to contact the information Commissioner's Office via <http://ico.org.uk/>.

Updates to this privacy policy

We may make changes to this privacy policy. If we do make any significant changes to the way we collect and process your personal information we will make this clear on this page or by contacting you directly. We do however recommend that you read the privacy policy each time you visit the site.