



# Privacy Notice

**Fire Service College  
25<sup>th</sup> April 2018**



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### Introduction

This privacy notice tells you what to expect when the Fire Service College (FSC) collects personal information through Be a Firefighter website ([www.beafirefighter.co.uk](http://www.beafirefighter.co.uk)) as part of a job application process, or an interest in a future role within the Fire & Rescue Service (FRS). To view their policy, please visit the relevant fire and rescue service website for their privacy policy.

Be a Firefighter ([www.beafirefighter.co.uk](http://www.beafirefighter.co.uk)) is used as part of the attraction element to support FRS's with the attraction of applicants to applying for a job within the Fire & Rescue Service. The FSC support FRS's with elements of their recruitment process using various online assessments which are supplied to us by various third parties.

This privacy notice is a public declaration of how the FSC (Part of Capita Group plc) applies the Data Protection Principles & Rights afforded to individuals by the GDPR, to the personal data that we process.

FSC is committed to complying with the 6 principles relating to the processing of personal data under the GDPR in all that we do. These principles are:

1. Lawfulness, fairness & transparency
2. Purpose limitation
3. Data minimisation
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality.



### Third Parties we work with who may collect/access your data

Should you register your details on Be a Firefighter website, we may retain this information to inform you of job opportunities that may arise within your local area. Should you apply for an open vacancy we may use your information to get in contact with you regarding the next stage of the recruitment process and you then therefore receive an email from one of our third party providers inviting you to complete a suite of online questions. If you are applying for an open job vacancy we will share your personal data with the Fire & Rescue Service of which you are applying for. This is done to support our clients (Fire & Rescue Services) as part of their recruitment process. Your data will be stored and shared with the Fire & Rescue Service for a period of 12 months. To view their policy, please visit the relevant fire and rescue service website for their privacy policy.

### How we collect your information

We may collect your personal data in a number of ways, for example:

- From the information you provide when submitting your information on [www.beafirefighter.co.uk](http://www.beafirefighter.co.uk)
- When you apply for a job through [www.beafirefighter.co.uk](http://www.beafirefighter.co.uk)
- When you communicate with us by telephone, email or via our website, for example to make enquiries or raise concerns

### The types of information we collect

We may collect the following types of personal data about you:

- Your name, and contact information such as address, email address and telephone number, as well as your date of birth, national insurance number, country of domicile and eligibility to work in the UK, your nationality and when providing work seeking opportunities, level of fitness, current daytime activity and whether you hold a driving licence.
- Should you be invited to complete any of the online assessments we will keep records of your assessment results.
- Sensitive personal data and information which may include the following as part of the recruitment process determined by FRS:
  - Information concerning any medical conditions or Mobility Impairment (e.g. disability)
  - Your gender/gender history
  - Sexual Orientation
  - Any criminal convictions
  - Whether you wear glasses
  - Any CCJ's
  - Religion
  - Ethnicity

### How we use your information

FSC offers various services to the public and Fire & Rescue Services. We have to hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person/Client has requested and for other closely related purposes.

We will use this information:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.



### Visitors to our websites

When someone visits [www.fireservicecollege.ac.uk](http://www.fireservicecollege.ac.uk) or [www.beafirefighter.co.uk](http://www.beafirefighter.co.uk) we may use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

### Use of cookies by the FSC

You can read more about how we use cookies on our Cookies page: <https://www.fireservicecollege.ac.uk/cookies/>

### Links to external websites

Be a Firefighter website may contain links to other websites. Please note that these links are intended for your convenience only. As part of the service to support our Clients with recruitment we may email you from a Third Party website inviting you or informing you of the next stage of the recruitment process. These websites are explicitly used as part of the application process.

Links to third party websites do not constitute endorsement, sponsorship or approval by the FSC of the content, policies or practices of those third-party websites.

This privacy notice does not cover the links within this site linking to other websites, if you have any concerns regarding your privacy when visiting a linked third party, you should ensure that you check the privacy statement/policies of those websites.

### How we use applicant's information

The purposes for which we may use personal data (including sensitive personal data) we collect during an applicant's association with us include:

- Other administrative purposes, including:
  - Recruitment
  - Carrying out research and statistical analysis
  - Carrying out audits (e.g. to ensure compliance with our regulatory and legal obligations)
  - Providing operational information (e.g. providing IT support)
  - Preventing and detecting crime
  - Dealing with grievances and disciplinary actions
  - Dealing with complaints and enquiries

### Why we process your information

We process information you give to us in responses to our assessments in behalf of our clients. We may process the information you provide for research purposes. The research we conduct is analyses on item performance characteristics (including validity, reliability, adverse impact and fairness). The research we conduct is done at only an aggregate anonymized level and no personally identifiable information is disclosed to any client or any third parties.

The information you provide will be used by us to generate results which in turn may be used by our clients for their own personnel selection and development decisions.

We may use the information you provide to us when taking an assessment on Our Sites:

- to identify your assessment and score any assessment you take;



- to analyse the answers you provide to our online assessments and make evaluations on your aptitudes and your preferences towards working styles
- to generate results reports on behalf of our client who has requested your assessment;
- to analyse aggregated data including performance data to improve our general understanding of the indicators of success; and
- to statistically analyse test question responses on an aggregate group-level. This allows us to generate demographic and norm group information and also perform item analyses (including differential item
  - functioning, reliability, and validity). This statistical data is collected on an aggregate level and does not identify any individual (for example we may report that 2000 men aged under 30 got a particular question wrong.)

### **The lawful basis for processing your information and how we use it**

We process your personal data due to a legitimate business interest as part of the recruitment process through Be a Firefighter in order to meet our contractual obligations with our clients. In this respect, we use your personal data for the following:

- To interact with you during the recruitment process, as part of the learner enrolment process (e.g. to send you information about the next steps should you be successful, to invite you to the next stage of the process or to inform you of the decision of the recruitment process)
- To deal with any concerns or feedback you may have
- For any other purpose for which you provide us with your personal data.

For all other processing we will obtain your consent before using any of your personal data.

### **Sharing information with others**

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties including those used to facilitate the application process. We may disclose limited personal data to a variety of recipients including:

- Our employees, agents and associate trainers where there is a legitimate reason for their receiving the information, including:
  - In relation to attendance logging, learner assessments and feedback
  - Catering company in relation to dietary requirements
- Selected third parties and assessment providers contracted with us to provide the recruitment process including:
  - Assessment & Development consultants/PSI Consulting
  - Test Partnership
  - VCA
  - Thinkology
  - business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you
- Those with an interest in tracking application progress, including:
  - Current or potential employers (providing statistical data to provide references and, where learners are sponsored by their employer and/or where you take part in a placement, to provide details of progress/attendance);
  - analytics and search engine providers that assist us in the improvement and optimisation of our site;
- Parents, guardians, and next-of-kin (where there is a legitimate reason for disclosure).



### **Capita Sharing**

We may share limited information with other Capita Businesses for legitimate purposes as part of our necessary obligations for internal reporting, processing of invoices and payments and to update existing customers of service and product updates or opportunities available within Capita plc Group.

### **Data Transfers outside of the EEA/EU and data portability**

Information that we collect may be stored, processed and transferred between any of the countries in which we operate in or supply from in order to enable us to use the information in accordance with this privacy statement. International transfers outside of the EU, e.g. Capita India and the US will be managed under Privacy Shield agreed terms or via other adequate security assessments and data protection controls (including EU model clauses) to enable us to carry out our service obligations to our clients, suppliers and business partners.

### **How long your information is kept**

Subject to any other notices that we may provide to you at the time of collecting your data, we may retain your personal data for a period of twelve months after your association with us has come to an end or in accordance with our Data Retention periods. Where data is captured under a consent basis it will confirm the period specified at time of capture.

FSC only keeps data for as long as is necessary. Once the data has reached the end of its retention period the data is deleted. For further details on the Data Retention, please contact us using the details at the end of this document.

### **Security of your personal information**

FSC takes information security extremely seriously. Significant investment has been made in all our systems to create the most secure environment possible. We continue to take all reasonable technical and organisational precautions to prevent the loss, misuse, or alteration of your personal information. With regards to working with our Third Party providers and their systems we have ensured that they have appropriate measures in place should they be managing your data on our behalf.

Any personal information you provide will be stored on our/our third party providers secure (password- and firewall-protected) servers. We use Transport Layer Security (TLS) to encrypt and protect email traffic in line with government. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit. We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

Of course, data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

Should you be invited to complete any of the online assessments through our third party providers (a&dc/PSI or Test Partnership) then you will be responsible for keeping your password and user details confidential. We will not ask you for your password (except when you log in to our systems).

### **Use of data processors**

Data processors are third parties who provide elements of our recruitment service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.



## Your rights

The FSC recognises the further rights of data subjects under the GDPR which include;

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- More information on Direct Marketing
- The right to withdraw consent
- The right to complain to the Supervisory Authority
- Rights related to automated decision making and profiling

You can read more about these rights here – <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

## Complaints or queries

FSC tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of FSC's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

## How to make a complaint to us

If you want to make a complaint or query about the way we have processed your personal information, please contact the Compliance Officer using the details found at the bottom of this document.

Alternatively, if you are unhappy with our response, you have the right to complain to the Supervisory Authority, the details of which are below:

Supervisory Authority: Information Commissioner's Office (ICO)

Website: <https://ico.org.uk/concerns/>

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

Telephone: 03031231113

## Subject Access Request Process

You may instruct us to provide you with any personal information we hold about you. Provision of such information will be subject to:



- The supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of
  - your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
- The description of the exact information you are seeking.

FSC will work collaboratively with our clients to ensure that we fulfil all obligations under the Data Protection Act and GDPR regarding subject access requests. We may withhold such personal information to the extent permitted by law.

### **How to contact us**

If you want to request information about our privacy policy, if you have a complaint or wish to execute a right, you can contact us by:

Writing to:

The Compliance Officer  
The Fire Service College  
London Road  
Moreton in Marsh  
Gloucestershire  
GL56 0RH

Or by email to: [ComplianceOfficer@fireservicecollege.ac.uk](mailto:ComplianceOfficer@fireservicecollege.ac.uk)

Or by phoning Reception on: 01608 650831 and asking for FSC Compliance Officer.

The Fire Service College Limited is a registered data processor under the Information Commissions Office – Reg.no. Z3584953

### **Changes to this privacy notice**

We keep our privacy notice under regular review. This privacy notice was last updated on 25<sup>th</sup> April 2019.