



Data Protection Privacy Notice (Recruitment)

We are the Funeral Partners Group (“us”, “we”, “our”) and we provide funeral services throughout our network of quality funeral homes which exist in the United Kingdom.

This privacy notice also applies to Funeral Partners Group, which includes but is not limited to Funeral Partners Limited (company number 06276941), Funeral Services Northern Ireland Limited (company number is 03983186) and Alternative Planning Company Limited (company number 08635411).

The registered office address is 80 Mount Street, Nottingham NG1 6HH

For the purposes of applicable Data Protection and Privacy Laws, we are considered the “Data Controller” in respect of the Personal Data that we collect, use and manage in accordance with this Privacy Notice (“**Notice**”).

This Notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. We are required to notify you of this information, under data protection legislation.

Please ensure that you read this Notice and any other similar notice we may provide to you from time to time when we collect or process personal information about you. If you have any questions about the contents of this Notice, then please let us know – we are here to help.

Who collects the information

Funeral Partners (the ‘Company’) is a ‘data controller’ and gathers and uses certain information about you. This information is also used by our affiliated entities and group companies (our ‘group companies’) and so, in this Notice, references to ‘we’ or ‘us’ mean the Company and our group companies which form part of the Funeral Partners Group. The recruitment software we use is supplied by IRIS Software Group Limited and they are defined as a Data Processor under the GDPR. They will only process your data in accordance with our instructions.

Data protection principles

We will comply with the data protection principles when gathering and using personal information.

About the information we collect and hold

What information

We may collect the following information as part of your initial application:

- Your name and contact details (e.g. address, home and mobile phone numbers, email address).
- Details of your qualifications, experience, employment history (including job titles, salary) and any other information you may choose to voluntarily provide us with as part of your application.

We may collect the following information from you as part of the offer process, and before making a final decision to recruit:

- Information about your previous academic and/or employment history obtained via references from current and/or previous employers and/or education providers.
- Information regarding your academic and professional qualifications.
- Information regarding your criminal record, in criminal records certificates (CRCs), via checks through organisations such as the Disclosure & Barring Service. Typically, this will be a basic check.
- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information *
- A copy of your driving licence, if applicable *

Data Protection Privacy Notice (Recruitment)

- A copy of your Right to Work ID, either passport or birth certificate *
- A copy of your proof of address e.g. bank statement, letter from a government agency *
- For certain roles within our business which relate to financial conduct, additional information may be requested from you and additional checks may be requested by us in order to meet our regulatory requirements and minimise the risk of financial misconduct. Any checks we undertake will be advised to you on a case-by-case basis. *
- Information which may be in the public domain, and where Funeral Partners is not the data controller, may be used to inform your suitability for the role, for example, media and journalism screening activity may take place.

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '*' above to us to enable us to verify your right to work and suitability for the position.

How we collect the information

Depending upon the extent to which you progress through our recruitment process, we may collect this information from you, your referees (details of whom you will have provided), your education provider (for FCA roles), relevant professional bodies, the Disclosure and Barring Service (DBS), the Home Office and Digital Identity Systems. We may use third parties to source information about you as part of our recruitment processes. Any such third party will be subject to confidentiality agreements. We reserve the right to record, or review calls for training, monitoring and quality control purposes. Where this happens, the data will be retained in line with our Data Retention Policy.

Why we collect the information and how we use it

We will typically collect and use this information for the following purposes:

- to take steps to enter into a contract.
- for compliance with a legal obligation (e.g. our obligation to check that you are eligible to work in the United Kingdom or to comply with our regulatory obligations).
- for the purposes of our legitimate interests, but only if these are not overridden by your interests, rights or freedoms.
- where call recording has taken place, this information will be used for training, monitoring and quality control purposes only.

We seek to ensure that our information collection and processing is always proportionate. In the event that we use automated decision-making, you will be notified of this, and you have the right to challenge and request a review of the decision made.

We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

How we may share the information

We may also need to share some of the above categories of personal information with other parties, such as HR consultants and professional advisers. Usually, information will be anonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators or as required to comply with the law.

The table set out in Part A of the Schedule below summarises the information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part B of the Schedule below summarises the additional information we collect before making a final decision to recruit or during the probationary period, i.e. before making an offer of employment unconditional, or before making a conditional offer of employment. How and why, we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Your data may be shared outside of the EEA, where this is the case, we will ensure that data is managed securely and in accordance with the relevant legislation.

Where information may be held

Information may be held at our offices and those of our group companies, our data processor, IRIS Software Group

Data Protection Privacy Notice (Recruitment)

Limited, Experian and third-party agencies, service providers, representatives and agents as described above.

How long we keep your information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful, and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. For further information, please ask for a copy of our Employment Privacy Notice.

All applications from external applicants, submitted after 1st Feb 2024 will be processed by IRIS Software Group Limited. Your candidate account held by IRIS Software Group Limited will be deactivated after 7 months of inactivity. You can choose to deactivate your candidate account at any time. At the same time as this, your data held by IRIS Software Group Limited will be fully anonymised.

For applications which were started or submitted prior to 1st February 2024 data processing will have been conducted via a different third-party software provider.

Your rights to correct and access your information and to ask for it to be erased.

Please contact data.protection@funeralpartners.co.uk if you would like to correct or request access to information that we, or IRIS Software Group Limited hold relating to you, or if you have any questions about this Notice. You also have the right to ask for some but not all of the information we hold and process about you to be erased (the 'right to be forgotten') in certain circumstances. We will provide you with further information about the right to be forgotten, if you ask for it.

In addition, please see the Funeral Partners Group main [Privacy Policy](#) for more about your rights.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

How to complain

Please contact data.protection@funeralpartners.co.uk in the first instance. We hope that we can resolve any query or concern you raise about our use of your information. If not, you are able to contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

Please always speak to us first so we can try to resolve your complaint, before going to the Information Commissioner's Officer (ICO).

The ICO expect us to work with you in the first instance to resolve any issue you may have.

The information we collect and hold about you

Part A - As part of your initial application

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (e.g., address, home and mobile phone numbers, email address)	From you, in your completed application, submitted online or via any other means.	- Legitimate interest: to carry out a fair recruitment process. - Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	- To enable HR personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome. - To inform the relevant manager or department of your application

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Details of your qualifications, experience, employment history (including job titles, salary)	From you, in your completed application form or CV submitted online or by any other means. and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process. Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	- To make an informed recruitment decision - To manage legitimate business interests: Certain previous roles which you may have undertaken may be subject to increased scrutiny in order to manage our legitimate business interests
Details of your qualifications, experience, employment history (including job titles, salary)	From you, in your completed application form or CV submitted online or by any other means and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process. Legitimate interest: if you are unsuccessful in your application, your details may be passed on within the company to see if they have any suitable vacancies	To see whether within the company there any suitable vacancies are

Part B - Before making a final decision to recruit or during your probationary period

Data Protection Privacy Notice (Recruitment)

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, from references obtained about you from previous employers and/or education providers	From your referees (details of whom you will have provided)	• Legitimate interest: to make an informed decision to recruit. • To comply with our legal obligations • Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	• To obtain the relevant reference about you • Information shared with relevant managers and HR personnel
Information regarding your academic and professional qualifications (depending upon the role you have applied for)	From you, from your education provider, from the relevant professional body	• Legitimate interest: to verify the qualifications information provided by you	• To make an informed recruitment decisions.
Criminal records check	From you and from the Disclosure and Barring Service (DBS) and Access NI	• To perform the employment contract • To comply with our legal obligations • Legitimate interest: to verify the criminal records information provided by you. • For reasons of substantial public interest (preventing or detecting unlawful acts, suspicion of terrorist financing or money laundering in the regulated sector and protecting the public against dishonesty)	• To make an informed recruitment decision • To carry out statutory checks • Information shared with DBS and other regulatory authorities as required. • For further information, see * below
Details of your referees	From your completed application form or CV submitted online or by any other means	Legitimate interest: to carry out a fair recruitment process	• To carry out a fair recruitment process • To comply with legal/regulatory obligations • Information shared with relevant managers, HR personnel and the referee

Data Protection Privacy Notice (Recruitment)

Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information ☐	From you and, where necessary, the Home Office	- To enter into/perform the employment contract. - To comply with our legal obligations - Legitimate interest: to maintain employment records	- To carry out right to work checks. - Information may be shared with the Home Office
A copy of your driving licence and driving history, if applicable	From you and the Driving & Vehicle Licensing Agency	- To enter into/perform the employment contract. - To comply with our legal obligations - To comply with the terms of our insurance	- To make an informed recruitment decision - To ensure that you have a clean driving licence. - Information may be shared with our insurer
Media screening records	From you and via our third-party screening provider	Legitimate interest: to ensure that those working for Funeral Partners support its policies and procedures, especially relating to conduct	To make an informed decision about your continued employment.
Adverse financial checks (for Director-level and relevant FCA roles recruitment and recruitment into the Finance function)	Via our third screening provider	Legitimate interest: to understand finance risks associated with finance personnel	To make an informed decision about your continued employment.

Directors Search (for Director-level recruitment)	Via our third-party screening provider	Legitimate interest: to understand the potential for conflicts of interest	To make an informed decision about your continued employment.
Requirements associated with regulatory reference checking and “fit and proper” assessments ☐ (As required by the Financial Conduct Authority - for Senior Manager and Certified roles only i.e., those roles which fall within the scope of the FCA’s Senior Manager & Certification Regime)	Via our third screening provider	To comply with our legal obligations	To make an informed decision and share with the FCA (if required) about your continued employment.

Data Protection Privacy Notice (Recruitment)

marked '☐' above to us to enable us to verify your right to work and suitability for the position.

* Further details on how we handle special category personal data and data relating to criminal convictions and offences can be obtained by contacting hr@funeralpartners.co.uk.

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