

The GDPR and how it applies to Talent Pools

The EU's General Data Protection Regulation (GDPR) comes into force on May 25 2018, enforcing a strict set of new rules concerning privacy and data security and imposing large penalties on violators - up to 4% of an organisation's annual worldwide turnover or €20 million, whichever is greater.

The severity of the fines going to be imposed mean this is a hot topic for all organisations dealing with personal information, and with less than a year to go before the fines start being applied the time to apply solutions is rapidly running out.

At Hollaroo we are proud that data protection and security have been at the heart of our technology since its inception. Our systems are already fully compliant with the new legislation and we are working with our clients to support their internal audit processes.

To support our existing and future clients we have produced the following document to summarise the relevant elements of GDPR for collecting, retaining and processing candidate information. Specifically, we have focused on talent pooling or engaging with talent outside the active application process.

For those concerned about future compliance and the potential risk of fines, Hollaroo offers a pipelining solution, Hollaroo Engage, which delivers a great candidate experience which is GDPR compliant. To help clients transition to the new regulations we offer a GDPR ready process for existing pools of talent.

Key Elements of GDPR

The GDPR is wide-ranging and there is a lot of confusion about what is required. In the context of recruitment, and particularly candidate information, the key elements are:

Consent – this must be specific for purpose, explicit and a record must be kept of when consent is given.

Retention – there must be justifiable policy and process in place for managing a period of data retention.

Access – the person whose data you are storing must be able to see what data you have and be able to notify you of any updates or errors.

Removal – the person has the right to withdraw consent and receive assurance that all information is deleted.

Storage – where you store data must be secure by design and ideally the data should be encrypted.

Access Control – you should be able to control who has access to the data and have an audit trail in case of a data breach.



hollaroo **engage**

How this applies to Talent Pools

Talent pooling covers all methods of recording and engaging with people not actively involved in the application process. The three key areas you need to consider are Consent, User Access and Storage:

Informed Consent – when dealing with applicants, specific and separate consent needs to be obtained (and recorded) after the selection process is complete. Similarly, if you obtain people’s data via other channels there needs to be a clear, explicit and recorded consent process.

User Access – the core principle behind GDPR is giving users visibility and control of their data. You need to be prepared for users asking for copies of their data and for it to be removed at any time. You also need to be prepared to allow amendments on demand.

Secure Storage – the GDPR covers all forms of data storage, not just electronic, and the security, audit and access control requirements mean that printouts, spreadsheets and email inboxes will no longer be acceptable places to store data.

Hollaroo Engage is fully GDPR compliant in the six key elements:

	Compliance	Details
Consent	✓	Even when they have been added by a third-party each new member is taken through a defined consent process before their data is visible.
Retention	✓	Automated tools can be set to flag members after defined time periods, re-obtaining consent can also be automated.
Access	✓	Members have full access to their own data and can review and update as necessary.
Removal	✓	There is an automated process that archives a user and all of their personally identifiable information with one click.
Storage	✓	All data is encrypted and protected by enterprise-class levels of security.
Access Control	✓	All activity is tracked and audited down to a granular level.

Conclusion

Recruiters need to get involved with the GDPR audit process because it will directly impact on the ways in which they can manage their talent. It is important, however, to treat GDPR as an opportunity to update processes rather than a threat.

Contact Us:

If you need any further advice on becoming compliant please call us on +44 (0) 1727 298081 or email us at getintouch@hollaroo.com. Further information is available at <https://ico.org.uk/media/for-organisations/documents/1624219/preparing-for-the-gdpr-12-steps.pdf>



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