Working together for a safer Scotland



PRIVACY NOTICE – ALICE (AI USE – RECRUITMENT)

Last updated: July 2025

The Scottish Fire and Rescue Service (SFRS) is committed to protecting your personal information. The processing of personal data is covered by the General Data Protection Regulation 2018 and Data Protection Act 2018.

This privacy notice explains the information SFRS ("we") are collecting about you, why we have collected it and how it will be used. It should be read alongside our <u>Website Privacy Notice</u>.

Process owner: People Directorate

This notice relates to the following categories of data subject: Internal and External Candidates

Why are we collecting your information?

Following the successful use of AI to assist with the shortlisting of applications in a previous recruitment process, we have identified a platform that has been built specifically to support UK Fire and Rescue Services. The Automated Language Inference and Cognitive Evaluation (ALICE) system is an artificial intelligence (AI) enabled platform that aims to improve the efficiency, transparency and consistency in the shortlisting stage of our recruitment processes.

What information is being collected by us and how?

ALICE will collect candidate ID number or email address to support user authentication and to enable communication regarding the application process. Your email address is stored securely and not directly linked to your responses during the shortlisting-process, however your responses are matched with your candidate ID number.

You will input your responses to the application questions directly to the ALICE system. The questions and criteria will be set by SFRS and whilst the questions are not designed to illicit personal data, there is a possibility that you may voluntarily include identifiable information within your responses.

By default, ALICE processes your responses anonymously and when responses are being reviewed by The Recruitment Team assessors in the ALICE platform, you are anonymised, ensuring a fair and unbiased process.

We are committed to ensuring that the use of AI in our recruitment process is fair and unbiased by taking the following steps:

- **Bias Mitigation**: ALICE is regularly audited and trained to minimize bias related to the protected characteristics;
- **Data Sources:** Only analyses your answers against the scoring matrix and the NFCC leadership framework. No other information is present in the analysis;
- Siloed Analysis: Has no memory function. When analysing your answers it will only do it in isolation. Previous answers it analysed have no bearing on its analysis;
- Pseudonymisation: You will be given an ID number on initial application.
 You will then use this to access ALICE. There is no need for you to enter any personal information into the AI platform;
- **Accessibility:** Has been designed to be accessible, and not score on spelling, grammar and punctuation to disadvantage you;

• **Human Oversight:** All Al-generated scores and rationales are reviewed by assessors who are trained to recognise and mitigate bias in recruitment decisions.

Legal basis for the processing

Before we process your data, we need a legal basis for doing so. In respect of processing your personal information:

the data subject has given consent to the processing of his or her Personal
 Data for one or more specific purposes – Art. 6(1)(a).

How the information will be used?

ALICE will "read" your application answers and score it using a scoring matrix provided by the assessors and by utilising the <u>NFCC Leadership Framework</u>. This matrix and framework are the same elements that assessors use to shortlist your application.

It will also provide a rationale for the score it has awarded to a question as well as elements you could improve on.

The assessor will review everything and make the sole decision to progress or reject your application.

Who we share your information with?

Your responses are shared with the ALICE system via your input. Once processed, the score, rationale and feedback are shared with the shortlisting panel.

How long we hold your information for?

Email addresses or Candidate IDs and responses will be retained for as long as necessary to support the recruitment process and in line with the <u>SFRS Records</u> <u>Retention Schedule</u>.

Data input into the ALICE system is stored within a UK based AWS environment.

Automated decision making?

It is important to emphasise that ALICE is used solely as a tool to assist our assessors. Final decisions regarding your application progression are made by our Recruitment Team. ALICE never makes the final decision on your application progression or rejection.

Your Rights and Feedback in relation to ALICE?

- **Request Human Review**: If any part of the process feels unclear or if you would like human intervention, you may request that your application be reviewed manually;
- **Receive Feedback**: We are committed to providing meaningful feedback on the use of AI in your application process;
- **Opt-Out of Al Processing**: If you do not wish for Al to be used in your application process, you can inform us and we will accommodate your request by using manual processes.

We are continuously monitoring and improving our AI tools to ensure they remain effective, unbiased, and transparent. We value your feedback and welcome any comments or concerns about the AI system used in our recruitment process.

If you have any questions or concerns regarding the use of ALICE in our Recruitment process, please contact <u>SFRS.TalentAcquisition@firescotland.gov.uk</u>.

Requesting access to your personal data and your rights?

Under data protection legislation, you have several rights regarding your personal data. You have the right to:

- be informed of how we will process it;
- request a copy of what we hold about you;
- have it deleted (where we do not have a legal requirement to retain it);
- have it rectified, restricted;
- object to us using it;
- data portability (in certain circumstances).

Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

To act on any of the above rights or if you have any concerns about how we are using your personal information, please contact the Data Protection Officer (contact details below).

However, if you are unhappy with the way we have processed your information or how we have responded to your request to exercise any of your rights in relation to your data, you can raise your concerns directly with the Information Commissioner's Office, Tel. No. 0303 123 1113 or in writing to:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

For more information about your rights:

https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-generaldata-protection-regulation-gdpr/individual-rights/

To complain to the Information Commissioner's Office: https://ico.org.uk/make-a-complaint/

Contact details of the Data Protection Officer:

We are a Data Controller for personal data. Our details have been registered with the Information Commissioners Office (ICO) and our register number is Z3555625. The ICO's register can be viewed online at https://ico.org.uk

If you would like to discuss anything in this privacy notice, please contact: Carol Wade, Information Governance Manager (Data Protection Officer), Scottish Fire and Rescue Service Headquarters, Westburn Drive, Cambuslang, G72 7NA Email: <u>carol.wade@firescotland.gov.uk</u>

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