



Candidate Privacy Notice

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| 1 | July 2021 | Diane Hanshaw | David Wilson | |
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As part of our candidate application and recruitment process GP Health Connect Limited collects, processes and stores personal information about you. We process this information for a range of purposes relating to the recruitment process and this may include your application, assessment, pre-employment screening, and your worker permissions. This document sets out:

- i. Why we collect your personal information;
- ii. What information is collected and;
- iii. How it is processed within the recruitment process.

Throughout this Privacy Notice we use the term “processing” to cover all activities involving your personal information, including collecting, handling, storing, sharing, accessing, using, transferring and disposing of the information.

1) Why do we collect your personal information?

In order to manage your application, we need to process certain personal information about you. We process this information in line with the Data Protection Act 2018 and General Data Protection Regulation (GDPR). Specifically our lawful basis for processing is:

- GDPR Article 6(1)(a) – the data subject has given consent to the processing for one or more specific purposes.
- GDPR Article 6(1)(b) - necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- GDPR Article 6(1)(f) - necessary for the purposes of the legitimate interests pursued by the controller.

The purposes for this are set out below. We only process your information as necessary for the purposes of progressing your application or as required by law or regulatory requirements, so not all of the purposes set out below will apply to you all of the time.

Where the organisation relies 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.

- **Application:** Application form or CV, name, address, employment history, academic and professional qualifications, age, diversity (i.e. gender, ethnicity, disability, sexual orientation), nationality.
- **Assessment:** CV, interview (face to face, telephone or video).
- **Pre-employment screening:**

Given the nature of our business, we have legal and regulatory obligations to ensure that the people we employ can be relied upon to safely interact with children and vulnerable adults in certain roles. We therefore ask questions about any prior civil or criminal proceedings you may have been subject to and may also conduct criminal record checks. This involves the following:

Police Records of Convictions, Cautions, Reprimands and Warnings including details of Convictions where there are convictions to cite. Information from the list held under Section 142 of the Education Act 2002. In Enhanced checks – DBS Barred List Information Adults and Children and also any other relevant information disclosed at the Chief Police Officer(s) discretion. We request references from two sources named by you. We will ask your job title, salary, dates of tenure, and the number of sick instances in the last 24 months. We will also ask for an opinionative reflection on your performance and trustworthiness in your time at that role.

2) What personal information might we process?

Here are some examples of the type of information we may process.

- Personal details such as name, address, date and place of birth;
- Work history/job data; previous employers, positions, dates, etc.
- Compensation; basic salary, benefits, bonuses, etc.;
- Education and work history including professional qualifications and skills;
- Employer feedback / references to include regulated references where necessary;
- Nationality / visa / right to work permit information; (e.g. passport, driving licence, National Insurance numbers)
- Photographs and images from provided documentation (passport or driving licence as examples)
- Results of Pre-employment screening checks (e.g. credit history, criminal records checks where permitted under local law)

During the process we also capture some sensitive personal data about you (e.g. disability information). We do this in order to make reasonable adjustments to enable our candidates to apply for jobs with us, to attend interviews, to prepare for starting at GP Health Connect Limited (if successful) and to ensure that we comply with regulatory obligations placed on us with regard to our hiring.

3) Who do we share your personal information with?

GP Health Connect Limited will need to share your personal information internally and with some external parties or associates of GP Health Connect Limited. Your information will only be shared if it is necessary or required (for example in order to carry out Pre-employment screening). External parties we will share your information with are listed below.

The recruitment process will involve:

- Assessing and progressing your application,
- Assessing your suitability (skills, strengths, behaviours for the role)
- Activities needed to complete the on-boarding and screening process should your application be successful.

To enable these processes your personal information may be shared internally, but the information shared is limited to what is required by each individual to perform their role in the recruitment process.

Your personal information may be shared internally with the following people:

- Those employees who would have managerial responsibility for you or are acting on their behalf;
- Employees who have responsibility for certain HR processes (for example recruitment, assessment, pre-employment screening);
- Employees in IT and system owners who manage user access;
- Audit and Investigations employees in relation to specific audits/investigations;

and

Your personal information may be shared externally with the following parties:

- Access Personal Checking Services Ltd www.onlinecrbcheck.co.uk/ who perform our DBS checks
- Organisations that may have an involvement in the recruitment process such as NHS Halton CCG or Runcorn PCN
- PayeDoc Limited <https://www.gppayroll.org.uk/> who manage our payroll

4) How do we protect your information?

The organisation takes the security of your data seriously. Internal policies and controls are in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. Paper records are kept in locked cabinets, payroll details are backed up on an encrypted format in a locked safe and all digital records are password protected on secure network drive access by authorised personnel only.

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 practice measures to ensure the security of data.

5) For how long do we keep your data?

GP Health Connect Limited will keep your information for the periods defined in the Records Management Code of Practice for Health and Social Care 2016. If you are

unsuccessful we will only retain your personal information for 6 months. If you are successful and become employed by GP Health Connect Limited we will hold your personal data for the duration of your employment. The periods for which your data is held after the end of employment are:

Personal Files: letters of employment, contracts, etc - 6 years from the date of employment termination unless otherwise stated in our Records Retention Policy.

PAYE information: 10 years from termination of employment – For superannuation purposes authorities may wish to retain such records until the subject reaches benefit age.

6) Your Rights

You are entitled to see the information that the GP Health Connect Limited holds about you. You can also request changes to be made to incorrect information. You can ask for information to be deleted or blocked if you legitimately think that the organisation shouldn't be processing that information, or isn't processing it incorrectly. Further details on your rights are available via the ICO website.

If you have any queries about this notice or your personal information generally, including questions about accessing your personal information or correcting it, you should contact diane.hanshaw@nhs.net in the first instance.

You can also contact the Data Protection Officer:

Dr David Wilson

David.Wilson2@GP-N81066.nhs.uk

If you are unhappy with the way in which GP Health Connect Limited has dealt with any requests you have made or require further information, you can also contact the Information Commissioner's Office via their website at <https://ico.org.uk/>