

## Primary Integrated Community Services Ltd (PICS)

***This document applies to all associated PICS GP Practices, Services and employees.***

### Candidate Privacy Notice

#### Document Control

##### A. Confidentiality and Equality Notice

This document and the information contained therein is the property of Primary Integrated Community Services Ltd.

This document contains information that is privileged, confidential or otherwise protected from disclosure. It must not be used by, or its contents reproduced or otherwise copied or disclosed without the prior consent in writing from Primary Integrated Community Services Ltd.

All PICS policies are tested using the PICS Equality Impact Assessment tool at the time of issue and renewed with every substantial update to the policy. A PICS policy will only be published and enforced once a policy is deemed to have an overall positive or neutral impact on all protected characteristics. The EIA can be found at the back of this policy.

##### B. Document Details

<b>Classification:</b>	Information Governance
<b>Author and Role:</b>	Marie Cooper, Workforce and Development Lead
<b>Champion:</b>	Workforce and Development Lead
<b>Organisation:</b>	Primary Integrated Community Services Ltd
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<b>Review Date:</b>	October 2026
<b>Current Document Approved By:</b>	PICS Policy Committee
<b>Scope:</b>	Applicable to all PICS employees, volunteers, contractors and people who are working for the Organisation.
<b>Issue Date:</b>	October 2020
<b>Equality Impact Assessment:</b>	completed and neutral

##### C. Document Revision and Approval History

Version	Date	Version Created By:	Comments and details of changes made
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1.0	October 2020	Paul Couldrey	New policy/notice
2.0	October 2021	Paul Couldrey	Reviewed with minor changes
3.0	October 2022	Paul Couldrey	Reviewed with minor changes
3.1	October 2023	Paul Couldrey	Reviewed with minor changes
3.2	October 2024	Paul Couldrey	Reviewed with minor changes
3.3	October 2025	Marie Cooper	Reviewed with minor word changes

#### **D. Policy Summary**

This notice outlines how we collect, use, store, and share your information during the recruitment process. We only process data that is necessary, and we do so lawfully, fairly, and transparently. Your information is kept secure and is not shared with third parties without your consent, unless required by law. You have rights regarding your data, including access, correction, and deletion.

#### **E. Related Policies and Procedures**

Not Applicable.

**“PICS” including the Associated GP Practices, PCNs and Organisations PICS provides HR support to**

## **Data Protection Privacy Notice for Candidates applying for work**

### **1. Introduction:**

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you.

This privacy notice applies to personal information processed by or on behalf of PICS.

This Notice explains

- Who we are, how we use your information and our Data Protection Officer
- What kinds of personal information about you do we process?
- What are the legal grounds for our processing of your personal information (including when we share it with others)?
- What should you do if your personal information changes?
- For how long your personal information is retained by us?
- What are your rights under data protection laws?

The UK General Data Protection Regulation (UK GDPR) became law on 24th May 2016. This is a regulation on the protection of confidential and sensitive information. It entered into force in the UK on the 25th May 2018, repealing the Data Protection Act (1998), being supplemented by the Data Protection Act 2018.

For the purpose of applicable data protection legislation (including but not limited to the UK General Data Protection Regulation (Regulation (UK) 2016/679) (the "UKGDPR"), and the Data Protection Act 2018 PICS is responsible for your personal data.

This Notice describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights

This Privacy Policy applies to the personal data collected from Candidates applying for roles within PICS, its GP Practices or bodies that PICS supports with HR functions.

### **2. How we use your information and the law.**

Primary Integrated Community Services Ltd (PICS) will be what's known as the 'Data Controller' of the personal data you provide to us.

We may collect and process the following categories of personal data in order to; consider you for employment, communicate with you during the recruitment process,

conduct pre-employment checks (e.g. references, right to work) and comply with legal and regulatory obligations.

- Identity data: name, date of birth, gender, nationality.
- Contact data: address, email, phone number.
- Employment data: CV, cover letter, employment history, qualifications, references.
- Right to work data: passport, visa, or other documentation.
- Special category data (if voluntarily provided): health information, disability status, ethnicity, etc.
- Assessment data: interview notes, test results, and feedback.

Throughout the application process we will collect data and add to your file i.e. interview scores etc

### **3. How do we lawfully use your data?**

Under the General Data Protection Regulations we will be lawfully using your information in accordance with: -

*Article 6, (b) Necessary for performance of/entering into contract with you*

*Article 9(2) (b) Necessary for controller to fulfil employment rights or obligations in employment.*

This Privacy Notice applies to the personal data of our Candidates.

### **4. How do we maintain the confidentiality of your records?**

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- Data Protection Act 2018
- The UK General Data Protection Regulation 2016
- Human Rights Act 1998
- Common Law Duty of Confidentiality
- NHS Codes of Confidentiality, Information Security and Records Management

We will only ever use or pass on information about you if others who have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances (i.e. life or death situations), where the law requires information to be passed on.

Our policy is to respect the privacy of our candidates and to maintain compliance with the UK General Data Protection Regulation (UK GDPR) and all UK specific Data

Protection Requirements. Our policy is to ensure all personal data related to our candidates will be protected.

All employees and sub-contractors engaged by us are asked to sign a confidentiality agreement. PICS will, if required, sign a separate confidentiality agreement if the client deems it necessary. If a sub-contractor acts as a data processor for PICS an appropriate contract (art 24-28) will be established for the processing of your information.

In Certain circumstances you may have the right to withdraw your consent to the processing of data. Please contact the Data Protection Officer in writing if you wish to withdraw your consent. In some circumstances we may need to store your data after your consent has been withdrawn to comply with a legislative requirement.

## **5. Where do we store your information Electronically?**

All the personal data we process is processed by our candidates in the UK however for the purposes of IT hosting and maintenance this information may be located on servers within the European Union.

No third parties have access to your personal data unless the law allows them to do so and appropriate safeguards have been put in place. We have a Data Protection regime in place to oversee the effective and secure processing of your personal and or special category (sensitive, confidential) data.

## **6. Who are our partner organisations?**

We may also have to share your information, subject to strict agreements on how it will be used, with the following organisations;

- Recruitment platforms
- Agencies acting on our behalf
- Background check providers
- Regulatory bodies, where required by law
- NHS Commissioning Support Units
- Clinical Commissioning Groups
- NHS England (NHSE) and NHS Digital (NHSD)
- Local Authorities
- CQC
- Private Sector Providers providing employment services
- Other 'data processors' which you will be informed of

You will be informed who your data will be shared with and in some cases asked for consent for this happen when this is required.

We may also use external companies to process personal information, such as for archiving purposes. These companies are bound by contractual agreements to ensure

information is kept confidential and secure. All employees and sub-contractors engaged by us are asked to sign a confidentiality agreement. If a sub-contractor acts as a data processor for us an appropriate contract (art 24-28) will be established for the processing of your information.

## **7. How long will we store your information?**

We are required under UK tax law to keep your information and data for the full retention periods as specified by the UK Employment legislation as below

<b>Business Function</b>	<b>Examples of documents</b>	<b>Retention Period</b>
HR	Training records	Current year plus 2 years
HR	Candidate application forms/CVs and archiving documentation (of applicants who aren't successful)	6 months post-date of recruitment decision
HR	DBS data	6 months post-date of check

## **8. How can you access, amend move the personal data that you have given to us?**

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

**Right to object:** If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.

**Right to withdraw consent:** Where we have obtained your consent to process your personal data for certain activities (for example for a research project), or consent to market to you, you may withdraw your consent at any time.

Right to erasure: In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will Delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

Right of data portability: If you wish, you have the right to transfer your data from us to another data controller.

## **9. Access to your personal information**

Data Subject Access Requests (DSAR): You have a right under the Data Protection legislation to request access to view or to obtain copies of what information the surgery holds about you and to have it amended should it be inaccurate. To request this, you need to do the following:

- Your request should be made in writing to PICS
- There is no charge to have a copy of the information held about you
- We are required to respond to you within one month

## **10. What should you do if your personal information changes?**

You should tell us so that we can update our records please contact the HR Department via [pics.picshr@nhs.net](mailto:pics.picshr@nhs.net) as soon as any of your details change, this is especially important for changes of address or contact details (such as your mobile phone number), PICS may from time to time ask you to confirm that the information we currently hold is accurate and up-to-date.

## **11. Objections / Complaints**

Should you have any concerns about how your information is managed at PICS, please contact the HR Department or the Data Protection Officer as above. If you are still unhappy following a review by PICS or our DPO, you have a right to lodge a complaint with a supervisory authority: You have a right to complain to the UK supervisory Authority as below.

Information Commissioner:  
Wycliffe house  
Water Lane  
Wilmslow

Cheshire  
SK9 5AF

Tel: 01625 545745  
<https://ico.org.uk/>

If you are happy for your data to be extracted and used for the purposes described in this privacy notice, then you do not need to do anything. If you have any concerns about how your data is shared, then please contact PICS HR Department.

If you would like to know more about your rights in respect of the personal data we hold about you, please contact the Data Protection Officer as below.

## **12. Data Protection Officer:**

PICS' Data Protection Officer is Paul Couldrey of PCIG Consulting Limited. Any queries regarding Data Protection issues should be addressed to him at: -

Email: [Couldrey@me.com](mailto:Couldrey@me.com)  
Postal: PCIG Consulting Limited  
7 Westacre Drive  
Quarry Bank  
Dudley  
West Midlands  
DY5 2EE

## **Appendix 1: Equality Impact Assessment**



EIA