

# **The Norfolk Hospice Privacy Statement - Employees**

## **WHAT IS THE PURPOSE OF THIS DOCUMENT?**

The Norfolk Hospice is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. You will be sent a copy of this privacy notice if you are applying for work with us. It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulations.

## **DATA PROTECTION PRINCIPLES**

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for specified, explicit and legitimate purposes and not used in any way that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date
- Kept only for as long as necessary for the purposes we have told you about.
- Kept securely.

## **THE KIND OF INFORMATION WE HOLD ABOUT YOU**

- Your name, address and contact details, including email address and telephone number;
- Details of your qualifications, skills, experience, professional membership(s) and employment history;
- Information about your current/previous level of remuneration, including benefit entitlements;
- Whether you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- Information about your entitlement to work in the UK; and
- Equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

## **HOW IS YOUR PERSONAL INFORMATION COLLECTED?**

The organisation collects this information in a variety of ways. For example, data might be contained in application forms, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

The organisation will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The organisation will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

## **HOW WE WILL USE INFORMATION ABOUT YOU?**

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the position you have applied for.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to process the information you have provided to enable us to decide whether to offer you employment in the position you have applied for.

We also need to process your personal information to decide whether to enter into a contract of employment with you.

Having received your application form (and supporting CV if provided) we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the position. If we decide to offer you the position, we will then take up references, carry out a criminal record check (if appropriate), and establish that you have the right to work in the UK. You will also be required to provide original documentation to prove you hold the qualification(s), if any, that are required for the position, including Full UK Driving Licence, where relevant. If you are offered a position which requires you to be registered with a governing body, i.e. GMC or NMC we will check your registration online. We will carry out all these checks before confirming your appointment.

## **If you fail to provide personal information**

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a criminal record check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

## **HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION**

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

## **INFORMATION ABOUT CRIMINAL CONVICTIONS**

We envisage that we will process information about criminal convictions.

We will collect information about your criminal convictions history if we would like to offer you employment (conditional on checks and any other conditions, such as references, being satisfactory) in a role which may bring you into contact with vulnerable adults or young people. We are entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role.

In particular:

- We are legally required by Care Quality Commission to carry out criminal record checks for those carrying out regulated activities as defined by the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012.
- If the role for which you are applying is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (*SI 1975/1023*) and is also specified in the Police Act 1997 (Criminal Records) Regulations (*SI 2002/233*) so is eligible for a standard or enhanced check from the Disclosure and Barring Service.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

## **AUTOMATED DECISION-MAKING**

We do not use recruitment software which makes autonomous shortlisting decisions.

## **DATA SHARING**

### **Why might you share my personal information with third parties?**

- We will only share your personal information with the following third parties for the purposes of processing your application: Disclosure & Barring Service. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.
- Active promotion of research, development and service evaluation improves the quality of our services in the future. You may be offered the opportunity to participate within such areas and we would gain your consent prior to undertaking anything that would be used in this manner. The appropriate safeguards to your information are applied at all times. You are under no obligation to participate and may choose whether you are involved or not.

## **DATA SECURITY**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Director of Human Resources.

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

## **DATA RETENTION**

### **How long will you use my information for?**

We will retain your personal information for a period of 6 months after we have communicated to you our decision about whether to appoint you to the position you have

applied for. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy. In the event of your application being successful we will retain your personal information for a period of seven years following your resignation or retirement.

## **RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION**

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
- **Be informed** about the collection and use of your personal data

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Director of Operations.

## **RIGHT TO WITHDRAW CONSENT**

You have the right to withdraw your consent for us to process your information at any time during the recruitment process. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely. To withdraw your consent, please contact the Director of Operations

## **DATA PROTECTION**

If you have any questions about this privacy notice or how we handle your personal information, please contact the Chief Executive. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.