

Recruitment Privacy Notice

1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

2.1 The Data and Procurement Officer is responsible for ensuring that this notice is made available to data subjects prior to Springhill Hospice collecting/processing their personal data.

2.2 All employees/staff of Springhill Hospice who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secure.

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As part of any recruitment process, Springhill Hospice collects and processes personal data relating to job applicants. Springhill Hospice is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

3.1 What information does Springhill Hospice collect?

Springhill Hospice collects, uses and processes a range of personal information about you during the recruitment process. This includes:

- your contact details, including your name, address, email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- copies of qualification certificates;
- your professional memberships;
- information about your current level of remuneration, including benefit entitlements; and
- Information and documentation regarding your entitlement to work in the UK and copies of proof of right to work documentation

Springhill Hospice may also collect, use and process the following special categories of your personal information during the recruitment process:

- whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process;
- information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation and
- information about criminal convictions and offences

Springhill Hospice may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport, driving licence or other identity documents, or collected through interviews or other forms of assessment.

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Springhill Hospice may 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 (from the Disclosure and Barring Service – DBS). Other than employment agencies, Springhill Hospice will only seek personal information from third parties during the recruitment process once an offer of employment has been made and will inform you that the hospice 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).

3.2 Why and how do Springhill Hospice process your personal data?

Where the hospice has a legal basis for processing your personal information it will do so :

- To process data to take steps at your request prior to entering into a contract with you. The hospice may also need to process your data to enter into a contract with you.
- To process data to ensure that the hospice is complying with our legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.
- Where it is necessary for our legitimate interests, and your interests, or fundamental rights and freedoms, do not override our interests

Springhill Hospice has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows Springhill Hospice to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. Springhill Hospice may also need to process data from job applicants to respond to and defend against legal claims.

Springhill Hospice may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. Springhill Hospice processes such information to carry out its obligations and exercise specific rights in relation to employment.

For some roles, Springhill Hospice is obliged to seek information about criminal convictions and offences. Where the hospice seeks this information, it does so because it is necessary to carry out our obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, Springhill Hospice may keep your personal data on file in case there are future employment opportunities for which you may be suited. Springhill Hospice will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

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Personal information

The purpose for which the hospice will process your personal information is to:

- Manage the recruitment process and assess your suitability for employment
- Decide to whom to offer a job
- Comply with statutory and/or regulatory requirements and obligations (for example, checking your rights to work in the UK)
- Comply with the duty to make reasonable adjustments for disabled job applicants and with other disability discrimination obligations
- Ensure compliance with your statutory rights
- Ensure effective HR, personnel management and business administration
- Monitor equal opportunities
- Enable us to establish, exercise or defend possible legal claims

Please note that the hospice may process your personal information without your consent, in compliance with these rules, where this is required or permitted by law.

Sensitive personal information

Springhill Hospice will only collect and use your sensitive personal information, which includes special categories of personal information and information about criminal convictions and offences when the law allows us to do so. This data is processed so that the hospice can perform or exercise our obligations or rights under employment law and in line with our data protection policy.

The hospice may also process information about your health and information about any criminal convictions and offences where the hospice has your explicit written consent. In this case, the hospice will first provide you with full details of the personal information requested and the reason it is needed, so that you can properly consider whether you wish to consent or not. It is entirely your choice whether to consent and your consent can be withdrawn at any time.

The purposes for which Springhill Hospice processes health information and information about any criminal convictions and offences, is to:

- Assess your suitability for employment
- Comply with statutory and/or regulatory requirements and obligations (for example, carrying out criminal record checks)
- Comply with the duty to make reasonable adjustments for disabled job applicants and with other disability discrimination obligations
- Ensure compliance with your statutory rights
- Ascertain your fitness to work
- Ensure effective HR, personnel management and business administration
- Monitor equal opportunities

Springhill Hospice processes information about other special categories of personal information (for example, racial or ethnic origin, religious or philosophical beliefs and sexual orientation) purely for the purpose of equal opportunities monitoring in recruitment and in line with our data protection policy. The personal information used for these purposes is anonymised and is collected with your explicit

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consent, which can be withdrawn at any time. It is entirely your choice whether to provide such personal information.

Who has access to data?

Your personal information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

Springhill Hospice will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. Springhill Hospice will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

3.3 How does Springhill Hospice protect your data?

Springhill Hospice takes the security of your data seriously. It has internal policies and controls 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.

3.4 For how long does Springhill Hospice keep data?

If your application for employment is unsuccessful, Springhill Hospice will hold your data on file for six months after the end of the relevant recruitment process, in accordance with our retention policy. If you agree to allow Springhill Hospice to keep your personal data on file, your data will be held on file for a further 6 months for consideration for future employment opportunities. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

3.5 Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- Restrict the processing of your personal information, enabling you to ask us to suspend the processing of your personal information, for example, if you contest its accuracy and want this verifying;

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- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing; and
- data portability giving you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes.

If you would like to exercise any of these rights, please contact the Data and Procurement Officer at the Hospice.

If you believe that Springhill Hospice have not complied with your data protection rights, you can complain to the Information Commissioner's Office.

3.6 What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to Springhill Hospice during the recruitment process. However, if you do not provide the information when requested, the hospice: may not be able to process your application properly or at all; may not be able to enter into a contract with you; or may be prevented from complying with its legal obligations. You may also be unable to exercise your statutory rights.

3.7 Automated decision-making

Recruitment processes are not based solely on automated decision-making.

3.8 Changes to this Recruitment Privacy Notice

Privacy laws and practices are constantly developing and at Springhill Hospice aim to meet high standards. The hospice's policies and procedures are, therefore, under continual review. The hospice may, from time to time, amend or update security and privacy policies and notices.

This notice was last updated May 2018.

How to contact us

If you have any questions regarding the Recruitment Privacy Notice please contact:

Data and Procurement Officer

Springhill Hospice

Broad Lane

OL16 4PZ

Tel: 01706 649920