

JOB APPLICANT PRIVACY NOTICE

Last updated: 1st October 2020

INTRODUCTION

West Cambridgeshire GP Federation, (“WCF”, “we”, “us”, “our”) of Unit 6, Incubator 1, Enterprise Campus, Alconbury Weald, Cambridgeshire, PE28 4XA is committed to protecting your privacy and meeting our legal obligations when you apply for a job or you (or an agent acting on your behalf) share your employment details with us.

QHS is the controller of data for the purposes of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. This privacy notice explains what personal data we collect about employment and agency candidates (“you”/“your”) during the recruitment process and how we will use it.

As a health care organisation, we place great importance on ensuring the quality, confidentiality, integrity and availability of the data we hold, and in meeting our data protection obligations where we process personal data. We are committed to protecting the security of your personal data. We use a variety of technical and organisational measures to help protect your personal data from unauthorised access, use or disclosure.

We update this privacy notice from time to time in response to changes in applicable laws and regulations, to our processing practices and to products and services we offer. When changes are made, we will update the date at the top of this page.

PERSONAL DATA WE COLLECT

When you apply for a role (whether as an employee, intern or an agency contractor) or submit your CV (or similar employment information) to us, whether directly or through an agency, or are interviewed by us, we will collect your personal data. This may include:

- Name and contact details (address, mobile phone number and email address)
- Date of birth and gender
- Work history and employment positions held
- Salary, other compensation and benefits information
- Nationality / visa / right to work permit information
- Academic and professional qualifications, education and skills

- Photographs or videos you submit with your application
- Demographic information
- Any other information you choose to give us
- Records we create during interviews or correspondence with you
- Results of pre-employment screening checks

We may collect some sensitive personal data about you, such as disability information. We will only do this to make reasonable adjustments to enable candidates to apply for jobs with us, attend interviews and to start work with us if successful. Also, to ensure we meet our legal obligations when recruiting.

HOW WE USE YOUR PERSONAL DATA

We use the personal data you share with us in a variety of ways, including to:

- Process your application (including by adding you to our HR management system)
- Communicate with you, including by telephone, email and SMS
- Assess your suitability, skills and experience for the role you have applied for
- Set up and conduct interviews by telephone and in person
- Contact third party references you have provided us
- Conduct pre-employment screening checks

If your candidacy is not successful or if you (or an employment agency on your behalf) have submitted your CV or application to us on a speculative basis, we may also add your details to our list of suitable candidates for future roles (our 'talent pool') and may contact you again should a suitable role arise.

PURPOSES AND BASES FOR USING YOUR PERSONAL DATA

We will only use your personal data when the law allows. At the recruitment stage, we may use your personal data for the following purposes and on the following lawful bases:

Purpose	Lawful Bases for Processing
When processing your personal data for the purposes of administering your job application, assessing your candidacy for a role, communicating with you and	We process this personal data with your consent and to meet our legal obligations.

contacting third party references.	<p>By submitting your application, you are confirming your consent to us processing your personal data for these purposes.</p> <p>If we process any sensitive personal data, we will do so with your explicit consent or where we are required to do so by law.</p>
Managing our talent pool of potential candidates by retaining contact details (name, telephone, email and CV) of job applicants that were unsuccessful.	It is in our legitimate interests to maintain the details of, and stay in contact with, suitable candidates for future roles.
To attend to an emergency during an interview and for health and welfare reporting to emergency services.	<p>It is necessary to protect your vital interest that we process your data in case of emergency.</p> <p>When processing your special category data, we do so with your explicit consent, or to protect your vital interest if unable to give consent.</p>
To identify areas for improving recruitment effectiveness and manage business planning.	It is in our legitimate interests that we process this personal data to identify areas for improving staff recruitment and selection, and to manage our business.
To monitor job applicant activities whilst at WCF offices.	It is in our legitimate interest to protect the organisations assets and ensure your safety.

You can withdraw your consent and/or object to being in our talent pool at any time, by contacting us at CAPCCG.westcambsfed@nhs.net or by writing to us at the address below.

Less commonly, we may process your personal data in relation to legal claims.

SHARING YOUR DATA

We may share your data with service providers and suppliers to our business who process data on our behalf, including those in countries outside the European Economic Area (the “EEA”) where the data protection laws are not equivalent to those within the EEA. We do so

using Standard Contractual Clauses approved by the European Commission which contractually oblige our group companies in those countries to maintain the data protection standards expected within the EEA. In such cases, our service providers and suppliers are data processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the contract we enter into with them.

Within WCF, your personal data will only be shared with those who need to have access to it. This will primarily be our Directors and hiring managers.

It is possible that we may be required to share your data to comply with applicable laws or with valid legal processes, such as in response to a court order or with government or law enforcement agencies.

HOW LONG WE KEEP YOUR DATA

We will retain your personal data for only as long as is necessary for the recruitment process. If your candidacy is successful and you are employed by us, your data will be processed and retained as set out in our employee privacy notice, provided to you with your employment paperwork.

If your candidacy is not successful, we will retain your CV, application details and interview notes for two years (from the date of first receipt of your details). During this time, we may add your information to our talent pool unless you ask us not to, or subsequently object to us doing so.

We will also retain personal data where it is necessary to comply with our legal obligations or as necessary in relation to legal claims. This is rare but may mean we need to retain your data for longer than two years.

YOUR RIGHTS

Individuals whose personal data we hold, and process have the following rights:

- You have the right of access to your personal data and can request copies of it and information about our processing of it.
- If the personal data we hold about you is incorrect or incomplete, you can ask us to rectify or add to it.

- Where we are using your personal data with your consent, you can withdraw your consent at any time.
- Where we are using your personal data because it is in our legitimate interests to do so, you can object to us using it this way.
- In some circumstances, you can restrict our processing of your data, request a machine-readable copy of your personal data to transfer to another service provider and compel us to erase your personal data.

If you wish to exercise your rights, please contact us at CAPCCG.westcambsfed@nhs.net or write to us at the address provided below.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

Employees in the EU also have the right to lodge a complaint with a supervisory authority in a member state of the EU if you believe we are infringing EU data protection laws. In addition to the above, please note that you have the right to make a complaint at any time to the [Information Commissioner's Office](#) if you are concerned about the way in which we are handling your personal data.

HOW TO CONTACT US

You can contact WCF in relation to data protection and this privacy notice by writing to:

Chief Executive Officer,
Unit 6, The Incubator,
Enterprise Campus,
Alconbury Weald,
Cambridgeshire,
PE28 4XA.

Alternatively, you can email us at CAPCCG.westcambsfed@nhs.net.