

GDPR Recruitment and Staff Privacy Notice

What is the Purpose of this Document?

Longfield ("Longfield" or "we") is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you before, during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all current and former employees, workers, volunteers, work experience students (including those undertaking the Duke of Edinburgh award) and contractors as well as job applicants.

Longfield is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to job applicants, current and former employees, workers, volunteers, work experience students (including those undertaking the Duke of Edinburgh award) and contractors. This notice does not form part of any contract of employment, other contract to provide services or volunteer agreement. We may update this notice at any time.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

The table set out in the schedule to this privacy notice summarises the information we collect and hold, how and why we do so, how we use it and with whom it may be shared.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.

3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest.

The table at the schedule to this privacy notice sets out how we will use the information we hold about you. Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations including under employment law.
3. Where it is needed in the public interest, such as for equal opportunities monitoring, and in line with our data protection policy.
4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed to establish, exercise or defend legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

The table at the schedule to this privacy notice sets out how we use your particularly sensitive personal information.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy and DBS policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We envisage that we will hold information about criminal convictions given the nature of the activities many of our staff carry out.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us. We will use information about criminal convictions and offences to check your suitability for the job.

For further detail, please see our DBS Policy which can be found on the intranet and hard copies can be found in the staff room/bistro.

Data sharing

We may have to share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

“Third parties” includes third-party service providers (including contractors and designated agents). The following activities are carried out by third-party service providers: DBS checks (MG Care Executive Limited, trading as uCheck), payroll, pension administration, benefits provision and administration, legal advisers, Occupational Health advisers and IT service providers.

Work Experience / Duke of Edinburgh

If you apply for work experience via your school and you are in Year 11 or below, we will need to provide the school with information in relation to your application. If you apply to work within Longfield as part of your Duke of Edinburgh award or you set up work experience independently and you are in school Year 11 or below, we will share your work experience application with Gloucestershire County Council ('GCC'). We need to do this as GCC are required under law to satisfy itself that the work experience is lawful and that your health, welfare and education will not be jeopardised and that you are fit to undertake the work that you will carry out. GCC will also use personal information in your application for the wider purpose of providing statistical data to assist them in monitoring provision and/or areas of need in order to target future resources. You may wish to contact GCC or review their privacy notice for further information.

Data Security

We have put in place measures to protect the security of your information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Full details of these measures are available on the intranet and hard copies can be found in the staff room/bistro.

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. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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 only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Once you are no longer an employee, worker, volunteer or contractor of Longfield or your work experience with us comes to an end, we will retain and securely destroy your personal information in accordance with our Information Lifecycle Management Policy and the applicable laws and regulations.

Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

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.
- **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.

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 your line manager in writing in the first instance, who will then inform the Head of Retail, IT and Facilities, Longfield's Data Protection Officer.

No fee usually required

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

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Head of HR/VS. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

Point of contact

If you have any questions about this privacy notice, please contact the Head of Human Resources.

You also 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.

Schedule – about the information we collect and hold

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Recruitment information (including copies of right to work documentation, references and other information included in an application form, CV or covering letter or as part of the application process)</p>	<p>From you and from referees</p>	<p>To comply with our legal obligations</p> <p>To perform the employment contract</p> <p>Legitimate interest: to carry out a fair and effective recruitment process</p> <p>To progress applications, arrange interviews and inform candidates of outcomes</p> <p>To make informed decisions to shortlist for interview and to recruit.</p> <p>To verify information provided by you in the recruitment process, for example qualifications or criminal records information</p>	<p>To carry out a fair and effective recruitment process</p> <p>To make an informed recruitment decision</p> <p>The details of referees may be shared with relevant managers, HR personnel and the referee</p> <p>Information regarding your criminal record may be shared with DBS and other regulatory authorities as required</p> <p>Information about your previous employment history from references obtained about you from previous employers may be shared with relevant managers and HR personnel</p> <p>Information about your nationality and immigration status and information from related documents, such as your passport or other identification or immigration information may be shared with the Home Office</p>
<p>Your name, contact details (i.e. address, home and mobile phone numbers, email address) and emergency contacts (i.e. name, relationship and home and mobile phone numbers)</p>	<p>From you</p>	<p>To enter into/perform the employment contract or volunteer agreement</p> <p>Legitimate interest: to maintain employment records and good employment practice</p>	<p>To enter into/perform the employment contract or volunteer agreement</p>

Details of salary and benefits, bank/building society, National Insurance and tax information, your age	From you	To perform the employment contract including payment of salary and benefits Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To ensure you receive the correct pay and benefits Information shared with our payroll administrators Randall and Payne and with HM Revenue & Customs (HMRC)
Emergency contact information	From you	Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To ensure that appropriate action can be taken in the event of an emergency Information shared with relevant managers, HR personnel and with consultants we may engage
Details of your spouse/partner and any dependants	From you	To perform the employment contract including employment-related benefits, e.g. private medical insurance, life assurance and pension	To ensure you receive the correct pay and benefits Information shared with our payroll administrators Randall and Payne and with HM Revenue & Customs (HMRC)
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information	From you and, where necessary, the Home Office	To enter into/perform the employment contract or volunteer agreement To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office
A copy of your driving licence	From you	To perform the employment contract To comply with our legal obligations To comply with the terms of our insurance	To ensure that you have a clean driving licence Information may be shared with our insurer
Details of your pension arrangements, and all information included in these	From you, from our pension administrators	To perform the employment contract	To administer your pension benefits

and necessary to implement and administer them	Scottish Widows and NHS Pension Services and (where necessary) from your own pension fund administrators	including employment-related benefits To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice	To comply with our auto-enrolment pension obligations Information shared with our pension administrators Scottish Widows and NHS Pension Services and with HMRC
Information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health)	From you, from your doctors, from medical and occupational health professionals.	To perform the employment contract or volunteer agreement including employment-related benefits To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices	To maintain employment records, to administer sick pay entitlement, to follow our policies and to facilitate employment-related health and sickness benefits To comply with our legal obligations to you as your employer Information shared with your doctors, with medical and occupational health professionals. For further information, see * below
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs, age and any disability	From you	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	To comply with our equal opportunities monitoring obligations and to follow our policies For further information, see * below
Criminal records information, including the results of Disclosure and Barring Service (DBS) checks	From you and the DBS	To perform the employment contract To comply with our legal obligations For reasons of substantial public interest (preventing or detecting unlawful acts)	To carry out statutory checks Information shared with DBS and other regulatory authorities as required For further information, see * below

<p>Information on grievances raised by or involving you</p>	<p>From you, from other employees and from consultants we may engage in relation to the grievance procedure</p>	<p>To perform the employment contract or volunteer agreement</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>For staff administration, to follow our policies and to deal with grievance matters</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
<p>Information on conduct issues involving you</p>	<p>From you, from other employees and from consultants we may engage in relation to the conduct procedure</p>	<p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices</p>	<p>For staff administration and assessments, to follow our policies, to monitor staff performance and conduct and to deal with disciplinary and grievance matters</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
<p>Details of your appraisals and performance reviews</p>	<p>From you, from other employees and from consultants we may engage in relation to the appraisal/performance review process</p>	<p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices</p>	<p>For staff administration and assessments, to follow our policies, to monitor staff performance and conduct and to deal with disciplinary and grievance matters</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
<p>Details of your performance management/improvement plans (if any)</p>	<p>From you, from other employees and from consultants we may engage in relation to the performance review process</p>	<p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice, to ensure safe working practices</p>	<p>For staff administration and assessments, to follow our policies and to monitor staff performance</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>

<p>Details of your time and attendance records</p>	<p>From you</p>	<p>To perform the employment contract or volunteer agreement</p> <p>Legitimate interest: to monitor and manage staff access to our systems and facilities and to record staff absences</p>	<p>For payroll and staff administration and assessments, to follow our policies and to monitor staff performance and attendance</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage and with our payroll administrators Randall and Payne.</p>
<p>Information in applications you make for other positions within our organisation</p>	<p>From you</p>	<p>To enter into/perform the employment contract or volunteer agreement</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To process the application</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p>
<p>Information about your use of our IT, communication and other systems</p>	<p>Automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, remote access systems, email systems, intranet and Internet facilities, telephones, voicemail, mobile phone records</p>	<p>Legitimate interests:</p> <p>to monitor and manage staff access to our systems and facilities</p> <p>to protect our networks, and personal data of employees and patients (or their families), against unauthorised access or data leakage</p> <p>to ensure our business policies, such as those concerning security and internet use, are adhered to</p> <p>for operational reasons, such as maintaining employment records, recording transactions, training and quality control</p>	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p> <p>For further information, see ** below</p>

		<p>to ensure that commercially sensitive information is kept confidential</p> <p>to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with</p> <p>for investigating complaints and allegations of criminal offences</p> <p>to prevent unauthorised access and modifications to our systems</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
<p>Details of your use of business-related social media, such as LinkedIn</p>	<p>From relevant websites and applications</p>	<p>Legitimate interests:</p> <p>to monitor and manage staff access to our systems and facilities</p> <p>to protect our networks, and personal data of employees and patients (and their families), against unauthorised access or data leakage</p> <p>to ensure our business policies, such as those concerning security and internet use, are adhered to</p> <p>for operational reasons, such as maintaining employment records, recording transactions, training and quality control</p> <p>to ensure that commercially sensitive information is kept confidential</p>	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p> <p>For further information, see ** below</p>

		<p>to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with</p> <p>for investigating complaints and allegations of criminal offences</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
<p>Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur)</p>	<p>From relevant websites and applications</p>	<p>Legitimate interests:</p> <p>to monitor and manage staff access to our systems and facilities</p> <p>to protect our networks, and personal data of employees and patients (and their families), against unauthorised access or data leakage</p> <p>to ensure our business policies, such as those concerning security and internet use, are adhered to</p> <p>for operational reasons, such as maintaining employment records, recording transactions, training and quality control</p> <p>to ensure that commercially sensitive information is kept confidential</p> <p>to check that restrictions on your activities that apply after your employment has ended (post-termination restrictions or restrictive covenants) are being complied with</p>	<p>To protect and carry out our legitimate interests (see adjacent column)</p> <p>Information shared with relevant managers, HR personnel and with consultants we may engage</p> <p>For further information, see ** below</p>

		<p>for investigating complaints and allegations of criminal offences</p> <p>as part of investigations by regulatory bodies, or in connection with legal proceedings or requests</p>	
<p>Details in references about you that we give to others</p>	<p>From your personnel records, our other employees</p>	<p>To perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and corporate governance obligations and good employment practice</p>	<p>To provide you with the relevant reference</p> <p>To comply with legal/regulatory obligations</p> <p>Information shared with relevant managers, HR personnel and the recipient(s) of the reference</p>

* Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in our Data Protection Policy and DBS Policy, available from the intranet and hard copies can be found in the staff room/bistro.

** Further information on the monitoring we undertake in the workplace and how we do this is available in our IT Acceptable Use Policy, available from the intranet and hard copies can be found in the staff room/bistro.