

Recruitment Privacy Policy

Our privacy promise to job candidates and third parties

We ask that you read this recruitment privacy policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and how to contact us and other organisations in the event you have a complaint.

We are Access Your Care Limited and in order to identify, select, train and recruit new employees we collect and process personal information about you.

Personal information means any information about you from which you can be identified, but it does not include information where your identity has been removed (anonymous data).

As the 'controller' of personal information, we are responsible for how that data is managed. The General Data Protection Regulation (GDPR), which applies in the United Kingdom and across the European Union, sets out our obligations to you and your rights in respect of how we manage your personal information.

As the 'controller' of your personal information, we will ensure that the personal information we hold about you is:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept in a form which permits you to be identified for only as long as necessary for the purposes we have told you about.
- Kept securely

If you have any questions about this privacy promise or would like further explanation as to how your personal information is managed then please contact us (see How to contact us below)

This document provides the information as required by GDPR under your right to be informed.

Personal data we process

There are two main ways we collect personal data about you:

1. Directly from you by registering an interest via our website, submitting a CV or registering an interest directly to us, applying for jobs through a third-party website, social media etc
2. From third parties such as your referees or third-party sources such as job sites or LinkedIn

We will only collect the information that we require at specific times during the recruitment process, such as:

- Name
- Contact details (postal address, phone number, email address)
- Age / date of birth
- Gender
- Marital status
- Your CV (including education details, employment history)
- Vehicle registration number
- Details of your Right to Work (immigration status)
- Driving licence number
- National Insurance number
- Bank details
- Proof of identity (passport, driving licence, identity card)
- Proof of address
- Next of kin contact details
- Referee contact details
- Information collected within interview notes
- Photograph
- Extra information that you choose to tell us (in writing or verbally)
- Extra information that your referees choose to tell us about you

Certain information that we process is classed as 'special category data'. This means it is sensitive by nature and we therefore have a higher duty of care in how we process this data:

- Criminal cautions or convictions
- Religion
- Nationality or ethnicity
- Medical information
- Motoring convictions

When using our website, we collect standard internet log information (otherwise known as cookies) including:

- IP address
- Details of the pages you visit
- General details about the type of computer or device that you are using

This is statistical information only which we collect in order to find out the number of visitors to our site and the pages they have visited. This information is collected in such a way that it is not used to identify individuals. Where we do collect personal information on the website, this will be made obvious to you through the relevant pages. See our full cookie policy for more information.

Please be aware that our website may provide you with links to other websites. If you follow a link to any other website please ensure you read their privacy promises. We do not accept any responsibility or liability for the privacy and security practices of such third-party websites therefore you use these sites at your own risk.

Whether information has to be provided by you, and if so why

The provision of certain personal data is necessary to enable us to fulfil our contractual and legal duties as part of the recruitment process. Depending on the type of personal data, and the grounds for which we are processing it, should you decline to provide us with such data we may not be able to fulfil our contractual requirements, and in extreme cases may not be able to continue with our relationship.

Purposes of processing your personal information

In order to provide you with the best possible employment opportunities within Access Your Care we will process personal data.

Data processing examples:

- Screening of applications
- To assess and shortlist candidates as part of the recruitment process for Access Your Care (including telephone interviews)
- To review and make informed decisions on the re-employment of a previous employee
- To receive, process and assess criminal convictions and cautions of candidates as part of the employment process
- To receive, process and assess details of motoring offences on candidates driving license (UK Only), as part of the screening process
- To receive, record and process applications for employment with Access Your Care
- To schedule interviews with the relevant hiring managers
- To conduct and record details of interviews with candidates for employment with Access Your Care
- Plan and deliver training during recruitment
- To schedule any required training with candidates as part of the recruitment process
- To book necessary travel and accommodation for candidates attending the training as part of the recruitment process
- To confirm that the candidate has successfully passed the required training before continuing with the recruitment process
- Communicate with candidates about the progress of their application
- To maintain communication with candidates in relation to their ongoing application
- To process withdrawal requests from candidates or to process rejection notices to candidates
- To take up references
- To receive and record contact details for Referees as provided by the candidate
- To attain and verbally confirm employment and / or character references for employment
- To make a job offer
- To offer a successful candidate employment with Access Your Care
- To create and update the system with the details of a new recruit enabling them to start work and receive pay/wages
- To receive and record contact details for Next of Kin as provided by the candidate
- To keep records to demonstrate our compliance to relevant laws

- To review, verify and take appropriate copies of relevant documentation for the recruitment process
- To monitor the operational effectiveness of our recruitment process
- To monitor and report on the effectiveness and compliance of the recruitment process
- Sourcing appropriate candidates
- To receive and contact prospective candidates referred to Access Your Care by an existing employee to market job opportunities we believe may be of interest
- To maintain communication with prospective candidates to market job opportunities we believe may be of interest
- To source and contact prospective candidates via third party recruitment platforms to market job opportunities we believe may be of interest

Who has access to your personal data

In order to operate our business and run our recruitment we rely on third parties to provide specialist support to us. To provide this support they will have access to, or a duty of care over your personal information. These third parties are:

- IT and telecoms support companies – to ensure the safe, secure and resilient operation of our IT infrastructure including computers, servers, phones and mobile devices
- Software support companies – to provide specialist support and resolve issues with the software that we run, for example the systems we use to store and manage your recruitment progression
- Relevant authorities – such as the DVLA, HMRC, Home office for Visa and Immigration purposes
- Occupational health providers
- Applicant screening service providers – for checking criminal records
- Referees – to confirm character and employment details

We will share relevant information within Access Your Care Home Care during the recruitment process, for example with hiring managers.

We will not share, sell or trade your personal information with any other third party without your consent, unless there is a legal reason to do so.

International transfer

All your personal data is stored and processed on systems that are within the European Economic Area (EEA) and offer the same level of legal protection and rights over your data.

In certain situations, we transfer your personal information to countries which are located outside the European Economic Area (EEA). This may be because you are a resident or located temporarily outside of the EEA. The purpose of this will be to communicate with you about your recruitment process when you are based in a country outside of the EEA.

This international transfer is under Article 49(1)(b) – the transfer is necessary for the performance of a contract between the data subject and the controller.

Such countries do not have the same data protection laws as the United Kingdom and EEA. Any transfer of your personal information will be subject to appropriate or suitable relevant safeguards that are designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal information.

If you would like further information please contact us. (see how to contact us below).

Retention schedule

Application details for successful candidates	7 years and in line with the information within our employee privacy notice
Employment Application details of candidates	12 months from the last date contact or entry was made
Details for prospective candidates	12 months if we have had no meaningful contact with you

Legal basis for processing

We rely on the following grounds within the GDPR:

- Article 6(1)(b) – processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
- Article 6(1)(c) – processing is necessary for us to demonstrate compliance with the law or regulatory frameworks
- Article 6(1)(f) – in pursuit of legitimate interests
- To review and make informed decisions on the re-employment of a previous employee
- To monitor and track the effectiveness and compliance of the recruitment process
- To contact prospective candidates to market job opportunities we believe may be of interest
- GDPR recognises that additional care is required when processing special category (sensitive) data such as your health, religious views. We process this under Article 9(2)(b) – Legal obligations under employment or social benefit law

Your rights

Under the GDPR you have important rights, these include the right to:

- **Fair processing of information** and transparency over how we use your use personal information
- **Request access to your data:** You can ask us to provide a copy of the personal data we hold about you.
- **Request corrections to be made to your data:** If you think that your personal data is incomplete, inaccurate you can ask us to correct it.
- **Request erasure of your data:** If you consider there is no lawful basis for us to continue processing your data you can ask for that data to be deleted or removed.
- **Object to the processing of your data:** If our lawful basis for processing your data relates to a legitimate business interest (or third party interest) you can raise an objection to that interest. You can also object to us using your information for direct marketing purposes.
- **Request that processing restrictions be put in place:** If you believe that your information is being processed without a lawful reason or that the information is incorrect you can request that a freeze/restriction is placed on the processing of the information until your concerns are addressed.
- **Request a transfer of your personal data:** You can ask us to transfer your personal data to a third party.
- **Right to data portability:** You have a right to request a copy of the personal data we hold about you in a commonly used and machine readable format. We can provide your data either to you or to a third party if specified in your request.
- **Automated decision making objection right:** automated decision making is when a decision is made entirely by technological means without human intervention. We don't use or rely on automated decision making.
- **Claim compensation for damages** caused by our breach of any data protection laws;

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the GDPR.

Keeping your personal information secure

We take your privacy and protection of data very seriously. Consequently, we have put in place appropriate security measures to prevent unauthorised use of your personal data. Details of the measures which are in place can be obtained from Sam Murray or Dionysios Aravantinos. We will notify you and any applicable regulator of any suspected, unauthorised use of your personal data.

We have appropriate organisational and technical security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Representatives Sam Murray or Dionysis on 01275 874861. If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

Data protection Champion

Sam Murray

Sam@accessyourcare.co.uk

01275 874861

To request a copy of the personal information we hold about you, you must send your request in writing to DATA ACCESS REQUEST, addressed to Access Your Care.

To help us deal with your request as efficiently as possible, you will need to include:

- Your current name and address
- Proof of identity (a copy of your driving licence, passport or two different utility bills that display your name and address)
- As much detail as possible regarding your request so that we can identify any information we may hold about you, this may need to include your previous name and address, date of birth and for what purposes we may hold data about you e.g a service or employment.

How to contact us

You can contact us by:

Email: info@accessyourcare.co.uk

Post: Access Your Care, Unit 3, 22a Griffin Road, Clevedon, BS21 6HH

Telephone: 01275 874861