



Circle Health Privacy Notice (Recruitment)

Data Controller: Circle Health

Data Protection Officer: dpo@circlehealth.co.uk

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

We acknowledge and agree that when we receive any personal data from you or about you as part of the recruitment process, that it will be processed securely in accordance with all applicable data protection laws in force currently and in the future within the United Kingdom.

Who collects the information

Circle Health Limited ('Circle Health') ('Company') is a 'data controller' for the purposes of recruitment and gathers and uses certain information about you in this context.

Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy available to all staff via the Insight platform.

About the information we collect and hold

The table set out in Part A of the Schedule below summarises the information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part B of the Schedule below summarises the additional information we collect before making a final decision to recruit, ie., before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where information may be held

We will store information securely and with controlled access governed by the Data Protection policies of the company, in several locations, including in your personnel file, in our HR management systems and in other IT systems (including within our email system).

How long we keep your information

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application is successful and you become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see Privacy Notice (employment).

Further details on our approach to information retention and destruction are available in our Records Lifecycle Management Policy.

Your rights to correct and access your information and to ask for it to be erased

The General Data Protection Regulation gives individuals (known as Data Subjects) new rights about how their information is handled. As a Data Subject being considered for a position at Circle Health, you will have the right to:

- request and obtain a copy of what information we hold about you
- ask us to change incorrect or incomplete data
- ask us to delete or stop processing your information, for example where it is no longer necessary for the purposes of processing
- object to us continuing to process your information where we are relying on legitimate interests as the legal ground for processing (when we rely on 'legitimate interests', this means that we have an appropriate business need to process your personal information and this business need does not cause harm to you); and
- ask us to stop processing your information for a period of time if the information we hold is inaccurate or there is a dispute about whether or not your interests override our legitimate interests grounds for processing.

Please contact our Data Protection Officer (DPO) at the email address above if you wish to exercise any of these rights. You can also contact the DPO if you believe that we have not complied with your data protection rights and you can complain to the Information Commissioner at ico.org.uk/concerns/.

Automated decision-making

Circle Health does not make any recruitment related decisions based solely on automated decision-making or profiling.

Keeping your personal information secure

We have appropriate 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.

How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at ico.org.uk/concerns/ or telephone: 0303 123 1113 for further information about your rights and how to make a formal complaint.

The Schedule

Part A: Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your name and contact details (ie address, home and mobile phone numbers, email address)	From you	Processing is necessary in order to take steps prior to entering into a contract of employment with us.	To enable HR personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome. To inform the relevant manager or department of your application.
Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests	From you, in the completed application form and interview notes (if relevant)	Processing is necessary in order to take steps prior to entering into a contract of employment with us.	To make an informed recruitment decision.
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you, in a completed anonymised equal opportunities monitoring form.	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 Equality and Diversity Policy. For further information, see * below.
Information regarding your criminal record	From you, in your completed application form.	To comply with our legal obligations. For reasons of substantial public interest (preventing or detecting unlawful acts and protecting the public against dishonesty).	To make an informed recruitment decision. To carry out statutory checks. Information shared with DBS and other regulatory authorities as required. For further information, see * below
Details of your referees	From your completed application form.	Processing is necessary in order to take steps prior to entering into a contract	To carry out a fair recruitment process.

		<p>of employment with us.</p> <p>In the regulated sector, to comply with our legal obligations to obtain regulatory references.</p>	<p>To comply with legal/regulatory obligations.</p> <p>Information shared with relevant managers, HR personnel and the referee.</p>
<p>Retaining your contact details and details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests.</p>	<p>From your completed application form.</p>	<p>We will only store your information in this way if you have provided your consent for us to do so.</p>	<p>To enable us to contact you if other suitable positions arise within Circle.</p>

Part B: Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers ◇</p>	<p>From your referees (details of whom you will have provided)</p>	<p>Processing is necessary in order to take steps prior to entering into a contract of employment with us.</p>	<p>To obtain the relevant reference about you. To comply with legal/regulatory obligations. Information shared with relevant managers and HR personnel.</p>
<p>Information regarding your academic and professional qualifications ◇</p>	<p>From you, from your education provider, from the relevant professional body.</p>	<p>Processing is necessary in order to take steps prior to entering into a contract of employment with us.</p>	<p>To make an informed recruitment decision.</p>
<p>Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs) ◇]</p>	<p>From you and from the Disclosure and Barring Service (DBS).</p>	<p>Processing is necessary in order to take steps prior to entering into a contract of employment with us.</p>	<p>To make an informed recruitment decision. To carry out statutory checks. Information shared with DBS and other regulatory authorities as required. For further information, see * below.</p>
<p>Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information ◇</p>	<p>From you and, where necessary, the Home Office.</p>	<p>Processing is necessary in order to take steps prior to entering into a contract of employment with us.</p>	<p>To carry out right to work checks Information may be shared with the Home Office.</p>
<p>A copy of your driving licence ◇</p>	<p>From you</p>	<p>To enter into/perform the employment contract. To comply with our legal obligations. To comply with the terms of our insurance.</p>	<p>To make an informed recruitment decision. To ensure that you have a clean driving licence. Information may be shared with our insurer.</p>

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '◇' above to us to enable us to verify your right to work and suitability for the position.

* 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 available to all staff via the Insight platform.