

## **Recruitment Statement**

HARBOUR MEDICAL PRACTICE is committed to ensuring that its recruitment process is fair, open and non-discriminatory, so that it selects appropriately qualified and experienced staff for new roles from both external and internal sources, and has a policy of developing existing staff to enable them to widen the scope of their roles, take on additional, more diverse duties, or change role completely.

The Practice ensures that its recruitment process always follows the principles and ethos of the Equality Act 2010.

Effective recruitment and selection is crucial to the continued success and progress of the Practice. This means finding people with the necessary skills, expertise and qualifications to deliver the Practice's objectives.

The following key principles set out the Practice's approach to recruitment:

- A continued commitment to equal opportunities in all recruitment and selection practices;
- Implementation of working policies which allow genuinely flexible ways of working which meet both the needs of the service, and those of the employee;
- Encouragement of managers to be creative in filling posts;
- Conducting a transparent, efficient recruitment process, built on current thinking and best practice, which always aims to take on people of the highest possible calibre and get them into post in the shortest possible time;
- Compliance with all statutory and regulatory requirements.

The Practice will ensure the following in all its recruitment and selection practices:

- Staff members are dealt with fairly and consistently in accordance with the Practice's agreed policies and procedures for recruitment and selection
- Staff members who are part of the interview panel are trained in the Practice's recruitment and selection policies and procedures.

## **Candidate Privacy Notice (Recruitment)**

### **Overview**

1. The Practice takes the security and privacy of your data seriously. We need to gather and use information or 'data' about you as part of our business and to manage our relationship with you. We intend to comply with our legal obligations under the EU General Data Protection Regulation ("GDPR") and the UK Data Protection Act 2018 ("DPA") (when it is enacted and comes into force) in respect of data privacy and security. We have a duty to notify you of the information contained in this policy.
2. The Practice is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us. It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

### **Data Protection Principles**

3. Personal data must be processed in accordance with six 'Data Protection Principles.' It must:
  - be processed fairly, lawfully and transparently;
  - be collected and processed only for specified, explicit and legitimate purposes;
  - be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
  - be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
  - not be kept for longer than is necessary for the purposes for which it is processed; and
  - be processed securely.
4. We are accountable for these principles and must be able to show that we are compliant.

### **The kind of information we hold about you**

5. In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you.
  - a. The information you have provided to us in your curriculum vitae and covering letter.
  - b. Any information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications
  - c. Any information you provide to us during an interview.
6. We may also collect, store and use the following "special categories" of more sensitive personal information:
  - a. Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.

- b. Information about your health, including any medical condition, health and sickness records.
- c. Information about criminal convictions and offences.

### **How is your personal information collected?**

- 7. We may collect personal information about candidates from the following sources: -
  - a. You, the candidate based on what you tell us.
  - b. a recruitment agency, from which we collect including name, title, address gender, employment history, qualifications.
  - c. Disclosure and Barring Service in respect of criminal convictions.

### **How we will use information about you**

- 8. We will use the personal information we collect about you to: -
  - a. Assess your skills, qualifications, and suitability for the position
  - b. Carry out background and reference checks, where applicable
  - c. Communicate with you about the recruitment process
  - d. Keep records related to our hiring processes.
  - e. Comply with legal or regulatory requirements.
  
- 9. It is in our legitimate interests to decide whether to appoint you to the role since it would be beneficial to our business to appoint someone to that role.
  
- 10. We also need to process your personal information to decide whether to enter into a contract with you.

11. Having received your CV and covering letter we may then take up references before confirming your appointment.

### **If you fail to provide personal information**

12. If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

### **How we use particularly sensitive personal information**

- 13. We will use your particularly sensitive personal information in the following ways:
  - a. We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during any test or interview.
  - b. We may use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

### **Information about criminal convictions**

14. We may process information about criminal convictions. If so, we will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory).

15. We may be required or entitled to carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular if the role is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023)] and / or is also specified in the Police Act 1997

(Criminal Records) Regulations (SI 2002/233)] and is eligible for a standard or enhanced check from the Disclosure and Barring Service.

### **Automated decision-making**

16. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

### **Data sharing**

17. We may share your personal information with the following third parties for the purposes of processing your application: the Disclosure and Barring Service

18. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **Data security**

19. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

20. 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**

21. We will retain your personal information for a period of 6 months after we have communicated to you our decision about whether to appoint you to position. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy or applicable laws and regulations.

22. If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

### **Rights of access, correction, erasure, and restriction**

23. 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 object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **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.

24. 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 The Practice Manager in writing.

**Right to withdraw consent**

25. When you applied for this role, you provided consent to us processing your personal information for the purposes of the recruitment exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact The Practice Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

**Questions about this policy**

26. If you have any questions about this privacy notice or how we handle your personal information, please contact The Practice Manager. You 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.

**Acceptance**

I, \_\_\_\_\_ (candidates name)

Acknowledge I have received a copy of The Harbour Medical Practice Candidate Privacy Notice and that I have read and understood it.

Signature

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Name

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Date

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