

Accad Healthcare Limited

Employment Business: GDPR privacy notice

Privacy notice

Accad Healthcare Limited is a recruitment company which provides work-finding services to its clients and work-seekers. The Company must process personal data (including special category data) so that it can provide these services – in doing so, the Company acts as a data controller.

You may provide your personal details to Accad Healthcare Limited directly, such as on an application form, by CV or via the company's website or we may collect them from another source such as a job board. Accad Healthcare Limited must have a legal basis for processing your personal data. For the purposes of providing you with work-finding services and/or information relating to roles relevant to you we will only use your personal data in accordance with the terms of the following statement.

This notice explains how Accad Healthcare Limited (referred to in this notice as **we, us** or **our**) collects and uses information during the work finding process. This notice covers the following:

- *What is personal data?*
- *How do we collect personal data?*
- *What information do we collect?*
- *How do we use your information?*
- *What is the legal basis that permits us to use your information?*
- *What happens if you do not provide information that we request?*
- *How do we share your information?*
- *How do we keep your information secure?*

All data is held on secure servers housed in a private suite within a Level (3) data centre. Access to the suite requires RFID access to the building and a key code combination to access the private suite. The internet breakout is secured using a Cisco firewall and we have Cyber Essentials accreditation for network security. All data is held on secure SAN nodes with RAID 10 redundancy, and data is accessible by authorised individuals only based on Active Directory and implemented windows security permissions.

Practises employed to help secure company data include (but are not limited to):

- Access to all data restricted to only authorised users.
- Endpoint encryption in place for portable media (including laptops)
- USB write blocking to prevent data being copied to personal drives
- Blocking of all web-based email and data storage websites
- All users are required to change their password every 30 days
- All user passwords must meet minimum security requirements
- All machines auto lock after 10 minutes of inactivity to prevent unauthorised access to unattended machines

All hardware, backups, and data links are fully monitored 24/7. We will ensure access to personal data is restricted to employees working within our group on a need-to-know basis. Training will be provided to any employees working within the group who need access to your personal data to ensure it is secured at all times.

For how long do we keep your information?

As a general rule we keep personal data about candidates for the duration of the recruitment and selection process and for a period of:

- 12 months after registration
- 24 months posts placements for working seeking services
- 6 years posts placement for HMRC purposes.

However, where we have statutory obligations to keep personal data for a longer period or where we may need your information for a longer period in case of a legal claim, then the retention period may be longer. Candidates are considered to be 'registered' when they have commenced the compliance process. No Personal Data will be retained for candidates that do not progress to the compliance stage.

Your rights in relation to your information

You have a number of rights in relation to your personal data, these include the right to:

- be informed about how we use your personal data;
- obtain access to your personal data that we hold;
- request that your personal data is corrected if you believe it is incorrect, incomplete or inaccurate;
- request that we erase your personal data in the following circumstances:
 - if we are continuing to process personal data beyond the period when it is necessary to do so for the purpose for which it was originally collected;
 - if we are relying on consent as the legal basis for processing and you withdraw consent;
 - if we are relying on legitimate interest as the legal basis for processing and you object to this processing and there is no overriding compelling ground which enables us to continue with the processing;
 - if the personal data has been processed unlawfully (i.e., in breach of the requirements of the data protection legislation);
 - if it is necessary to delete the personal data to comply with a legal obligation.
- ask us to restrict our data processing activities where you consider that:
 - personal data is inaccurate;
 - our processing of your personal data is unlawful;
 - where we no longer need the personal data but you require us to keep it to enable you to establish, exercise or defend a legal claim;
 - where you have raised an objection to our use of your personal data;
 - request a copy of certain personal data that you have provided to us in a commonly used electronic format. This right relates to personal data that you have provided to us that we need in order to take steps to enter into a contract with you and personal data where we are relying on consent to process your personal data;
 - object to our processing of your personal data where we are relying on legitimate interests or exercise of a public interest task to make the processing lawful. If you raise an objection, we will carry out an assessment to determine whether we have an overriding legitimate ground which entitles us to continue to process your personal data;
 - not be subject to automated decisions which produce legal effects or which could have a similarly significant effect on you.

If you would like to exercise any of your rights or find out more, please contact info@accadcare.co.uk. The Table at the end of this notice provides more detail about the information that we use, the legal basis that we rely on in each case and your rights.

Complaints

If you have any complaints about the way we use your personal data please contact info@accadcare.co.uk, who will try to resolve the issue. If we cannot resolve your complaint, you have the right to complain to the data protection authority in your country (the Information Commissioner in the UK).

Table: quick check of how we use your personal data Purpose

| Purpose | Data used | Legal basis | Which rights apply? |
|-----------------------------|---|--|---|
| Work seeking services | Personal contact details, national insurance number, recruitment information, employment/engagement records, referencing, application form, DBS, vaccination status, PIN number and compensation history. | Legitimate interests. It is in our legitimate interests to evaluate whether you have the necessary experience, qualifications, skills and qualities to perform the relevant role. Necessary for the performance of the contract with you. | The generally applicable rights <i>plus the right to object</i> . |
| Right to work checks | Information relating to your right to work status, national insurance number, passport number, nationality, tax status information, and personal contact details. | Legitimate interest. It is in our interests to ensure that those who work for us have the right to work in the UK as well as to establish the statutory excuse to avoid liability for the civil penalty for employing someone without the right to undertake the work for which they are employed. Necessary for the performance of the contract with you. | The generally applicable rights plus the right to object. |
| Fraud and crime prevention | Information about criminal convictions and offences committed by you. Identity verification information. | Public interest and legitimate interest. It is in our interests as well as the interest of our candidates/ employees/ workers/ contractors to ensure the prevention of fraud and crime is monitored. This will ensure a safe workplace for all. Necessary for the performance of the contract with you. | The generally applicable rights plus the right to object. |
| Diversity monitoring | Gender, marital status and dependents and information about your race or ethnicity, religious beliefs, health, sexual orientation. | Public interest. | The generally applicable rights plus the right to object. |
| To deal with legal disputes | Personal contact details, references, information submitted as part of the selection process and interview notes. | Legitimate interest. It is in our interests to process personal data to make and defend legal claims to ensure that our legal rights are protected. | The generally applicable rights plus the right to object. |
| Investigations | Personal contact details, training records, worker assessments, engagement records, PIN number | To comply with a legal Obligation. | |
| Payroll processing | Personal contact details, National Insurance number, bank details, compensation | To comply with a legal obligation in terms of PAYE, NMW, HMRC and auto enrolment purposes. Legitimate interests. It is in our legitimate interests to ensure we process your remuneration correctly for the work you undertake and | The generally applicable rights plus the right to object |

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| | | to ensure we fulfil our contractual obligations with you. Necessary for the performance of the contract with you. | |
| Audits | Personal contact details, recruitment information, employment/engagement records, referencing, application form, DBS, PIN number | Legitimate interests. It is in our legitimate interests to ensure we pass the audits as required by our clients to ensure we remain as a supplier and provide work to you and other candidates. Necessary for the performance of the contract with you. | The generally applicable rights plus the right to object |
| Referencing | Name, employment dates and any safeguarding or NMC investigations | Legitimate interests. It is in our legitimate interests to ensure we comply with legal, NHS and contractual requirements to only provide workers who have satisfactory clinical references. Necessary for the performance of the contract with you. | |

