



## **Community Based Care Workforce Solutions Limited Privacy Notice for Recruitment and Staffing**

This privacy notice tells you what to expect us to do with your personal information when you contact us or use our services.

### **Our contact details:**

**Name:** Community Based Care Workforce Solutions Limited

**Address:** Queens Park, Queensway North, Team Valley, Gateshead, NE11 0QD

**General phone number:** 0191 497 7710

**General enquiries email address:** [cbchealth.flexiblehub@nhs.net](mailto:cbchealth.flexiblehub@nhs.net)

**Website:** <https://www.cbchealth.co.uk/>

We are the controller for your information. A controller decides on why and how information is used and shared.

### **Data Protection Officer contact details**

Our Data Protection Officer is Kate Watson and is responsible for monitoring our compliance with data protection requirements. You can contact them with queries or concerns relating to the use of your personal data at [cbchealth.governance@nhs.net](mailto:cbchealth.governance@nhs.net).

### **Senior Information Risk Owner contact details**

Our Senior Information Risk Owner is Sally Sadasivam and is responsible for the security of data, and management of security risks and incidents. The SIRO also has oversight of the Workforce's information assets. The SIRO can also be contacted at [cbchealth.governance@nhs.net](mailto:cbchealth.governance@nhs.net).

### **How do we get information and why do we have it?**

The personal information we collect is provided directly from you for one of the following reasons:

- you have an enquiry or have requested information about vacancies or workforce initiatives

- you have applied for a job
- you have signed up to our newsletter following appointment
- you have made a complaint
- you have registered for training

We also receive personal information about you indirectly from others, in the following scenarios:

- we receive information about you from Job Centre Plus and Local Authority Employment Services in relation to our vacancies
- we receive references from former employers and people named by candidates as referees
- we receive information from the Disclosure and Barring Service (DBS).

## **What information do we collect?**

### **Personal information**

We currently collect and use the following personal information:

- personal identifiers and contacts (for example, name and contact details)
- your previous employers name and contact details
- qualifications and professional memberships
- photographic identity (for example, a photograph for your Smartcard where issued)
- information associated with the undertaking of due diligence associated with employment, either salaried, sessional or bank. This can include a copy of your driving licence, passport details.

### **More sensitive information**

We process the following more sensitive data (including special category data):

- data concerning physical or mental health (for example, details about your appointments or diagnosis) for the purpose of occupational health
- data revealing racial or ethnic origin
- data concerning a person's sexual orientation
- data revealing religious or philosophical beliefs
- data relating to criminal or suspected criminal offences

## **Why we need your information**

We need your information in order to:

- move your application forward
- check that you're the right candidate for the role
- to undertake pre-employment checking and onboarding activity prior to commencement of your role

- get in contact with you
- to make any reasonable adjustments to enable you to carry out your role
- send you notifications for vacancy roles and job alerts.

### **Who do we share information with?**

The information you share with us in relation to the recruitment process will be made available to members of our team responsible for recruitment processing. If you are successfully recruited, we will save your details into a secure HR folder.

We may share information with the following organisations:

- GP Practices in Gateshead on confirmation of an assignment

In some circumstances we are legally obliged to share information. This includes:

- when reporting some infectious diseases
- when a court orders us to do so
- where a public inquiry requires the information

We will also share information if the public good outweighs your right to confidentiality. This could include:

- where a serious crime has been committed
- where there are serious risks to the public or staff
- to protect children or vulnerable adults

We may also process your information in order to de-identify it, so that it can be used for statistical analysis which is shared with the Integrated Care Board (it will be anonymised first). Sharing of this type of information falls under our contractual obligations.

### **What is our lawful basis for using information?**

#### **Personal information**

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for using personal information is set out below.

Our purpose for processing this information is to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process.

The lawful bases we rely on for processing your personal data are article 6(1)(b) of the UK GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract, and article 6(1)(f) for the purpose of our legitimate interests.

If you provide us with any information about reasonable adjustments you require under the Equality Act 2010 the lawful basis we rely on for processing this information is article 6(1)(c) to comply with our legal obligations under the Act.

### **More sensitive data**

Under UK GDPR, the lawful basis we rely on for using information that is more sensitive (special category).

Article 9 (2) (b) Employment, social security and social protection.

The lawful bases we rely on to process any information you provide as part of your application which is special category data, such as health, religious, sexual orientation or ethnicity information are article 9(2)(b) of the UK GDPR, which relates to our obligations in employment and the safeguarding of your fundamental rights or article 9(2)(g) - necessary for reasons of substantial public interest.

We process information about applicant criminal convictions and offences. The lawful basis we rely on to process this data are Article 6(1)(e) for the performance of our public task.

### **How do we store your personal information?**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for.

Your information is securely stored for the time periods specified in the [Records Management Code of Practice](#). We will then dispose of the information as recommended by the Records Management Code for example we will:

- securely dispose of your information by deleting any electronic records, and where paper records exist, these would be shredded to legal standards of destruction.

### **Data Security**

We have put in place measures to protect the security of your information.

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 appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised manner, altered or disclosed. In addition, we only give access to your personal information to those who need to work on your recruitment process.

We have procedures in place 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.

## What are your data protection rights?

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information (known as a [subject access request](#)).

**Your right to rectification** - You have the right to ask us to [rectify personal information](#) you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal information in certain circumstances. For example, if you want us to establish its accuracy or the reason for processing it.

Where you have opted to receive our newsletter, you may change your preference at any time.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. However, if your request for access is clearly unfounded or excessive we may charge a reasonable fee or refuse the request. In some cases we will need some information to confirm your identity. This is to ensure that your personal information is not disclosed to someone who has no right to access it.

Please contact us at [cbchealth.governance@nhs.net](mailto:cbchealth.governance@nhs.net) if you wish to make a request.

## How do I complain?

If you have any concerns about our use of your personal information, you can make a complaint to us at [cbchealth.governance@nhs.net](mailto:cbchealth.governance@nhs.net).

Following this, if you are still unhappy with how we have used your data, you can then complain to the ICO.

The ICO's address is:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow

Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

**Date of last review**

We keep our privacy notice under regular review to make sure it is up to date and accurate. If we make any changes, we will post the updated notice on our website. Any changes to the privacy notice will apply to you and your information immediately. Continued use of CBC Workforce Solutions services will signify that you agree to any such changes.

**Last updated:** February 2025