

## **KCH Management Limited**

### **Recruitment Privacy Notice**

#### **What is the purpose of this document?**

KCH Management Limited (“KCHM”) is a wholly owned subsidiary of KCH Commercial Services Limited, a wholly owned subsidiary of King's College Hospital NHS Foundation Trust. KCHM acts as both an employment business, introducing prospective candidates to hiring organisations in the healthcare sector for permanent and temporary vacancies.

This document explains how we use the personal data which we collect about you when you register with KCHM as a prospective candidate. 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 UK General Data Protection Regulation (UK GDPR).

#### **Data protection principles**

We will comply with data protection law and principles, which means that your data will be:

- 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 only as long as necessary for the purposes we have told you about.
- Kept securely.

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

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae and covering letter.
- The information you have provided on our application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications,
- Any information you provide to us during an interview.
- Evidence of your right to work in the UK which may include a photograph, nationality, place of birth, birth certificate, driving licence, etc. (in accordance with Home Office requirements);

We may also collect, store and use the following types of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

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

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies.
- Your named referees
- Data from third parties that is from a publicly accessible sources such as social media sites including LinkedIn, to enhance the information we hold in order to assist you better with finding suitable roles.

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

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Comply with legal or regulatory requirements.
- To communicate with hiring organisations in respect of prospective roles and placement.

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

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. For example, if we require a credit check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further.

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

We will use your particularly sensitive personal information in the following ways:

- 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 a test or interview.
- We will 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**

We envisage that we will process information about criminal convictions.

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). We are required 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.

We have in place an appropriate safeguards which we are required by law to maintain when processing such data.

## **Data sharing**

### **Why might you share my personal information with third parties?**

To the extent necessary to process your application and without notifying you, KCHM may disclose your personal data to external third parties for legitimate and commercial purposes for the management and conduct of the business in the following circumstances:

- To companies and individuals we employ to perform business functions and services on our behalf;
- To government agencies including: UK Visas & Immigration, Home Office, Police and other law enforcement agencies, regulatory and supervisory authorities (such as the UK Information Commissioners);
- To comply with applicable laws;
- To potential hiring organisations in order to discuss placement in job roles.

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**

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.

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**

### **How long will you use my information for?**

We will retain your personal information for a period of 24 months. 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 applicable laws and regulations.

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 further 24 months on that basis.

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

### **Your rights in connection with personal information**

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 process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want 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.

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 [kch-tr.RecruitmentKingscommercial@nhs.net](mailto:kch-tr.RecruitmentKingscommercial@nhs.net) in writing.

### **Right to withdraw consent**

When you registered with us for job seeking opportunities 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 [kch-tr.RecruitmentKingscommercial@nhs.net](mailto:kch-tr.RecruitmentKingscommercial@nhs.net). Once we have received notification that you have withdrawn your consent, we will no longer continue to provide job seeking services to you and, subject to our retention policy, we will dispose of your personal data securely.

### **Data protection officer**

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) who is responsible for data protection issues in the UK.