Job Applicant Privacy Notice

Cotswold Surgical Partners LLP (CSP)

Full Job Applicant Privacy Notice

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1. Introduction

Cotswold Surgical Partners LLP (“CSP”, “we”, “us”, “our”) is committed to protecting the privacy and security of the personal data we collect from job applicants (“you/your”). We comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

This notice explains what personal data we collect during recruitment, how we use it, and your rights. CSP is the data controller for the personal data processed during recruitment and is registered with the Information Commissioner’s Office (ICO) under registration number **ZB192477**.

This notice applies to all individuals who apply for a job with CSP. We may update this notice from time to time and will amend the review date when changes are made.

2. Personal data we collect

Personal data means information relating to an identified or identifiable individual. This does not include truly anonymous data. We may collect your personal data directly from you and, where appropriate, from third parties (see section 4).

We will collect and process information needed to manage and assess your application. Initially this is likely to include your contact details, work experience, qualifications and training, and other information contained within your CV, application form, and correspondence.

- Personal contact details
- CV / application information (qualifications, skills, experience, job titles, work history, training records, professional memberships)
- Interview notes and assessment outcomes

Conditional offer stage – additional checks

If you are successful at interview and we make you a conditional job offer, we will collect additional information to complete pre-employment checks. We only collect what is necessary and what you would reasonably expect for recruitment.

- Proof of identity and right to work in the UK (e.g., passport / ID)
- References from former employers (where applicable)
- Proof of qualifications
- DBS check (standard or enhanced) where relevant to the role

If you accept a final offer

If you accept a final job offer, we will also collect certain employment-related details and this will form part of your employment record. You will receive our Employee Privacy Notice, which explains additional processing during employment.

- Next of kin and emergency contact details
- National Insurance number, bank account details, payroll records, and tax status information
- Start date, salary, place of work, annual leave, pension, and benefits information

3. Special category personal data

We may collect, store, and use special category personal data, which is more sensitive and requires a higher level of protection. This may include information about your health or disability status.

We use this information only where needed for recruitment purposes, for example to make reasonable adjustments during interviews or assessments, to meet health and safety obligations, or to assess fitness to work where relevant.

We will only process special category data where a legal condition applies (for example, to comply with employment law obligations or exercise specific rights), and we may seek your explicit consent where appropriate.

4. How we collect your personal data

We collect personal data in a variety of ways, including directly from you via your CV, application form, correspondence, interviews, meetings, and assessments.

With your consent, we may also collect personal data from third parties such as referees and pre-employment screening providers.

5. Purposes and lawful bases for using your personal data

We will only use your personal data when the law allows. Most commonly, we use your information where it is necessary to take steps at your request before entering into a contract, where we need to comply with a legal obligation, or where it is in our legitimate interests (and not overridden by your rights).

In rare cases, we may also process your data with your consent, to protect vital interests, or where it is needed in the public interest.

- Responding to correspondence about your application (legitimate interests)
- Assessing suitability for the role (steps prior to entering a contract / contractual necessity)
- Making reasonable adjustments and meeting Equality Act 2010 obligations (legal obligation; for special category data: Article 9(2)(b) UK GDPR and Schedule 1 DPA 2018)
- Pre-employment screening checks such as identity and right to work (legal obligation; for special category data where relevant: Article 9(2)(b) UK GDPR and Schedule 1 DPA 2018)

6. Sharing your data

Your personal data will be shared internally with those involved in the recruitment exercise. We do not share your personal data outside CSP except where necessary to obtain references, carry out pre-employment screening checks, or where otherwise required by law.

7. International transfers

During recruitment your personal data may be processed by third-party service providers (for example recruitment agencies or head-hunters). We currently use UK-based providers, so international transfers should not be necessary.

If we use providers outside the UK in future, we will ensure appropriate safeguards are in place so transferred data has an essentially equivalent level of protection. This may include an adequacy regulation, or an International Data Transfer Agreement (IDTA) / Standard Contractual Clauses with the UK addendum.

8. How we protect personal data

We take data security seriously and implement appropriate technical and organisational measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access.

Where third parties process personal data on our behalf, they do so under written instructions, are bound by confidentiality, and must implement appropriate security measures.

9. How long we keep your data

We retain your personal data only for as long as necessary for the purposes it was collected, including meeting legal, accounting, or reporting requirements.

If your application is unsuccessful, we retain your personal data for **3 months** and then securely delete it, unless you ask us to retain your details for longer for future vacancies. If your application is successful, we retain your data as part of your personnel file.

In some circumstances we may anonymise your personal data so it can no longer be associated with you; we may use anonymised information without further notice.

10. Your rights

You have rights in relation to your personal data, including the right to request access, correction, deletion (in certain circumstances), restriction, portability, and to object to processing where we rely on legitimate interests.

Automated decision-making: you have the right not to be subject to decisions based solely on automated processing that significantly affect you. CSP does not use automated decision-making for recruitment.

Right to withdraw consent: where we rely on your consent for a specific purpose, you can withdraw it at any time. Once withdrawn, we will stop processing for that purpose unless the law allows continued processing.

How to exercise your rights

To exercise your rights, please email csp.data@nhs.net. You will not usually have to pay a fee, but we may charge a reasonable fee or refuse requests that are clearly unfounded or excessive.

We may request information to confirm your identity before responding, to ensure your data is not disclosed to someone without the right to receive it.

11. How to complain

You have the right to lodge a complaint with the ICO if you believe we are infringing UK data protection laws or you are concerned about how we handle your personal data.

ICO website: https://ico.org.uk/concerns/
ICO telephone: 0303 123 1113

12. Your duty to update us

Please keep us informed if your personal data changes during the recruitment process so that our records remain accurate and up to date.

13. What if you do not provide personal data to us

We require certain information to consider your application (for example contact details to arrange interviews, work history and qualifications to assess suitability, and identity information to verify your right to work). If you do not provide the information we request, we may be unable to progress your application.

14. Automated decision-making

CSP does not make employment decisions based solely on automated decision-making.

15. Contact

If you have questions about this notice, please contact csp.data@nhs.net.