



B-Well Health & Social Care Group Limited Privacy Policy

Our contact details:

- **Name:** Human Resources
- **Address:** 19 Camborne Avenue, Aylesbury, Buckinghamshire, HP21 7UH
- **Phone Number:** 0300 303 4811
- **E-mail:** hr.bwell@nhs.net

The type of personal information we collect

We currently collect and process the following information:

- personal identifiers, contacts and characteristics (for example, name and contact details)
- your contact details, including your name, address, telephone number and personal e-mail address.
- your emergency contact/next of kin details,
- your date of birth
- your gender
- your marital status
- the start and end dates of your employment or engagement
- recruitment records, including personal information included in a CV, any application form, cover letter, interview notes, references, copies of proof of right to work in the UK documentation, copies of qualification certificates, copy of driving licence and other background check documentation
- the terms and conditions of your employment or engagement (including your job title and working hours), as set out in a job offer letter, employment contract, written statement of employment particulars, terms of engagement (contract for services), consultancy agreement, pay review and bonus letters, statements of changes to employment or engagement terms and related correspondence
- details of your skills, qualifications, experience and work history, both with previous employers and with the Company
- your professional memberships
- your salary, entitlement to benefits and pension information
- your National Insurance number



- your bank account details, payroll records, tax code and tax status information
- any disciplinary, grievance and capability records, including investigation reports, collated evidence, minutes of hearings and appeal hearings, warning letters, performance improvement plans and related correspondence
- appraisals, including appraisal forms, performance reviews and ratings, targets and objectives set
- training records
- annual leave and other leave records, including details of the types of and reasons for leave being taken and related correspondence
- any termination of employment or engagement documentation, including resignation letters, dismissal letters, redundancy letters, minutes of meetings, settlement agreements and related correspondence
- information obtained through electronic means, such as swipe card or clocking-in card records
- information about your use of our IT systems, including usage of telephones, e-mail and the Internet
- photographs

The Company collects, uses and processes a range of personal information about you. This includes:

- information about your health, including any medical condition, whether you have a disability in respect of which the Company needs to make reasonable adjustments, sickness absence records (including details of the reasons for sickness absence being taken), medical reports and related correspondence
- information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation
- trade union membership information

How we get the personal information and why we have it

Most of the personal information we process are provided to us directly by you for one of the following reasons:

The Company may collect personal information about employees, workers and contractors in a variety of ways. It is collected during the recruitment process, either directly from you or sometimes from a third party such as an employment agency. We may also collect personal information from other external third parties, such as references from former employers, information from background check providers,



information from credit reference agencies and criminal record checks from the Disclosure and Barring Service (DBS).

We will also collect additional personal information throughout the period of your working relationship with us. This may be collected during your work-related activities. Whilst some of the personal information you provide to us is mandatory and/or is a statutory or contractual requirement, some of it you may be asked to provide to us on a voluntary basis. We will inform you whether you are required to provide certain personal information to us or if you have a choice in this.

Your personal information may be stored in different places, including in your personnel file, in the Company's HR management system and in other IT systems, such as the e-mail system about criminal convictions and offences.

We will only use your personal information when the law allows us to. These are known as the legal bases for processing. We will use your personal information in one or more of the following circumstances:

- where we need to do so to perform the employment contract, casual worker agreement, consultancy agreement or contract for services we have entered with you where we need to comply with a legal obligation.
- where we need to protect your vital interests (or someone else's vital interests).
- We need all the types of personal information listed under "What types of personal information do we collect about you?" primarily to enable us to perform our contract with you.
- where we need to comply with our legal obligations. In some cases, we may also use your personal information where it is necessary to pursue our legitimate interests (or those of a third party), provided that your interests or your fundamental rights and freedoms do not override our interests. Our legitimate interests include performing or exercising our obligations or rights under the direct relationship that exists between the Company and you as its employee, worker or contractor; pursuing our business by employing (and rewarding) employees, workers and contractors; performing effective internal review. We may share this information with other employers, organisations & legal bodies where there is a legal requirement by law.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information.

- **Your consent. You can remove your consent at any time. You can do this by contacting our HR department at hr.bwell@nhs.net**
- **We have a contractual obligation.**



- **We have a legal obligation.**
- **We have a vital interest.**
- **We need it to perform a public task.**
- **We have a legitimate interest.**

How we store your personal information

Your information is securely stored.

The Company has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls in place to try and prevent your personal information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, we limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need to know to perform their job duties and responsibilities. You can obtain further information about these measures from our HR department.

Where your personal information is shared with third-party service providers, we require all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law. We only allow them to process your personal information for specified purposes and in accordance with our written instructions and we do not allow them to use your personal information for their own purposes.

The Company also has in place procedures to deal with a suspected data security breach, and we will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where we are legally required to do so.

The Company will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, tax, health and, reporting or accounting requirements.

Once you have left employment or your engagement has been terminated, we will generally hold your personal information for one year after the termination of your employment or engagement, but this is subject to: (a) any minimum statutory or other legal, tax, health and safety, reporting or accounting requirements for particular data or records, and (b) the retention of some types of personal information for up to six years to protect against legal risk, e.g. if they could be relevant to a possible legal claim in a tribunal, County Court or High Court. We will hold payroll, wage and tax records (including salary, bonuses, overtime, expenses, benefits and pension information, National Insurance number, PAYE records, tax code and tax status information) for six



years after the termination of your employment or engagement. Overall, this means that we will “thin” the file of personal information that we hold about you one year after the termination of your employment or engagement, so that we only continue to retain for a longer period what is strictly necessary.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from our IT systems and we will also require third parties to destroy or erase such personal information where applicable.

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.

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.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

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.

Please contact us at B-Well Health & Social Care Group, 19 Camborne Avenue, Aylesbury, HP21 7UH. E-mail: hr.bwell@nhs.net, if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at B-Well Health & Social Care Group, 19 Camborne Avenue, Aylesbury, HP21 7UH.

You can also complain to the ICO if you are unhappy with how we have used your data.



The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

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