

# Human Resources Privacy Notice

## 1. Scope

This document provides further information about how Spirit collects and uses personal information relating to our prospective employees, employees, ex-employees and external contracting or agency staff.

## 2. Key terms

“Spirit employee” and “you” mean prospective, present and past employees, contractors, agency staff, any category of ‘worker’ and people connected to them (such as the person you nominate to contact in an emergency).

“Personal information” means information about you, and from which you could be identified, including information which may be protected under the privacy or data protection legislation.

## 3. Recruitment Purposes

If you are an external candidate please speak with your recruitment advisor.

- **Your application:** when you apply for a role with us, you will be asked to provide personal information to support your application. This will enable us to determine your eligibility and suitability to work within Spirit. This will include the personal information we need to enable us to select the right candidate for the role, and may include things such as past employment details, educational qualifications, skills, and volunteering activities.
- If you are successful in the employment process any personal information provided to us may then form part of your HR record which we would hold.
- If your applicant is unsuccessful we will dispose of your information within 6 months.
- **Pre-employment checks:** prior to you starting work with us or changing roles within Spirit, we may use your personal information to carry out pre-employment checks, including criminal record checks and right to work in the UK, and to verify references.
- For more information regarding Spirit’s preemployment checks, see the Spirit Recruitment and selection policy.
- **Equality and Diversity information:** which includes information about your ethnicity, disability, age, religion/belief, gender and sexual orientation. This information is used to help us improve our employment practices. Access to this information is strictly controlled.

#### **4. Human Resources (“HR”), finance, payroll and other business administration purposes.**

We will use your personal information to manage our employment relationship with you for the purposes below:

To administer your pay and any associated contractual benefits:

- Bank details
- National insurance number
- Tax information

We use this information so that we can make:

- Salary payments,
- Pension deductions
- Pay tax
- National insurance contributions
- Repay student loan
- Pay CMS contributions (if applicable)
- Administer the Childcare vouchers scheme

We do share your personal information with external service providers who manage these functions on our behalf under relevant contracts.

To manage other aspects of your employment relationship with Spirit the personal information we collect and use for this purpose will include:

- Information about your performance at work (e.g. appraisals, development notes and plans)
- Records of your training and other compliance requirements,
- Succession or other forecasting information,
- Information about absence history including sickness absence, requests for unpaid leave,
- Accident at work records,
- Occupational Health Service reports and other Medical Reports
- Notes of management interviews
- Processing employment or work-related claims: including grievances, personal injury and compensation claims.
- To contact you or your nominated contact in the case of an emergency (either yours or ours): we will ask you to provide us with home telephone numbers, mobile numbers and the names of people we can contact in an emergency. Where you nominate a contact for emergencies (e.g. a friend or relative) please ensure you advise them of this arrangement and where applicable, get their consent.
- Pensions: we collect and use your personal information so that we can administer your pension or any other ongoing entitlements once you have stopped working for Spirit.

## **5. Security purposes**

Monitoring the use of communications services: we provide communications services and facilities, including email, instant messenger, telephones and mobiles, and the internet to you for Spirit business use, but we may allow some limited personal use in accordance with our policies. Your use of these communications services and facilities must be appropriate to protect Spirit and its reputation.

Subject to legislation or regulations, we may block access to certain sites, and may monitor, record and analyse your usage of the communications services and facilities that we provide to you. We will also record the numbers dialled and the duration of all calls for billing purposes.

**CCTV:** we have CCTV at Spirit sites to enhance the security of our property and to protect the people who work at these sites. CCTV will be monitored for security reasons, for evidence of misuse or where we have grounds for suspecting a criminal or serious disciplinary offence has been committed. At a number of Spirit sites CCTV is not managed by Spirit but is contracted out to a third-party provider under contract.

**Prevention and detection of crime:** in the rare event that we have reasonable grounds for suspecting criminal activity or that another serious disciplinary offence has been committed, information maybe passed to Local Security Management Services, the police or other Law enforcement agencies.

## **6 Information Technology (“IT”) administration purposes**

Most Spirit employees require access to various IT systems of Spirit or of third parties in order to do their jobs. So that you can use these systems, Spirit and/or third parties may need your personal information to authorise, grant, administer, monitor and terminate your access to, or use of, Spirit and/or third-party IT systems.

Your personal information may also be required so that we can perform other IT related activities such as reporting, managing and resolving faults or other IT issues you may encounter when doing your job, and for the administration, support, development, testing, management and maintenance of our and/or third-party IT systems.

## **7 Who has access to your personal information?**

Spirit’s policy is that only those who have a legitimate need to access your personal information will be able to do so. For example: Your line manager may hold local records on performance, notes of one to one interviews, emergency contact numbers, etc. They will also be able to access information Spirit holds about you centrally which includes general job-related information, current pay, and absence history.

Dedicated HR, Finance and other professionals will also have access to information about you, for example, to enable them to manage the needs of the business, provide specialist support to management and to calculate pay and bonus entitlements.

Where you are asked to provide information relating to ethnicity and disability, and you provide it, access to this is restricted and is only used to comply with corporate policies, contractual or legal obligations.

### **8. How long do we need to keep your personal data?**

We only hold your personal data for as long as there is a business need or a legal obligation to keep it. For more information see our Records Management Policy.

### **9. How can you keep your personal information accurate and up-to-date?**

It is important that the personal information we hold about you is kept accurate and up to date. We therefore need you to inform us of any change or update to your personal information. We also re-confirm basic information such as address, next of kin etc annually.

### **10. Your rights as a data subject**

As a data subject, you have a number of rights. You can:

- Access and obtain a copy of your data on request;
- Require the organisation to change incorrect or incomplete data;
- Require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- Object to the processing of your data where Spirit is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact [lisa.wakeford@spirit-healthcare.co.uk](mailto:lisa.wakeford@spirit-healthcare.co.uk)

### **11. How can you request access to the personal information Spirit holds about you?**

If you would like to access information Spirit holds about you, then you can make such a request in writing to either the Head of Human Resources or the Head of Governance.

### **12. The Data Protection Officer (DPO)**

Spirit have appointed a DPO. This is our Head of Governance – Lisa Wakeford. The role of the DPO is to assist data ‘Controllers’ and ‘Processors’ to comply with data protection law and avoid the risks that organisations face when processing personal data.

### **13. The Data Controller**

The Data Controller is responsible for keeping your information confidential. The information relating to HR, Finance and Payroll is managed centrally by the Spirit Health Group on behalf of each of the main business areas. The data controller is therefore the business unit you are employed by.

Spirit  
Spirit House,  
Saffron Way,  
Leicester, LE2 6UP  
Telephone: 08008815423 [www.spirit-healthcare.co.uk](http://www.spirit-healthcare.co.uk)

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

### **14. Information Commissioner**

The Data Protection Act 2018 requires organisations to lodge a notification with the Information Commissioner to describe the purposes for which they process personal information. These details are publicly available in the Register of Data Controllers.

Further information can be obtained from:  
Information Commissioner's Office  
Wycliffe House, Water Lane  
Wilmslow, SK9 5AF  
Telephone: 0303 123 1113 [www.ico.org.uk](http://www.ico.org.uk)