

Privacy Notice for Lancashire and South Cumbria Integrated Care Board Applicant Recruitment System – TRAC jobs

Effective 30th September 2023

As part of our application and recruitment process where candidates have applied for roles in Lancashire and South Cumbria (LSC) Integrated Care Board (ICB) via <https://apps.trac.jobs> and/or via <https://www.jobs.nhs.uk> we will collect, process, and securely store personal information about you.

Civica UK Ltd supplies the TRAC recruitment system under license to the ICB and East Lancashire Hospitals Foundation Trust (ELHT) administer the recruitment service for the ICB under a service level agreement. This notice describes how the parties involved handle and protect the data that you provide us access to for the purpose of recruitment and selection process.

1. *What personal information do we collect and process?*

Here are some examples of the type of information that we may process. There's a full list in Schedule 1 at the end of the notice.

- Personal details such as name, postal address
- Information to enable us to contact you such as telephone number and email address.
- If you choose to share it with us, we will capture your date of birth, nationality, and gender. There will be an option for you to choose not to disclose this information which would not affect your application in any way.
- Information to identify you such as your National Insurance number, passport, driving licence.
- Information about your skills and experience such as work history, qualifications, training.
- Information about your suitability to work for us such as references, interview notes, criminal record, assessment results, occupational health screening results.
- Information about your terms of employment such as salary, job title, location, and hours.

For roles that are subject to the Fit and Proper Person's Test which are typically Board member roles, we are required to check the following:

- A search of the Companies House Register to ensure that no board member is disqualified as a director.
- A search of the Charity Commission's register of removed trustees.
- A Disclosure and Barring Service (DBS) check in line with the local policy requirements – in defining the required DBS level, NHS organisations should identify those board roles that fall within the definition of a 'regulated activity', as defined by the Safeguarding Vulnerable Groups Act 2006, as required barred list checks.
- A check with the relevant professional bodies where appropriate.

- A check of the Bankruptcy and Insolvency Register for any record of insolvency.
- A check of Employment Tribunal (ET) decisions for any ET judgements on the appointee.
- A check of various social media platforms for the last 2 years (various – Google, Facebook, Instagram, etc) for any inappropriate activity.

2. Why do we need to collect and process your personal data?

The purpose of the data capture and processing is primarily to enable you to register for our job alerts or to apply for a job vacancy at Lancashire & South Cumbria ICB, have your suitability assessed for the role and ensure that all the necessary information is obtained for an offer of employment, where applicable, and onboarding to be progressed without delay.

We will administer your application by:

- Assessing your skills, qualifications, and interests against our job opportunities.
- Verifying your information and carrying out pre-employment checks including reference checks, occupational health screening and conducting criminal record Disclosure and Barring Service checks if you are offered a job.
- Communicating with you about the recruitment process and/or your application(s).
- Where requested by you, assisting you with obtaining an immigration visa or work permit if required.
- Complying with applicable laws, regulations, legal processes, or enforceable governmental requests.
- Ensuring that the processing is always fair and lawful and in the case of sensitive personal information your express consent will be obtained. This means we will only process your data for recruitment and employment purposes.
- We utilise various candidate assessment methods across the organisation and at times work with an external company to supply these. If you are offered and accept employment with LSC ICB, some of the information collected during the application and recruitment process will become part of your employment record including individual demographic information for equal opportunities monitoring purposes and to enable rights and obligations to be identified (including ethnic origin, age, gender etc.).

3. Screening Checks

We comply with NHS Check Standards and guidance for pre-employment checking to check suitability for roles. These checks include basic disclosure and barring service (DBS) checks, reference checks and occupational health screening and are only performed on candidates who have been selected for a role. Your consent will be requested in line with the relevant laws before screening checks are performed.

4. Who has access to your data?

Your personal information may be shared internally and externally, with the people below, to enable the recruitment process to take place. The information shared is limited to what is required by an individual to perform their role in the recruitment process.

We may need to share your information with parties internally including:

- Employees who have responsibility for assessing suitability for the vacancy either during the application, assessment, or pre-employment checking stages and for ensuring your successful onboarding.
- Employees who have responsibility for administering the recruitment processes (for example, attraction, assessment, pre-employment screening).
- Employees in Information Technology (IT) and system owners who grant/manage user access.

We also may also need to share your information confidentially with external third parties including:

- ELHT recruitment personnel will administer the ICB recruitment service under license.
- Your previous employers and/or academic institutions in seeking references and in validating information that you have provided. We will only approach your referees with your permission or if stated in the job advert as part of the selection process.
- Companies who provide candidate assessment tools and applicant tracking services to LSC ICB.
- Suppliers who undertake background screening on behalf of LSC ICB (e.g. criminal record checking agencies, occupational health screening).
- Other third-party suppliers (or potential suppliers), who provide services on our behalf.

5. How is your data protected?

- We take the security of your data very seriously. We have internal policies and controls in place, (for example, restricting electronic access rights to information systems based on an employee's role) to ensure that your data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by those authorised to do so in the performance of their duties.
- Where we use 3rd parties to process personal data on our behalf, they guarantee, as a minimum, the same level of data protection as that provided by NHS organisations.
- Your personal data will be retained in accordance with our retention schedule for candidate records. This means that we will retain some data after your application to LSC ICB is complete. Retention periods are outlined in Schedule 2 below.
- You can contact our Data Protection Officer, for questions on data protection legislation and is the first point of contact on data protection issues and you can contact the Information Commissioner.

6. Employment Stage

Electronic Staff Record:

On commencement of employment with the Organisation, some of your personal data will be uploaded to the Electronic Staff Record (ESR) from the TRAC recruitment system. ESR is a national workforce system solution for the NHS which is used by the Organisation to effectively record and manage your employee record.

Streamlining:

If you are already in employment with another NHS organisation and will be leaving that role to join LSC ICB, you accept that the following personal data will be transferred, in accordance with streamlining staff movement principles.

- Personal information (Name, address, NI number etc) – to enable the new NHS employer to verify who you are.
- Employment information (your grade, employment dates, salary, post, sickness information etc) – to enable the new NHS employer to ensure you are paid correctly and can calculate appropriate NHS holiday and sickness entitlements and correct calculation of NHS continuous service entitlement.
- Training compliance/competency information – so that you should not need to repeat some nationally recognised training, including statutory and mandatory/core skills training.
- Full details of the exact data items shared can be supplied if required.

Please be advised that immunisation and vaccination data is not currently transferred in all organisations but may be in the future. However, please be assured that this data will not be shared without your permission – consent will be sought at such a time that there is a requirement to share that data.

Inter Authority Transfer (IAT) is the process by which certain personal data is transferred from one NHS organisation to another when you accept an employment offer or your employment transfers. NHS organisations have a legitimate interest in processing your data in this way in establishing the employment of a suitable workforce. The streamlining staff movement principles include data sharing arrangements which are aimed at improving efficiencies within the NHS both to make costs savings for Organisations but also to save you time when your employment transfers. You have the right to object to your information being shared.

6. Your Rights

You have a right to be informed about personal information that we process about you, and you can request to have access to a copy of the information LSC ICB holds about you. You also have a right to request that any incorrect information about you is changed and you can ask for information to be restricted and/or deleted or if you think that LSC ICB should not be processing that information. These rights are limited and apply in specific circumstances.

You can contact the Data Protection Officer at LSC ICB regarding the exercise of these rights. If you have any queries about this notice or your personal information generally, including questions about accessing your personal information or correcting it, you should contact mlcsu.ig@nhs.net in the first instance. Alternatively, there is information

available on our website about accessing your personal information, please search [LSC Integrated Care Board :: Home \(icb.nhs.uk\)](https://lsc.nhs.uk/) for “subject access requests”. Email requests should be sent to mlcsusars@nhs.net and please write “Subject Access Request” in the subject line.

It is your responsibility to keep your personal information up to date so that accurate application records can be maintained. You can manage all your applicant data by accessing and updating your profile in the applicant tracking system (TRAC) used by LSC ICB.

If you have a complaint regarding the way in which your data has been handled, if you believe it is inaccurate, held for too long or it is not secure you can contact our Data Protection Officer.

You also have the right to complain to the Information Commissioner's Office (ICO) which is the regulator for data protection legislation and upholds information rights. More information is available on the ICO website <https://ico.org.uk/concerns>

7. Changes to this Notice

We may make changes to this notice from time to time. We will post any changes on this page and the version of the notice is identified at the top of the page by its effective date.

Schedule 1: Information we may process:

- Name and address
- Contact telephone number(s) and email address
- Date of birth and national insurance number
- Work history, employer name and address, job title, years worked and reason for leaving
- Education, results, educational establishment, and year
- Professional training and awards, awarding establishments, results and year
- Previous salary and expectations
- Physical/mental health and condition(s) requiring adaptations to the work environment
- Relations and/or relationships with LSC ICB employee(s), whom and type of relationship
- Where an applicant has heard about a vacancy to enable advertising success to be identified
- Unspent criminal convictions and details
- Referee details, job title, employer, and relationship
- Gaps in employment, dates, and a reason
- Whether an applicant is a current member of staff at risk of redundancy
- Individual demographic information in compliance with legal requirements (such as national insurance number, passport/visa information, nationality, citizenship, work permit, disability, and gender)
- Individual demographic information for equal opportunities monitoring purposes and to enable rights and obligations to be identified (including ethnic origin, age, gender etc.)
- Employment contract related information (including job title, salary, location, hours of work, reporting relationship etc.)
- Bank account details for salary payment purposes
- Reference details such as disciplinary and attendance/absence records
- Interview and assessment results, reports, and notes

Schedule 2: Below outlines the retention periods for the different types of information that LSC ICB may process:

- Interview notes: 12 months for unsuccessful applicants. Transferred to personal file within TRAC file for successful applicant(s).
- Photocopies of documentation taken for pre-employment/screening checks will be uploaded into the applicant TRAC file and paper copies disposed of confidentially. The TRAC file is passed to the recruiting manager for storage in the electronic personal file of the new starter.

- TRAC files of unsuccessful applicants will be retained for 12 months electronically and then deleted.