



**Halcyon
Care Homes**
Part of Anchor

Employee Privacy Notice

All personal information about you will be under the control of Anchor Hanover Group (Anchor) acting as Data Controller and will be processed in line with applicable UK (United Kingdom) data protection legislation including, but not limited to, the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (the DPA). Anchor is registered with the Information Commissioner's Office (ICO) and our registration number is Z7000835.

This document tells you about the sort of personal information we collect and how it will be used by us.

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Who does the privacy notice apply to?

This privacy notice applies to all applicants, employees on permanent, temporary, or fixed term contracts including bank staff; workers, contractors; agents; and representatives.

In this notice:

- What is personal information?
- How do we get your information?
- How do we use your personal information?
- What information do we ask for, and why?
- The purpose and lawful basis for processing applicant information
- Purpose and lawful basis for processing employee information
- Your rights in relation to this processing
- Who do we share information with?
- Where will your information be stored?
- How long is your personal data kept for?
- Your rights as a data subject
- Can I find out the personal data that **Anchor** holds about me?
- Complaints
- How to contact us
- Appendix A – Applicant Data
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What is personal information?

Personal information is information about someone which allows that person to be identified. Examples of personal information that we hold about you include:

- Your name and address
- Date of birth
- Your bank details
- Details of your salary and benefits
- Next of kin and emergency contact details
- Your photograph
- Information about your entitlement to work in the UK
- Details about periods of absence
- Disciplinary or grievance records
- Performance details
- Training and development you have undertaken
- Whether or not you have a disability for which we need to make reasonable adjustments
- Equal opportunities monitoring to offer equal opportunities, prevent discrimination and support under-represented groups
- CCTV data

Some personal information is deemed to fall into special categories of personal data. The special categories of data that we hold will be information about your race or ethnic origin, physical or mental health condition, alleged or real offences, proceedings for any alleged or real offence, trade union membership, sexuality, religion, or beliefs. When required by regulations or to reduce the risk of certain contagions, we may also capture and hold health screening information particularly for care home workers or where visiting a care home is necessary to fulfil a role.

How do we collect your personal information?

- Directly from you.
- From an employment agency.
- From your employer if you are a secondee.
- From referees, either external or internal.
- From the NHS.
- From the Disclosure Barring Service (DBS).
- From Occupational Health and other health care providers.
- From Pension administrators and other government departments, for example tax details from HMRC.
- From providers of staff benefits.
- CCTV images taken using our own CCTV systems.

Such information may be collected over the phone; by face-to-face contact; when receiving written correspondence; or electronic correspondence such as e-mails, faxes, online application forms, questionnaires, and text messages.

How do we use your personal information?

We will use your information to help us manage your application and employment with us. The information we use is stored within an employee database held by Anchor Care Homes.

What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not keep it longer than necessary. The information we ask for is used to assess your suitability for employment. You do not have to provide what we ask for, but it may affect your application and continuing employment

if you do not. We will use any feedback you provide about our recruitment process to develop and improve our future recruitment campaigns.

Details of what information we collect, and store can be found in Appendix A for Applicants (page 8) and Appendix B for Employees (page 9).

The purpose and lawful basis for processing applicant information

Our purpose for processing this information is to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process.

The lawful basis we rely on for processing your personal data is article 6(1)(b) of the UK GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract.

If you provide us with any information about reasonable adjustments you require under the Equality Act 2010, the lawful basis we rely on for processing this information is article 6(1)(c) to comply with our legal obligations under the Act.

Special category data

The lawful basis we rely on to process any information you provide as part of your application which is special category data, such as health, religious or ethnicity information is article 9(2)(b) of the UK GDPR, which relates to our obligations in employment and the safeguarding of your fundamental rights. And Schedule 1 part 1(1) and part 1(2)(a) and 1(2)(c) of the DPA 2018 which again relates to processing for employment purposes.

We process information about applicant criminal convictions and offences. The lawful basis we rely on to process this data are article 6(1)(b) for the performance of a contract and article 6(1)(e) for the performance of our public task. In addition, we rely on the processing condition at Schedule 1 part 1 paragraph 1 and Schedule 1 part 2 paragraph 6(2)(a).

Purpose and lawful basis for processing employee information

Depending on the processing activity, we rely on the following lawful basis for processing your personal data under the GDPR:

- Article 6(1)(b) which relates to processing necessary for the performance of a contract.
- Article 6(1)(c) so we can comply with our legal obligations as your employer.
- Article 6(1)(d) to protect your vital interests or those of another person.
- Article 6(1)(f) for the purposes of our legitimate interest.

Special category data

Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:

- Article 9(2)(b) which relates to carrying out our obligations and exercising our rights in employment and the safeguarding of your fundamental rights.
- Article 9(2)(c) to protect your vital interests or those of another person where you are incapable of giving your consent.

- Article 9(2)(h) for the purposes of preventative or occupational medicine and assessing your working capacity as an employee.
- Article 9(2)(f) for the establishment, exercise, or defence of legal claims.
- Article 9(2)(j) for archiving purposes in the public interest.

Your rights in relation to this processing

As an individual you have certain rights regarding our processing of your personal data, including a right to lodge a complaint with the Information Commissioner as the relevant supervisory authority.

More information about your individual rights is detailed in Your rights as a data subject (page 5)

Who do we share information with?

There may be times when we share information about you with colleagues or other organisations. These include trusted data controllers or processors who process data on our behalf.

The information we share with others will be the minimum necessary to enable them to carry out their task. Special categories of personal data are confidential and will only be made available to those who require it. The organisations with whom information is shared may include:

- the DBS to check your details with them;
- providers of goods or services and other professional advisers who provide support in various aspects of our business related to your employment such as our HR and payroll system. The access that these

service providers have to your personal data will be restricted in accordance with our agreement with them;

- If we are required to do so by law or in connection with legal proceedings; and
- to protect the vital interest of an individual (in a life-or-death situation).

Where will your information be stored?

We do not transfer employee/applicant personal data overseas. If it was necessary to transfer your personal data outside the United Kingdom or European Economic Area (EEA) we will ensure that before we do so, there is adequate protection in place to ensure the security of your personal data.

How long is your personal data kept for?

We will only keep your personal data for as long as is necessary and will securely dispose of it after that time. For employees, we hold the personal data detailed above throughout the period of your employment.

Your personnel file will be retained for a maximum of 6 years after you have left Anchor unless it is required to be kept for a longer or shorter period by law. For applicants that have not been short listed, we retain personal information (outlined in Appendix A) for 6 months after the position is filled. For applicants that are shortlisted, but unsuccessful, personal information is retained for 1 year after the position is filled.

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you have the right not to be subject to the legal effects of a decision based solely on automated processing or profiling.
- Right to judicial review: if Anchor refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the clause below.

Can I find out the personal data that Anchor holds about me?

Anchor can at your request confirm what information we hold about you and how it is processed. If Anchor does hold personal data about you, you can request the following information:

- The purpose and legal basis for processing;
- If the processing is based on the legitimate interests of Anchor or a third party, information about those interests;
- The categories of personal data collected, stored, and processed;
- The recipient(s) or categories of recipients that the data is/will be disclosed to;
- If we intend to transfer the personal data to a third party or international organisation, information about how we ensure this is done securely;
- How long the data will be stored;
- Information about your right to withdraw consent at any time;
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data;
- The source of personal data if it was not collected directly from you; and
- Any details regarding automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

If we need to establish your identity before responding to a request to exercise your rights, we may request that you provide us with ID, for example passport, driving licence, birth certificate or utility bill (within the last three months).

If you would like to exercise any of your rights or request a copy of some or all your personal information, please contact us by using the details below. No charge will be made for this service.

Complaints

We hope that you will not ever need to, but if you do want to complain about our use of your personal data, please send an email outlining your complaint to **data.protection@anchor.org.uk**

- If you wish to make a complaint about how your personal data is being processed by Anchor or any of our third parties, or how your complaint has been handled, please contact us at **data.protection@anchor.org.uk**

You also have the right to complain to the ICO about how we have processed your personal data. The ICO can be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, by telephone on **0303 123 1113** or through the website **www.ico.org.uk**.

How to contact us

You can contact us in the following ways to discuss any aspect of this notice or about the information we hold about you:

- Writing to the Data Protection Officer at Anchor Hanover Group, 2 Godwin St, Bradford BD1 2ST Email us at **data.protection@anchor.org.uk**
- Telephoning the Data Protection Team on **01274 026141**

This privacy notice may change from time to time.

Appendix A – Applicant Data

What data we collect	What we do with it
Name, address, and contact details, including email address and telephone number.	To correspond with you.
Details of your qualifications, skills, experience, and employment history, including start and end dates, performance, attendance, conduct, training record, disciplinary and grievance information with previous employers and with Anchor Care Homes.	To assess your suitability for employment and to request references should we decide to make you an offer.
	To keep records of our hiring process
Passport, national insurance details, images, and other evidence of identity	Confirmation of your identity
Information about your nationality and entitlement to work in the UK	To check your right to work in the UK and enter into a contract with you
For certain positions – DBS (Disclosure Barring Service) details	To ensure the suitability of individuals for certain positions
For positions where you are required to work in a care home or visit care homes as part of your role – details of your Covid vaccination or exemption status	To meet government and regulatory requirement
Records, emails, correspondence, and other communication you created or updated in relation to your application for employment at Anchor Care Homes.	Share with relevant third parties for the purposes of references, verification, and fraud prevention
Information about your criminal record (where this is a requirement of the role or relates to unspent convictions)	To ensure you are permitted to undertake the role in question.
For positions where you are required to drive – details of your driving licence, motoring convictions, vehicle insurance	To ensure you have the legal capacity for a role that involves driving at work
Details of your car/vehicle ownership and registration	To ensure you have the capacity for a role that involves driving at work
	To process expenses claims
Information about medical or health conditions, including whether you have a disability for which Anchor needs to make reasonable adjustments under the Equality Act 2010	To ensure that reasonable accommodation can be made for interview and for the role in question.
Equality and diversity monitoring information, including your ethnic origin and date of birth	For the purposes of equal opportunities monitoring to ensure we are being fair in our employment practices
Voice recordings of phone calls	Monitor service quality, complaint resolution

Appendix B – Employee Data

What data we collect	What we do with it
Name, address and contact details, including email address and telephone number, date of birth and gender	To enter and manage performance of an employment contract with you. To ensure you have access to appropriate systems and platforms.
Passport, national insurance details and other evidence of identity	Confirmation of your identity
The terms and conditions of your employment	To meet our obligations under your employment contract
Details of your qualifications, skills, experience, and employment history, including start and end dates, with previous employers and with Anchor Care Homes.	To enter into, and performance of an employment contract with you Assessing qualifications for a particular job or task, including decisions about promotions
Details of your employment history, including start and end dates, with Anchor Care Homes.	Provide references on request for current or former employees To identify staff who qualify for service-related benefits, long service awards and publicise long service award recipients to other Anchor colleagues.
Operational and training records, emails, correspondence, and other communication you created or updated during your employment at Anchor Care Homes.	Provide references, assessments, and appraisals Share with relevant third parties for the purposes of references, verification, and fraud prevention
Information about your remuneration, including entitlement to benefits such as pensions, life assurance cover	To pay you in accordance with your employment contract, deduct tax and to administer pension entitlements
Details of your bank account and national insurance number	To pay you in accordance with your employment contract and ensure we are complying with our legal obligations
Information about your marital status, next of kin, dependants, and emergency contacts	Maintain accurate and up-to-date employment records and contact details. Contact you/and or your named emergency contact(s) in the event of an emergency.
Your photograph or digital image	Marketing, verification of identity, security, and fraud prevention.
Your Anchor Care Homes work contact details	Routine correspondence and contact related to your employment at Anchor Care Homes.

Information about your nationality and entitlement to work in the UK	To check your right to work in the UK and enter into a contract with you
Information about your criminal record (where this is a requirement of the role or relates to unspent convictions)	To ensure you are permitted to undertake the role or training in question

What data we collect	What we do with it
For positions where you are required to drive – details of your driving licence, motoring convictions, vehicle ownership and insurance	To enter into and manage performance of an employment contract with you.
Details of your car/vehicle ownership and registration	Confirmation of your identity
Details of your work pattern (days of work and working hours) and attendance at work	To meet our obligations under your employment contract
For positions on an hourly rate - Details of actual working hours	To enter into, and performance of an employment contract with you Assessing qualifications for a particular job or task, including decisions about promotions
Details of periods of leave taken by you, including holiday and career breaks and the reasons for the leave	Provide references on request for current or former employees To identify staff who qualify for service-related benefits, long service awards and publicise long service award recipients to other Anchor colleagues.
Details of periods of family leave taken by you and the reasons for the leave	Provide references, assessments, and appraisals Share with relevant third parties for the purposes of references, verification, and fraud prevention
Details of periods of sickness absence	Operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled. Ascertaining your fitness to work.
Details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence. Gathering evidence for grievance or disciplinary hearings	Operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace
Information necessary to manage legal disputes	Dealing with legal disputes involving you, or other employees, workers, and contractors, including accidents at work

What data we collect	What we do with it
<p>Assessments of your performance, including PDRs, 1:1 meeting, performance reviews, training you have participated in, performance improvement plans and related correspondence</p>	<p>Operate and keep a record of employee performance and related processes, to plan for career development, and for organisational continuity/succession planning and workforce management purposes</p>
<p>Information about medical or health conditions, including whether you have a disability for which Anchor needs to make reasonable adjustments</p>	<p>Obtain occupational health advice, to ensure that we comply with our duties in relation to individuals with disabilities, meet our obligations under health and safety law, ensure that employees are receiving the pay or other benefits to which they are entitled, ascertaining your fitness to work</p>
<p>Equality and diversity monitoring information, including your ethnic origin, sexual orientation, health and religion or belief.</p>	<p>For the purposes of equal opportunities monitoring to ensure we are being fair in our employment practices</p>
<p>Security information such as CCTV footage, key card information and car park entry systems</p>	<p>Service monitoring, confirmation of work attendance, evidence for insurance claims and crime prevention and investigation</p>
<p>Voice recordings of phone calls</p>	<p>Monitor service quality, complaint resolution</p>
<p>Information about your use of our information and communications systems (such as emails, calls, correspondence, and other communications).</p>	<p>To perform our employment contract with you, manage performance, monitor confidentiality and data protection compliance, ensure compliance with us IT (Information Technology) policies, and manage network and information security, including preventing unauthorised access to our computer and electronic communications systems and prevent malicious software distribution.</p>
<p>Health screening information may be captured and stored when required by regulations or to reduce the risk of certain contagions, for positions where you work in a care home or visit care homes as part of your role</p>	<p>To meet government and regulatory requirements</p>

What data we collect	What we do with it
ASB (Anti-Social Behaviour) or Safeguarding	To comply with regulatory requirements
Use of our information and communication systems.	<p>To ensure compliance with IT (Information Technology) policies.</p> <p>To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems</p>
Anonymised data about your employment for analytical purposes	<p>To conduct data analytics studies to review and better understand employee retention and attrition rates</p> <p>Business management and planning, including accounting and auditing</p>
Information required under the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE)	To ensure compliance with our obligations on a TUPE transfer
Details of any whistleblowing complaints and investigations	Operate and keep a record of whistleblowing complaints and investigations to ensure acceptable conduct in the workplace and the safety of colleagues, residents, and customers
Information required under the Transfer of Undertakings (Protection of Employment) Regulations 2006 (TUPE)	To ensure compliance with our obligations on a TUPE transfer
Witness statements or investigation notes/ minutes	For use in disciplinary, grievance or whistleblowing or other internal investigatory processes.