



Privacy Policy

Applicant & Candidate within Health & Social Care

Document Control

Policy Name	Privacy Policy Applicant & Candidates
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Non-Clinical Policy Lead	Kim Berwick, Thurrock Health Hubs Corporate Services Manager
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Contents

1. Policy Update Log
2. Summary
3. Who are we
4. What information we collect, use, and why
5. How do we get the information and why do we have it:
6. What we do with the information
7. How do we store your information (Your data protection)
8. Duty of confidentiality
9. Lawful bases and data protection rights
10. What are your rights
11. Accessing personal records
12. Changes to the policy



1. Policy Update Log

This policies amendments and approval dates are:

Section Amended	Version	Date	Author
Policy reviewed with no amendments	V1.1	05 th Dec 25	Michelle McCormack

2. Summary:

This privacy notice tells you what to expect us to do with your personal information when you contact us or use one of our services. At **Thrive Health Hubs**, we are committed to protecting your personal information and respecting your privacy. This Privacy Policy outlines how we collect, use, and safeguard your information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

3. Who are we:

We are a private healthcare provider, founded by clinicians with the mission of delivering the highest standards of care to all. Our goal is to empower our service users to manage their conditions independently.

We are a trusted partner of the NHS and have been providing our range of services to the NHS, GPs and primary care networks since 2014.

4. What information we collect, use, and why

We collect or use the following personal information for recruitment purposes:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)



- CV, Contract, proof of Address, confirmation of vaccinations (If required) Hep B declaration confidentiality Agreement, Emergency Contact, & professional registration (If required)

5. How do we get the information and why do we have it:

We collect personal data on a legitimate interest basis in order to deliver a fair, safe and legally compliant recruitment process. Personal data may be obtained from the following sources:

- **Directly from the candidate** (e.g., CV, application form, interview responses).
- **Referees** provided by the candidate.
- **Right to work and identity verification checks** (e.g., passport, visa documentation).
- **Pre-employment checks**, where relevant and lawful (e.g., DBS checks, professional registration verification).
- **Internal recruitment systems and assessment tools** used during the process.

6. What we do with the information:

We use the personal information we collect to manage and support the recruitment process. This may include sharing relevant personal data with third parties involved in the hiring process—such as recruitment agencies, background-check providers, assessment providers, or referees—where this is necessary, proportionate, and lawful.

7. How do we store your information (Your data protection):

The personal information that we hold and collect is held on a centrally secure drive. Once the recruitment process is completed,

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

This means that you can remove your consent at any time. You can do this by contacting your Thrive Health Hubs Hr department.

We have a legitimate interest.



8. How long do we store your information:

All recruitment-related personal data is retained in line with the Records Management Code of Practice for Health and Social Care 2023.

- **Unsuccessful candidate information** is typically retained for **12 months** after the completion of the recruitment process, unless a shorter or longer period is legally required.
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- **Successful candidate information**, forming part of the employment record, is retained in accordance with our staff records retention schedule, which may vary depending on the type of information held.

These retention periods ensure we can respond to queries, meet legal obligations, and manage our recruitment processes effectively.

Any enquiries about data retention should be directed to the **Data Protection Officer**.

9. Who do we share your Information with:

We may share your information with:

- Disclosure & Barring Service DBS
- **Third-Party Providers:** Services that support recruitment (Disclosure & Barring Service DBS IT systems).
- **Regulatory Bodies:** Organisations like the Care Quality Commission (CQC) for compliance purposes.
- **Safeguarding Authorities:** If required to protect your welfare or others.

We ensure all third parties adhere to strict data protection standards.



8. Duty of confidentiality

We are subject to a common law duty of confidentiality. However, there are circumstances where we will share relevant health and care information. These are where:

- you've provided us with your consent (we have taken it as implied to provide you with care, or you have given it explicitly for other uses);
- we have a legal requirement (including court orders) to collect, share or use the data;
- on a case-by-case basis, the public interest to collect, share and use the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime);
- If in England or Wales – the requirements of The Health Service (Control of Patient Information) Regulations 2002 are satisfied; or
- If in Scotland – we have the authority to share provided by the Chief Medical Officer for Scotland, the Chief Executive of NHS Scotland, the [Public Benefit and Privacy Panel for Health and Social Care](#) or other similar governance and scrutiny process.

9. Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information for recruitment purposes are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **Public task** – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an Organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.



10. What are your Rights:

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- 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 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 information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your data in certain circumstances.
- Your right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or 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 if you wish to make a request.

Our contact details:

Thrive Health Hubs Limited
33 Fobbing Road
Fobbing
Essex
SS17 9BG
01375 641323

Thurrock.healthhubs@nhs.net



11. Accessing your Personal records:

- Under the [General Data Protection Regulation](#) You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for.

If you are applying for access to your own records you will need to send proof of identity. Please send a copy of your passport, photo driving licence or equivalent identification.

12.Changes to This Policy:

We may update this Privacy Policy periodically to reflect changes in the law or our practices. The latest version will always be available on our website

Thrive Health Hubs remains committed to protecting your privacy while delivering high-quality healthcare services. Thank you for trusting us with your information.