

## Simplifyhealth Candidate Privacy Notice

### Welcome to Simplifyhealth Candidate Privacy Notice

SIMPLIFYHEALTH is a trading name under Centene UK Ltd. which is a limited company registered in England and Wales. Registered number 10014577.

SIMPLIFYHEALTH are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are applying for work with us (whether as an employee, worker or contractor). It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation.

### Data protection principles

SIMPLIFYHEALTH are committed to complying with data protection law and principles, which means that your personal data be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### The kind of information we hold about you

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae covering letter or application form.
- The information you have provided on your application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications and professional registrations.
- Any information you provide to us during an interview such as right to work or ID.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

## **How is your personal information collected?**

We collect personal information about candidates from the following sources:

- You, the candidate.
- The recruitment agency introducing you to us, from which we collect the following categories of data: The information you have provided on your application form, including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications.
- Disclosure and Barring Service in respect of criminal convictions.
- Your named referees.

## **How we will use information about you**

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to appoint you to a role since it would be beneficial to our business to appoint someone to that role.

We also need to process your personal information to decide whether to enter into a contract with you.

Having received your CV, covering letter, application form we will then process that information to decide whether you meet the basic requirements to be shortlisted for the role. If you do, we will decide whether your application is strong enough to invite you for an interview. Prior to interview you may be required to complete either a clinical test or a competency based test. If we decide to call you for an interview, we will use the information you provide to us at the interview to decide whether to offer you the role. If we decide to offer you the role, we will then take up references and

carry out a criminal record and check your professional body's records before confirming your appointment.

**If you fail to provide personal information**

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully. For example, if we require a DBS check or references for this role and you fail to provide us with relevant details, we will not be able to take your application further. Please see the table below for statutory/ contractual requirements.

Statutory/ contractual Information requirements	Optional Information requirements
Disclosure and Barring Service	Ethnicity
National Insurance Number	Sexuality
Professional registration numbers	Disability
Qualifications	
Referee details and References	
Right to Work	
Passport or driver's licence	
Bank details	
Work history for 3 previous years	
Fitness to Work	
Student loan	

**How we use particularly sensitive personal information**

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during an interview.

- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

## Information about criminal convictions

We envisage that we will process information about criminal convictions.

We will collect information about your criminal convictions history if we would like to offer you the role (conditional on checks and any other conditions, such as references, being satisfactory). We are required to carry out a criminal record check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role. In particular:

- We are legally required by the NHS to carry out criminal record checks for those carrying out clinical roles or roles where you are likely to be alone with patients.
- Where the specific role is one which is listed on the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (SI 1975/1023) so is eligible for an enhanced check from the Disclosure and Barring Service.
- Where the specific role requires a high degree of trust and integrity and so we would like to ask you to seek a basic disclosure of your criminal records history.

We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data.

## Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

## Data sharing

### Why might you share my personal information with third parties?

We will only share your personal information with third parties for the purposes of processing your application, these are detailed in the table below. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Third Party	Reason	Frequency
Gov.uk	Application to DBS for criminal records check	Upon appointment and as may be required during employment
Beaumont Solutions Ltd (Cascade Go)	HR system	Upon appointment and as may be required during

Third Party	Reason	Frequency
		employment
Possibly Gowling/ NWE	Paper storage of files relating to claims and disputes	As and when a claim or dispute arises
McQuaig	For Mental Agility Test	Upon invitation to interview or as may be requested during employment
KML Occupational Health Ltd	For provision of occupational health support including pre-employment health questionnaire, and referrals	Upon appointment and as may be required during employment
Professional bodies (e.g. NMC)	To provide staff names for validity of registration/. Reporting	Upon appointment and as may be required during employment

### Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality and other appropriate contractual terms. Details of these measures may be obtained from the Data Protection Officer.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### Data retention

#### How long will you use my information for?

We will retain your personal information for a period of 9 months after we have communicated to you our decision about whether to appoint you to role. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

## Rights of access, correction, erasure, and restriction

### Your rights in connection with personal information

Under certain circumstances, and subject to applicable law, you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request").
- **Request correction** of the personal information that we hold about you (to the extent incomplete or inaccurate)
- **Request erasure** of your personal information where you consider there is no good reason for us continuing to process it.
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to access, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing.

### Right to withdraw your application

When applying for a role at Simplify Health, you have provided consent to us to process your personal information for the purposes of the recruitment exercise. You have the right to withdraw your application at any time. To do this, please email [workwithus@simplifyhealth.co.uk](mailto:workwithus@simplifyhealth.co.uk) or indicate your withdrawal via the application system. Once we have received notification that you have withdrawn your application, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

### Data Protection Officer - TBA

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our DPO on [contactus@simplifyhealth.co.uk](mailto:contactus@simplifyhealth.co.uk). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.