



ASPEN MEDICAL PRACTICE

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Branch Sites

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ASPEN MEDICAL PRACTICE

Recruitment Privacy Notice

Privacy information for job applicants and candidates

1. Purpose of this notice

This Recruitment Privacy Notice explains how Aspen Medical Practice collects, uses, stores and shares personal information about people who apply for roles with us.

It applies to applicants for employment, locum work, contractor roles, casual work, volunteering, apprenticeships, trainee roles, work experience and other work-related opportunities with Aspen Medical Practice.

In summary, we use applicant information to manage recruitment, assess suitability for roles, carry out required checks, communicate with candidates, meet legal and regulatory obligations, and keep appropriate records of recruitment decisions.

This notice should be read before you submit an application or otherwise share recruitment-related information with us.

We are committed to protecting your personal information and handling it fairly, lawfully and transparently in accordance with UK data protection law, including the UK General Data Protection Regulation and the Data Protection Act 2018.

2. Who is the data controller?

Aspen Medical Practice is the data controller for the personal information we process about applicants and candidates.

This means that we are responsible for deciding how your personal information is used and for ensuring that it is handled in accordance with data protection law.

If you have any questions about how we use your information, you can contact:

Risk and Compliance Manager
Aspen Medical Practice
Horton Road
Gloucester
GL1 3PX

Email: aspen.riskandcompliance@nhs.net

For data protection queries, we can also direct you to our Data Protection Officer where appropriate.

Partners

Dr Christopher Andrews, Dr Nadine Burrows, Dr Bob Hodges, Dr Iain Jarvis, Dr Hasib Khalid, Dr Sam Kuok,
Dr Joan Nash, Dr Laura Quentin, Dr Kannan Raj, Dr Jhumpa Sarkar

3. What information we collect

During recruitment, we may collect and use the following types of information:

- name, address, telephone number and email address
- application form, CV, covering letter and supporting statement
- employment history, qualifications, skills, training and experience
- professional registration, membership, licence to practise and revalidation information, where relevant
- details of current and previous employers
- referee details and references
- interview notes, assessment records, shortlisting notes and recruitment panel comments
- correspondence with you about your application
- identity documents
- right-to-work information
- information about your availability, notice period and preferred working pattern
- information about salary expectations, pay scale, sessional rate or working pattern preferences, where relevant to the role
- declarations about professional conduct, fitness to practise, restrictions, investigations, disciplinary history or safeguarding concerns, where relevant to the role
- information required for pre-employment checks
- information relating to reasonable adjustments needed during the recruitment process
- equal opportunities monitoring information, where requested
- occupational health or health-related information, where relevant and lawful
- criminal offence information and DBS information, where the role is eligible for a check and the check is necessary.

We will only collect information that is relevant and necessary for the recruitment process and for the role being applied for.

4. Where we get your information from

We usually collect recruitment information directly from you.

We may also receive information from:

- referees
- previous employers
- recruitment agencies
- NHS Jobs or other recruitment platforms
- professional bodies and regulators
- NHS organisations
- Disclosure and Barring Service bodies
- occupational health providers
- right-to-work checking services
- educational institutions or training providers
- publicly available professional registers
- publicly available sources, where relevant and proportionate.

We will only seek information from third parties where it is relevant, lawful and necessary for the recruitment process.

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5. Why we use your information

We use recruitment information to:

- manage and assess your application
- decide whether to shortlist, interview and appoint
- communicate with you about your application
- make recruitment decisions
- verify your identity
- check your right to work in the UK
- check qualifications, training, professional registration and employment history
- obtain and assess references
- carry out appropriate pre-employment checks
- assess suitability for the role
- meet safeguarding, patient safety and regulatory requirements
- consider reasonable adjustments during the recruitment process
- make arrangements for interview or assessment
- monitor the fairness and effectiveness of our recruitment processes
- comply with employment law, NHS requirements, regulatory requirements and other legal obligations
- keep appropriate records of recruitment decisions
- respond to complaints, disputes, legal claims, regulatory enquiries or safeguarding concerns.

6. Our lawful bases for using your information

Under UK GDPR, we must have a lawful basis for using your personal information.

Depending on the circumstances, our lawful bases may include the following.

Article 6(1)(b) – contract

We may process your information where this is necessary to take steps before entering into an employment contract or other work-related contract with you.

For example, this may include assessing your application, communicating with you about the role and progressing pre-employment steps.

Article 6(1)(c) – legal obligation

We may process your information where this is necessary to comply with a legal obligation.

For example, this may include checking your right to work in the UK, complying with employment law, meeting safeguarding duties, or responding to legal or regulatory requirements.

Article 6(1)(f) – legitimate interests

We may process your information where this is necessary for our legitimate interests, provided your rights and interests do not override those interests.

Our legitimate interests include managing safe, fair and effective recruitment, assessing suitability for roles, maintaining appropriate recruitment records, protecting patients, staff and the Practice, and defending or responding to complaints or legal claims.

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7. Special category information

Some information is given extra protection under data protection law. This is known as special category data.

During recruitment, this may include:

- information about health, disability or medical conditions
- occupational health information
- information about reasonable adjustments
- racial or ethnic origin
- religious or philosophical belief
- sexual orientation
- trade union membership
- information used for equal opportunities monitoring.

We will only use special category information where this is necessary and where we have a lawful basis under UK data protection law.

Where we process special category information, we must also meet a separate condition under Article 9 of UK GDPR. Depending on the circumstances, these may include:

Article 9(2)(b)

Processing is necessary for employment, social security or social protection law obligations.

Article 9(2)(h)

Processing is necessary for occupational medicine, assessment of working capacity, medical diagnosis, or the provision of health or social care.

Article 9(2)(g)

Processing is necessary for reasons of substantial public interest, where applicable and supported by the Data Protection Act 2018.

We will only use special category information where it is necessary and proportionate.

8. Reasonable adjustments

If you tell us that you need reasonable adjustments during the recruitment process, we will use this information to consider and arrange appropriate support.

This may include adjustments to application, interview, testing or assessment arrangements.

Information about reasonable adjustments will be handled confidentially and will only be shared with those who need to know in order to support the recruitment process.

Requesting reasonable adjustments will not disadvantage your application.

9. Occupational health and health information

For some roles, we may need to obtain occupational health information or ask health-related questions.

Health-related information will only be requested where it is relevant and lawful. In most cases, this will be after a conditional offer has been made, unless the information is needed earlier to arrange reasonable adjustments or for another lawful reason.

Occupational health information may be used to assess fitness for work, identify reasonable adjustments, meet health and safety obligations, or support safe working arrangements.

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10. Equal opportunities monitoring

We may ask you to provide equal opportunities monitoring information.

This information helps us monitor the fairness and inclusiveness of our recruitment process and meet equality-related obligations.

Providing equal opportunities monitoring information is voluntary unless we clearly state otherwise.

Where practicable, this information will be kept separate from the selection process and will not be used to make decisions about your application.

11. Criminal offence information and DBS checks

Roles at Aspen Medical Practice involve work in a healthcare setting, access to patients, access to sensitive information, regulated activity, safeguarding responsibilities or other responsibilities where a DBS check may be required or appropriate.

Where a role is eligible for a DBS check, we may process criminal offence information as part of recruitment and pre-employment checks.

We will only request a DBS check where the role is eligible and the level of check is appropriate. We will not request a higher level of check than is permitted for the role.

We will not ask applicants to disclose spent convictions unless the role is exempt from the Rehabilitation of Offenders Act 1974 and we are legally entitled to ask.

Criminal record information will be handled fairly, proportionately and confidentially. It will be considered in line with the nature of the role, safer recruitment requirements, NHS employment standards, DBS requirements, safeguarding considerations and any relevant Practice policy on the recruitment of applicants with criminal records.

A criminal record will not necessarily prevent you from working with us. Any information disclosed will be considered in relation to the role applied for, the nature of the offence, the time that has passed, its relevance to the role, and any other relevant circumstances.

12. Right-to-work checks

We are legally required to check that successful applicants have the right to work in the UK before employment starts.

This may involve checking identity documents, immigration documents, online right-to-work share codes, or using an approved identity or right-to-work checking process.

If you do not provide the information needed to complete a right-to-work check, we may be unable to offer you employment or allow you to start work.

13. References

We will request references as part of the recruitment process.

We will usually only contact referees once you have given us their details and where it is appropriate to do so.

In most cases, references will be requested after interview or after a conditional offer has been made, unless the recruitment process states otherwise or you have given permission for earlier contact.

References may be used to verify employment history, assess suitability for the role and support safer recruitment decisions.

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14. Pre-employment checks

We need to complete pre-employment checks before employment or engagement begins.

These may include, where relevant:

- identity checks
- right-to-work checks
- reference checks
- qualification checks
- professional registration checks
- DBS checks
- occupational health checks
- safeguarding checks
- employment history checks
- checks required by NHS employment standards or regulatory requirements.

Some checks will only be carried out after interview or after a conditional offer has been made, unless there is a lawful and necessary reason to carry them out earlier.

If required pre-employment checks are not completed satisfactorily, we may be unable to confirm an offer of employment or engagement.

15. Who we share your information with

Your recruitment information may be shared internally with:

- those involved in recruitment administration
- interview panel members
- line managers
- GP partners
- HR and management staff
- staff involved in pre-employment checks
- staff involved in safeguarding, compliance or governance where relevant.

Where necessary, we may also share information externally with:

- referees
- previous employers
- recruitment agencies
- NHS Jobs or other recruitment platforms
- occupational health providers
- DBS bodies and umbrella bodies
- professional regulators and registration bodies
- NHS organisations
- right-to-work or identity checking providers
- IT and HR system providers
- legal advisers
- insurers
- auditors
- safeguarding bodies
- courts, tribunals or regulators
- government departments or agencies where required by law.

We will only share information where there is a lawful basis to do so and where it is necessary and proportionate.

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16. International transfers

We do not normally transfer recruitment information outside the United Kingdom.

If it becomes necessary to transfer information outside the UK, we will ensure that appropriate safeguards are in place as required by data protection law.

17. Automated decision-making

We do not make recruitment decisions based solely on automated decision-making or profiling.

Recruitment decisions are made by people involved in the recruitment process.

If this changes, we will update this notice and provide information about the logic involved, the significance of the processing and your rights.

18. How long we keep recruitment information

We will not keep recruitment information for longer than necessary.

For recruitment purposes, the recruitment exercise will usually be treated as closed once the successful candidate has accepted the role, any required pre-employment checks have been completed, and the vacancy is no longer being actively recruited.

Unsuccessful applicants

If your application is unsuccessful, we will normally retain your recruitment information for 6 months after the recruitment exercise has closed.

This allows us to keep an appropriate record of the recruitment process, respond to queries or complaints, and defend or respond to any legal claim arising from the recruitment process.

After this period, your recruitment information will be securely deleted or destroyed, unless there is a lawful reason to keep it for longer.

For example, we may need to retain information for longer where there is an unresolved complaint, dispute, legal claim, safeguarding concern, regulatory issue or other lawful reason.

We may ask whether you would like us to keep your details for longer so that we can contact you about future suitable vacancies. We will only do this where you have agreed to it, and you can withdraw your agreement at any time.

Successful applicants

If your application is successful and you become employed or engaged by Aspen Medical Practice, relevant information collected during recruitment will become part of your staff personnel file.

This may include your application form, CV, interview and selection records, references, evidence of qualifications, professional registration information, right-to-work checks, DBS information where applicable, occupational health clearance where applicable, and other pre-employment check records relevant to your role.

Once you become a member of staff, the ongoing use and retention of your information will be explained in our Staff Privacy Notice and managed in line with our staff records retention schedule.

Recruitment information that is not needed for your employment record will not be kept longer than necessary and will be securely deleted or destroyed.

Recruitment records and audit trail

We may keep limited recruitment records to demonstrate that a fair, lawful and appropriate recruitment process was followed.

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These records may include the vacancy details, shortlisting criteria, interview records, scoring information, the recruitment outcome and relevant correspondence.

Where these records include information about unsuccessful applicants, they will normally be deleted or destroyed 6 months after the recruitment exercise has closed, unless there is a lawful reason to keep them for longer.

19. Security of your information

We take appropriate steps to protect recruitment information from unauthorised access, loss, misuse or disclosure.

Access to recruitment information is limited to those who need it for recruitment, employment, legal, regulatory, safeguarding, governance or administrative purposes.

Information may be stored electronically and/or in paper form. Electronic information is stored on systems with appropriate access controls. Paper information is stored securely.

20. What happens if you do not provide information

You are not required to provide information to us.

However, if you do not provide information that we need to assess your application, verify your identity, check your right to work, obtain references or complete required pre-employment checks, we may be unable to progress your application or offer you employment.

21. Your rights

Under data protection law, you have rights in relation to your personal information.

These include:

- the right to be informed about how your information is used
- the right of access to your personal information
- the right to request correction of inaccurate information
- the right to request erasure of information in certain circumstances
- the right to request restriction of processing in certain circumstances
- the right to object to processing in certain circumstances
- the right to data portability in certain circumstances
- rights in relation to automated decision-making and profiling.

These rights are not absolute and may depend on the circumstances and the legal basis for processing.

If you wish to exercise your rights, please contact:

Risk and Compliance Manager
Aspen Medical Practice
Horton Road
Gloucester
GL1 3PX

Email: aspen.riskandcompliance@nhs.net

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22. Complaints

If you are unhappy with how we have handled your personal information, please contact us first so that we can try to resolve your concern.

You also have the right to complain to the Information Commissioner's Office, which is the UK regulator for data protection.

Information Commissioner's Office

Website: www.ico.org.uk

Telephone: 0303 123 1113

23. Changes to this notice

We will keep this Recruitment Privacy Notice under review and update it when necessary.

Any changes will be published on our website or otherwise made available to applicants.

24. Document control

Document title	Recruitment Privacy Notice
Organisation	Aspen Medical Practice
Document owner	Risk and Compliance Manager
Version	1.0
Approved by	
Date approved	26/05/2026
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