Privacy Notice: Recruitment and Placements

Who we are

Sirona (Sirona care & health C.I.C) is a Data Controller and is registered with the Information Commissioner's Office (ICO), registration number is Z2861455. Our registered office is Sirona care & health, Badminton Rd Office, 2nd Floor, Badminton Rd, Yate, BS37 5AF.

Established in October 2011, Sirona care & health Community Interest Company are the sole provider of NHS and local authority funded adult and children's community healthcare services across Bristol, North Somerset and South Gloucestershire (BNSSG). Sirona is a not-for-profit social enterprise committed to serving its communities and funded by the NHS and local authorities.

Sirona care & health Privacy Notice: Policies - Sirona care & health

Why we need information about you

This notice is aimed at prospective staff and bank workers.

For the purposes of this privacy notice, the term 'staff' includes applicants, employees, bank workers (including agency, casual and contracted staff), volunteers, trainees, apprentices and work experience placements.

We need your information to:

- move your application forward
- check your eligibility and suitability for the role/placement
- get in contact with you
- send you notifications for vacancy roles or job alerts
- manage you work experience placement, including evaluation of programmes

What information is collected about you?

Personal data This is information that identifies you, such as your name or contact details.

Special category personal data Some of the information we collect is special category data, or sensitive data, which can include your race or ethnicity, religious beliefs, trade union membership, health (including physical and mental health), sexual orientation and gender, criminal convictions and disabilities.

We process this data when it's necessary for reasons of substantial public interest for the exercise of our functions. This applies to information about criminal convictions, allegations and offences during baseline security clearance checks.

It is important that the personal information we hold about you is accurate and up to date. Please let us know if your personal information changes during your working relationship with us.

If any changes are required, please let us know by contacting your line manager in the first instance or contacting our HR Department (see 'Ask HR' contact details later).

How do we collect information?

We usually collect your personal information when you apply for vacancies or work experience placements and during the onboarding process for successful candidates.

We might also collect information from you when you register to attend through Eventbrite Microsoft Teams Webinar or similar platform or attend a virtual or physical event.

We use recruitment sites such as NHS Jobs and Indeed. This means that your personal data is processed by these websites (the 'data processor') on behalf of Sirona care & health, following the instructions Sirona care & health sets out. If you have questions about how NHS Jobs processes personal data, you can read their privacy notice.

Sirona care & health is also present on platforms such as LinkedIn to promote employment opportunities. Sirona care & health uses the built in analytics functions on these platforms to look at de-identified data, with a view to improving our pages. If you have questions about how LinkedIn processes personal data, you can read their privacy notice.

If you are successfully recruited, you will sign a contract of employment and agree to additional terms on how your data is handled and stored.

How your personal information is collected

If you apply for a job/placement

When you apply for a position with Sirona care & health, you will give us relevant information about you which includes:

- personal contact details
- details of your skills, qualifications, employment history, experience, and professional membership (if relevant), and training history and referee details

During the recruitment and selection process

During recruitment and selection, we will collect additional information like:

- correspondence, interview notes, and results of any tests you're asked to complete as part of the selection process
- copies of qualifications and certificates
- pre-employment checks, including referees
- your nationality and immigration status, to confirm your eligibility to work in the UK
- your national insurance number, tax and bank details
- details of your pension
- remuneration, including salary and entitlement to benefits
- trade union membership
- criminal record

- ethnicity, gender, health, religion or sexual orientation
- medical history relevant to your employment, including physical health, mental health, disabilities and absence history, vaccination status
- if you contact us regarding your application, a record of that correspondence
- details of your use of our recruitment tools and services, such as your candidate profile and alerts for vacancies
- the status of your application and updates on how it moves forward

We use an on-line recruitment management system called 'Trac' to assist with our recruitment services. This service is provided by Civica UK Ltd (as a data processor). Civica UK Ltd provide an application tracking system along with back-office recruitment support services to our own recruitment team, e.g. for advertising roles, setting up interviews, sending offer letters and supporting with the completion of some employment checks. Further information can be found here: https://apps.trac.jobs/privacy-notice?_ts=89736

If you become an employee or registered with our bank If you are employed by us or registered with us as a bank worker, we may collect additional information like:

- your image, for security and ID badges
- education and training history
- appraisal and performance reviews
- security and audit data when you use organisational IT equipment and systems, including the use of NHS smart cards
- your performance, sickness absence and other work-related matter
- CCTV recordings when you're on NHS or other authorised premises
- personal data recorded as a normal part of your work activity
- data relating to employee relations, like disciplinary proceedings or complaints

If incomplete information is provided or you refuse to provide the information, then this may impact on your employment with us.

How do we protect your information?

Everyone working for, or with Sirona, has a legal duty to keep your information secure and confidential at all times. Staff are trained on requirements of keeping data secure. We are committed to protecting your privacy and will only process data in accordance with legislation.

Strict principles govern our use of your information and our duty to ensure that it is kept safe and secure. Your information may be stored within electronic or paper records, or a combination of both. All our records are restricted so that only those individuals who have a need to know the information, can get access.

How we share your information?

In circumstances where we need to share your personal data; we will always ensure this is conducted lawfully and account the justifications for doing so.

Unless there are exceptional circumstances (such as likely risk to the health and safety of others) or a valid reason permitted by law, we will not disclose any information to third parties which can be used to identify you without your consent.

Sometimes we are required by law to disclose or report certain information that may include details that identify you. However, this is only done after formal authority by the courts or by a qualified health professional. This may include reporting a serious crime or identification of an infectious disease that may endanger the safety of others.

Who we share your information with?

Any information sharing with third parties is covered by a sharing agreement/contract to ensure that only relevant information is shared, and this is done in a secure way.

Sometimes we are required by law to disclose or report certain information, which may include details which can identify you. For example, sending statutory information to government organisations such as HM Revenue and Customs, or releasing information to the police or counter fraud. Where mandatory disclosure is necessary, only the minimum amount of information is released.

You have the right to refuse (or withdraw) consent to information sharing at any time. However, this may not be possible if the sharing is a mandatory or legal requirement imposed on the Organisation.

Only organisations with a legitimate requirement will have access to your information and under strict controls and rules.

Other NHS organisations

To streamline staff movement, we may share your information with other NHS organisations within the Bristol, North Somerset and South Gloucestershire (BNSSG) area. We may also share your information if your employment transfers or you are seconded to another NHS organisation.

An agreement is in place with NHS organisations within BNSSG, that enables the following information to be shared if there is a legitimate business interest of the organisations to do so:

- personal data to verify who you are, like your name, date of birth, address, NI Number
- employment information to allow for correct pay and annual leave and sickness entitlements, like your position, salary, and dates of any sickness

- training compliance and competency dates, to reduce the need to repeat nationally recognised training and statutory and mandatory training

Record Retention

All our records are held and destroyed in accordance with the Records Management Code of Practice which sets out the appropriate length of time each record is retained.

The Code covers organisations working within or under contract to NHS England. All records are appropriately reviewed once the retention period has been met and we will decide whether the record still requires retention or should be confidentially destroyed. We do not keep records for longer than is necessary.

This will depend on:

- the amount, nature, and sensitivity of the personal data
- the potential risk of harm from unauthorised use or disclosure of your personal data
- the purposes for which we process it
- whether we can achieve those purposes in other ways

For documents supporting recruitment, application and sifting the retention period is 3 years.

Work placements: We will retain your personal information for a period of 6 months from the end of your placement with us. After this period, we will securely destroy your personal information in accordance with applicable laws and regulations. If we wish to retain your personal information, 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.

For candidates held on record for future opportunities/vacancies, the retention period is 6 months. Personally identifiable data is removed 6 months after your most recent application.

For those who opt in to our mailing list, we will hold your data for 24 months at which time we will contact you again to confirm whether you would like to remain on the list. A positive response at contact will continue your subscription for a further 24 months. A negative or no response (within 28 days of contact) will end your subscription, and all personally identifiable data will be removed.

Lawful Basis

The legal bases we use most often to collect information are:

- entering and managing your employment contract
- legal obligations where processing is necessary for compliance, for example, informing HMRC of your tax and National Insurance contributions
- when considering employees' rights as potential Members of the Organisation
- where the Organisation may rely on its legitimate interests, where a formal assessment has been made and recorded

Where we process sensitive personal or special categories of data about you, we will ensure this is done only where one of the following conditions applies:

- processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller, or the data subject, in the field of employment and social security and social protection law
- processing is necessary for the purposes of preventive or occupational medicine, assessment of the working capacity of the employee, or the provision of health or social care

What are your rights

When it comes to personal data held about you by Sirona care & health, you have the right to:

- request access to that personal data
- request the correction of inaccurate or incomplete information, subject to certain safeguards
- request that your information is deleted or removed where there is no need for us to continue processing it, and when the retention time has passed
- to ask that we restrict the use of your information, based on personal circumstances
- to withdraw your consent for the collection, processing and transfer of personal information for a specific purpose
- to object to how your information is used
- to challenge automated decision making

How to access your personal data

If you require copies of personal information held by Sirona care & health, speak to your line manager if you are a current member of staff or a bank worker. Alternatively, please contact our Data Protection Officer – sirona.dataprotection@nhs.net

In some cases, we will need some information to confirm your identity. This is to ensure that your personal information is not disclosed to someone who has no right to access it.

If this is not appropriate or you're not satisfied with the response, you can contact our Ask HR Service on 0300 124 5446 or email Sirona.askhr@nhs.net. They will be able to advise you further and obtain copies of central or locally held personnel files, and ensure appropriate personal information is disclosed.

Contact information and further advice

If you would like to know more about how we use your information, require information in any accessible format or language or if (for any reason) you do not wish to have your information used in any of the ways described, please contact:

Data Protection Officer
Sirona care & health
Badminton Rd Office
2nd Floor

Badminton Road
Yate
BS37 5AF
Email: Sirona.dataprotection@nhs.net

How can you make a complaint?

You have the right to make a complaint if you feel unhappy about how we hold, use or share your information. Depending on the nature of your complaint, we would recommend contacting your line manager in the first instance (if you are a current member of staff or a bank worker).

You could also contact our Data Protection Officer (contact details above) to talk through any concerns that you have.

This privacy notice was last updated in September 2025