



United Medical Limited ("We") are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

1. Definitions

Data controller - A controller determines the purposes and means of processing personal data.

Data processor - A processor is responsible for processing personal data on behalf of a controller.

Data subject – Natural person

Categories of data: Personal data and special categories of personal data

Personal data - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example, name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

Special categories personal data - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

Processing - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Third party - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

2. Who are we?

United Medical Limited is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: United Medical Limited, Parkway House, Hambrook Lane, Stoke Gifford, Bristol, BS34 8QB. For all data matters contact Charlotte Huxtable-Whyte our Data Protection Officer on 0333 320 8016.

3. The purpose(s) of processing your personal data

We use your personal data for the following purposes:

To ensure compliance with Health Sector Regulatory Bodies and Clients Contractual Requirements in securing work placements.



4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your data:

- Personal data – this includes Name, address, telephone number, e-mail address, passport number, birth certificates, visa details, date of birth, national insurance number, any name change history including marriage and deed poll, work history (CV), referee and references, qualifications, training records, NOK, professional memberships, indemnity insurance details
- Special categories of data Bank Details, employment status, health status – serology, DBS information and number, gender, age, ethnic and disability monitoring

We have obtained your personal data from you together with original documented evidence provided by you.

5. What is our legal basis for processing your personal data?

a) Personal data (article 6 of GDPR)

Our lawful basis for processing your general personal data:

<input type="checkbox"/> Consent of the data subject;	Signed Consent on the application form.
<input type="checkbox"/> Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract	Contract for Services
<input type="checkbox"/> Processing necessary for compliance with a legal obligation	Contractual and regulatory obligations
<input type="checkbox"/> Processing necessary to protect the vital interests of a data subject or another person	Service User and Client safety
<input type="checkbox"/> Processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	Satisfying NHS Employers Requirements and Employment legislation.
<input type="checkbox"/> Processing necessary for the purposes of the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests or fundamental rights or freedoms of the data subject	To ensure compliance with Health Sector Regulatory Bodies and Clients Contractual Requirements in securing work placements.



b) Special categories of personal data (article 9 of GDPR)
Our lawful basis for processing your special categories of data:

Explicit consent of the data subject	We ask you for your consent during our recruitment and compliance process.
Processing necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement	Pay roll detail HMRC and pension enrolment.
Processing necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent	On occasion we may have data regarding Service Users who do not have capacity to give consent. In such circumstances we will work with their advocates and wider multidisciplinary teams to deliver safe care services.
Processing necessary for reasons of preventative or occupational medicine, for assessing the working capacity of an employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services on the basis of EU or Member State law or a contract with a health professional	We ask if you have any disabilities or health needs that we need to take account of and make appropriate provision for.
Processing necessary for the reasons of public interest in the area of public health	To ensure Service User and Client safety we need to process information such as Enhanced DBS applications. We ask for your consent to do this in our recruitment and compliance process. In support of infection control and to protect service users, yourselves and your families we may ask you to complete our health declaration and provide evidence of serology.
Processing necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes	We undertake equal opportunities monitoring to ensure our recruitment and compliance procedures are fair and equitable for all

More information on lawful processing can be found on the [ICO website](#).

6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with Clients and auditors, statutory bodies that regulate our services.

7. How long do we keep your personal data?

We keep your personal data whilst you are engaged with us and we update some of this data on an annual basis. Historical data is retained for safeguarding purposes, legal claims or complaints. Annual updates are undertaken for eligibility, DBS, Health Declarations, Referencing.

We archive all data for clinicians who have not worked for a period of 12 months.



8. Providing us with your personal data

We require your personal data as it is a requirement necessary to enter into a contract both with yourself and with our clients.

9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent has been the lawful basis for processing the data.
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

10. Transfer of Data Abroad

WE DO NOT TRANSFER PERSONAL DATA OUTSIDE THE EEA.

11. Automated Decision Making

The only automated decision making within our business is through our booking system. When we enter a shift that has been requested by our Clients the system will identify which staff are available to cover the shift. It may also identify the grade and historical cover so that assignments are covered by appropriately qualified and experienced individuals. Although the system identifies potential cover the actual assignment is finalised by our Recruitment Consultant.

12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

13. Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.



14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact Charlotte Huxtable-Whyte our Data Protection Officer on 0333 320 8016.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.