

1. General Data Protection Regulation & Information keeping

The General Data Protection Regulation (GDPR) is EU law on data protection and privacy for all individuals within the European Union and the European Economic Area. It is designed to protect the rights of around 750 million people across the EU.

Betheny Nursing Care Services is clear, open and honest with people from the start about how personal data is used. This policy sets out how, where and when personal information is collected and used and what actions are taken to keep it secure. It also explains the Staff and clients' rights against any personal information held about them.

Betheny Nursing Care Services take the Staff and the Client's data privacy and security extremely seriously. This policy bonds its commitment to protect clients' personal information.

Betheny Nursing Care Services complies with the main principles of GDPR such as lawful and transparent use of personal data for a specific purpose with a gained consent, using only the necessary amount of information, and is committed to protect personal data in all dealings with customers and staff. The Staff, Clients and Candidates and other persons involved have the right to withdraw their consent at any time.

Types of information

Personal information is any personally identifiable information, such as:

- Full name and previous names
- Address and previous addresses
- Date of birth
- Nationality
- Contact numbers
- Email address(es)
- Marital status
- History of employment
- History of education
- Next of kin details
- Bank account and payment card details and previous bank details
- National Insurance details
- Photographs

- Any form of ID
- Driving license details and history
- Right to work and immigration status documentation
- DBS checks – application and criminal history
- Medical history and additional health information about any health condition that may affect your ability to undertake certain roles as may be required Information about sex / gender, physical or mental disabilities
- Qualifications
- Referees' details and references
- Any feedback given on us
- User's computer IP address
- CCTV footage if they have visited our offices
- Account login details, user name and password
- Details and content of any written communication with us, such as emails, messages or post
- Other information received from other sources
- Copies of proof of person's identity and other documents and other necessary additional information.

Betheny Nursing Care Services collect and store information provided when the Clients, Staff and Candidates are filling in the forms, sharing or sending attached documents, posting on social media and blogs, corresponding, making transactions and sharing information in other ways.

Also, there are other types of information Betheny Nursing Care Services might store like aggregated data which may be derived from personal information and usage data information about the User's computer and use of the Company's websites. This includes: the User's location; IP address; browser; operating system; referral source; length of visit; individual page views; site navigation. However, all types of information collected is treated the same way.

Purposes to Use and Share Information

Betheny Nursing Care Services may use provided information with purposes such as:

- Registering a new User as a new Candidate or Client and making the services available to them.
- Contacting the Candidates or the Clients with regard to the services.
- Providing the services required and processing the orders.
- Communicating and managing relationship with the Staff and the Clients.
- Sending invoices and statements to collect payments and giving refunds.
- Providing third parties with statistical but anonymous information about the Users for market research and statistical analysis purposes, such as an equality and diversity questionnaire.
- Dealing with enquiries and complaints sent and identifying ways to improve the services.
- When the Client or Candidate agrees us to use their information on particular purpose, such as advertise a CV or a job vacancy on the Company's website.
- For contract fulfilment purposes – pass the information to the Employer and take/make payments and refunds.
- For legal obligation purposes – when there are any requirements to share information from statutory institutions.

Because of the nature of being a recruitment business, Betheny Nursing Care Services will pass Staff, Clients' and Candidates' personal information to the third parties, such as potential employers, trusted businesses in private and public service, the Job Centre and other agencies because of specific purpose. When the information is passed to third parties, Betheny Nursing Care Services require them to respect the security of any personal information and treat it in accordance with the law.

In the case of selling or transferring the business, Betheny Nursing Care Services may need to share sensitive personal information with prospective purchasers.

Also it is Betheny Nursing Care Services' duty to share the required information when required by law, as may be asked to do so by a public or regulatory authority such as the police or the Home Office.

In order to process some Candidates' applications, all required personal information will be supplied to certain institutions, ie. DBS Services, and they would return information about the Candidates such as convictions, cautions, reprimands and final warnings.

If anyone wishes to get a more detailed explanation of how the information will be used in their circumstances, they should contact Betheny Nursing Care Services by email admin@bethenynursingcare.co.uk or telephone 0151 601 4177.

Information Storing

Betheny Nursing Care Services will retain Personal information for the certain length of time which is required by applicable laws. Betheny Nursing Care Services will ensure that any Personal Data will continue to be treated in accordance with this Privacy Policy.

The main purpose of storing collected data is to obtain certain details including personal information from the Clients, Candidates and Staff to provide them with a high quality, continuous and consistent service and for genuine interests only in the course of operating the business.

Betheny Nursing Care Services will ensure appropriate security measures to help protect personal information and will put in every effort to guard against access by unauthorised persons. Information storage is on secure computers in a secure environment or, in the case of hard copy information, in secure and locked storage.

Betheny Nursing Care Services' web and email servers are all located in UK data centres. The Company's internal servers, hard paper documents and physical digital media storage (CDs, DVDs) copies are located at the Head Office in Wirral or in secure offices of branches in Liverpool and Preston.

Information submitted for recruitment purposes by the Candidate (as anonymous as possible removing unnecessary personal information) may be published on the internet and may be available worldwide. Betheny Nursing Care cannot prevent the use or misuse of such information by others and be held liable if any issues arise in connection with their use of that information.

Betheny Nursing Care periodically review the data held, delete information not needed and will keep personal data only for as long as it is necessary for the purpose it is initially collected. The law requires to hold personal information for certain period of time. However if the Client, Candidate or Staff exercise the right to have the information deleted then it does not need to be held in connection with any of the reasons permitted or required under the law.

Currently the law requires to keep Candidates' records for at least one year from the date of receiving them or their creation or after the date on which we last provided work-finding services. The Company must also keep their payroll records, holiday pay, sick pay and pension auto-enrolment records for as long as is legally required by HMRC and associated national minimum wage, social security and tax legislation. This is currently 3 to 7 years. Any internal correspondence and other documentation, such as meetings minutes and annual reports, will be stored as long as they are relevant to the business.

In rare cases Betheny Nursing Services may need to keep information longer if it brought a legal claim until it is solved.

The Clients', Staff and Candidates' Rights

Betheny Nursing Care Services guarantee people's rights – the Clients, Staff and Candidates can at any time:

- withdraw their consent;
- ask to change their information if the one currently held is incorrect, out of date or incomplete;
- object to the processing of their data for profiling and marketing purposes;
- opt out receiving marketing information;
- access their data giving a valid reason;
- request their personal data be deleted when it's no longer required or at any other point;
- opt out of receiving marketing information;
- electronically move, copy or transfer information in certain circumstances.

Data Breach

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data. This includes breaches that are the result of both accidental and deliberate causes.

Betheny Nursing Care has a duty to report certain types of personal data breach to the relevant supervisory authority, Information Commissioner's Office, within 72 hours of becoming aware of the breach.

If the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms, we also have a duty to inform those individuals involved without undue delay to provide advice to help them to protect themselves from its effects.

Betheny Nursing Care Services' Staff and Customers have a right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). However, Betheny Nursing Care Services would appreciate the opportunity to hear and attempt to rectify any concerns before approaching the ICO.

Clients' Information & Confidentiality

In the course of their duties, Betheny Nursing Care Services' employees may become privy to confidential information concerning the Clients and private affairs of the Service Users they assist fulfilling their duties.

Betheny Nursing Care Services' employees are advised during their induction and must:

- keep all information strictly confidential about the Agency's business, Clients, Service Users and colleagues;
- always consult the manager or person in charge of the facility for advice if they are uncertain about how to deal with confidential information;
- not discuss the affairs of the Company business, Clients, Service Users and other colleagues with anybody unless there is a specific reason and they have verifiable permission to do so;
- not purposefully seek to obtain confidential information about the Company, Clients, Service Users and the colleagues outside of the strict scope of their job role.