Draft - Step Into Health Privacy Notice

**Protecting your data: The NHS Confederation privacy statement**

Protecting your privacy is very important to us. So that you can feel in control of your personal information, we want to be clear with you about the information we collect and how it is used.

In order to provide you with our full range of services and benefits, we sometimes need to collect information about you. This Privacy Policy explains the following:

1. Who we are
2. What data we collect
3. How we use your personal data
4. Our reasons for using your data
5. Transferring data outside the EEA
6. How long we will keep your data
7. How we protect your data
8. Who we share your data with
9. Your rights
10. Accessing your data
11. Lodging a complaint
12. Changes to this policy
13. **Who we are:**

The NHS Confederation is a charity and membership organisation, which includes NHS Employers, NHS Clinical Commissioners, the Mental Health Network, the Independent Healthcare Providers Network, the Welsh NHS Confederation and Northern Ireland Confederation. We operate a trading subsidiary, The NHS Confederation (Services) Company Limited, together they form the NHS Confederation group.

This privacy policy explains how we use any personal information we collect about you when you contact us by phone, email, letter, complete online forms, attend any of our events or when you use any of the Step Into Health website.

The NHS Confederation’s registered office is: Floor 15, Portland House, Bressenden Place, London
SW1E 5BH and we are a registered Charity in England and Wales under number 1090329 and company number 04358614. We are registered on the Information Commissioner's Office and act as the data controller. Our designated Data Protection Lead can be contacted via the following methods;

Email: dataprotection@nhsconfed.org

Tel: 0207 799 6666

Fax: 0844 774 4319

1. **What data we collect**

The Step into Health programme supports employers in the NHS to recruit from the Armed Forces community (e.g. service leavers, spouses, dependents) by providing tailored access routes to employment and training opportunities. As part of this work the team at NHS Employers provides tools, guidance and support to NHS organisations so they can engage with the Armed Forces community and therefore have a more representative workforce. By employing across diverse groups, the NHS can seek to address its workforce supply issues and improve patient care as well as the overall performance of its workforce.

When you register we collect your:

* Name
* Date of Birth
* Armed Forces community description
* Service number
* Rank
* Military branch
* date of leaving or date available
* current/preferred location
* job type
* role area of interest
* type of work you are looking for
* source of referral.
1. **How we use your personal data**

The ability to understand the number and demographics of the candidates engaging with the Step into Health programme and, which stage of the journey the candidate is in, is vital to evidencing the success of Step into Health both for the national co-ordination team and local employer.

We use your personal data to:

* Follow your career path
* Analyse effectiveness of recruitment campaigns

We do not undertake any automated decision making or profiling.

1. **Our reasons for using your data**

Processing is necessary for our legitimate business interests

* Purpose of Processing

The NHS Confederation has a legitimate interest to process personal data relating to service personnel and their community members who have submitted their details via the Step into Health website.

* Necessity

The processing is necessary enable individuals to receive information related to their career search and gather data to assess the effectiveness of campaigns to attract candidates from the armed forces into the NHS.

* Balance - Reasonable Expectation

The data subjects have expressed interest in finding a role with the NHS and can reasonably expect their data to be shared amongst NHS employers who have vacancies.

1. **Transfer data outside the EEA**

In some cases we may process your personal data outside the European Economic Area (EEA) where countries may not have laws which protect your personal data to the same extent as in EEA. We ensure that your personal data is processed securely and is protected against unauthorised access, loss or destruction, unlawful processing and any processing which is inconsistent with the purposes set out in this privacy notice.

1. **How long will we keep your data**

We will keep your personal data for as long as you continue to be registered and as long is as reasonably necessary afterwards to fulfil any legal requirements. If you decide you no longer wish to be registered, we will delete your personal data but retain a record that includes the outcomes of your engagement. This record cannot be traced back to you.

1. **How we protect your data**

We take the security of your personal information seriously. In order to prevent unauthorised access or disclosure and unlawful or unauthorised processing and accidental loss, destruction or damage, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. For example, we have adopted internal data protection procedures and trained our staff on them with a view to preventing breaches of security.

We take all reasonable steps to protect any personal information you submit via the website. However, as our Website is grouped to the internet, which is inherently insecure, we cannot guarantee the information you supply will not be intercepted while being transmitted over the internet.  Accordingly, we have no responsibility or liability for the security of personal information transmitted via our Website.

Our website may, from time to time, contain links to third party websites. If you follow a link to any of these websites, please note that these websites will have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

1. **Who we share your personal data with**

The NHS Confederation will not sell your information to any third party.

Your data will be available to all parties listed on this website that you have agreed to share your data with.

### Your Rights

As an individual you have explicit rights under general data protection regulation:

* The right to be informed
* The right of access
* The right to rectification
* The right to erasure (also known as the ‘right to be forgotten’)
* The right to restrict processing
* The right to data portability
* The right to object
* Rights with respect to automated decision-making and profiling
* The right to withdraw your consent to the collection, holding and processing of your personal data at any time.
1. **Accessing your data**

We are legally required to act on requests and provide information free of charge with the exception of requests that are manifestly unfounded, excessive or repetitive.  If we determine this to be the case we may charge a reasonable fee or refuse to act on the request.  We will respond to acknowledge your request and provide the information within one month of receiving your request.  Please send your request to dataprotection@nhsconfed.org with subject access request in the subject line.

###  Lodging A Complaint

### If you are not satisfied with our response or believe we are processing your personal information in a way that is not in accordance with the law, you have the right to lodge a complaint with the supervisory authority in the UK responsible for the implementation and enforcement data protection law: the Information Commissioner’s Office (the “ICO”).  You can contact the ICO via their website – <https://ico.org.uk/concerns/> - or by calling their helpline – 0303 123 1113.

### Changes to The NHS Confederation’s Privacy

This Privacy and Cookies Policy may be updated from time to time so you may wish to check it each time you submit personal information to the us. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use The NHS Confederation’s websites to submit personal information to the us.

**This Privacy Notice was last updated in September 2019**