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Privacy Notice for Employees and Recruitment

Version control

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1	Whole document	January 2021	BLS draft
1.1	Whole document	July 2021	Approved document
2	Whole document	July 2022	BLS Review
3	Whole document	April 2023	Change of Data Protection Champion and Caldicott Guardian
4	Whole document	September 2023	BLS Review
5	Whole document	September 2024	BLS Review
6	Whole document	September 2025	BLS Review
7	Whole document	September 2026	Annual review. Revised wording to improve clarity and accessibility. Recruitment data retention period increased from 6 to 12 months. Updated Information Commission Office contact details

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Purpose

As an employer N-Compass must meet its Data Protection contractual, statutory, and administrative obligations. We are committed to protecting your privacy and will only use personal data that we collect in line with all applicable laws, including the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA).

This privacy notice tells you what to expect when N-Compass collects personal information about you. It applies to all applicants for employment and to current employees, ex-employees, agency employees, contractors and secondees. However, the information we will process about you will vary depending on your specific role and personal circumstances.

Where appropriate this privacy notice is also applicable to job applicants. It is not intended to, neither will it, form part of any contract of employment or contract of services. We reserve the right to make changes to this privacy notice at any time. If you are affected by substantial changes, we may make an alternative privacy notice available to you.

N-Compass is the data controller; details of our Data Protection Champion can be found in the contact details below.

Our contact details

Our registered address is Edward VII Quay, Navigation Way, Ashton-on-Ribble, Preston, PR2 2YF. Our phone number is 01772 280030. Our email address is hr@N-Compass.org.uk and for recruitment it is jobs@n-compass.org.uk. Our website address is www.n-compass.org.uk.

N-Compass is registered with the Information Commission. Our registration number: Z1718763.

We take our duty to protect your personal data and maintain confidentiality very seriously. We are committed to taking all reasonable measures to make sure the personal data we are responsible for, whether in electronic or in paper format, is kept securely.

Our Data Protection Champion is Asher Ayres and can be contacted by writing to: Asher Ayres, N-Compass, Edward VII Quay, Navigation Way, Ashton-on-Ribble, Preston, PR2 2YF, emailing asher.ayres@n-compass.org.uk or by phone on 01772 280030.

Details of information we will hold about you

Recruitment

The list below identifies the kind of data that we will process about you during the application process:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- date of birth
- gender
- your photograph
- marital status and dependents
- information included on your CV including references, education history and employment history
- documentation relating to your right to work in the UK
- National Insurance number
- copy of driving licence
- evidence of qualifications or professional memberships

The following list identifies the kind of data that we will process which falls within the scope of "special categories" of more sensitive personal information under the Data Protection Act:

- information relating to your race or ethnicity, religious beliefs, sexual orientation, sex life and political opinions
- information about your health, including any medical conditions and disabilities
- information about criminal convictions and offences
- genetic information and biometric data

Employees

This includes current employees, ex-employees, agency employees, contractors and secondees. We will routinely collect and store:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- date of birth
- your photograph
- gender
- marital status
- dependents, next of kin and their details
- Car insurance certificate/MOT certificate & vehicle registration(s)
- Exit interview, termination form and leave date information
- Maternity, Paternity, Shared Paternity Adoption Information
- Flexible Working Requests
- National Insurance number

- bank account details, payroll records and tax codes
- salary, pension, and benefits information
- leave records including annual leave, family leave, sickness absence etc
- start date
- location of employment or workplace
- copy of driving licence
- information included on your application form or CV including references, education history, and employment history
- documentation relating to your right to work in the UK
- information used for equal opportunities monitoring about your sexual orientation, religion or belief and ethnic origin
- medical or health information including whether or not you have a disability
- current and previous job titles, job descriptions, pay grades (if applicable), training records, hours of work, professional membership and other terms and conditions relating to your employment with us
- compensation history including expenses records etc.
- internal performance information including measurements against targets, formal warnings and related documentation with regard to capability procedures and appraisal forms
- information and relevant communications regarding disciplinary and grievance issues
- CCTV and doorbell footage and audio, and other information obtained through electronic means such as building entry card records (if applicable)
- telephone call recordings and associated call records, including calls made to N-Compass telephone systems where recording is in operation for quality, training, safeguarding, service delivery or audit purposes
- information about your use of our information and communications systems

The following list identifies the kind of data that we will process which falls within the scope of “special categories” of more sensitive personal information under the Data Protection Act:

- information relating to your race or ethnicity, religious beliefs, sexual orientation, sex life and political opinions
- information about your health, including any medical conditions and disabilities
- information about criminal convictions and offences
- genetic information and biometric data

How do we collect your information

We get information about you from the following sources:

- directly from you

- from an employment agency
- from your employer if you are a secondee
- from referees, either external or internal
- from security clearance providers, for example DBS checks
- from Occupational Health and other health providers
- from Pension administrators and other government departments
- tax details from HMRC
- CCTV images from our landlords or gathered using our own CCTV systems
- telephone systems and call recording platforms used by N-Compass

Automated decision making

We do not anticipate that any of our decisions will occur without human involvement. Should we use any form of automated decision making in the future, we will advise you of any change in writing.

Lawful basis for processing your personal data

Recruitment

Our purpose for processing this information is to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process.

The lawful basis we rely on for processing your personal data is article 6(1)(b) of the UK GDPR, which relates to processing necessary to perform a contract or to take steps at your request, before entering a contract.

If you provide us with any information about reasonable adjustments you require under the Equality Act 2010, the lawful basis we rely on for processing this information is article 6(1)(c) to comply with our legal obligations under the Act.

The lawful basis we rely on to process any information you provide as part of your application which is special category data, such as health, religious or ethnicity information is article 9(2)(b) of the UK GDPR, which relates to our obligations in employment and the safeguarding of your fundamental rights. Also, Schedule 1 part 1(1)(a) of the DPA which again relates to processing for employment purposes.

We process information about applicant criminal convictions and offences. The lawful basis we rely on to process this data are (f) legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. In addition, we rely on the processing condition at Schedule 1 part 2 paragraph 6(2)(a) where we exercise a function conferred on us by an enactment or rule of law.

Employees

Depending on the processing activity, we rely on the following lawful bases for processing your personal data under the UK GDPR:

- Article 6(1)(b) which relates to processing necessary for the performance of a contract

- Article 6(1)(c) so we can comply with our legal obligations as your employer
- Article 6(1)(d) in order to protect your vital interests or those of another person
- Article 6(1)(f) for the purposes of our legitimate interest or the legitimate interests of a third party

Where the information we process is special category data, for example your health data, the additional bases for processing that we rely on are:

We process special categories of personal data under the following UK GDPR Articles:

- Article 9(2)(b) – where processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on N-Compass or you as the data subject in connection with employment, social security, or social protection. Examples of our processing include details referring to employee's sickness absences.
- Article 9(2)(f) – for the establishment, exercise, or defence of legal claims. Examples of our processing include processing relating to any employment tribunal or other litigation.
- Article 9(2)(c) – where processing is necessary to protect the vital interests of the data subject or of another natural person. An example of our processing would be using health information about an employee in a medical emergency.

Criminal convictions and offences

Recruitment and employees

Depending on the role you have applied for we may be required to undertake criminal background checks (referred to as DBS checks) for some posts, to ensure our lawful safeguarding responsibilities. Where a DBS check is required, this will be clearly stated in the job advert, so you are aware of these requirements at the outset.

Information regarding criminal convictions may be processed in accordance with our legal obligations. Occasionally we may process such information to protect yours, or someone else's interests and you are not able to give your consent, or we may process such information in cases where you have already made the information public. Such information may be sought as part of the recruitment process or in the course of your employment with us. The lawful bases we rely on to process this data are:

We rely on the processing condition at Schedule 1 part 2 paragraph 6(2)(a) and UK GDPR Article 6(1)(b) for the performance of a contract. In addition, we rely on the processing condition at Schedule 1 part 1 paragraph 1.

What will we do with the information you give us?

Recruitment

We'll use all the information you provide during the recruitment process to progress your application with a view to offering you an employment contract with us, or to fulfil legal or regulatory requirements if necessary. We will not share any of the information you provide with any third parties for marketing purposes.

We'll use the contact details you give us to contact you to progress your application. We may also contact you to request your feedback about our recruitment process. We'll use the other information you provide to assess your suitability for the role. Your data will be shared with colleagues within N-Compass where it is necessary for them to undertake their duties during the recruitment process.

Employees

Your data may be shared within N-Compass and our partners, for example, your line manager for their management of you, the HR department for maintaining personnel records and the payroll department for administering payment under your contract of employment.

It may be necessary for us to share your personal data with a third party or third-party service provider (including, but not limited to, contractors, agents or other associated/group companies) within the UK or overseas. Where personal data is transferred overseas, we will ensure that appropriate safeguards are in place to protect your personal data.

We may also be required to share your personal data with third parties including government agencies, for example HMRC and external regulators or auditors due to a legal obligation on us as part of the performance of a contract or in situations where there is another legitimate interest (including a legitimate interest of a third party) to do so.

The list below identifies which activities are carried out by third parties on our behalf:

- payroll
- pension providers/administrators
- IT services
- legal advisors
- security
- insurance providers
- benefit providers

Data may also be shared with 3rd parties in the following circumstances:

- in the process of regular reporting activities regarding our performance
- with regards to a business or group reorganisation, sale or restructure
- in relation to the maintenance support and/or hosting of data
- to adhere with a legal obligation
- in the process of obtaining advice and help in order to adhere with legal obligations Some of these partners may process your information on our behalf.

If data is shared, we expect third parties to adhere to and comply with the UK GDPR and protect any data of yours that they process. We do not permit any third parties to process personal data for their own reasons. Where they process your data, it is for a specific purpose according to our instructions.

How long we keep your personal data

Recruitment

We anticipate that we will retain your data as part of the recruitment process for no longer than is necessary for the purpose for which it was collected. If you are unsuccessful in the application this is no longer than 12 months after the recruitment process has ended.

Employees

For information about how long we hold your personal data, see our retention schedule which can be found in our records management policy.

Your rights in relation to this processing

As a data subject, under data protection legislation, you have various rights in relation to your personal data. You can:

- request access to your own data by making an access request – this enables you to receive a copy of the personal information we hold about you and check that we are lawfully processing it. For example, your personnel file is held in physical and electronic format. Data is held securely on N-Compass systems and at our premises. You can request your personnel file by emailing the HR team. You will not be able to take away your physical file. Your request will be handled by employees with restricted access. You can also make a verbal request for your general information, for example copies of your appraisal etc by submitting an access request
- request that we correct any inaccuracies in the data that we hold about you
- request that we erase your personal data where we are not entitled by law to process it, or it is no longer needed for the purpose it was collected
- request that processing of your data is restricted – this enables you to ask us to suspend the processing of personal information about you, for example if you want to establish its accuracy or the reason for processing it
- object to processing of your personal information where we are relying on our legitimate interests and there is something about your particular situation which makes you want to object to processing on this ground
- request the transfer of your personal information to another party

In most situations as an applicant or employee, N-Compass does not require your consent to process your data. If we do request your consent to process your data for a specific purpose, you are under no obligation to provide it and you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing before your consent was withdrawn.

If you wish to make an access request or assert any of the rights detailed above, please contact our Data Protection Champion: Asher Ayres by writing to: Asher Ayres, N-Compass, Edward VII Quay, Navigation Way, Ashton-on-Ribble, Preston, PR2 2YF, by emailing asher.ayres@n-compass.org.uk or by phone on 01772 280030.

Complaints

If you are concerned about how N-Compass has used your personal information or believe that

we have not kept it secure, we would like the opportunity to address your concerns. Please contact our Data Protection Champion in the first instance at asher.ayres@n-compass.org.uk.

We will consider your concerns, make appropriate enquiries and explain the outcome to you.

You also have the right to complain to the Information Commission if you are unhappy with how we have used your personal information or believe that data protection requirements have not been met.

Information Commission
4th Floor, No. 3 Circle Square
5 Hawkshaw Street
Manchester
M1 7BL

Helpline: 0303 123 1113
Website: Contact us | ICO
Make a complaint: Make a complaint | ICO

Changes to this notice

We may update this privacy notice from time to time to reflect changes in how we use personal information, our procedures or data protection requirements. The date of the most recent review or revision will be shown on this notice.

Any significant changes will be brought to your attention where appropriate. The latest version of our privacy notice will also be available on the N-Compass website.

Last reviewed September 2026