



PRIVACY NOTICE FOR STAFF AND POTENTIAL STAFF

Applies to Aspirations Care Ltd. and Aspirations (SL) Ltd.

1. Introduction

Aspirations Care Ltd. and Aspirations (SL) Ltd. (herein after referred to as “Aspirations”, “we”, “us”, “our”) are committed to protecting your personal data and respecting your privacy.

This Privacy Notice explains how we collect, use, store, share, and protect personal data relating to staff and potential staff, including employees, workers, agency staff, contractors, volunteers, and applicants (“you”).

This notice applies throughout your recruitment process, during your engagement or employment with us, and for a period after your relationship with us has ended.

We review this Privacy Notice regularly and may update it from time to time. The most recent version will always be available via our internal systems or website.

2. What is Personal Data?

Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, **personal data** means any information relating to an identified or identifiable individual.

This includes information that identifies you directly (such as your name) or indirectly (such as an employee number or combination of details).

3. Who is Responsible for Your Personal Data?

Aspirations is the **data controller** for the personal data processed in connection with your employment or engagement.

We process personal data in accordance with:

- The UK GDPR
 - The Data Protection Act 2018
 - Guidance issued by the Information Commissioner's Office (ICO)
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4. Lawful Bases for Processing Your Personal Data

We process your personal data only where the law allows us to do so. The lawful bases we rely on include:

Article 6 UK GDPR - General Personal Data

- **Contract (Article 6(1)(b))**
Processing necessary to enter into or perform your contract of employment or engagement.
- **Legal Obligation (Article 6(1)(c))**
Processing required to comply with employment law, tax law, health and safety legislation, safeguarding duties, and regulatory requirements (including those imposed by the Care Quality Commission).
- **Legitimate Interests (Article 6(1)(f))**
Processing necessary for our legitimate business interests, provided those interests are not overridden by your rights and freedoms (e.g. workforce management, safeguarding, quality assurance, and defending legal claims).

Special Category Data - Article G UK GDPR

Where we process special category data (such as health or equality information), we rely on one or more of the following conditions:

- **Article G(2)(b)** - Employment, social security and social protection law
- **Article G(2)(h)** - Occupational health, fitness for work, and health or social care management
- **Article G(2)(g)** - Substantial public interest

These conditions are supported by **Schedule 1 of the Data Protection Act 2018** and our internal **Appropriate Policy Document**, which sets out safeguards and retention controls.

Criminal Records Data - Article 10 UK GDPR

We process criminal conviction and offence data only where:

- It is legally permitted and relevant to your role
- DBS eligibility criteria are met
- Appropriate safeguards are in place

This processing is carried out in accordance with the Data Protection Act 2018, the DBS Code of Practice, and our internal policies.

We do **not** rely on consent as the lawful basis for routine employment-related processing, as consent in an employment context is not usually freely given.

5. How We Obtain Your Personal Data

We collect personal data from:

- You directly (applications, interviews, employment records)
 - Recruitment agencies
 - Referees and previous employers
 - Disclosure and Barring Service (DBS)
 - Professional bodies, educational institutions, and regulators
 - Government departments (e.g. HMRC, Home Office)
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6. What Personal Data We Hold

This may include:

- Name, address, contact details, date of birth
- Right to work and immigration status
- Qualifications, registrations, training, and experience
- Employment history and references
- Payroll, pension, and benefits information
- Performance, supervision, disciplinary and grievance records

- Next of kin and emergency contact details
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7. Special Category and Sensitive Data

We may also process special category data, including:

- Health information (sickness absence, occupational health, reasonable adjustments)
- Equality and diversity monitoring data
- Pregnancy, maternity, paternity, and parental leave records

We process this information only where necessary, proportionate, and lawful, and with appropriate safeguards in place.

You are not required to disclose more information than is necessary, but in some cases limited disclosure may affect our ability to meet legal or contractual obligations.

8. How We Use Your Personal Data

We use your personal data for purposes including:

- Recruitment, selection, and onboarding
 - Managing employment and contractual relationships
 - Payroll, pensions, and benefits administration
 - Training, development, and professional registration
 - Workforce planning and quality assurance
 - Safeguarding and protection of people we support
 - Health and safety management
 - Meeting regulatory and legal obligations
 - Investigating complaints, incidents, or concerns
 - Exercising or defending legal rights
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G. Who We Share Your Personal Data With

We may share your data with:

- Relevant staff within Aspirations
- Occupational health providers
- Recruitment agencies and referees
- Professional bodies and regulators
- Legal advisors, auditors, insurers, and accountants
- IT, HR, payroll, and e-learning system providers
- Government departments and law enforcement where required

We only share data where necessary and proportionate, and all third parties are required to protect your information appropriately.

10. Accuracy of Your Personal Data

It is important that the personal data we hold about you is accurate and up to date. Please inform us of any changes as soon as possible so we can maintain accurate records.

11. How Long We Keep Your Personal Data

We retain personal data in line with our **Records Retention Policy**. In most cases:

- Personnel files are retained for **six years** after employment ends
- Some records are retained for shorter or longer periods where legally required

Retention periods may be extended where there is an ongoing complaint, legal claim, or regulatory requirement.

12. Your Rights Under Data Protection Law

You have the right to:

- Be informed about how your data is used
- Access your personal data (Subject Access Request)
- Request correction of inaccurate data
- Request erasure (in limited circumstances)
- Restrict processing

- Object to processing based on legitimate interests
- Data portability (where applicable)
- Not be subject to solely automated decision-making

We do **not** use solely automated decision-making that produces legal or similarly significant effects.

13. How to Exercise Your Rights

To ask questions or exercise your rights, please contact:

CEO

Christine Cameron

Aspirations Care Ltd
Corinium House Barnwood Business Park
Corinium Avenue
Gloucester GL4 3HX

Aspirations (SL) Ltd
Kings Buildings
Hill St
Lydney
GL15 5HE

Email: DPO@aspirationscare.com

14. Complaints and the ICO

If you are unhappy with how we handle your personal data, you have the right to complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113
Website: <https://ico.org.uk>

ICO Registration Number Aspirations Care Ltd: **Z8717214**

ICO Registration Number Aspirations (SL) Ltd: **ZB736413**