



NOTE: This privacy policy is tailored to DrPARecruitment and is designed to ensure compliance with UK GDPR and healthcare-related regulations within the environments we operate in.

DrPA Recruitment – Privacy Policy

1. Document Details

Organisation:	DrPA Recruitment Ltd
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Current Document Approved By:	Zara Shaker
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2. Document Revision and Approval History

Version	Date	Version Created By:	Version Approved By:	Comments
v.1	Oct 24	Leanne Galley	Farwa Pasha	
v.2	October 25	Leanne Galley	Zara Shaker	Update to 3 rd party plus other sections advised by HR

Introduction

At DrPA Recruitment, we are committed to protecting the privacy and security of our candidates, clients, healthcare practitioners, and other users. As a UK-based healthcare recruitment agency, we comply with the General Data Protection Regulation (GDPR) and UK data protection laws. This Privacy Policy explains how we collect, use, store, and disclose your personal data.

1. Who We Are

DrPA Recruitment is a healthcare recruitment agency providing adhoc, temporary, contract and permanent staff to healthcare establishments both in the NHS and private sector.

2. Data We Collect

We collect and process personal data to deliver our services effectively. This includes:

- **Personal Identifying Information:** Full name, date of birth, address, and contact information (email, phone).
- **Professional Data:** CV details, job titles, work experience, qualifications, and employment history.
- **Health Information:** Medical history, where necessary, to comply with legal obligations or as part of employment health checks.
- **Compliance Data:** Proof of right to work in the UK, DBS checks, and records required to comply with NHS and private contracts.
- **Financial Data:** Bank account details, payroll information, and tax details (for employees and self-employed contractors).
- **Special Category & Criminal Records Data:** This includes health data and DBS criminal record data, processed only where necessary for employment, safeguarding, or regulatory obligations in line with UK GDPR Art. 9(2)(b) and DPA 2018 Sch. 1, and on the basis of UK GDPR Art. 6(1)(b) (performance of contract) and Art. 6(1)(f) (legitimate interest).



3. How We Use Your Data

We process your data to:

- **Fulfill Contractual Obligations:** Provide healthcare professionals (including GPs) to healthcare establishments within the NHS and private healthcare.
- **Manage Employment and Contracts:** Handle employment or self-employed contracts, timesheets, payroll, and pension obligations.
- **Legal Compliance:** Ensure compliance with CQC requirements, NHS Trust protocols, and legal obligations such as safeguarding.
- **Communication:** Keep you informed about work placements, updates to services, or other business-related communications.
- **Recruitment & Compliance Support:** Share necessary personal data with trusted third-party processors (e.g. DBS services, training providers, reference checkers) to facilitate recruitment, vetting, and placement in line with regulatory and contractual obligations.
- **Safeguarding:** Special category and criminal record data are processed where necessary to protect vulnerable individuals and comply with safeguarding regulations, under DPA 2018 Schedule 1, Part 1, Paragraphs 1 and 2.

4. Legal Basis for Processing

We process your data under several lawful bases, including:

- **Performance of a Contract:** To place you in employment or to provide healthcare services.
- **Legal Obligation:** To comply with laws such as safeguarding, right to work, and tax legislation.
- **Legitimate Interests:** To provide healthcare staff to organisations, ensure the security of our business, and maintain relationships with NHS Trusts and private providers.
- **For special category data** (e.g. health data, criminal checks), we rely on UK GDPR Art. 9(2)(b) and the Data Protection Act 2018 Schedule 1, where processing is necessary for employment and safeguarding purposes.

5. Sharing Your Information

We may share your personal information with:

- **Healthcare Facilities:** Institutions where you are placed to provide medical services.
- **NHS Trusts and Private Healthcare Providers:** As part of our contractual obligations.
- **Regulatory Bodies:** The CQC and other regulatory organizations to ensure compliance with healthcare standards.
- **Third-Party Service Providers:** To support operations such as payroll, background checks (e.g., DBS), or legal compliance.
- **Legal Authorities:** Where required by law or to protect our business from fraud or other legal claims.
- **Other Data Sources:** We may collect data from third parties such as referees, DBS/background check providers, training and qualification bodies, umbrella companies, and client site representatives.

6. Data Security

We implement robust technical and organisational measures to protect your data.

These include:

- Role-based access control
- Encryption of data in transit and at rest
- Multi-factor authentication (MFA)
- Supplier due diligence before onboarding processors
- Regular audits and reviews of data handling practices

All personal data is stored securely and accessed only by authorised personnel.



7. Retention of Data

We will retain your personal information only for as long as necessary for the purpose it was collected or to meet legal and contractual obligations.

Data Type	Retention Period
Unsuccessful applicants	12 months
Placed candidate compliance pack	6 years after last placement (or per client contract)
Payroll and tax records	6 years
ID / Right to Work documentation	As per client contract or legal requirement, then deleted

8. Your Rights

Under the UK GDPR, you have the following rights concerning your personal data:

- **Right to Access:** Request access to the data we hold about you.
- **Right to Rectification:** Request that we correct any inaccurate or incomplete information.
- **Right to Erasure:** Request that we delete your personal data where applicable.
- **Right to Restrict Processing:** Request a restriction on processing under certain conditions.
- **Right to Data Portability:** Receive your personal data in a structured, commonly used, and machine-readable format.
- **Right to Object:** Object to the processing of your data under certain circumstances, including for direct marketing.

To exercise any of these rights, please contact us at admin@drparecruitment.co.uk

We may ask for identification to verify your request. We aim to respond within one month, but this may be extended by up to two additional months for complex or multiple requests. Requests are handled free of charge, unless they are unfounded or excessive.

9. Cookies and Website Usage

We may collect technical information about your use of our website, including your IP address, browser type, and pages visited. This data is used to enhance the functionality of our website and improve user experience. Cookies may also be used for these purposes. For more details, please see our Cookie Policy.

10. Automated Decision-Making / Profiling

We do not use automated decision-making or profiling in our recruitment or placement processes. All decisions are made by qualified personnel based on relevant criteria. If this changes, we will update our policy and provide the necessary information about your rights.

11. International Data Transfers

We currently store and process data within the UK and EEA. Where any personal data is transferred outside the UK/EEA, we ensure appropriate safeguards are in place, such as:

- UK-approved Standard Contractual Clauses (SCCs)
- Transfers to jurisdictions with adequacy decisions
- Binding agreements with processors to act strictly on our instructions and protect your data to UK standards

12. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our business operations or legal obligations. Any significant changes will be posted on our website, and you will be notified where appropriate.

13. Contact Us

DrPA Recruitment

Email: admin@drparecruitment.co.uk

Address: 42 Kew Court Richmond Road, Kingston Upon Thames, Surrey, KT2 5BF.

For more information about your rights or to make a complaint, you can contact the UK Information Commissioner's Office at www.ico.org.uk or call 0303 123 1113 or Email: Casework@ico.org.uk (please ensure you Include your contact number)

14. Children's Data

We do not recruit minors. If any placement or training activity involves access to data about individuals under 18, we apply additional safeguards such as restricted access, staff vetting, and child-specific confidentiality policies.

15. Jurisdiction

This Privacy Policy is governed by the laws of England. Any disputes arising out of this policy will be subject to the jurisdiction of the courts of England and Wales.