

Staff and Recruitment Privacy Notice

August 2026



The Country's Leading
Lottery for Hospices

Staff and Recruitment Privacy Notice

This Staff and Recruitment privacy notice describes how we collect and use personal data about you when you apply for your role with us and, where relevant, during and after your working relationship with us, in accordance with data protection legislation. It should be read in conjunction with Local Hospice 'Lottery's main Privacy Policy at <https://www.localhospicelottery.org/privacy-policy/> (please see this main Privacy Policy for more information about us as an organisation, as well as information about how we use your personal data when you use our website and other services).

Local Hospice Lottery is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations. This notice applies to the personal data that we process about all job applicants, as well as current and former employees, workers and contractors (together "Staff"). This notice does not form part of any contract of employment or services contract.

What data does Local Hospice Lottery collect?

Job Applicants

If you are a job applicant, Local Hospice Lottery collects a range of personal data about you as part of its recruitment process. This includes:-

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which Local Hospice Lottery needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

Staff

If you are a member of Staff, we may collect, store and use the following categories of personal data about you, including (but not limited to):

Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;

- Date of birth and gender;
- Marital status and dependants;
- Next of kin and emergency contact information;
- National Insurance number;
- Bank account details, payroll records and tax status information;

- Salary, annual leave, pension and benefits information;
- Start date and, if different, the date of your continuous employment;
- Leaving date and your reason for leaving;
- Recruitment information (including copies of right to work documentation, references and other information included in the CV or cover letter or as part of the application process);
- Employment records (including job titles, work history, working hours, holidays, training records and professional memberships);
- Compensation history;
- Performance information;
- Disciplinary and grievance information;
- CCTV footage and other information obtained through electronic means;
- Information about your use of our information and communications systems;
- Results of HMRC employment status check, details of your interest in and connection with the intermediary through which your services are supplied.

We may also collect, store and use the following special categories of data:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- Information about your health, including any medical conditions, health and sickness recordings, including:
- When you leave employment and under any share plan operated by us the reason for leaving is determined to be ill-health, injury or disability, the records relating to that decision;
- Details of any absences (other than holidays) from work, including time on statutory parental leave and sick leave;
- When you leave employment and the reason for leaving is related to your health, information about that condition needed for pensions and permanent health insurance purposes;
- Information about criminal convictions and offences.

Where does Local Hospice Lottery collect this personal data?

Local Hospice Lottery may collect this personal data in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

Local Hospice Lottery may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers. Local Hospice Lottery will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

On appointment:

- We may collect additional personal data about you in the course of your job-related activities throughout the period of you working for us. For instance, we may collect personal data your use of our IT and communications systems.
- Local Hospice Lottery reserves the right to collect and monitor the information available via the fundraising tablet application, including the GPS data, in accordance with Data Protection legislation. This includes, but is not limited to; working hours, location, signups, and health and safety information.

Storage of your personal data

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems

Why does Local Hospice Lottery process personal data?

Job Applicants

Local Hospice Lottery processes your personal data in order to process your application and to make a decision about whether or not to offer you a role with the organisation. If your application is unsuccessful, Local Hospice Lottery may keep your personal data on file in case there are future employment opportunities for which you may be suited. The organisation will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time by emailing us using the contact details set out below.

Staff

If your application is successful and you become a Staff member at Local Hospice Lottery, we will process your personal data for the following purposes:

- Determining the terms on which you work for us;
- Determining whether your engagement with us is deemed employment for the purposes of Chapter 10 of Part 2 of the Income Tax (Earnings and Pensions) Act 2003 (ITEPA 2003) and providing you with a status determination statement in accordance with the applicable provisions of ITEPA 2003;
- Checking you are legally entitled to work in the UK;
- Paying you and, if you are an employee or deemed employee for tax purposes, deducting tax and National Insurance contributions (NICs);
- Providing employment related benefits to you;
- Liaising with any provider of employee benefits;
- Liaising with any provider of employee training, including HR consultants;
- Enrolling you in a pension arrangement in accordance with our statutory automatic enrolment duties;
- Administering the contract we have entered into with you;

- Business management and planning, including accounting and auditing;
- Conducting performance reviews, managing performance and determining performance requirements;
- Making decisions about salary reviews and compensation;
- Assessing qualifications for a particular job or task, including decisions about promotions;
- Gathering evidence for possible grievance or disciplinary hearings;
- Making decisions about your continued employment or engagement;
- Making arrangements for the termination of our working relationship;
- Education, training and development requirements;
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work;
- Ascertaining your fitness to work;
- Managing sickness absence;
- Complying with health and safety obligations;
- To prevent fraud;
- To monitor your use of our information and communication systems to ensure compliance with our IT policies;
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution;
- Equal opportunities monitoring.

What are our lawful bases?

Local Hospice Lottery must have a reason under the law (also known as a 'lawful basis') for collecting and handling your personal data. Local Hospice Lottery relies on the following lawful bases when collecting and using your personal data:

- **Contract:** Local Hospice Lottery may process your personal data to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you.
- **Legal obligations:** In some cases, Local Hospice Lottery needs to process data to ensure that it is complying with its legal obligations. For example, Local Hospice Lottery is required to check a successful applicant's eligibility to work in the UK before employment starts, and must also make returns to HMRC.
- **Legitimate interests:** Local Hospice Lottery may process your personal data where doing so is in its legitimate interests (provided that these interests are not overridden by your rights or freedoms). For example, Local Hospice Lottery has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the organisation to manage the

recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. Local Hospice Lottery may also need to process data from job applicants to respond to and defend against legal claims. Local Hospice Lottery also has a legitimate interest in maintaining and managing our relationship with you as a member of Staff (where relevant),

In some cases, Local Hospice Lottery may also process sensitive personal data (also known as special category data), which is afforded greater protection under data protection law. For example:

- Local Hospice Lottery may process information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.
- Local Hospice Lottery may process your special category data where we need to do so to carry out our legal obligations under employment law (or other laws), or to exercise rights in connection with employment.
- Where Local Hospice Lottery processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.
- Local Hospice Lottery may, in limited circumstances, need to process special category data to protect you or another person from harm.
- In some (limited circumstances), we may process special category data with your consent (which you can withdraw at any time), or where needed in relation to legal claims, where necessary to protect your interests or someone else's interests and you are not capable of giving your consent, or where you have already made the information public.

Who has access to data?

Job Applicants

Your personal data may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles. Your personal data may be shared externally with our recruitment partner for the purposes of the recruitment exercise or technical issues regarding your application.

Staff

As a Staff member of Local Hospice Lottery, your personal data will be accessible internally to the extent necessary for you to be able to perform your role with us and/or in accordance with the purposes set out above.

Local Hospice Lottery will not generally share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. Local Hospice Lottery will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks. We may also share your personal data (whether as a job applicant or Staff member) in the following circumstances:

- with third party service providers who process personal data on our behalf (for example, CRM, website hosting and payroll providers);
- as part of a sale, merger or acquisition, or other transfer of all or part of our assets, including as part of a bankruptcy proceeding;
- pursuant to a subpoena, court order, or other legal process or as otherwise required or requested by law, regulation or to protect our rights or the rights or safety of third parties;
- with our professional advisors, lawyers, accountants and auditors; or
- with your consent or as otherwise disclosed at the time of data collection or sharing.

International Data Transfers

The personal data we collect from you may be transferred to and processed and/or stored at a destination outside the UK. For example, we store some of your personal data in countries in the European Economic Area (which have all been deemed to be 'adequate' from a data protection perspective by the UK Government).

In any event, when we transfer your personal data outside of the UK, we take steps to ensure that your personal data is protected in accordance with appropriate safeguards, especially where the recipient country is not considered to be adequate by the UK Government. Where this is the case, we will rely on the appropriate safeguards under data protection legislation, such as standard contractual clauses approved by the UK Government to protect your data.

How does the organisation protect data?

Local Hospice Lottery takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. While we seek to use appropriate organisational, technical and administrative measures to protect personal data within our organisation, unfortunately no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us using the details below.

For how long does the organisation keep data?

If your employment application is unsuccessful, Local Hospice Lottery will hold your data on file for six months after the end of the relevant recruitment process for consideration for future employment opportunities. Within this 6-month period every applicant is asked whether they want this period to be extended (to enable us to retain your personal data for longer than six months in order to consider you for future opportunities). At the end of that period or once you withdraw your consent, your personal data is removed from the system and replaced by a number and application date. This action removes your personal data but allows for internal recruitment activity reporting to remain unaffected.

If your employment application is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your engagement with us. We will only retain your personal data for as long as is necessary to

fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. The criteria we use to determine the retention period of personal data are: (i) any relevant statutory retention periods; (ii) our relationship with you; (iii) (potential) disputes; and (iv) any guidelines issued by relevant regulators. After expiration of the relevant period, the relevant information is routinely deleted, as long as it is no longer necessary for the fulfilment of a contract, the initiation of a contract or to protect or defend our position or that of a third party.

If you have any questions about our retention periods, please contact us using the details in the 'Contact information' section below.

Your rights

As a data subject, you have a number of rights. You can:

- request access to a copy of your personal data;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data in some circumstances, e.g. where the organisation is relying on its legitimate interests as the legal ground for processing; and
- in some circumstances, ask us to port personal data about you to you or to a third party.

If you would like to exercise any of these rights, please contact dp@localhospicelottery.org. Please be aware that we may be unable to provide these rights to you under certain circumstances, for example if we are legally prevented from doing so or can rely on exemptions. If you believe that the Local Hospice Lottery has not complied with your data protection rights, you can complain to the Information Commissioner's Office (www.ico.org.uk).

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to Local Hospice Lottery during the recruitment process. However, if you do not provide your data to us, Local Hospice Lottery may not be able to process your application properly or at all.

If you are a Staff member and do not provide certain personal data when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our Staff).

Automated decision-making

We do not anticipate that any decisions will be taken about you using solely automated decision-making but we will notify you in writing if this position changes.

Changes to this Notice

This Notice may change from time to time – for example, to take into account changes at Local Hospice Lottery or to reflect changes in regulation or legislation. It was last updated in March 2025.

We will provide you with a new Notice when we make substantial updates, and may also notify you in other ways from time to time about the processing of your personal data.

Contact information

- If you have any questions about this Privacy Notice or our handling of your personal data more generally, please contact us using the following details:
- Post: The Data Protection Representative, Local Hospice Lottery Ltd, The Barn, Glandfields Farm, Chelmsford Road, Felsted, Essex CM6 3LT
- Email: DP@localhospicelottery.org
- Phone: 0800 316 0645

