



Director and Employee Privacy Notice

Valid from: March 2021

Valid To: March 2023

Version 2.0

This privacy policy has been created by North Staffordshire GP Federation. We take your privacy very seriously therefore we urge to read this policy very carefully because it contains important information about:

- Who we are,
- How and why we collect, store, use and share personal information,
- Your rights in relation to your personal information, and
- How to contact us and supervisory authorities in the event that you have a complaint.

Who we are

North Staffordshire GP Federation ('we' or 'us') collect, use and are responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulations which apply across the European Union (including the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

The personal information we collect and use may include:

1) Personal information you provide to us

We collect the following personal information that you provide to us:

- Name,
- Address,
- Contact details,
- Email Address,
- Bank Details,
- Next of Kin Information,
- DBS reports,
- Medical clearance reports,
- CV / Application form,
- References.
- Any other information we may need from time to time in relation to your employment.

2) Personal information from other sources

We may receive information about you from other sources. This information includes:

- CRB check from Disclosure and Barring Service
- Occupational Health reports from NHS Occupational Health Service

We will add this information to the information we hold about you for the following purposes:

- To ensure employees are able to work with children and vulnerable adults.
- To ensure that your immunisations and vaccinations are up to date.

3) Sensitive Personal Information

Sensitive personal information includes any information which relates to the following:

- Your genetic data
- Your biometric data
- Your ethnic origin
- Your political Opinions

- Your religious beliefs
- Whether you belong to a trade union
- Your physical or mental health condition
- Your sexual life, and
- Whether you have committed a criminal offence

4) Personal information you provide about third parties

If you give us information about another person, you confirm that the other person has appointed you to act on their behalf and agreed that you:

- Shall consent on their behalf to the processing of their personal data;
- Shall receive any data protection notices on their behalf;
- Shall consent on their behalf to the transfer of their personal data abroad; and
- Shall consent on their behalf to the processing of their sensitive personal data.

5) Monitoring

We may also monitor, intercept, read and/or record your telephone, email and other electronic communications for the purpose of monitoring and recording to establish facts, to establish compliance with regulatory procedures, to prevent or detect crime, to investigate or detect the unauthorised use of our systems or to ascertain compliance with our practices or procedures. We may also monitor and record communications to check that they are relevant to its business.

We may also use CCTV for the protection of employees and third parties, and to protect against theft, vandalism and damage to goods and property. Generally recorded images are routinely destroyed and not shared with third parties unless there is suspicion of a crime, in which case they may be turned over to the police or other appropriate government agency or authority.

How we use your personal information

We may process personal data and sensitive personal data concerning you in our manual and computerised/automated filing systems internally and, so far as is reasonably necessary, externally, for the purposes of complying with statutory requirements, meeting the our legitimate interests, properly conducting the our business, complying with the terms of your employment and for all purposes in connection with your employment with us.

Who your information may be shared with

We may share your information with;

- Professional advisors;
- Any Third party providing services to us for the benefit of its employees;
- HM Revenue and Customs or other authorities;
- Prospective purchasers of all or any part of our business in return for suitable confidentiality undertakings regardless of the country to which the data is to be transferred;
- Law enforcement agencies in connection with any investigation to help prevent unlawful activity;
- Government bodies for the purposes of accounting, tax and regulatory compliance;
- NHS Payroll services
- Our Accountants and Finance Staff

We will not share your personal information with any other 3rd parties.

How long your personal information will be kept

We will hold your personal information for the following periods:

As set out in our Records Retention Policy.

These periods are no longer than necessary in each case.

Reasons we collect and use your personal information

We rely on the following as the lawful basis on which we collect and use your personal information:

- Consent
- Contract
- Legal obligation

The basis on which we process your sensitive information (i.e. special category as in the GDPR) is that:

- Processing is necessary to protect the vital interests of the data subject or another individual.

Keeping your information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We will also use technological and organisation measures to keep your information secure.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Your obligations to safeguard personal data of others

In the course of your duties you may have access to the personal data of other individuals during the course of your employment. You must undertake any mandatory North Staffordshire GP Federation data protection training, and ensure that you do not inappropriately obtain, retain, amend, use, delete, transmit or compromise the security of the personal data of others.

Failure to comply with your data protection obligations puts at risk the individuals whose personal information is being processed, carries the risk of significant civil and criminal sanctions for you and North Staffordshire GP Federation and may, in some circumstances, amount to a criminal offence for which you are personally liable. Because of the importance of data protection obligations, it may lead to disciplinary action under our procedures, up to and including dismissal for gross misconduct.

If at any time you have any queries, you should contact us immediately.

Transfers of your information out of the EEA

We will not transfer your personal information outside of the EEA at any time.

What rights do you have?

Under the General Data Protection Regulation you have a number of important rights free of charge. In summary, those include rights to:

- Fair processing of information and transparency over how we use your personal information
- Access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- Require us to correct any mistakes in your information which we hold

- Require the erasure of personal information concerning you in certain situations
- Receive the personal information concerning you which you have provided to us, in structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- Object at any time to processing of personal information concerning you for direct marketing
- Object to decisions being taken by automated means which produce legal effects concerning your or similarly significantly affect you
- Object in certain other situations to our continued processing of your personal information
- Otherwise restrict our processing of your personal information in certain circumstances
- Claim compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK information Commissioner's office (ICO) on individual's rights under the General Data Protection Regulations (<http://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individuals-rights/>).

If you would like to exercise any of these rights please:

- Email, call or write to us
- Let us have enough information to identify you
- Let us know the information to which your request relates

Do you need extra help?

If you would like this policy in another format (for example: audio, large print, braille) please contact us using the details below.

Changes to the privacy policy

This privacy policy was published on 27/03/2019 and last updated on 17/03/2021.

We may change this privacy policy from time to time and will notify all employees of any changes by Email.

Contacting us

North Staffordshire GP Federation, are the Data Controller and have an appointed Data Protection Officer, Hayley Gidman, Head of Information Governance, Midlands and Lancashire CSU.

Any queries in regard to Data Protection issues should be addressed to her at: -

Address: Heron House, 120 Grove Road, Fenton, ST4 4LX

Email: mlcsu.dpo@nhs.net / Tel : 01782 872648

Our Caldicott Guardian can be contacted by emailing Lisa Dulson, Quality and Governance Manager (below).

If you have any questions about this policy or the information we hold about you, please contact us by:

E-mail: Lisa.Dulson@northstaffs.nhs.uk or Telephone: 01782 987585