

University Health Service – Staff Privacy Notice

In May 2018 new rules come into place under the General Data Protection Regulations (GDPR) that builds on previous data protection legislation. This notice explains how we at University Health Service (the Practice) deal with our employee data.

How we use your information

1. As your employer, the Practice needs to keep and process information about you for normal employment purposes under the contract of employment we have with you. This is a lawful basis for processing data under legislation. The information we hold and process will be used for our management and administrative use. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, (a) during the recruitment process, (b) whilst you are working for us, (c) at the time when your employment ends and (d) after you have left. This includes using information to enable us to comply with the employment contract, to comply with legal requirements, pursue the legitimate interests of the Practice and protect our legal position in the event of legal proceedings.
2. The Practice provide healthcare services which means additional layers of scrutiny and confidentiality are sometimes required; we may sometimes need to process your data to pursue our legitimate business interests, for example to ensure patient confidentiality, prevent fraud, administrative purposes or reporting potential crimes. In such cases the nature of our interests will be that the processing is necessary for legal obligations, public tasks or legitimate interests as appropriate.
3. Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager, or in some cases, external sources, such as referees or DBS.
4. The personal information we hold includes your application form and references, your contract of employment; correspondence with or about you, for example letters to you about a change in hours or, at your request, a letter to your mortgage company confirming your salary; information needed for payroll, pension, benefits and expenses; contact and emergency contact details; records of holiday, sickness and other absence; information needed for equal opportunities monitoring; and records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records. You may also have provided us with special category data relating to your racial and ethnic origin, religion, health records etc.
5. You will inevitably be referred to in many the Practice documents and records that are produced by you and your colleagues in the course of carrying out your duties and the business of the company. You should refer to the Practice information governance policies which are available via the staff intranet or in paper format at our head offices for details of how this information is retained and managed.
6. Where necessary, we may keep information relating to your health, which could include reasons for absence and, where provided, medical notes. This information will be used in order to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay.

7. Where we process special categories of information relating to for instance your racial or ethnic origin, religious beliefs, or sexual orientation, we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.
8. In addition, we monitor computer (internet and software) and telephone use, as detailed in our information governance policies, available via the staff intranet or in paper format at our head offices. In processing such information the nature of our interests will be that the processing is necessary for legal obligations, public tasks or legitimate interests.
9. Other than as mentioned below, we will only disclose information about you to third parties if we are legally obliged to do so (for instance to CQC during an inspection or to NHS Digital regarding the workforce minimum data set) or where we need to comply with our contractual duties to you, including but not limited to passing on relevant information to our external payroll provider (IFS), for pensions (NHS Pensions Authority), or for statutory benefits (DWP).
10. The Practice does not intend to transfer your information outside of the European Economic Area (EEA). Should it become necessary to transfer your information outside of the EEA the Practice will put in place safeguards to ensure the protection of your data and a copy of these safeguards will be made available via the staff intranet, or in paper format at our head offices.
11. Your personal data may be stored for a period of six years after you have left the Practice, further details of retention of documents relating to your personal data is detailed in the Practice Information Lifecycle Policy. Your information is stored securely; electronically on servers with limited password protected access, and in hard copy in a protected locked cabinet within a locked room to which only restricted and relevant individuals have access.

Your rights

12. You have a number of rights with regard to your personal data: the right to request access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn. You can contact us on the details below to exercise these rights.
13. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with legal requirements with regard to your personal data: <https://ico.org.uk/global/contact-us/>.

Contact details

14. The Practice is the Data Controller and is committed to protecting the rights of individuals in line with the DPA and GDPR.
15. If you have any concerns or queries as to how your data is processed you can contact the practice manager (Mrs Wendy Fielder) or our designated Data Protection Officer (Caroline Sims) or you can write to the partners.

I understand and acknowledge the lawful basis for processing of my personal data identified by The Practice

Signed: _____ Date: _____
Name: _____