

Data Protection – Privacy Notice for ALL Employees (New and Existing)

Privacy Notice

How your information will be used

1. As your employer, Brigstock Family Practice needs to keep and process information about you for normal employment purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. This includes using information to enable us to comply with the employment contract, to comply with any legal requirements, pursue legitimate interest of the surgery, and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.
2. As a GP Practice pursuing healthcare activities, we may sometimes need to process your data to pursue our legitimate business interest, for example to prevent fraud, administrative purposes or reporting potential crimes. The nature of our legitimate interests is healthcare. We will never process your data where these interests are overridden by your own interests.
3. Much of the information we hold will have been provided by you, but some may come from other internal sources, or in some cases, external sources such as referees.
4. The sort of information we hold includes your application and references, your contract of employment and any amendments to it; correspondence with or about you, for example letters to you about a pay rise, or at your request, a letter to your mortgage company confirming your salary; information needed for payroll, benefits and expenses purposes, contact and emergency contact details; records of holiday, sickness and other absence; information needed for equal opportunities monitoring policy; and records relating to your career history, such as training records, appraisal, other performance measures and where appropriate disciplinary and grievance records.
5. You will, of course, inevitably be referred to in many surgery documents and records that are produced in the course of carrying out your duties and the business of the surgery.
6. Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations. We will also need this data to administer and manage statutory and surgery sick pay.
7. Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientations, 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 use, as detailed in our telephone, email and internet policy and our social media policy (available on Docman and in the policy folders in the PMs Office).
9. Other than as mentioned below, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance we may need to pass on certain information to our payroll provider, pension or HSCIC.
10. Your personal data will be stored for a period of 7 years after you have left the Surgery.

11. If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

Your rights

12. Under the General Data Protection Regulations (GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances to the right to data portability.
13. 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.
14. You have the right to lodge a complaint to the Information Commissioner Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data.

Identity and contact details of controller and data protection officer

15. Davenal House Surgery is the controller and processor of data for the purposes of the DPA 18 and GDPR.
16. If you have any concerns as to how your data is processed you can contact:
Umar Sabat, Data Protection Officer, dpo.swl@nhs.net