

## Employee Privacy Notice

*This document provides a widely drafted privacy notice to allow data to be processed under a number of grounds and for a number of purposes.*

### How your information will be used:

1. As your employer, Primary Care Doncaster Limited (PCD) 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 the legitimate interests of the Company and protect our legal position in the event of legal proceedings. For those employees who are on secondment to a primary care network or a GP Practice for example, some personal information will also be shared to ensure that the PCN/GP Practice are able to implement the relevant systems to maintain your health, safety and welfare, whilst working with them. Some personal information, may also be shared to provide evidence that you are able to fulfil your role and responsibilities (for example registration with a professional body).

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 company, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes. We will never process your data where the nature of our legitimate 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, such as your manager, or in some cases, external sources, such as referees.
4. The sort of information we hold includes:
  - Application form which may include personal information such as your date of birth, address and qualifications and telephone number
  - References
  - Contract of employment which will include details about your pay, start date and home address/place of work
  - 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 which may also include any information about student loans, CCJs or court orders which we are required to disclose
  - Contact and emergency contact details which will include next of kind address and telephone numbers

- Records of holiday, sickness and other absence
  - Information needed for equal opportunities monitoring policy such as your religion, nationality and sexual orientation
  - records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records
  - Confidentiality agreements
  - Declarations of conflicts of Interest
  - Photographic ID, for Identification and publicising your role on our public website
5. 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 – 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.
  6. 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 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.

7. In addition, we monitor computer, email and internet usage, as detailed in the Employee Handbook. We also keep records of your hours of work by way of our clocking in and out system.
8. 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, (which will also include any secondment arrangements), for instance we may need to pass on certain information to our external payroll provider, pension or health insurance schemes.
9. We may transfer information about you to other group companies for purposes connected with your employment or the management of the company's business. This may include our payroll provider and our HR advisor.
10. Your personal data will be stored for a period of 12 months following the termination of your employment. The criteria used for determining how long your data will be stored for can be found in PCD's Data Processing Inventory.
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 ask your explicit consent.
12. Under the General Data Protection Regulation (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, objects to processing as well as in certain circumstances 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 Commissioners' 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 Data Controller Data Protection Officer**

15. PCD is the data controller and processor of data for the purposes of the DPA and GDPR.
16. The Data Protection Officer for PCD is Liane Cotterill. If you have any questions relating to how we process your data or GDPR rules in general please contact her using the following details:

**Liane Cotterill**

Senior Governance Manager & Data Protection Officer

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Westpoint Road  
Thornaby  
Stockton-on-Tees  
TS17 6BL

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