



## PRIVACY NOTICE

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Ratified by	Bernard Seymour					
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Responsible Committee / Officers	Senior Management Team / Regulatory Solution					
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## **PRIVACY NOTICE**

### **1. ABOUT THIS POLICY**

1.1 During the course of our activities we, Salford Primary Care Together CIC, will process personal data (which may be held on paper, electronically, or otherwise) about our staff and we recognise the need to treat it in an appropriate and lawful manner, in accordance with the Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation (UKGDPR). The purpose of this notice is to make you aware of how we will collect and use your personal information both during and after your working relationship with Salford Primary Care Together CIC.

1.2 This notice applies to all current and former employees, workers, contractors, consultants and others. It is non-contractual and does not form part of any employment contract, casual worker agreement, consultancy agreement or any other contract for services.

1.3 The Controller is Salford Primary Care Together CIC, 3<sup>rd</sup> Floor, 2 City Approach, Albert Street, Eccles, M30 0BL.

1.4 Salford Primary Care Together CIC have appointed a data protection officer and this is Regulatory Solution Ltd. Email [dpo@regulatorysolution.co.uk](mailto:dpo@regulatorysolution.co.uk).

### **2. DATA PROTECTION PRINCIPLES**

2.1 We will comply with the six data protection principles in the DPA and UK GDPR, which say that personal data must be:

- (a) Processed lawfully, fairly and in a transparent manner.
- (b) Collected only for specified, explicit and legitimate purposes.
- (c) Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- (d) Accurate and where necessary kept up to date.
- (e) Not kept in a form which permits your identification for no longer than is necessary for the purposes for which the data is processed.
- (f) Processed in a manner which ensures appropriate security of the data.

2.2 "Personal data" means recorded information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, expressions of opinion about you or indications as to our intentions about you. "Processing" means doing anything with the data, such as accessing, disclosing, destroying or using the data in any way.

### **3. FAIR AND LAWFUL PROCESSING**

3.1 We will usually only process your personal data where the processing is necessary for your contract of employment or to comply with our legal obligations. In other cases, processing may be necessary for the protection of your vital interests, for our legitimate interests, or the legitimate interests of others or where you have given your consent. The full list of conditions is set out in the UK GDPR.

3.2 We will only process “special category data” about racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sex life, sexual orientation, biometric or genetic data and personal data relating to criminal proceedings or convictions, where a further condition is also met. Usually this will mean that the processing is legally required for employment purposes or that you have given your explicit consent. The full list of conditions is set out in the UK GDPR.

### **4. WHAT TYPES OF PERSONAL DATA DO WE COLLECT ABOUT YOU**

Salford Primary Care Together CIC collects and processes a range of personal information about you. This may include:

- (a) Your contact details including name, address, telephone number and email address.
- (b) Emergency contact details and next of kin.
- (c) Date of birth and national insurance number.
- (d) Your gender, marital status and dependants.
- (e) Right to work in the UK and passport.
- (f) Recruitment records, application form and covering letter, CV, interview notes, references, qualification certificates, any professional memberships, any background checks, termination letters and interview notes including exit interviews.
- (g) Details of skills, qualifications, experience and work history.
- (h) Salary, entitlement to any benefits, pension information, HMRC information and bank account details.
- (i) Any disciplinary, complaints, grievance and capability records.
- (j) Any information relating to appraisals including information at meetings.
- (k) Information about your use of IT systems, including use of telephone and email and any recording we make.
- (l) Photographs.
- (m) Video recordings in our building and in our vehicles
- (n) Health including medical conditions, disabilities, sickness absence records, medical reports and related records.
- (o) Racial or ethnic origin, religious or similar beliefs and sexual orientation.
- (p) Criminal proceedings or convictions.
- (q) Bank account details.

- (r) Driving licence and car insurance details.
- (s) Professional indemnity insurance cover.
- (t) Information from surveys, promotions or competitions.

## **5. HOW DO WE COLLECT YOUR PERSONAL DATA**

We collect personal data in a variety of ways. It is collected during the recruitment process, either directly from you or sometimes from a third party, such as an employment agency, former employer, background check providers, credit reference agencies and from the DBS. We also collect information throughout the period of your working relationship with us. This may be collected during your work-related activities. Some of the information you provide will be a statutory requirement and others contractual. We will inform you whether you are required to provide certain personal information statutory or contractually or whether you have a choice.

## **6. HOW DO WE USE YOUR PERSONAL DATA**

6.1 We will process data about staff for legal, contractual, personnel, administrative and management purposes and to enable us to meet our legal obligations as an employer, for example to pay you, monitor your performance and to confer benefits in connection with your employment. We will also process data where it is necessary for our legitimate interest such as training, profiling staff and advising staff of benefits from third parties. We may also use your data where it is necessary to protect your vital interests. This processing may include:

- (a) To maintain accurate records and contact details.
- (b) Assessing suitability for employment, promotion, conferring benefits and pay reviews.
- (c) Complying with statutory and contractual requirements.
- (d) Maintaining records of employment, grievance, complaints, disciplinary, performance, appraisal, training, career and professional development and needs.
- (e) Operating staff schedules, leave, sickness absences, workforce management, maternity leave, paternity leave, adoption leave and any other unpaid leave.
- (f) Payment to you of any entitlements and payment to any third party such as HMRC or a pension provider.
- (g) Reviewing sick leave or fitness to work.
- (h) Preventing fraud.
- (i) Monitoring use of IT systems.
- (j) Ensuring effectiveness of HR policies, data protection policies, business administration and other business policies and procedures.
- (k) Establishing or defending complaints and legal claims.
- (l) To fulfil laws which apply to us and any third parties we work with.
- (m) For statistical research and analysis and to enable us to monitor and improve services.

- (n) To monitor how we are meeting our performance standards.
- (o) Managing our relationships with you and third parties who assist us to provide the services or information to you.
- (p) Circulating your image and contact details to other staff members so that they can recognise and get to know you.
- (q) Promoting our staff and services of the organisation to members of the public, on our website and in any marketing campaigns.

6.2 We may process special category data relating to staff including, as appropriate:

- (a) information about an employee's physical or mental health or condition to monitor sick leave and take decisions as to the employee's fitness for work.
- (b) the employee's racial or ethnic origin or religious or similar information to monitor compliance with equal opportunities legislation.
- (c) to comply with legal requirements and obligations to third parties.
- (d) The above is not a restrictive list and we may process all the special category data set out in clause 3.2 above.

## **7. WHO WILL SEE YOUR PERSONAL DATA**

7.1 Your personal data may be shared internally within Salford Primary Care Together CIC including members of HR, payroll department, management and IT where your personal data is necessary for the performance of their roles. It may also be shared with the wider work force where this is necessary for our legitimate interest.

7.2 Salford Primary Care Together CIC may also share your personal data with third parties which may include:

- (a) External organisations for conducting pre-employment reference and background checks.
- (b) Payroll providers.
- (c) Benefits providers such as insurance and pensions.
- (d) Occupational health providers.
- (e) External IT support.
- (f) Auditors, accountants, lawyers and other professional providers.
- (g) HMRC and other government bodies.
- (h) To regulators or other bodies e.g. NHS Trusts and other health care bodies.
- (i) DBS checking agencies.
- (j) If we merge or restructure organisation.
- (k) With regulators or to comply with any legal obligation.

- (l) To any organisation requesting a reference when you have applied for a position with the organisation or to join the organisation in some capacity.
- (m) When you request, we supply personal data to another party you wish to supply services or products to you.
- (n) Where we use other companies to provide services on our behalf for training, processing, mailing, delivering, answering questions about services, sending mail and emails, data analysis, assessment and profiling or processing credit/debit card payments.
- (o) with our subsidiaries, affiliates or associated organisations or companies
- (p) When you join or take part in any social media platforms managed by us.
- (q) When we have a contract with another organisation to provide our services jointly with them.
- (r) Other members of staff.
- (s) Members of the public when promoting our staff and services in marketing campaigns and on our website.

## **8. PROTECTING YOUR PERSONAL DATA**

8.1 We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

8.2 We have in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction. We will only transfer personal data to a third party if they agree to comply with those procedures and policies, or if they put in place adequate measures themselves.

8.3 Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of the personal data.

## **9. DATA RETENTION**

9.1 We will retain your personal data for as long as is necessary to fulfil the purposes for which it was collected and processed including satisfying any legal, tax, health and safety, reporting or accounting requirements.

9.2 We will generally retain your data for the duration of your employment or contract with us and for a period of 7 after termination of your employment or contract. This is subject to any minimum statutory or other legal requirement.

9.3 Personal data which is no longer retained will be securely and effectively destroyed.

## **10. PROCESSING IN LINE WITH YOUR RIGHTS**

10.1 You have the right to:

- (a) Request access to any personal data we hold about you.
- (b) Ask to have inaccurate data held about you amended.
- (c) Request the erasure of your personal data – this enable you to ask us to delete or remove your personal data where there is no compelling reason for its continued processing.
- (d) Request us to restrict the processing of your personal data.
- (e) Object to the processing of your personal data.
- (f) Request data portability – this is a request to transfer personal data to a third party so it can be reused.
- (g) Request a review of automatic decision making – we do not envisage that any employment decisions will be taken solely on automated decision making. However, we will notify you is this position changes.

10.2 If you wish to know what personal data, we hold about you, you must make the request in writing to your Line Manager. All such written requests should be forwarded to the Senior Management Team.

10.3 If you are not satisfied with the way in which we deal with your request you can contact the Information Commissioners Office on 0303 123 1113 or at their website [www.ico.org.uk](http://www.ico.org.uk)

## **11. TRANSFERRING DATA OUTSIDE THE EEA**

All the personal data is processed in the UK however for IT hosting and maintenance your information may be situated outside the European Economic Area (EEA).

## **12. CHANGES TO THIS PRIVACY NOTICE**

Salford Primary Care Together CIC reserves the right to update or amend this privacy notice at any time, including where Salford Primary Care Together CIC intends to further process your personal data for a purpose other than that for which the personal data was collected or where we intend to process new types of personal data. We will issue you with a new privacy notice when we make significant updates or amendments.

## **13. CONTACT**

13.1 If you have any questions about this privacy notice or how we handle your personal data please contact

Julie Parr

Salford Primary Care Together,

3<sup>rd</sup> Floor, 2 City Approach,

Albert Street,

M30 0BL

[gmicb-sal.spcthr@nhs.net](mailto:gmicb-sal.spcthr@nhs.net)

13.2 If you consider that the data protection principles have not been followed in respect of personal data about yourself or others you should raise the matter with your line manager or contact

Julie Parr

Salford Primary Care Together,

3<sup>rd</sup> Floor, 2 City Approach,

Albert Street,

M30 0BL

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