PCIG Consulting Template

Employee Privacy Notice

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This template is for use by Practices to Comply with the UKGDPR requirement to display a Privacy Notice regarding processing of patient data. The template is Generic in design as PCIG Consulting have clients across the UK, local sharing arrangements and area specific sharing or processing will need to be added by the Practice.

Harbury Surgery

Data Protection Privacy Notice for Staff

Introduction:

This privacy notice lets you know what happens to any personal data that you give to us, or any that we may collect from or about you.

This privacy notice applies to personal information processed by or on behalf of Harbury Surgery.

This Notice explains

- Who we are, how we use your information and our Data Protection Officer
- What kinds of personal information about you do we process?
- What are the legal grounds for our processing of your personal information (including when we share it with others)?
- What should you do if your personal information changes?
- For how long your personal information is retained by us?
- What are your rights under data protection laws?
- Enable monitoring of staff vaccination status

The UK General Data Protection Regulation (UKGDPR) became law on 24th May 2016. This is a regulation on the protection of confidential and sensitive information. It entered into force in the UK on the 25th of May 2018, repealing the Data Protection Act (1998) with the new Data Protection Act 2018 supplementing it.

For the purpose of applicable data protection legislation (including but not limited to the UK General Data Protection Regulation (Regulation (UK) 2016/679) (the "UKGDPR"), and the Data Protection Act 2018 (DPA2018) the organisation responsible for your personal data is [practice Name].

This Notice describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights

This Privacy Policy applies to the personal data of our Employees.

How we use your information and the law.

Harbury Surgery will be what's known as the 'Controller' of the personal data you provide to us.

Upon commencement of employment with the company you will be asked to supply the following personal information:

Name, address, telephone numbers, email address, date of birth, national insurance number, bank details, emergency contact information and health information.

The information that we ask you to provide to the company is required by the business for the following reasons:

- In order for us to pay your salary
- In order for us to contact you out of hours if required
- To provide you with company information via email and post if required
- To have the ability to contact your emergency contacts if necessary
- To ensure we are able to inform the emergency services if your health is compromised
- To ensure that we can provide any reasonable adjustments as necessary
- To comply with payroll, auto-enrolment and RTI responsibilities.

We ask that you provide ID for copying to comply with our responsibilities as an employer under section 8 of the Asylum and Immigration Act 1996.

Throughout your employment we will collect data and add to your personnel file i.e. appraisal paperwork, communications, absence information and changes to personnel data.

How do we lawfully use your data?

We need to know your personal, sensitive and confidential data in order to Employ you, under the General Data Protection Regulation we will be lawfully using your information in accordance with: -

- *Article 6, (b) Necessary for performance of/entering into contract with you*
- *Article 9(2) (b) Necessary for controller to fulfil employment rights or obligations in employment.*

This Privacy Notice applies to the personal data of our employees and the data you have given us about your carers/family members.

How do we maintain the confidentiality of your records?

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- Data Protection Act 2018
- The UK General Data Protection Regulations 2016
- Human Rights Act 1998
- Common Law Duty of Confidentiality
- NHS Codes of Confidentiality, Information Security and Records Management

We will only ever use or pass on information about you if others who have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances (i.e., life or death situations), where the law requires information to be passed on.

Our policy is to respect the privacy of our staff and to maintain compliance with the UK General Data Protection Regulations (UKGDPR) and all UK specific Data Protection Requirements. Our policy is to ensure all personal data related to our staff will be protected.

All employees and sub-contractors engaged by [practice Name] are asked to sign a confidentiality agreement. [practice Name] will, if required, sign a separate confidentiality agreement if the client deems it necessary. If a sub-contractor acts as a data processor for [practice Name] an appropriate contract (art 24-28) will be established for the processing of your information.

In Certain circumstances you may have the right to withdraw your consent to the processing of data. Please contact the Data Protection Officer in writing if you wish to withdraw your consent. If some circumstances we may need to store your data after your consent has been withdrawn to comply with a legislative requirement.

Where do we store your information Electronically?

All the personal data we process is processed by our staff in the UK however for the purposes of IT hosting and maintenance this information may be located on servers within the European Union.

No 3rd parties have access to your personal data unless the law allows them to do so and appropriate safeguards have been put in place. We have a Data Protection regime in place to oversee the effective and secure processing of your personal and or special category (sensitive, confidential) data.

Who are our partner organisations?

We may also have to share your information, subject to strict agreements on how it will be used, with the following organisations;

- NHS Commissioning Support Units
- Integrated Care Boards
- NHS England (NHSE) and Department of Health
- Local Authorities
- CQC
- Private Sector Providers providing employment services
- Other 'data processors' which you will be informed of

You will be informed who your data will be shared with and in some cases asked for consent for this happen when this is required.

We may also use external companies to process personal information, such as for archiving purposes. These companies are bound by contractual agreements to ensure information is kept confidential and secure. All employees and sub-contractors engaged by [practice Name] are asked to sign a confidentiality agreement. If a sub-contractor acts as a data processor for [practice Name] an appropriate contract (art 24-28) will be established for the processing of your information.

How long will we store your information?

We are required under UK tax law to keep your information and data for the full retention periods as specified by the UK Employment legislation.

Employee personnel files will be stored for a period of seven years for the purpose of any legal claims. Other files we may need to keep longer the full retention schedule of NHS employee data can be found here:- https://transform.england.nhs.uk/information-governance/guidance/records-management-code/

How can you access, amend move the personal data that you have given to us?

Even if we already hold your personal data, you still have various rights in relation to it. To get in touch about these, please contact us. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Right to object: If we are using your data because we deem it necessary for our legitimate interests to do so, and you do not agree, you have the right to object. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases). Generally, we will only disagree with you if certain limited conditions apply.

Right to withdraw consent: Where we have obtained your consent to process your personal data for certain activities (for example for a research project), or consent to market to you, you may withdraw your consent at any time.

Right to erasure: In certain situations (for example, where we have processed your data unlawfully), you have the right to request us to "erase" your personal data. We will respond to your request within 30 days (although we may be allowed to extend this period in certain cases) and will only disagree with you if certain limited conditions apply. If we do agree to your request, we will delete your data but will generally assume that you would prefer us to keep a note of your name on our register of individuals who would prefer not to be contacted. That way, we will minimise the chances of you being contacted in the future where your data are collected in unconnected circumstances. If you would prefer us not to do this, you are free to say so.

Right of data portability: If you wish, you have the right to transfer your data from us to another data controller.

Access to your personal information

Data Subject Access Requests (DSAR): You have a right under the Data Protection legislation to request access to view or to obtain copies of what information this organisation holds about you and to have it amended should it be inaccurate. To request this, you need to do the following:

- Your request should be made in writing to the Harbury Surgery
- There is no charge to have a copy of the information held about you
- We are required to respond to you within one month

What should you do if your personal information changes?

You should tell us so that we can update our records please contact the Head of Support Services as soon as any of your details change, this is especially important for changes or address or contact details (such as your mobile phone number), Harbury Surgery will from time to time ask you to confirm that the information we currently hold is accurate and up-to-date.

Objections / Complaints

The Introduction of the Data Use and Access Act 2025 has created a new, mandatory statutory complaints-handling framework for GP Practices which takes effect on June 19th, 2026.

This gives individuals the right to complain directly to the practice and requires the practice to acknowledge complaints within 30 days and respond without undue delay.
Should you have any concerns about how your information is managed at the GP, please contact the Practice at practice.manager@harburysurgery.nhs.uk The practice has a specific Data Protection Complaints Policy which can be provided upon request.

If you are still unhappy following a review by the GP practice, you have a right to lodge a complaint with a supervisory authority: You have a right to complain to the UK supervisory Authority as below.

Information Commissioner:

Wycliffe house

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 01625 545745

https://ico.org.uk/

If you are happy for your data to be used for the purposes described in this privacy notice, then you do not need to do anything. If you have any concerns about how your data is shared, then please contact the Practice Data Protection Officer.

If you would like to know more about your rights in respect of the personal data we hold about you, please contact the Data Protection Officer as below.

Data Protection Officer:

The Practice Data Protection Officer is Paul Couldrey of PCIG Consulting Limited. Any queries regarding Data Protection issues should be addressed to him at: -

Email: info@pcdc.org.uk

Postal: PCIG Consulting Limited

7 Westacre Drive

Quarry Bank

Dudley

West Midlands

DY5 2EE

Changes:

It is important to point out that we may amend this Privacy Notice from time to time. If you are dissatisfied with any aspect of our Privacy Notice, please contact the Data Protection Officer.