



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

### **Privacy Notice**

Tower Hamlets GP Care Group (THGPCG) is a registered data controller with the Information Commissioner's Office (ICO) as part of the Data Protection Act 2018. We're committed to collecting, storing and processing personal information in line with UK Data Protection Law and the General Data Protection Regulation (GDPR).

THGPCG will keep your records as defined within the Records Management Policy.

For the purposes of this privacy notice, the term 'staff' includes:

- Applicants
- Employees
- Workers, including agency, casual and contracted staff
- Volunteers
- Trainees
- Apprentices
- Work experience placements

We will notify you if we make any substantial changes to this privacy notice. From time to time, we may also let you know about the processing of your personal information in other ways.

### **How your information will be used, and the types of information we collect**

As your employer, we need 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 Tower Hamlets GP Care Group (THGCG) 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.

The personal information we collect about you may also be used for:

- for crime prevention and prosecution of offenders
- sharing and matching of personal information for national fraud initiatives
- to monitor your use of information and communication systems to ensure compliance with IT policies and running of day to day tasks (in case of absenteeism, maternity leave, or any other form of leave), this also includes accessing NHSmail and office 365 by the Systems Administrator
- when dealing with legal disputes involving you or other employees, workers and contractors, including accidents at work
- when gathering evidence for possible grievance or disciplinary hearings



As a large business pursuing healthcare activity, 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.

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.

The type 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.

You will, of course, inevitably be referred to in many documents and records that are produced in the course of carrying out your duties and the business of the surgery.

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.

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.

In addition to information relating to your health, THGPCG may also collect and process information relating to coronavirus (COVID-19) self-isolation status, to help with workforce planning and ensure continuity of services.

The lawful basis will be GDPR Article 6(1)(e), that processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority (the provision of statutory health care services).

The exemptions in GDPR Article 9(1)(g) and 9(2)(h) will be applied, that processing is necessary for matters of substantial public interest or for the management of health care systems. The conditions in paragraphs 2 (management of health care systems) and 3 (public health) are engaged.

Other than as mentioned above, 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 Clinical Commissioning Groups.

Your personal data will be stored for a period of seven years after you have left the THGPCG.



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**

Under the General Data Protection Regulations (GDPR) and The Data Protection Act 2018 (DPA) you have some rights regarding 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.

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 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 regarding your personal data.

If you have any concerns as to how your data is processed, you can contact our Data Protection Officer: Umar Sabat, Data Protection Officer, [umar.sabat@ig-health.co.uk](mailto:umar.sabat@ig-health.co.uk)