

Privacy Notice – Video Recordings for Staff

This privacy notice outlines the conditions of use for employees to record virtual meetings via Teams which are later downloaded and stored on Microsoft Stream (both are Microsoft Office 365 platforms). These recordings may serve the purposes for:

- Staff briefings, and;
- One to one meetings and appraisals

These platforms and recordings are undertaken via a secure system and meets all NHS requirements and guidelines and are protected through the THGPCG Data Protection policies. Access to these recordings are only available by authorised personnel – those are who attended the meeting, as well as the IT Administration Team. These recordings will not usually be shared outside these individuals. However, the appraisal documents will be shared with the Human Resources department. If we hold recordings that have not been deleted, you can ask for copies by putting a request to the Data Controller.

We are required by Articles in the General Data Protection Regulations to provide you with the information in the following subsections.

Contact details:

- Data Controller Information Governance: Hamsa Hassan, Tower Hamlets GP Care Group, Tel: 020 3961 8563, email: hamsa.hassan@nhs.net
- Data Protection Officer: Umar Sabat, IG-Health, Tel: 07894 826 037, email: umar.sabat@ig-health.co.uk

Purpose of the processing:

To facilitate with virtual meetings, give the current nature of changing work dynamics underpinned by Covid-19.

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Lawful basis for processing:

The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions of the GDPR:

Article 6(1)(b) “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;”

We will also recognise your rights established under UK case law collectively known as the “Common Law Duty of Confidentiality”

Recipient or categories of recipients of the processed data

THGPCG collects, stores and processes personal information of current staff to ensure compliance with legal or industry requirements. These in virtual meetings are, names and email addresses.

The actual recordings are recorded via Teams and then stored on Microsoft Stream and after a designated period of time will be either deleted or saved, onto the organisations Shared Drive if it is deemed necessary. You will be informed if the recording is to be stored for longer than is set out in this Privacy Notice and you will be advised as to the reasons for the extended storage.

We don't intend to share your information or the recordings outside of the organisation without your permission, however, there are some circumstances where we must or can share information about you with the following organisations without your consent:

- Disciplinary/investigation processes, including referrals to professional bodies, e.g. the Nursing and Midwifery Council and the General Medical Council
- Legislative and/or statutory requirements
- Court orders which may have been imposed on us
- NHS counter-fraud requirements
- Requests for information from the police and other law enforcement agencies for the prevention and detection of crime, and/or fraud if the crime is of a serious nature

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Your rights

If we need to use your information for any reasons beyond those stated above, we will discuss this with you and ask for your explicit consent. The Data Protection Act 2018 gives you certain rights, including the right to:

- request to access the personal data we hold about you, e.g. personnel records (see "How to access your personal data" below)
- request the correction of inaccurate or incomplete information recorded in our records, subject to certain safeguards
- request that your information be deleted or removed where there is no need for us to continue processing it and where the retention time has passed
- ask us to restrict the use of your information where appropriate
- in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, to withdraw your consent for that specific processing at any time
- challenge any decisions made without human intervention (automated decision making)

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Retention period

We have a duty to:

- maintain records about you in accordance with retention guidelines
- keep records about you confidential and secure
- provide information in a format that is accessible to you

We will keep recordings in line with NHS' Records Management Schedule and are as such:

- Your employee records will be destroyed 6 years after you leave or your 75th birthday, whichever is sooner, if a summary has been made.

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Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Right to complain

You have the right to complain to the Information Commissioner's Office, you can use this link <https://ico.org.uk/global/contact-us/> or calling their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate). There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)

Changes to this privacy notice

We reserve the right to update this privacy notice at any time. We will notify you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.