

Employee Privacy Notice

During the course of its employment activities, NHS Herefordshire Clinical Commissioning Group (CCG) collects, stores and processes personal information about prospective, current and former staff.

This Privacy Notice includes applicants, employees (and former employees), workers (including agency, casual and contracted staff), volunteers, trainees and those carrying out work experience.

We recognise the need to treat staff personal and sensitive data in a fair and lawful manner. No personal information held by us will be processed unless the requirements for fair and lawful processing can be met.

What types of personal data do we handle?

In order to carry out our activities and obligations as an employer we handle data in relation to:

- Personal demographics (including gender, race, ethnicity, sexual orientation, religion)
- Contact details such as names, addresses, telephone numbers and Emergency contact(s)
- Employment records (including professional membership, references and proof of eligibility to work in the UK and security checks)
- Bank details
- Pension details
- Medical information including physical health or mental condition (occupational health information)
- Information relating to health and safety
- Trade union membership
- Offences (including alleged offences), criminal proceedings, outcomes and sentences
- Employment Tribunal applications, complaints, accidents, and incident details

Our staff are trained to handle your information correctly and protect your confidentiality and privacy.

We aim to maintain high standards, adopt best practice for our record keeping and regularly check and report on how we are doing. Your information is never collected or sold for direct marketing purposes.

Your information may be processed overseas.

What is the purpose of processing data?

- Staff administration and management (including payroll, performance and monitoring)
- Pensions administration
- Business management and planning
- Accounting and Auditing
- Accounts and records
- Crime prevention and prosecution of offenders
- Education
- Health administration and services
- Information and databank administration
- Sharing and matching of personal information for national fraud initiative

We have a legal basis to process this as part of your contract of employment (either permanent or temporary) or as part of our recruitment processes following data protection and employment legislation.

Sharing your information

There are a number of reasons why we share information. This can be due to:

- Our obligations to comply with legislation
- Our duty to comply any Court Orders which may be imposed

Any disclosures of personal data are always made on case-by-case basis, using the minimum personal data necessary for the specific purpose and circumstances and with the appropriate security controls in place. Information is only shared with those agencies and bodies who have a "need to know" or where you have consented to the disclosure of your personal data to such persons.

Hereford CCG will be merging with the three Worcestershire CCGs from April 2020, accordingly as part of the merging process, staff data identified above may be shared in order to prepare for the forming of a merged organisation. An appropriate Data Sharing Agreement has been signed by the Senior Information Risk Owner to authorise the sharing of staff data when required as part of the merger process. Further details can be found by contacting Business Support.

Use of Third Party Companies

To enable effective staff administration NHS Herefordshire CCG may share your information with external companies to process your data on our behalf in order to comply with our obligations as an employer.

Employee Records; Contracts Administration (NHS Business Services Authority)

The information which you provide during the course of your employment (including the recruitment process) will be shared with the NHS Business Services Authority for maintaining your employment records, held on the national NHS Electronic Staff Record (ESR) system.

How long do we keep your information

We hold data securely in line with the Records Management Code of Practice for Health and Social Care 2016 <https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/codes-of-practice-for-handling-information-in-health-and-care/records-management-code-of-practice-for-health-and-social-care-2016>

Prevention and Detection of Crime and Fraud

We may use the information we hold about you to detect and prevent crime or fraud. We may also share this information with other bodies that inspect and manage public funds.

We will not routinely disclose any information about you without your express permission. However, there are circumstances where we must or can share information about you owing to a legal/statutory obligation.

National Fraud Initiative Privacy Notice

NHS Herefordshire CCG is required [by law] to protect the public funds it administers. It may share information provided to it with other bodies responsible for; auditing, or administering public funds, or where undertaking a public function, in order to prevent and detect fraud.

The Cabinet Office is responsible for carrying out data matching exercises.

Data matching involves comparing computer records held by one body against other computer records held by the same or another body to see how far they match. This is usually personal information. Computerised data matching allows potentially fraudulent claims and payments to be identified. Where a match is found it may indicate that there is an inconsistency which requires further investigation. No assumption can be made as to whether there is fraud, error or other explanation until an investigation is carried out.

We participate in the Cabinet Office's National Fraud Initiative: a data matching exercise to assist in the prevention and detection of fraud. We are required to provide particular sets of data to the Minister for the Cabinet Office for matching for each exercise, as detailed [here](#).

Staff personal data such as contact details may be provided to bodies responsible for auditing, administering public funds or where undertaking a public function for the purposes of preventing and detecting fraud. This is done in line with the Cabinet Office's National Fraud Initiative, a data matching exercise that is carried out with statutory authority under Part 6 of the Local Audit and Accountability Act 2014.

Data matching by the Cabinet Office is subject to a [Code of Practice](#).

View further information on the [Cabinet Office's legal powers and the reasons why it matches particular information](#). For further information on data matching at NHS Herefordshire CCG contact:

Fiona Dwyer

Counter Fraud Specialist

Email: Fiona.dwyer@cwaudit.org.uk

Telephone: 07552 290964

Individuals Rights

Data Protection laws gives individuals rights in respect of the personal information that we hold about you. These are:

1. To be informed why, where and how we use your information.
2. To ask for access to your information.
3. To ask for your information to be corrected if it is inaccurate or incomplete.
4. To ask for your information to be deleted or removed where there is no need for us to continue processing it.
5. To ask us to restrict the use of your information.
6. To ask us to copy or transfer your information from one IT system to another in a safe and secure way, without impacting the quality of the information.
7. To object to how your information is used.
8. To challenge any decisions made without human intervention (automated decision making)

Please visit our [website](#) for further details on this.

Requesting Access to your Personal Data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact Hayley Gidman, Data Protection Officer.

Should you have any further queries on the uses of your information, please speak to the IG Team or our Data Protection Officer – Hayley Gidman on mlcsu.dpo@nhs.net.

Should you wish to lodge a complaint about the use of your information, please contact the IG team on mlcsu.ig@nhs.net.

If you are still unhappy with the outcome of your enquiry you can write to: The Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF - Telephone: 01625 545700.