

Employees and Contractors Privacy notice

We are Malmesbury Primary Care Centre, a provider of Primary Care services.

This privacy notice explains how we use any personal data we collect about you as an employee of Malmesbury Primary Care Centre or an individual contractor providing a service for the PCN.

Malmesbury Primary Care Centre is a Data Controller for the information processed by us unless otherwise stated and is registered as such with the UK Information Commissioners Office under registration number Z6710345.

How do we collect your personal data?

We may collect your personal data in a number of ways, for example:

- When you register with our recruitment website
- When you apply for a vacancy and submit an application form
- When we ask you to complete new starter forms when you accept an offer of employment from us
- When we collect data through the implementation of any HR process
- When we collect information through the delivery of an inoculation process
- When you complete staff surveys
- When we receive your personal data from third parties, for example security screening and recruitment agencies

What types of personal data do we collect about you?

We may collect the following types of personal data:

- Your name, job title, address, email address, telephone number and other contact information that allows us to meet our organisational and statutory obligations to you as your employer
- NI Number, date of birth and medical history
- Details of family members and next of kin details
- Pay and bank details
- Details of benefits or allowances you receive such as your pension
- Right to work documentation and other security screening information
- Equality and diversity information
- Video and audio footage from CCTV cameras installed at Malmesbury Primary Care Centre.

How will we use the personal data we collect about you?

We may use your personal data in the following ways:

- To ensure that the information we hold about you is kept up to date
- To facilitate the correct payment of salary and any applicable benefit or allowance
- To set up and provide IT system access accounts
- To deal with any employee/employers related dispute that may arise
- To prevent and detect fraud and other crime
- To comply with contractual and legal obligations
- To facilitate background checks (DBS)

- To deliver inoculations when required

Any medical or health related personal data will be treated with confidence in line with the Common Law Duty of Confidence.

CCTV

CCTV is captured to help us ensure the safety and security of our staff and members of the public.

CCTV is managed in the same way as all other personal data processed by us and in line with current legislation.

Call recording

All calls made from and received by Malmesbury Primary Care Centre are recorded and may be used to support the learning and development of our staff. They may also be used when reviewing incidents, compliments or complaints.

Call recordings are managed in the same way as all other personal data processed by us and in line with current legislation.

Data processors

We may use the services of a data processor to assist us with some of our data processing, but this is done under a contract with direct instruction from us that controls how they will handle employee information and ensures they treat any information in line with the General Data Protection Regulation, confidentiality, privacy law, and any other laws that apply.

How will we share your personal information?

If your role requires a standard or enhanced DBS check, we will share your personal data entered on the DBS form with the Disclosure and Barring Service.

Further details on how the DBS will process your personal data are available here:

<https://www.gov.uk/government/publications/dbs-privacy-policies>

We will not share your information with third parties without your consent unless the law allows or requires us to.

How long do we keep your personal data

We will hold your personal data for 6 years after you leave the employment of Malmesbury Primary Care Centre

Legal Basis

The processing of your personal data is required in order that we can fulfil our obligations under the contract of employment between Malmesbury Primary Care Centre and yourself.

We will use your sensitive personal information, such as that relating to your race, ethnic origin, and health for the purposes of the performance or exercise of our or your rights and obligations under employment law or where the processing is necessary for the purpose of preventative medicine or an assessment of your fitness for work.

It is in our, yours and the public's legitimate interests to ensure the safety and security of our staff and members of the public. The processing of your personal data from the dash cam footage is necessary for this purpose.

In some circumstances, we may process your personal information on the basis that:

- we are required to do so in order to comply with legal obligations to which we are subject;
- in the establishment, exercise or defence of a legal claim;
or
- you have given us your explicit consent to do so

Your rights

You have a right to:

- access the information we hold about you;
- correct inaccuracies in the information we hold about you;
- withdraw any consent you have given to the use of your information;
- complain to the relevant supervisory authority in any jurisdiction about our use of your information; and
- in some circumstances:
 - ask us to erase information we hold about you;
 - request a copy of your personal data in an electronic format and require us to provide this information to a third party;
 - ask us to restrict the use of information we hold about you; and
 - object to the use of information we hold about you.

You can exercise these rights by contacting us as detailed below.

How to contact us

If you have any questions about our privacy notice, the personal information we hold about you, or our use of your personal information then please contact our Data Protection Officer at:

Data Protection Officer
Malmesbury Primary Care Centre
Priory Way
Malmesbury
Wiltshire
SN16 0FB

Or

info.ghs@nhs.net

How to make a complaint

You also have the right to raise any concerns about how your personal data is being processed by us with the Information Commissioners Office (ICO):

<https://ico.org.uk/concerns>

0303 123 1113

Changes to our privacy notice

We keep our privacy notice under regular review and we inform you of any updates. This privacy notice was last updated on 22nd August 2024.