# **Employees Privacy Notice**

We are **Hillcrest Surgery**, well-established GP Surgery. Our General Practitioners and allied healthcare professionals provide primary medical care services to our practice population and are supported by our administrative and managerial team in providing care for patients.

This privacy notice explains how we as a data controller use any personal data we collect about you as an employee of **Hillcrest Surgery** or someone working on behalf of **Hillcrest Surgery** such as a Locum.

# How do we collect your personal data?

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

- When you register with a recruitment website while applying for a role within the practice
- 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 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
- Call recordings [JR1]
- CCTV footage[JR2]

### 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 both the Common Law Duty of Confidence and applicable data protection legislation.

# Call recording [JR3]

All calls made from and received by **Hillcrest Surgery** 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.

# CCTV footage[JR4]

We use Close Circuit Television (CCTV) to record images within public areas of the practice for the safety and security of our patients and staff.

CCTV footage is 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 that controls how they will handle employee information and ensures that they treat any information in accordance with the any applicable data protection legislation, confidentiality, privacy law, and any other laws that apply.

We will share your information with Clarity Informatics Ltd who provide the Agilio TeamNet service we use to manage back office tasks such as HR management and communication with the ICB and other organisations.

We use the Lantum system to allow Locums to request and book shifts. When you register to use Lantum, you will be presented with both Lantums Terms and Conditions and Privacy Policy. Lantum will also capture your explicit consent to process your special categories of data such as DBS information and immunisation records.

Further details about how Lantum will process your personal data can be found on their privacy notice here:

https://lantum.com/wp-content/uploads/2019/06/Lantum-Privacy-Policy-12 03 19.pdf

### 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 other third parties without your consent unless the law allows or requires us to.

# How long do we keep your personal data

We will retain the personal data contained in your employee record for six years after you leave the employment of **Hillcrest Surgery**. After which it will be summarised, the full record confidentially destroyed and the summary kept until your 75<sup>th</sup> birthday. This is in line with the NHS X Records Management Code of Practice 2021.

# **Legal Basis**

The processing of your personal data is required in order that we can fulfil our obligations under the contract of employment between **Hillcrest Surgery** 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 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 CCTV footage is necessary for this purpose. [JR7]

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

# COVID-19 Lateral Flow Testing [LN8]

As a provider of front-line patient facing services, we offered COVID-19 lateral flow tests to all applicable staff.

We used your personal information in the following ways:

- To keep a record of all completed COVID-19 lateral flow tests
- To enable us to investigate any incidents, complaints or compliments we may receive

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

Any reporting (such as the number of tests completed) will be completely anonymous.

The results of the test were not recorded on your employment record but we will retain a record of who has completed a COVID-19 lateral flow test, and this will be kept for 6 years after your last completed COVID-19 lateral flow test.

#### **COVID-19 Vaccination Status**

We are required by NHS England to record and share the COVID-19 vaccination status of all our staff.

We will process the following additional personal data:

NHS Number

The additional legal basis for processing your COVID-19 vaccination status are:

- Public task
- Health care
- Public interest in the area of public health

We will not record the results of the test on your employment record but we will keep a separate record of COVID-19 vaccination status and this will be retained for 6 years from the time of the latest recorded COVID-19 vaccination.

# 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:
  - o ask us to erase information we hold about you;
  - o request a copy of your personal data in an electronic format and require us to provide this information to a third party;
  - o ask us to restrict the use of information we hold about you; and
  - o object to the use of information we hold about you.

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

#### **Data Protection Officer**

Our Data Protection Officer (DPO) function is provided by the HealthHero Integrated Care Data Protection Officer service.

#### 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 Team at:

#### **Data Protection Team**

### Bswicb.reception.hillcrest@nhs.net FAO management

All data protection queries will be initially dealt with by the practice data protection team and escalated to the HealthHero Integrated Care Data Protection Officer service if required.

### 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 will place any updates on this webpage.

This privacy notice was last updated on 08/09/2025