

## Employee Privacy / Transparency Notice

### Statement of Overarching Principles

All Policies, Procedures and Guidelines of Allied Health Professionals Suffolk (AHP Suffolk) are formulated to comply with the overarching requirements of legislation, policies or other standards related to equality and diversity.

### 1. Introduction

#### Allied Health Professionals Suffolk and **Your** Information

Allied Health Professionals Suffolk takes your privacy very seriously. The organisation collects and processes personal data relating to its employees to manage the employment relationship. The organisation is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations. We are registered with the Information Commissioner as a Data Controller and our registration number can be found by searching at <https://ico.org.uk/ESDWebPages/Search>.

If you have any questions or wish to make a request in relation to your information, please contact the Data Protection Officer at: [emma.cooper35@nhs.net](mailto:emma.cooper35@nhs.net).

Some of your personal information is transferred outside of the UK to EU Member States. This is permitted under GDPR under Article 49 (1) (d), because the transfer is necessary for the performance of your employment contract. We ensure that we have the necessary safeguards in place to protect your personal data when transferred.

### 2. How Does Allied Health Professionals Suffolk **Collect** my Information?

We will collect information about you, either directly – when you make an application for a job with us or via a recruitment agency - through CVs/resumes, application forms, interview assessments and during the course of your employment with us, or indirectly – through references, DBS checks, right to work checks, and occupational health referrals.

The information we collect will be stored on computer and electronic systems and in a locked filing cabinet. The information includes **Personal Data**;

- basic details about you, such as address, date of birth, personal phone number, personal email and next of kin
- banking and payment information, salaries, pension payments and other deductions from your pay

as well as **Sensitive Personal Data**, where it is relevant to your employment;

- notes and reports about your health and any disabilities
- information about your home life such as marital status
- Information about criminal records checks Allied Health Professionals Suffolk are permitted to collect, store, use and share this information, where necessary, under the UK General Data Protection Regulations Article 6 (1) (b) "for the purposes of a contract" and Article 9 (2) (b) "employment purposes" or their equivalent provisions under domestic legislation. In some cases, we process personal data because of a statutory requirement to do so.

Allied Health Professionals Suffolk will also collect information about you through observed routes such as monitoring of use of equipment, CCTV and telephone recording. These uses are generally in line with our 'legitimate interests' as an organisation and the use of information collected in this way will be in conjunction with support from our DPO to ensure that employee rights are properly observed.

### 3. How Does Allied Health Professionals Suffolk **Use** my Information?

Allied Health Professionals Suffolk will use your information for your employment in the following ways;

- To support the process of recruiting and onboarding you as a member of staff
- Maintaining and administering the employment relationship we have with you
- To pay you and to keep payroll records
- Administration of expenses and leave
- To deliver and maintain records on your training and professional development
- To support secondments or promotions
- To manage your performance
- To provide you with access to IT systems relevant to your role

To undertake some of these activities, your information will be shared internally across our teams. We will work to ensure that only the right people have your information and that they are only given the information they need.

### 4. Who Does Allied Health Professionals Suffolk **Share** My Information With?

Allied Health Professionals Suffolk works hard to ensure that only the right people have your information and that they are only given the information they need.

Allied Health Professionals Suffolk Uses other companies to help us deliver some of our services and manage the employment relationship such as;

AccuRx	Clinical system / software
Booked Scheduler	Scheduling system
Facebook	Social media platform
Infotex	IT and website support
Microsoft 365	Data hosting and office tools
MJOG	Texting and messaging
NHS Mail	Secure patient email service
Nodescape	IT provision
Norfolk and Suffolk NHS Foundation Trust (NSFT)	Hospital and data services provision
Olympus Digital Dictation Software	Digital dictation
Physitrack	Clinical system / software
SAGE Line 50/ Auto Entry	Accounting software
SAGE People	HR software
Survey Monkey	Mailshot and survey software
SystemOne	Clinical system
TrustID	Identify verification software
Twitter	Social media platform
WhatsApp	Social media platform
WordPress	Website development
Xero	Accounting software
Zoom	Video calling software

Personal data will never be made available to organisations not involved in your employment or contracted directly by us without letting you know and giving you a chance to object (aside from in the examples listed in the section below).



We have contracts in place with these organisations that prevent them from using it in any other way that how we tell them to. These contracts also require them to maintain good standards of security to ensure your confidentiality.

When we receive reference requests from prospective new employers for you, we will share information about your employment with us. This may include:

- Dates employed
- Job Title
- Any formal disciplinary actions (only required for certain positions in accordance with NHS guidelines)

## 5. Will Allied Health Professionals Suffolk **Share** without Asking Me?

Sometimes we will be required by law to share your information and will not always be able to discuss this with you directly.

Examples might be;

- Sharing with the police or tax authorities for the detection or prevention of crime
- Where it is in the wider public interest – to keep the public safe for example
- To safeguard children or vulnerable adults
- Because the court has told us we must share

## 6. What are my Information **Rights**?

Data protection law provides you with a number of rights that Allied Health Professionals Suffolk is committed to supporting you with;

### **Right to Access**

You have the right to obtain:

- confirmation that your information is being used, stored or shared by Allied Health Professionals Suffolk
- a copy of information held about you
- If you only require a particular part of your record, tell us and this can reduce the time it takes to provide it
- We will respond to your request within one month of receipt or will tell you when it might take longer.
- We are required to validate your identity including the identity of someone making a request on your behalf

### **Right to Object or Withdraw Consent**

We collect, use, store and share your information because we are permitted to by law; in order to manage the employment relationship, but you do have a right to object to us doing this.

When we collect, use, store or share your information based on your consent, you have a right to withdraw that consent at any time.

Our Data Protection Officer will be happy to speak with you about any concerns you have.

### **Right to Correction**

If information about you is incorrect, you are entitled to request that we correct it.

There may be occasions, where we are required by law to maintain the original information – our Data Protection Officer will talk to you about this and you may request that the information is not used during this time

We will respond to your request within one month of receipt or will tell you when it might take longer.

### **Right to Portability**

You can ask us to send your information to another organisation on your behalf if you wish.

### **Complaints**

You also have the right to make complaints and request investigations into the way your information is used. Please contact our Data Protection Officer or visit the link below for more information.

For more detailed information on your rights visit <https://ico.org.uk/for-the-public/>.

## **7. Does Allied Health Professionals Suffolk Use Profiling or Automated Decision Making?**

No Allied Health Professionals Suffolk does not undertake automatic profiling or automated decision making in relation to your employment information.

Our Data Protection Officer will be happy to speak to you about this if you have concerns or objections.

## **8. How Does Allied Health Professionals Suffolk Protect My Information?**

Allied Health Professionals Suffolk are committed to ensuring the security and confidentiality of your information.

There are a number of ways we do this;

- Staff receive regular training about protecting and using personal data



- Policies are in place for staff to follow and are regularly reviewed
- We check that only the minimum amount of data is shared or accessed
- We use controlled access to systems, this helps to ensure that the right people are accessing data – people with a 'need to know'
- We use encrypted emails and storage which would make it difficult for someone to 'intercept' your information
- We report and manage incidents to make sure we learn from them and improve
- We put in place contracts that require providers and suppliers to protect your data as well

## 9. How Long Does Allied Health Professionals Suffolk **Store** My Information?

Allied Health Professionals Suffolk will retain your CV / Application Form (external applications) for a 6-month period unless you are provided permission for us to retain it for future permissions.

When your employment relationship comes to an end we will either retain or securely destroy your personal data in accordance with the data retention policy or other applicable laws and regulations. Allied Health Professionals Suffolk will review your personnel record 6 years after you have left service. At this stage some items will be destroyed / summarised and then we will retain for according to the schedule below.

The National Archives provides guidelines around the retention periods for different records of the personnel file of employees.

Allied Health Professionals Suffolk will review your personnel record when you leave and 6 years after you have left service. At this stage some items will be destroyed / summarised and then we will retain for according to the schedule below

Some data will be destroyed after a short period from you leaving the Company e.g bank details.

Please refer to Appendix B of the Company's Records Management & Data Quality Protocol Policy for further information.



Record	Action at 6-year review	Next review and delete
Written particulars of employment and Contracts	Retain documents as part of summary	Aged 100
Job History - consolidated record of whole career and location details (paper or electronic)	Retain documents as part of summary	Aged 100
Current address details	Delete / Destroy	NA
Record of location of overseas service	Retain documents as part of summary	Aged 100
Variation of hours - calculation formula for individual	Delete / Destroy	NA
Promotion, temporary promotion and/or substitution documentation	Make summary note and delete / destroy associated documents	NA
Working Time Directive opt out forms	Delete / Destroy	NA
Record of previous service dates	Make summary note and delete / destroy associated documents	NA
Previous service supporting papers	Make summary note and delete / destroy associated documents	NA
Qualifications/references	Delete / Destroy	NA
Transfer documents (OGD E18)	Make summary note and delete / destroy associated documents	NA
Annual/Assessment reports or summary of performance marks where an open reporting system operates	Delete / Destroy	NA
Annual/Assessment reports for the last five years of service or summary of performance marks where an open reporting system operates	Retain documents as part of summary	Aged 100
Training history	Delete / Destroy	NA
Travel and subsistence - claims and authorisation	Delete / Destroy	NA

Annual leave records (dependent on departmental practice)	Delete / Destroy	NA
Job applications – internal	Delete / Destroy	NA
Recruitment, appointment and/or promotion board selection papers	Delete / Destroy	NA
Building society references	Delete / Destroy	NA
Health Declaration	Retain documents as part of summary	Aged 100
Health referrals, including: Medical reports from doctors and consultants	Retain documents as part of summary	Aged 100
Papers relating to any injury on duty	Retain documents as part of summary	Aged 100
Medical reports of those exposed to a substance hazardous to health	Retain documents as part of summary	Aged 100
Medical/Self Certificates – unrelated to industrial injury	Delete / Destroy	NA
Welfare papers	as long as it has been 6 years since last action - Delete / Destroy	NA
Security personnel files	Retain documents as part of summary	Aged 100
Death Benefit Nomination and Revocation Forms	Retain documents as part of summary	Aged 100
Death certificates (original)	Send back to Provider	NA
Death Certificates (copy)	Retain documents as part of summary	Aged 100
Decree Absolutives (original)	Send back to Provider	NA
Decree Absolutives (copy)	Retain documents as part of summary	Aged 100
Housing advance	as long as it has been repaid - Delete / destroy	NA
Marriage certificate and documentation relating to civil registration (original)	Send back to Provider	NA
Marriage certificate and documentation relating to civil registration (copy)	Retain documents as part of summary	Aged 100



Unpaid leave periods (such as maternity leave)	Retain documents as part of summary	Aged 100
Statutory maternity pay documents	Delete / Destroy	NA
Other maternity pay documentation	Delete / Destroy	NA
Overpayment documentation	as long as it has been repaid - Delete / destroy	NA
Personal payroll history, including record of pay	Retain documents as part of summary	Aged 100
Pensions estimates and awards	Retain documents as part of summary	Aged 100
Pension Information	Retain documents as part of summary	Aged 100
Resignation, termination and/or retirement letters	Retain documents as part of summary	Aged 100
Pension and Pay		
Added years (pension and pay)	Retain documents as part of summary	Aged 100
Additional Voluntary Contributions (AVC)	Retain documents as part of summary	Aged 100
Payroll input forms	Delete / Destroy	NA
Bonus nominations	Delete / Destroy	NA
Complete sick absence record showing dates and causes of sick leave	Retain documents as part of summary	Aged 72
Statutory Sick Pay (SSP) forms	Retain documents as part of summary	Aged 100
Papers relating to disciplinary action which has resulted in any changes to terms and conditions of service, salary, performance pay or allowances	Retain documents as part of summary	Aged 72
Authorisation for deputising, substitution allowance and/or overtime/travel time claim	Delete / Destroy	NA
Advances for: Season tickets Car parking Bicycles Christmas/holidays Housing	As long as it has been repaid - Delete / destroy	NA



**Document Control**

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**AGREED POLICY REVIEW / RATIFICATION / ADOPTION PATH:**

<p><b>Level 1:</b></p> <p>Information Governance Steering Group</p> <p>Date Agreed: 23/03/23</p>	
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