

## **ICB Employee Privacy Notice**

**The following privacy notice applies to all staff who work for NHS Coventry and Warwickshire Integrated Care Board (ICB), including employed staff, voluntary staff, and contractors.**

The ICB is committed to protecting your privacy and complying with the Data protection Act 2018 and General Data Protection Regulations (GDPR)

The following privacy notice sets out the basis by which we collect, use and disclose data relating to individuals we employ to work as, or are otherwise engaged to work as, part of the ICB's workforce. We do this for employment purposes, to assist in the running of the ICB and / or to enable individuals to be paid. The notice also sets out your rights in respect of such Personal Data as ICB process data under Article 6 (1)(e) processing duties of a Public Authority and 9 (2)(h) processing of sensitive information and consent, all covered below.

### **How Do We Collect Your Personal Information?**

We may collect your Personal Data in a number of ways, for example:

- At the point of recruitment to the ICB via the CSU;
- When you contact the CSU or ICB via the HR Department; either via telephone or email;
- When you apply for an internal vacancy within the ICB;
- During the course of managing your employment with the ICB, i.e. appraisals, disciplinary, implementation of HR policies and procedures;
- Contact details you have provided for the purposes of managing the ICB's Business Continuity Plan; and
- Information we receive from third parties such as HMRC, Disclosure and Barring Service (DBS) checks, external organisations seeking a reference and recruitment agencies.

### **What Type of Information Do We Collect?**

We may collect the following types of Personal Data:

- Your name, address, email address, telephone number and other contact information that allow us to meet our organisational and statutory obligations to you as your Employer;
- Details of family members and Next of Kin details;
- Bank details; and
- Right to work documentation and other security screening information.

In addition, we may collect the following types of special categories of personal data

- Racial or ethnic origin;
- Health data disclosed by you as part of an Occupational Health screening questionnaire and/or referral;

- Qualifications and employment history; and
- Absence information

Your personal information will not be disclosed to a third party without your consent, unless the law allows or requires us to do so.

### **How Do We Use the Information We Collect?**

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 deal with any employee / employer related disputes that may arise;
- Payroll purposes;
- For assessment and analysis purposes to help improve the operation and performance of the ICB;
- To inform the development of recruiting and retention policies so that they are relevant to the ICB's workforce;
- To enable the monitoring of protected characteristics in accordance with the Equality Act 2010 and ensure that the CSU continues to meet equality standards;
- To prevent, detect and prosecute against fraud;
- To respond to requests made by a "relevant authority" under Section 29 of the Data Protection Act 2018, such as the police, government departments and local authorities with the regulatory powers to request access to personal data without the consent of the data subject for the purposes of the prevention or detection of crime.
- In accordance with the consent provided by you as part of your terms and conditions of employment; and
- To comply with the ICB's legal obligations as an employer; i.e. HMRC and pensions.

### **Who Will We Share Your Information With?**

We may share your personal data with:

- NHS Shared Business Services who are commissioned by the ICB to provide payroll and remuneration services on behalf of the ICB;
- OH provider, Sugarman Health & Wellbeing who are commissioned to provide occupational health services on behalf of the ICB.

All third party services commissioned by the ICB must comply with the latest Information Governance Toolkit and have registered/commenced the new Data Security Protection Toolkit. As part of the ICB's IG assurance process we will check that each provider can provide assurance of GDPR compliance, which provides the ICB with assurance that they are handling your personal data to the current information security, records management, data protection and confidentiality standards.

### **How Will We Manage Information We Receive About You?**

Where we have received personal data from a third party about you (such as a previous employer, HMRC) we will provide you with:

- The identity and contact details of the third party;
- The purpose for processing your personal data and the legal basis; and • The categories of personal data received.

### **Transferring Personal Data Outside of the EEA/EU**

The ICB does not routinely transfer information outside of the European Economic Area, unless it is required for the delivery of the above HR, payroll and occupational health services.

Where information is transferred outside of the EEA/EU, we will ensure that such transfers are compliant with the Data Protection Act and GDPR and that appropriate measures are put in place to ensure security of your information is maintained.

### **Storage and Retention of Your Information**

Your information will be stored by the CSU and its third party suppliers in accordance with the [National Data Security Standards](#), which will ensure that appropriate technical and organisational measures are in place to prevent unauthorised or unlawful processing of Personal Data and against accidental loss or destruction of, or damage to Personal Data. Your records will also be retained in accordance with the [Records Management Code of Practice for Health and Social Care](#).

### **Right of Access to Your Information – Subject Access Request**

You can request a copy of the information held by the CSU/ICB about you at any time by contacting the Deputy Director of Corporate Affairs. The provision of this information will be free of charge and provided in a format of your request, i.e. hardcopy or electronic via secure email.

The ICB will endeavour to respond to your request within 28 days.

In addition to the right of access, you also have the right of rectification or erasure of personal data or restriction of processing of your personal data, except where this is mandated by law.

### **Management of a Breach Involving Your Information**

The ICB is committed to managing all data breaches in a timely and efficient manner, and will endeavour to respond to any data breach within 72 hours. Data breaches will be managed in accordance with the ICB's **Incident Reporting Policy**.

## Complaints Process

Should you wish to raise a complaint regarding the management of your information you can do so in the following ways:

**Informal Resolution** – you should raise your concerns with your line manager, who will liaise with the Governance Team regarding the use and management of your information.

**Formal Complaint** – you may raise your complaint in writing to the Deputy Director of Corporate Affairs.

**Independent Investigation** – if you are unable to obtain local resolution through the ICB, you can contact the Information Commissioner's Office which is a UK independent public body responsible for upholding information rights and data privacy at:

Tel: 030 123 1113

Online: <https://ico.org.uk/global/contact-us/email/>

By Post: Information Commissioner's Office,  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF