



Staff and Other Partners Privacy Notice

This privacy notice tells you what to expect when Conexus Healthcare collects personal information about you. This notice applies to all employees, casual workers, ex-employees, agency staff, self-employed contractors, secondees, apprentices, trainees, Directors and Non-Executives of the Board, and other partners. However, the information we will process about you will vary depending on your specific role and personal circumstances. This notice should be read in conjunction with our wider UK general data protection regulations (UK GDPR) and Data Protection policies and procedures.

How your information will be used:

1. As your employer or provider of other commissioned services, Conexus Healthcare needs to keep and process information about you for normal employment/contracting purposes. The information we hold and process will be used for our management and administrative use only. We will not use any of your data to make any automated decisions.

We will keep and use your data to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment or engagement process; whilst you are working for us; for the duration of your service contract with us, and for a period of time when your employment or period of contracted work ends. This includes using information to enable us to comply with employment or other contracts; to comply with any legal requirements; pursue the legitimate interests of the Company, and to protect our legal position in the event of legal proceedings.

If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

2. As a company, we may sometimes need to process your data to pursue our legitimate business interests, for example to prevent fraud, administrative purposes or reporting potential crimes.
3. Much of the information we hold will have been provided by you, but for employment purposes some may come from other internal sources, such as your manager, or in some

cases, external sources, such as NHS Jobs, a recruitment agency, your referees, an employment agency, from security clearance providers (such as the Disclosure and Barring Services (DBS), your professional/registration body (to validate your professional registration as a clinician), from our Occupational Health provider or other health providers, pension administrators and other government departments (including HMRC). Other information that we process may come from your organisation within the wider Conexus family.

4. The information we hold may include, but it is not limited to:

- Application forms and starter information for new employees which may include personal information such as your date of birth, gender, ethnicity and religion, home address and qualifications and telephone number (both mobile and landline);
- Contract for services details for self-employed contractors, which will contain details of your address, office base, company registered number. Information relating to the arrangement for commissioned services, such as consultancy work, may also contain personal or organisational detail;
- For staff, employment and education history including qualifications, right to work information and details of any criminal convictions which have been declared or previous disciplinary action by another employer;
- A copy of your passport or similar photographic identification and/or proof of address documents (such as utilities bill, bank statement etc);
- References including the name and address of your referees and their job title;
- Contracts of commissioned services / consultancy with partners; contracts of employment for staff which will include details about pay, start date and home address/place of work;
- Correspondence with or about you, for example letters relating to concerns and complaints; a pay rise or change of job role or, at your request, a letter to your mortgage company confirming your salary;
- Information needed for payroll, benefits and expenses purposes such as NI number, tax code, marital status and any information about student loans, CCJs or court orders which we are required to disclose, company loans and overtime claims.
- Bank account details including sort code and account number together with details of invoices processed if you are self-employed;
- Contact and emergency contact details which will include next of kin address and telephone numbers;
- Records of holiday, sickness and other absence such as maternity leave, paternity leave, compassionate leave etc.;
- Information needed for equal opportunities monitoring policy such as your religion, nationality and sexual orientation;

- Records relating to your employment history with us, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records;
 - Trade union membership for the purposes of deduction of subscriptions from salary;
 - Details of any whistleblowing concerns raised by you, or to which you may be a party or witness;
 - Information derived from monitoring of IT equipment (for example use of smartcard to access SystmOne) or images/photographs from CCTV images;
 - Confidentiality agreements;
 - Declarations of conflicts of Interest, secondary employment, or gift declarations (which may also be declared in our annual accounts/annual report);
 - Photographic ID, for Identification and publicising your role on our public website
5. Where necessary for staff, we may keep information relating to your health, which could include vaccinations and immunisations, sick leave forms and Fit to Work statements, reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay.
6. We may also keep information in relation to accidents/incidents which occurred in the workplace, or places where duties are undertaken on behalf of Conexus, or where Conexus are providing commissioned services; details of any work risk assessments, including visual display unit assessments for the purposes of complying with our health and safety duties to you as an employee.

How your information may be processed

7. Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation, we will always obtain your explicit consent to those activities unless the information is required by law or the information is required to protect your health in an emergency.

Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

8. Other than as mentioned below, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual

duties to you, for instance we may need to pass on certain information to our external payroll provider, pension or health insurance schemes.

9. We may transfer information about you to other organisations for purposes connected with your employment or the management of the company's business. This may include our payroll provider and our HR advisor. This will also include sharing information with Primary Care Networks who you may be providing services on behalf of and to whom on a day-to-day basis you report.
10. In limited and necessary circumstances, your information may be transferred outside of the EEA or to an international organisation to comply with our legal or contractual requirements. We have in place safeguards including ensuring the security of your data.
11. Any records we hold will be kept in line with the Records Management Code of Practice.
12. If in the future we intend to process your personal data for a purpose other than that for which it was collected we will provide you with information on that purpose and ask your explicit consent.

Your rights in relation to the processing of your data

13. Under the UK General Data Protection Regulation (UK GDPR) and The Data Protection Act 2018 (DPA 2018) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing as well as in certain circumstances the right to data portability.
14. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.
15. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the UK GDPR or DPA 2018 with regard to your personal data.

Further information

16. Electronic records, and in some cases physical records, are held for the partners we work with, and for each member of staff. Data is held securely on our Conexus systems and we use an external IT provider to ensure that data is backed up on a regular basis.
17. Information relating to prospective applicants will either be held on the NHS Job portal, or via the recruitment agency applied through. Conexus Healthcare will only hold personal information on candidates who have been shortlisted and invited to interview (as well as those of the successful candidate). Any information used for monitoring purposes will be anonymised and, in some cases, may not be shared if a prospective applicant's personal details can be identified (for example due to the low number of applications for a specific post).
18. On occasion we may be asked to respond to requests for information on behalf of partners or as part of the wider health and social care network. We will normally disclose work related information about staff in a public-facing or senior role but may also have to disclose information about staff numbers and types of work undertaken. Personal details in these circumstances will not be shared.

Identity and Contact Details of Data Controller Data Protection Officer

19. Conexus Healthcare is the data controller and processor of data for the purposes of the DPA and UK GDPR.
20. If you have any initial enquires regarding this policy, your data, or if you require further information on the data held by Conexus please contact the Managing Director at the address below.
21. If you require access to information that we hold about you (Subject Access Request), please contact us via email wyicb-wak.conexussar@nhs.net or by writing to:
IG Lead
Head Office: Conexus Healthcare CIC
C/O Sandal Castle Medical Centre
Asdale Road
Wakefield
WF2 7JE

22. Our Data Protection Officer for Conexus Healthcare is an external advisor whose details are provided below.

23. If you have any questions relating to how we process your data or UK GDPR rules in general, please contact our Managing Director or our Data Protection Officer using the following details:

Steve Knight – Managing Director

Email: steve.knight1@nhs.net

or

Helen Holt, external Data Protection Officer

Email: Helen.Holt@this.nhs.uk

Postal: The Health Informatics Service

Unit 13 Ainleys Industrial Estate

Ainley Bottom

Elland

HX5 9JP

If you are still unhappy following a review, you have a right to lodge a complaint with a supervisory authority: You have a right to complain to the UK supervisory Authority as below.

Information Commissioner:

Wycliffe house

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113

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

Updated Feb 2025