



How we use your information

Your information will be held by Devon Doctors Group. This privacy notice is to let you know how Devon Doctors will undertake to manage your personal information. This relates to data that you provide us with and what we learn about you in the course of your employment. This notice also tells you about your privacy rights and how the law protects you.

Who we are

Devon Doctors Group is made up of all the partly and wholly owned companies owned by Devon Doctors Limited, which is a not-for-profit social enterprise, owned by Herts Urgent Care Ltd. whose privacy notice can be found [here](#).

Devon Doctors Limited registered address is: Osprey House, Osprey Road, Exeter, EX2 7WN

Voice recordings

We currently record all calls made to and from Devon Doctors including internal calls.

Groups of Personal Information

This explains what all the different types of personal information mean, that are covered by data protection law.

We use different kinds of personal information. The groups are all listed here so that you can see what categories of information we hold about you.

Type of personal Information	Description
Contact	Name, contact details , address and next of kin
Demographic	Age, gender, right to work status
Medical	Work Assessment and compliance with legal duty
Transactional	Payment of salary sick pay or expenses, Bank details
Locational	If you access different sites using your staff ID card a record of your visit to each individual site will be recorded electronically as well as hard copy guest books. This information may be used as part of an investigation process including internal and external incidents. Vehicles are GPS tracked and we record information relating to journey undertaken
Login	Data logged by door entry systems, phone systems and IT systems where staff have a unique login, may be used to assist HR and managers to ensure staff remain compliant with policies, procedures and contracts. This information may also be used as part of a disciplinary, as appropriate, or in support of internal or external investigations and incidents
Communication	This includes any correspondence relating to your employment
Employment history	Includes appraisals and employment history
Absence record	Absence records and certificates
IT Usage data	Usage of IT services including browsing history
National Identifiers	National Insurance number
Voice	Voice recordings
Graphical	Copy of Passport or driving license. Image for Staff ID card
Special Category and Criminal data	<p>The law and other regulations treat some types of personal information as special. We will only collect and use these if the law allows us to do so:</p> <ul style="list-style-type: none"> • Racial or ethnic origin • Religious, political or philosophical beliefs • Trade union membership • Genetic and bio-metric data • Health data • Lifestyle information, including data related to sex life or sexual

	<p><i>orientation</i></p> <ul style="list-style-type: none">• <i>Criminal convictions and other related data</i>
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How the law protects you

Your privacy is protected by legislation and below is an explanation of how this works in practice.

The law says that we are allowed to use personal information only if we have good reason to do so and this includes sharing it outside Devon Doctors. The law says we must have one or more of these reasons to process your data. The law requires us to have a separate reason for processing special category data such as health data. These reasons are grouped and summarised below.

Any type of personal data	Special Category/Criminal data
<i>Legitimate interest</i>	<i>Occupational medicine</i>
	<i>Prevention of crime including fraud</i>
<i>Performing a contract</i>	<i>Employment or Social Protection law</i>
<i>Consent</i>	<i>Legal claims</i>
<i>Legal obligation</i>	<i>Explicit consent</i>
	<i>Insurance purposes</i>

The table below lists the individual purposes we may use your data and identifies the reason or the legal basis that the law permits us to do this.

What we use your information for	Our Legal basis /reason	Legitimate Interest (if applicable)
<i>a. Provide you with an employment contract</i>	<i>Performing contract</i>	
<i>b. Administer HR-related processes, including those relating to performance management, conduct and promotion</i>	<i>Performing contract</i>	
<i>c. Operate and keep a record of disciplinary, complaint and grievance issues to ensure acceptable conduct in the workplace.</i>	<i>Performing contract</i>	

<i>d. Ensure you are legally eligible to work in the UK</i>	<i>Performing contract/Employment or Social Protection law</i>	
<i>e. Calculate your pay, including any statutory or voluntary deductions</i>	<i>Performing contract Explicit consent Legal obligation</i>	
<i>f. Payment of expenses through payroll</i>	<i>Performing contract</i>	
<i>g. Ensure that you are able to practice in a particular role</i>	<i>Performing contract</i>	
<i>i. Identify and prevent any potential risks to your health or wellbeing that may arise from your work</i>	<i>Performing contract</i>	
<i>j. Ensure that you are physically fit to work or practice in a particular role</i>	<i>Performing contract/Occupational medicine</i>	
<i>k. Provide you with a Devon Doctors staff identification card (with personalised access to our various sites)</i>	<i>Legitimate interest</i>	<i>To limit access to authorised staff</i>
<i>l. Devon Doctors IT user services including provision of a system and email account</i>	<i>Performing contract</i>	
<i>m. Monitor use of IT services to ensure adherence to Devon Doctors Policies and Procedures</i>	<i>Performing contract</i>	
<i>n. Provide you with access to training and development services</i>	<i>Performing contract</i>	
<i>o. Process and pay your statutory and occupational payments for relevant periods of absence or leave, such as when you are unable to work due to illness</i>	<i>Performing contract/legal obligation</i>	

<i>p. Administer pension scheme</i>	<i>Performing contract</i>	
<i>q. Ensure we can get in touch with you if we need to regarding work or employment related matters</i>	<i>Performing contract</i>	
<i>r. Time sheet and shift rota administration</i>	<i>Performing contract / Legitimate Interest</i>	<i>Detection and prevention of fraud</i>
<i>s. Reasonable adjustments for staff with a disability</i>	<i>Legal obligation/Employment or Social Protection law</i>	
<i>t. To meet our obligations under the employment law such as the Equality Act 2010</i>	<i>Legal obligation/Employment or Social Protection law</i>	
<i>u. For some roles, we are obliged to seek information about criminal convictions and offences.</i>	<i>Legal obligation/Employment or Social Protection Law</i>	
<i>v. Employment tribunals or for legal proceedings</i>	<i>Legitimate interest/Legal Claims</i>	<i>To defend or to make legal claims</i>
<i>w. Produce statistics for internal reporting</i>	<i>Legitimate interests</i>	<i>to ensure the effective management of our workforce.</i>
<i>x. To communicate news and other work related information</i>	<i>Legitimate interest</i>	<i>To ensure you are informed to help you work effectively</i>
<i>y. To administer our staff reward and incentive scheme</i>	<i>Legitimate interest</i>	<i>to keep staff motivated for the purpose of staff retention.</i>
<i>z. Undertake surveys to assess staff views on the provision of the service</i>	<i>Legitimate interest</i>	<i>To help plan for improving services</i>
<i>aa. Use of images for promotional or information material</i>	<i>Consent</i>	
<i>bb. Reference requests for mortgage or tenancy application</i>	<i>Consent</i>	
<i>cc. Employment reference</i>	<i>Legitimate interest (of a third</i>	<i>To assist third</i>

<i>from prospective employers</i>	<i>party)</i>	<i>party in evaluating suitability of the individual for a post</i>
<i>dd. Produce statistics for external reporting</i>	<i>Performing a contract</i>	<i>to ensure the effective management of our workforce.</i>
<i>ee. Management Referrals to our Occupational Health provider</i>	<i>Occupational medicine</i>	<i>to ensure the effective management of our workforce.</i>
<i>ff. 111 pathways data relating to training and performance monitoring</i>	<i>Legitimate interest</i>	<i>necessary to comply with the pathway license conditions</i>
<i>gg. Monitoring of transactions and payments internally and externally</i>	<i>Legitimate interest</i>	<i>Prevention of fraud</i>
<i>hh. Provide relevant information to insurer to consider or settle a claim</i>	<i>Legitimate interest</i>	<i>Insurance Purpose/ Explicit consent</i>
<i>hi. vaccine data for HR to show compliance with legal duty as required by regulators and the law</i>	<i>Legal obligation / Performing contract / Legitimate interest</i>	<i>Necessary to comply with contractual obligations with regulators and the law</i>
<i>hj. Monitoring driver's vehicle location and speed</i>	<i>Legal obligation/Employment or Social Protection Law</i>	

How to withdraw your consent

This section explains what to do if you no longer want us to hold or process your personal information in circumstances where we are relying on your consent. If this is the case you can withdraw your consent at any time. Please contact us if you want to do so.

If you withdraw your consent or you do not give your consent we will let you know if this has any consequences or impacts you in any way.

How long is the information kept for?

Devon Doctors must only retain your personal data for as long as necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory or other operational requirement.

Specified retention periods are applied to each category of personal data that we may process about you. In setting these retention periods, Devon Doctors will take account of the following:

- the nature, sensitivity and volume of the personal data
- the potential risk of harm to you arising from the continued retention of the personal data
- the purposes for which Devon Doctors may process your personal data
- whether Devon Doctors is required to retain any personal data by law or in accordance with its legitimate interests

Generally speaking, all relevant correspondence in relation to your employment or engagement will be held by Human Resources or the Rota team and retained for six years after you have left Devon Doctors, after which time it will be securely disposed of. Similarly information held by Finance Team relating expense claims or other financial information will also be held for six years. However some basic information about your employment (appointment, dates of service etc) will be retained indefinitely.

In some cases, Devon Doctors may anonymise your personal data so that you can no longer be identified, in which case such information may be held indefinitely.

If a legal claim is received, then we may retain and process relevant personal data to defend the claim for the duration of the proceedings. Whilst we may dispose of any personal data after the conclusion of the claim, please be aware that all litigation documents disclosed or evidence given may be a matter of public record.

Your rights

Your right of access

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process. You can read more about your right [here](#).

Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies. You can read more about your rights [here](#).

Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances. You can read more about your right [here](#).

Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances. You can read more about your rights [here](#).

Your right to object to processing

You have the right to object to processing if we are able to process your information because the process forms part of our public tasks, or is in our legitimate interests. You can read more about your rights [here](#).

Your right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated. You can read more about your rights [here](#).

You will not normally be required to pay any charge for exercising your rights. We have one month to respond to you.

Please contact us at ddooh.hr@nhs.net if you wish to make a request or if you are in anyway unhappy about how your data was used during the recruitment process.

Do we obtain information from other sources?

Yes we do.

We procure services from **Heales Medical** to provide our Occupational Health service. Where it is deemed that it is required we'll send you a link to the questionnaire on the provider's website. The information you provide will be held by the provider, who will give us a fit to work certificate or a report with recommendations. You are able to request to see the report before it is sent to us. If you decline for us to see it, this could affect your employment with us. The link to the provider's privacy notice can be found [here](#).

We also receive certain information from **HM Revenue and Customs** about your tax status.

We may receive information in relation to **NHS Digital staff passports**, with your consent to include:

- Name, date of birth, national insurance number
- Photograph
- Basic details relating to employment checks, including DBS and right to work information,
- Professional registration details
- Basic details relating to current employment – including employing organisation, job role, staff group, department, start date (and fixed term end date, if appropriate), pay band, work email address, smartcard number
- Occupational Health clearance confirmation.

Who are the recipients of the information you provide us with

If you have joined our pension scheme your details will be provided to **NHS Pensions**, who is the administrator of the occupational pension scheme, of which we are a member organisation. Details provided to the pension administrator will be your name, date of birth, National Insurance number and salary. The link to the provider's privacy notice can be found [here](#).

Where it is a requirement for the role your email address will be passed to our Disclosure and Barring Service provider, **Atlantic Data**, who will contact you in order to complete an application for a standard/enhanced DBS check dependent on and relevant to your contract of employment and role within the organisation. The link to the provider's privacy notice can be found [here](#)

Your payslip and P60 is made available to you via a staff self-service payroll portal which is hosted by **Sage Group Plc**, our payroll supplier. The information provided to the payroll supplier includes: Name, salary, National Insurance number, pension contributions, deductions, and tax code. The link to their Privacy Notice can be found [here](#)

Where it is a requirement for the role your email address will be passed to our Disclosure and Barring Service provider, **TRAC**, who will contact you in order to complete an application for a standard/enhanced DBS check dependent on and relevant to your contract of employment and role within the organisation. The link to the provider's privacy notice can be found [here](#)

We use **RotaMaster** to allocate shifts, in order to do this effectively, we provide them with your contact details, role, hourly rate or salary and duration and category of absence, where appropriate. The link to their Privacy Notice can be found [here](#)

Devon Doctors operates a staff reward and incentive scheme through our provider **Perkbox**. We provide them with your name and work email address and then you are invited by them to activate an account if wish to take advantage of this benefit. The link to the provider's privacy notice can be found [here](#)

If you are required to have a smart card to access confidential patient data we must provide certain details to the **Registration Authority** provider who will process the application. As part of the application process we must provide approved forms of identification. You can either provide these or we can use the information we hold on your personnel file if you are happy for us to do this.

As an operator of 111 pathways service Devon Doctors are required under the license to provide information to **NHS Digital** relating to our 111 pathway users. This includes information relating to staff training, assessments, roles, skills, qualifications and performance monitoring data relating to how effective the pathway is being used by system users.

We provide payroll information to HM Revenue and Customs to ensure you pay the correct amount of tax and other contributions.

Sending data outside of the European Economic Area [EEA]

The provision of the payroll self-service portal requires the processing of personal data in a third country outside the EEA. Data Protection law requires that in the event of data exports to a third country that suitable safeguards are in place to protect the rights and freedoms of data subjects. This safeguard is provided by the use of the European Commission's standard model data protection clauses.

Data Protection Officer

Devon Doctors Group has appointed a Data Protection Officer who can be contacted at ddooh.irm@nhs.net or by post: Data Protection Officer, Devon Doctors Ltd, Suite 1, Osprey House, Osprey Road, Sowton Industrial Estate, Exeter, England EX2 7WN. Telephone: 01392 822345