

Staff Privacy Notice

The CCG is part of the Hampshire and Isle of Wight Partnership of CCGs, hereafter 'the partnership'. The Hampshire and Isle of Wight Partnership of CCGs is comprised of North Hampshire CCG; Fareham & Gosport CCG; South Eastern Hampshire CCG and Isle of Wight CCG. Each Partnership CCGs constitution has been updated to reflect the fact that the CCGs work collaboratively as a Partnership and share information where necessary. This privacy notice advises staff within the CCG on what information is held, processed and shared.

Your personal information – what you need to know

- Staff should be fully informed about how their information may be used
- There are strict conditions under which personal data may be disclosed
- Certain disclosures are not permitted without the express consent of the individual, for example where required under law such as for safeguarding purposes
- Individuals have the right to see what information is held about them, and to have any errors corrected
- Personal information should be anonymised wherever and whenever possible
- The legitimate use, disclosure or sharing of personal data does not constitute a breach of confidentiality
- Sharing of personal data between organisations can take place with appropriate safeguards
- Sometimes a judgement has to be made about the balance between the duty of confidence and disclosure in the public interest. Any such disclosure must be justified
- Personal data should be kept secure and confidential at all times.

Why we collect information about you?

The CCG needs to collect information from you to:

- Ensure that you are paid your salary
- To monitor your well-being and progression
- To keep a record of your employment history
- To ensure that the CCG complies with its statutory and regulatory obligations
- To detect and prevent crime in the CCG and wider NHS including fraud, bribery and corruption

What does the information include?

We work with NHS South, Central and West Commissioning Support Unit (CSU) to collate and process information which will also be shared with the following organisations, subject to strict agreements describing how it will be used:

- NHS South, Central and West CSU - details about you, your training and development
- McKesson/Shared Business Services and NHS South, Central and West CSU - HR and payroll information
- The CCG's Internal and External Auditors
- The Cabinet Office – a data matching exercise to assist in the prevention and detection of fraud

- Hampshire and Isle of Wight Fraud and Security Management Service – Reactive and Proactive Fraud Detection Work

How we keep your information confidential?

Everyone working for the CCG has the responsibility to use personal data in a secure and confidential way. Staff that have access to information about individuals need to use it effectively, whilst maintaining appropriate levels of confidentiality. We will not disclose information about you to third parties without your permission unless there are exceptional circumstances, such as where laws require information to be passed on or for auditing purposes.

Your line manager and executive director require access to ESR to monitor and manage your annual leave and sickness and other HR related matters. This function may be delegated to the executive directors PA/EA or a nominated lead at the CCG. This information is kept strictly confidential. If you have any objections to this please raise this directly with your line manager who will ensure that delegated permissions are removed.

Anyone who receives information from us is also under a legal obligation to keep it confidential. We are required by law to report certain information to the necessary authorities. Occasions when we must pass on information include:

- Providing key payroll data and personal identifiers such as contact details to bodies responsible for auditing and administering public funds for the purposes of preventing and detecting fraud
- Where a court order has been issued
- To investigate complaints, legal claims, counter fraud investigations or adverse incidents.

Conflict of Interest Notification and Publication

The information you are required to submit in relation to Conflict of Interest notifications and publication will be held by the CCG to comply with the Managing Conflicts Of interest: Revised statutory Guidance for CCGs and relevant organisational policies. This information may be held in both manual and electronic form in accordance with Data Protection Legislation. Information may be disclosed to third parties in accordance with the Freedom of Information Act 2000 and will be published in registers that the CCG holds which will be made publically available on the CCG's website.

If you believe that substantial damage or distress may be caused by the publication of this information you are entitled to request that the information is not made publically available. You must detail the reasons why in writing at the time of declaring any interest or as soon as you believe there are significant risks from any interest already declared and in the public domain. This will be formally reviewed by the Conflict of Interests Guardian in line with the Standard of Business Conduct Policy and National Guidance. The CCG will however retain a confidential un-redacted version of the register.

Right of Access

Under the General Data Protection Regulation (GDPR), you have a right to:

- Be informed whether personal data is being processed (which includes details regarding the categories and source of the data, storage and the purposes for which it is processed)
- Details of any recipients of the data (and the safeguards we provide if we transfer personal data to a third country or international organisation)
- The existence of others rights under the GDPR which include rectification, erasure, restriction or to object to such processing
- Your right to lodge a complaint with the ICO
- Details of any automated decision making
- Request access to your information under the GDPR which will be dealt with within 1 month from the date of receipt. Requests can be made verbally or in writing

For access to your employment records, please contact South, Central and West CSU HR Team by e-mail at scwcsu.hrsupport@nhs.net or call 0300 123 6220. Alternatively, use the following link to access the staff subject access request application form.

<http://consulthr.scwcsu.nhs.uk/index.php/resources/a-z-forms>

NATIONAL FRAUD INITIATIVE DATA MATCHING

NHS Fareham and Gosport Clinical Commissioning Group is required to protect the public funds it administers. It may share information provided to it with other bodies responsible for; auditing, or administering public funds, or where undertaking a public function, in order to prevent and detect fraud.

The Cabinet Office requires us to participate in a data matching exercise to assist in the prevention and detection of fraud.

Data matching involves comparing computer records held by one body against other computer records held by the same or another body to see how far they match. This is usually personal information. Computerised data matching allows potentially fraudulent claims and payments to be identified. Where a match is found it may indicate that there is an inconsistency which requires further investigation. No assumption can be made as to whether there is fraud, error or other explanation until an investigation is carried out.

We are required to provide particular sets of data to the Cabinet Office for each matching exercise. For more information please refer to the [Cabinet Office Website](#)

The use of data by the Cabinet Office in a data matching exercise is carried out with statutory authority under Part 6 of the Local Audit and Accountability Act 2014. It does not require the consent of the individuals concerned under data protection legislation or the General Data Protection Regulations (GDPR). Data matching by the Cabinet Office is subject to the [Code of Data Matching Practice](#)

You can contact Colin Edwards LCFS, the organisation's Local Counter Fraud Specialist by emailing colin.edwards1@nhs.net



Fareham and Gosport
Clinical Commissioning Group