

Privacy Notice for Staff

How we collect, use, protect and share workforce information.

1. Who we are

The Treatment Centre is the data controller for the personal information described in this notice. Dr Anna Taylor and Dr Oliver Turner, Joint Principals, oversee data protection at the practice.

Privacy and policy contact
The Treatment Centre
1st Floor, Tinner's Court, Back Quay
Truro, TR1 2LL

Joint Principals
Dr Anna Taylor and Dr Oliver Turner
01872 241955
info@thetreatmentcentre.co.uk

2. Who this notice covers

This notice covers applicants, employees and workers, including agency, casual and contracted staff, volunteers, trainees, apprentices and work-experience placements.

3. Information we may use

- identity, contact, emergency-contact and right-to-work information;
- application, employment, education, reference and professional-registration records;
- contracts, role details, working hours, leave, attendance and performance records;
- payroll, tax, pension, bank, benefits and expenses information;
- training, appraisal, capability, conduct and access-control records;
- occupational-health, fit-note, accident, disability and adjustment information; and
- criminal-record information where a lawful DBS or other check is required.

4. Sources of information

Information usually comes from you. It may also come from referees, recruitment agencies, professional bodies, DBS and other public authorities, occupational-health providers, pension and payroll providers, previous employers, training providers, publicly available professional sources or your use of practice systems.

5. Why we use it

- recruitment, selection, identity and right-to-work checks;
- contracts, payroll, pensions, benefits and workforce administration;
- training, professional registration, appraisal, performance and conduct;
- health, safety, wellbeing, adjustments, absence and family leave;
- safeguarding, security, emergency planning and business continuity;
- responding to concerns, claims, audits and regulatory requirements; and
- meeting employment, tax, equality, health-and-safety and healthcare obligations.

6. Lawful bases

Depending on the purpose, we rely on steps before entering a contract, performance of the employment contract, legal obligation, legitimate interests, vital interests and consent under Article 6 UK GDPR. For special category information, we generally rely on employment and social-protection law, occupational health, provision or management of health care, substantial public interest, legal claims, vital interests or explicit consent where appropriate.

Criminal-offence information is used only where lawful, necessary and supported by an appropriate condition and policy. Consent is not normally relied on where the employment relationship means it would not be freely given.

7. Who we may share information with

Where necessary and lawful, information may be shared with payroll, pension, benefits, occupational-health, IT, training and professional advisers; HMRC and other public bodies; professional regulators including the GDC and CQC; law-enforcement agencies or courts; and prospective employers where an authorised reference is provided. Providers acting for us must protect information and use it only as instructed.

8. International transfers

Some technology providers may process information outside the UK. Where this occurs, we use an appropriate lawful transfer mechanism and safeguards.

9. Retention

Retention varies by record type and is set out in the practice retention schedule. Unsuccessful recruitment records are normally kept for up to one year. DBS certificate information is normally retained only as long as necessary and usually no longer than six months after the recruitment decision. Core employment and payroll records are generally retained for at least six years after employment ends, while pension, health-and-safety, safeguarding, occupational-health or legal records may need longer periods. Information is then securely deleted or destroyed.

10. Security and monitoring

Paper and electronic staff records are protected by access controls and are available only to people who need them for their role. Practice systems may record security and audit information. Any proportionate monitoring will have a defined purpose and will be communicated where required.

11. Required information and automated decisions

Some information is required to enter or perform an employment contract or meet a legal obligation. If it is not provided, we may be unable to recruit, employ, pay or safely support the person concerned. We do not make solely automated employment decisions that produce legal or similarly significant effects.

12. Your rights

Depending on the circumstances and lawful basis, rights may include access, rectification, erasure, restriction, objection and data portability, and withdrawal of consent. These rights are not absolute. Contact the Joint Principals using the details above.

13. Concerns and complaints

Please raise concerns with a Joint Principal so we can respond. You may also complain to the Information Commissioner's Office on 0303 123 1113 or at ico.org.uk/make-a-complaint.

14. Review

We review this notice regularly and update it when our employment practices, suppliers or legal responsibilities change. Team members should tell us promptly when their personal information changes.