

**Data Protection Privacy Notice
Staff, volunteers and sub-contractors**



Document Control

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1	New Policy, New information.	SW	February 2023
1.1	New format, new information	LW	July 2023

We understand your privacy is important to you and you care about how your personal data is used. We respect and value the privacy of all our staff, volunteers, service users and business partners and will only collect and use personal data in a way that is consistent with our obligations and your rights under the law.

Please read this document carefully. We may provide similar notices to you from time to time when we collect or process personal data about you.

1. What does this Privacy Notice cover?

This notice explains what information (personal data) we hold about you, how we collect it, and how we use and may share information about you during your employment and after it ends. We are required to notify you of this under data protection legislation. It also briefly explains your rights under the law relating to your personal data and who to contact if you have any questions.

2. What is Personal Data?

Personal data is defined by the General Data Protection Regulations (GDPR) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

In simpler terms, this means any information about you that enables you to be identified. It covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

3. What Are My Rights?

Coverage Care Services Ltd is a ‘Data Controller’ and gathers and uses certain information about you.

Under the GDPR, you have the following rights:

- a) The right to be informed about our collection and use of your personal data.

- b) The right to access the personal data we hold about you.
- c) The right to have your personal data rectified if any of the information held by us is inaccurate or incomplete.
- d) The right to be forgotten. This means the right to ask us to delete or otherwise dispose of any of your personal data that we have.
- e) The right to restrict (i.e., prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose.
- g) The right to data portability. This means you have the right to obtain and use your personal data for your own purposes across different services. You can choose to move, copy, or transfer personal data easily from one IT environment to another in a safe and secure way without affecting its usability.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

If you unreasonably refuse to provide us with certain necessary information when asked to do so, we may not be able to perform the contract we have with you. We also may not be able to comply with our legal or regulatory obligations.

4. What Personal Data Do You Collect?

We may collect some or all of the following personal data:

- basic personal information, e.g., name and address, date of birth
- financial information
- information about you, e.g., equal opportunities data, marital status, next of kin and emergency contact details
- visual images e.g., photo ID or promotional images
- information we receive from other sources, such as HMRC or previous employers
- our correspondence and communications with you

Employees and volunteers – our Safer Recruitment Policy complies with the GDPR regulations, and all personal information obtained, including CVs and references, is securely kept, retained and disposed of in line with this. All employees are informed of their right to access any information about them.

Third parties - all personal data obtained about others associated with the delivery of the primary care service, including contractors and suppliers will be protected in the same way as information on employees and volunteers.

5. How Do You Collect Information?

The bulk of your personal data is collected directly from you or through form filling, mainly manually, but also electronically for some purposes, e.g., when contacting Coverage Care through our website.

Personal data is also obtained directly through such means as references, testimonials and criminal records (DBS) checks. When recruiting staff, we seek applicants' explicit consent to obtain all the information needed for us to decide to employ them.

6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using your personal data. This may be because the information is necessary for the management of a contract with you, because you have consented to our use of it, or because it is in our legitimate business interests to use it. For example, your personal data may be used for providing and managing your contract of employment or communicating with you via letter or email.

7. How Long Will You Keep My Personal Data?

We keep your information during and after your employment or other engagement for no longer than is necessary for the purposes for which the personal information is processed. Further details on this are available in our Retention and Disposal Policy. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

8. How and Where Do You Store or Transfer My Personal Data?

Information may be held at our offices, Homes, third party agencies, service providers or, representatives as required. We have security measures in place to seek to ensure that there is appropriate security for information we hold.

Our website and databases are regularly audited to ensure they meet all privacy standards, are protected through strong passwords and encryption and comply with our general data protection security and protection policies.

9. Do You Share My Personal Data?

We would only share your personal information with your consent on a “need to know” basis, observing strict protocols in doing so. We would not disclose information about you without your agreement.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours. This may be if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

Where we provide information for statistical purposes, the information is aggregated and provided anonymously so that there is no privacy risk involved in its use. If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law.

If any personal data is transferred outside of the EEA, we will take suitable steps to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR.

10. How Can I Access My Personal Data?

If you want to review, verify, correct, or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact our Data Protection Officer in writing at Allison House, Oxon Business Park, Shrewsbury, Shropshire, SY3 5HJ

You will not have to pay a fee to access your personal data. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive and requires extra resources in order to meet the request. Alternatively, we may refuse to comply with the request in such circumstances.

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it. This is known as a “subject access request”. All subject access requests must be made in writing and sent to the email or postal addresses shown below. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

We endeavour to provide a complete response to your formal request within 14 days but not more than one month of receiving it. In some cases, however, particularly if your request is more complex, more time may be required to fulfil your request. It may be up to a maximum of three months from the date we receive your request. You will be kept fully informed of progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including how to make a subject access request, please use the following contact information:

Coverage Care Services Limited
Allison House, Oxon Business Park, Shrewsbury, Shropshire SY3 5HJ
Data Protection Officer: Finance Director
dataprotection@coveragecareservices.co.uk
01743 283200

Further information about your rights can also be obtained from the Information Commissioner’s Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner’s Office.

Review and update

The HR Department will be responsible for reviewing this notice every three years or where changes to legislation impact on it.