Data Protection Privacy Notice

We are Medvivo Group Ltd, a provider of integrated urgent care services including clinical access service, out of hours GP services, access to care, success clinics, children and young people's clinics, high intensity user service and crisis response services.

This privacy notice explains how we use any personal data we collect about you as an employee of Medvivo Group Ltd or an individual contractor providing a service for Medvivo Group Ltd. Medvivo Group Ltd, a company registered in England and Wales under company number 05146354 with its registered office at Fox Talbot House, Bellinger Close, Chippenham, Wiltshire SN15 1BN.

How do we collect your personal data?

We may collect your personal data in a number of ways, for example:

- When you register with our recruitment website
- When you apply for a vacancy and submit an application form
- When we ask you to complete new starter forms when you accept an offer of employment from us
- When we collect information through the implementation of any HR process
- When we collect information through the delivery of an inoculation process
- When you complete staff surveys
- When we receive your personal data from third parties, for example security screening and recruitment agencies

What types of personal data do we collect about you?

We may collect the following types of personal data:

- Your name, job title, address, email address, telephone number and other contact information that allows us to meet our organisational and statutory obligations to you as your employer
- NI Number, date of birth, sex and medical history (including current symptoms and allergies)
- Details of family members and next of kin details
- Pay and bank details
- Details of benefits or allowances you receive such as your pension
- Right to work documentation and other security screening information
- Equality and diversity information
- Video footage from dashboard cameras fitted inside all Medvivo vehicles (Dash Cams)

How will we use the personal data we collect about you?

We may use your personal data in the following ways:

- To ensure that the information we hold about you is kept up to date
- To facilitate the correct payment of salary and any applicable benefit or allowance
- To set up and provide IT system access accounts
- To deal with any employee/employers related dispute that may arise
- To prevent and detect fraud and other crime
- To comply with contractual and legal obligations
- To facilitate background checks (DBS) for applicable roles
- To provide information to the Adult Social Care Workforce Data Set
- To deliver inoculations when required

Any medical or health related personal data will be treated with confidence in line with the Common Law Duty of Confidence.

CCTV

Dash cam footage is captured to help us ensure the safety and security of our staff and members of the public.

Dash cam footage is managed in the same way as all other personal data processed by us and in line with current legislation.

Call recording

All calls made from and received by Medvivo are recorded and may be used to support the learning and development of our staff. They may also be used when reviewing incidents, compliments or complaints.

Call recordings are managed in the same way as all other personal data processed by us and in line with current legislation.

Data processors

We may use the services of a data processor to assist us with some of our data processing, but this is done under a contract with direct instruction from us that controls how they will handle employee information and ensures they treat any personal data in line with the Data Protection Act, the General Data Protection Regulation, confidentiality, privacy law, and any other laws that apply.

How will we share your personal data?

If your role requires a standard or enhanced DBS check, we will share your personal data entered on the DBS form with the Disclosure and Barring Service.

Further details on how the DBS will process your personal data are available here:

https://www.gov.uk/government/publications/dbs-privacy-policies

As a member of the HealthHero group, Medvivo will share your personal data with other companies within the HealthHero group.

HealthHero use Workplace by Facebook to communicate with employees within the HealthHero group. Further details about how Facebook will process your personal data are available here:

Workplace Privacy Policy

As part of the HealthHero group, Medvivo employees can access employee benefits via Perkbox. We will share your name and email address with Perkbox to enable them to invite you to register for a Perkbox account. Further details about how Perkbox will process your personal data are available here:

Perkbox Privacy Policy

We will not share your personal data with third parties without your consent unless the law allows or requires us to.

International Data Transfers

We will share the personal data of the response team members with Skills for Care Ltd as part of the Adult Social Care Workforce Data Set (ASC-WDS).

Whenever Skills for Care transfer your personal data out of the EEA, they will ensure a similar degree of protection is afforded to it by ensuring they use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

Please contact the HR team if you want further information on the specific mechanism used by Skills for Care when transferring your personal data out of the EEA.

Workplace by Facebook will process your personal data across Facebooks data centres located in the US and the EU.

Perkbox will process your personal data in data centres located in Ireland and the US.

How long do we keep your personal data?

We will retain your personal data held in our HR systems for 6 years after you leave the employment of Medvivo Group Ltd.

We will retain your personal data used for the delivery of inoculations for 8 years after the inoculation.

Legal Basis

The processing of your personal data is required in order that we can fulfil our obligations under the contract of employment between Medvivo Group Ltd and yourself.

We will use your sensitive personal information, such as that relating to your race, ethnic origin, and health for the purposes of the performance or exercise of our or your rights and obligations under employment law or where the processing is necessary for the purpose of preventative medicine or an assessment of your fitness for work.

It is in our, yours and the public's legitimate interests to ensure the safety and security of our staff and members of the public. The processing of your personal data from the dash cam footage is necessary for this purpose.

In some circumstances, we may process your personal data on the basis that:

- we are required to do so in order to comply with legal obligations to which we are subject;

- in the establishment, exercise or defence of a legal claim;
  or
- you have given us your explicit consent to do so

COVID-19 Lateral Flow Testing

As a provider of front-line patient facing services, we offer COVID-19 lateral flow tests to all applicable staff.

We will collect your personal data via an online form when you report back the results of your test.

We will use your personal data in the following ways:

- To keep a record of all completed COVID-19 lateral flow tests
- To enable us to investigate any incidents, complaints or compliments we may receive

Any medical or health related personal data will be treated with confidence in line with the Common Law Duty of Confidence.

Any reporting (such as the number of tests completed) will be completely anonymous.

We will not record the results of the test on your employment record but will retain a record of who has completed a COVID-19 lateral flow test, and this will be kept for 6 years after your last completed COVID-19 lateral flow test.

COVID-19 Antibody Testing

When requested by NHS England and NHS Improvement, we will offer COVID-19 antibody tests to all staff.

We will collect your personal data via an online form when you agree to have a COVID-19 antibody test and when we arrange an appointment for the COVID-19 antibody test.

We will process the following additional personal data as part of the test:

- NHS Number

We will use your personal data in the following ways:

- To keep a record of all booked COVID-19 antibody tests
- To book you an appointment for your COVID-19 antibody test in our Adastra clinical system
- To allow the hospital laboratory to identify your COVID-19 antibody test
- To enable us to investigate any incidents, complaints or compliments we may receive

Any medical or health related personal data will be treated with confidence in line with the Common Law Duty of Confidence.

Any reporting (such as the number of tests completed) will be completely anonymous.

We will share your personal data with the hospital laboratory to enable them to process your COVID-19 antibody test.

We will not record the results of the test on your employment record but will retain a record of who has completed a COVID-19 antibody test, and this will be kept for 6 years after your last COVID-19 antibody test.

Following instruction from NHS England and Improvement, your antibody test results may be automatically added to your patient clinical record held by your registered GP practice.

The hospital laboratories will retain your personal data contained in their systems as per their own retention schedules.

Your rights

You have a right to:

- access the personal we hold about you;
- correct inaccuracies in the personal data we hold about you;
- withdraw any consent you have given to the use of your personal data;
- complain to the relevant supervisory authority in any jurisdiction about our use of your personal data; and
- in some circumstances:
    - ask us to erase personal data we hold about you;
    - request a copy of your personal data in an electronic format and require us to provide this information to a third party;
    - ask us to restrict the use of personal data we hold about you; and
    - object to the use of personal data we hold about you.

You can exercise these rights by contacting us as detailed below.

How to contact us

If you have any questions about our privacy notice, the personal data we hold about you, or our use of your personal data then please contact our Data Protection Officer at:

Data Protection Officer
Medvivo Group Ltd
Fox Talbot House
Bellinger Close
Chippenham
Wiltshire
SN15 1BN

Or

DataProtection.Officer@Medvivo.com

How to make a complaint

You also have the right to raise any concerns about how your personal data is being processed by us with the Information Commissioners Office (ICO):

https://ico.org.uk/concerns

0303 123 1113

Changes to our privacy notice

We keep our privacy notice under regular review, and will inform you of any updates. This privacy notice was last updated on 15th February 2021.