

Responding to patients and carers

Purpose	Processing special categories of personal data to respond or liaise with other organisations in relation to individuals' experience, concerns or complaints.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health information)
Legal basis	GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.
How we collect (the source)and use the information	Individuals' and/or their representative contact the CCG. CCG may liaise with other organisations where there is consent to do so.
Your Rights	With regards to Complaints under GDPR you have the right: <ul style="list-style-type: none"> • To be informed about the processing of your information (this notice) • Of access to the information held about you • To have the information corrected in the event that it is inaccurate • To restrict or stop processing • Object to it being processed or used • Not to be subject automated decision-taking or profiling • To be notified of data breaches
How long we will keep the information	Review with the intention to destroy from closure plus 10 years.
Who we will share the information with (recipients)	Not shared outside the CCG

Responding to Member of Parliament and other elected members of Government communication

Purpose	Processing special categories of personal data to respond or liaise with other organisations in relation to individuals' experience, concerns or complaints.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health information)
Legal basis	GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.
How we collect (the source)and use the information	MPs and other elected members and/or their representative contact the CCG. CCG may liaise with other organisations where there is consent to do so.
Your Rights	With regards to Complaints under GDPR you have the right: <ul style="list-style-type: none"> • To be informed about the processing of your information (this notice) • Of access to the information held about you • To have the information corrected in the event that it is inaccurate • To restrict or stop processing • Object to it being processed or used • Not to be subject automated decision-taking or profiling • To be notified of data breaches
How long we will keep the information	Review with the intention to destroy from closure plus 10 years.
Who we will share the information with (recipients)	

Safeguarding

Purpose	Information for safeguarding purposes is used to assess and evaluate safeguarding concerns to ensure individuals (vulnerable adults and children) within the CCG boundary are effectively protected.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health and social care information)
Legal basis	<p>GDPR Article 6(1)(e) ‘processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority...’</p> <p>GDPR Article 9(2)(b) ‘processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of social protection law in so far as it is authorised by Union or Member State law.’</p> <p>For the purposes of Article 9(2)(b) the provisions of the Children Acts 1989 and 2004, and the Care Act 2014 are relevant.</p>
How we collect (the source) and use the information	<p>The CCG may receive information relating to safeguarding concerns from you directly or relatives or through notification of concerns from other Health and Social Care organisations. All Health and Social Care professionals have a legal requirement to share information with appropriate agencies where safeguarding concerns about children or adults have been received. Where it is appropriate to do so the organisations will keep you informed of when information is required to be shared, to provide you with assurance regarding the security of that sharing and the benefit to you or the person you are raising safeguarding concerns about. Access to this information is strictly controlled and where there is a requirement to share information, e.g. with police or social services, all information will be transferred safely and securely ensuring only those with a requirement to know of any concerns are appropriately informed.</p> <p>The Children Act requires local authorities ‘to safeguard and promote the welfare of children within their area who are in need’ and to request help from specified authorities including NHS Trusts and Foundation Trusts, NHS England and CCGs. These are required by the Children Act to comply with such requests. Under the Children Act 2004 local authorities must make arrangements to promote cooperation with relevant partners and others, to improve well-being.</p>
Your Rights	<p>With regards to Safeguarding under GDPR you have the right:</p> <ul style="list-style-type: none"> • To be informed about the processing of your information (this notice) • Of access to the information held about you • To have the information corrected in the event that it is inaccurate • To be notified of data breaches
How long we will keep the information	<p>For children [up to 18 birthday] or to child protection and care – awaiting government direction, keep indefinitely until the independent investigation into child sex abuse is closed.</p> <p>For adults, case closure plus 30 years.</p>
Who we will share the information with (recipients)	Information may be shared with Safeguarding Boards, Multi-Agency Safeguarding Hubs (MASH), Multi-Agency Risk Assessment Conference (MARAC), Local Authority, other Health and Social Care organisations or the Police.

Communications and Engagement

Purpose	If you have asked the CCG to keep you regularly informed and up to date about the work of the CCG or of you are actively involved in our engagement and consultation activities or patient participation groups, we will collect and use information you share with us. You may be approached to contribute case stories, photographs or video regarding your experiences of services within Leeds . Where you submit your details to us for involvement purposes, we will only use your information for this purpose.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Personal Data (relating to health and equal opportunity data such as race, religion, etc)
Legal basis	<p>GDPR Article 6 1(a) – the data subject has given consent to the processing of his or her personal data for one or more specific purposes</p> <p>Under Section 14Z2 of the NHS Act 2006 we have a statutory duty to involve users whether directly or through representatives (whether by being consulted or provided with information, or other ways) in:</p> <ul style="list-style-type: none"> • planning the provision of services • the development and consideration of proposals for changes in the way services are provided, and • decisions to be made affecting the operation of services <p>Additionally, NHS organisations have a duty under Section 244 of the Act to consult the local Scrutiny Board (Health) on any proposal for “substantial development or variation of the health services.”</p> <p>The Health and Social Care Act 2012 also places specific duties on CCGs to reduce inequalities in respect of planning and commissioning, in the development and consideration of service change proposals and in decisions affecting commissioning arrangements.</p>
How we collect (the source) and use the information	<p>The CCG collects and uses information to keep those who have requested, informed of any news, participation group or consultation activities.</p> <p>Your information will be held securely and accessible only to those who need it for the purposes it was collected.</p>
How long we will keep the information	<p>Leeds CCG retain personal data until our engagement reports are published. Date of publication of engagement report, review with intention to destroy.</p> <p>We also retain personal data, photographs and video for two years from date consent form signed. Review with intention to destroy.</p>
Who we will share the information with (recipients)	Where you have explicitly consented for us to do so, we may share your personal data, photographs and video with media organisations and public domain in the publications we produce.

Infection Prevention and Control

Purpose	CCGs collaborate with Public Health services and work closely with the organisations involved in providing patient care, to jointly identify and agree the possible causes of, or factors that contributed to a patient's infection.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health information)
Legal basis	<p>GDPR Article 6(1)(e) 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority...'</p> <p>GDPR Article 9(2)(j) '...necessary for reasons of public interest in the area of public health...or ensuring high standards of quality and safety of health care and of medicinal products or medical devices...'</p> <p>Related legislation: The Health and Social Care Act 2008: Code of Practice for the NHS for the Prevention and Control of Healthcare Associated Infections (revised January 2015) and Regulation 3 of The Health Service (Control of Patient Information) Regulations 2002</p>
How we collect (the source) and use the information	<p>CCGs participate in Post Infection Review in the circumstances set out in the Post Infection Review Guidance, issued by NHS England. The CCG receives this information from Healthcare providers. The CCG uses the results of the Post Infection Review to inform the mandatory healthcare associated infections reporting system.</p>
How long we will keep the information	<p>Review with the intention to destroy from Date of Incident plus 10 years.</p> <p>For serious incidents Review with the intention to transfer to a place of deposit from date of incident plus 20 years.</p>
Who we will share the information with (recipients)	Information may be shared with Primary and Secondary healthcare providers and with the Local Authority who are responsible for Public Health with the CCG boundary.

Serious Incident reports

Purpose	The CCG collects and uses information from Serious Incident reports from Primary and Secondary Care Providers to ensure incidents are dealt with appropriately and lessons learnt.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health information)
Legal basis	GDPR Article 6(1)(e) 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority...' Related legislation: NHS Act 2006/Health and Social Care Act 2012. GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.
How we collect (the source) and use the information	We are statutorily required to fully investigate and review incidents and will receive information from Primary and Secondary Care Providers. Where there is a requirement to provide incident reports externally, the information will be anonymised unless there is a legal requirement to provide your details. You will be kept informed of the requirements we are required to meet where information is to be shared externally.
How long we will keep the information	Review with the intention to transfer to a place of deposit from date of incident plus 20 years.
Who we will share the information with (recipients)	Your information may be shared with Primary and Secondary healthcare providers involved in the incident.

Freedom of Information requests

Purpose	As a public authority, the CCG has a duty to respond to requests made under the Freedom of Information Act 2000 (FOIA), Environmental Information Regulations 2004 (EIR), and the Re-Use of Public Sector Information Regulations 2015 (RPSI).
Type of information Used	Identifiable: Personal (name and either email or postal address only)
Legal basis	GDPR Article 6(1)(c) 'processing is necessary for compliance with a legal obligation to which the controller is subject' Relevant legislation: FOIA, EIR and RPSI.
How we collect (the source) and use the information	We will only collect identifiable information such as name and contact details provided by individuals making requests under the Freedom of Information Act 2000 (FOIA), Environmental Information Regulations 2004 (EIR) and the Re-Use of Public Sector Information Regulations 2015 (RPSI). This information will only be used to respond to such requests and in correspondence with individuals following appeals. The personal data we process is freely provided by applicants who wish to exercise their right to use the above legislation in order to access information held by or on behalf of the CCG. Where the individual is making a request under the Re-Use of Public Sector Regulations 2015, by law we also require the name of the organisation and the re-use purpose.
How long we will keep the information	Review with the intention to destroy from closure of FoI request plus 3 years. For FoI where there has been a subsequent appeal, from closure of appeal plus 6 years
Who we will share the information with (recipients)	This information is not shared outside of the CCG.



Leeds
Clinical Commissioning Group

Assuring Transformation (Learning Disability Data)

Purpose	Assuring Transformation (AT) data collects information about individuals with learning disabilities and/or autism, who may have a mental health condition or behaviour that challenges, in in-patient settings, and provides it to the CCG. It gives the CCG broad oversight of their care.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health information)
Legal basis	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller.</p> <p>It is a statutory duty for the CCG to participate in this data collection. There are formal directions from the Secretary of State mandating the collection: (Health & Social Care Act 2012). The Information Standard Notice for this data collection was published on 6th January 2015 (SCCI2007 Amd 7/2014).</p> <p>GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.</p>
How we collect (the source) and use the information	The AT data is sent to the CCG from healthcare providers and collected by NHS Digital on NHS England’s behalf. It covers all people with learning disabilities and/or autism that are being cared for in in-patient settings and includes: the number of people in in-patient settings; discharges and admissions; whether individuals have a care plan, a care co-ordinator, regular care reviews and access to independent advocacy; the age and gender of individuals; and the type of in-patient setting that is providing their care. The information collected is published in reports by NHS Digital.
How long we will keep the information	
Who we will share the information with (recipients)	Information will be received from healthcare providers and shared with NHS Digital and NHS England.

Care and Treatment Reviews

<p>Purpose</p>	<p>Care and Treatment Reviews (CTRs) are part of NHS England's commitment to transforming services for people with learning disabilities, autism or both. CTRs are for people whose behaviour is seen as challenging and/or for people with a mental health condition. They are used by commissioners for people living in the community and in learning disability and mental health hospitals.</p>
<p>Type of information Used</p>	<p>Identifiable: Personal (such as name, address, date of birth) and Special Category (health information)</p>
<p>Legal basis</p>	<p>??consent (per national guidance – although this is actually 6(1)e and 9(2)h??)</p>
<p>How we collect (the source) and use the information</p>	<p>Care and Treatment Reviews are independent panel meetings about your care arranged by the CCG. The CTR panel is made up of professionals who are not involved in your everyday care. The panel members listen to you and to everyone involved in your care. They look at your notes and check that your care and plans are working well. They use this information and their own experience to decide what will improve your care and plans for the future. They speak up when they think your care could be different or better.</p> <p>CCGs have to understand people's needs, to plan for different levels of support at different times. They work with other health and social care services to find out who needs extra support or contact to make sure things are okay. The CCG keeps a list or register of people who need support. This list or register helps the CCG work with health and social care services. It allows them to arrange the extra support needed, if a CTR is needed, or extra help for carers. If you need a community CTR, you can join this register. Ask your care co-ordinator about it.</p> <p>If someone suddenly becomes very unwell and urgently needs to go into hospital, there might not be enough time for a community CTR. If this happens, an adult should have a hospital CTR within four weeks of going into hospital, or two weeks if you are a child or young person. This process is carried out with consent from the patient in order to satisfy the Common Law Duty of Confidentiality.</p>
<p>How long we will keep the information</p>	<p>Reviewed, records relating to some treatments must be retained longer than others.</p> <p>Minimum retention is 8 years from end of care or last request. Records relating to children need to be kept until their 25 or 26th birthday depending on the circumstances</p>
<p>Who we will share the information with (recipients)</p>	<p>Information may be shared with the Local Authority, and primary and secondary healthcare providers.</p>

Visitors to our Website- information you provide

Purpose	Monitoring how the CCG's website is used. This is done to find out things such as the number of visitors to the various parts of the site.
Type of information Used	Identifiable: Personal
Legal basis	
How we collect (the source) and use the information	<p>When someone visits the CCG's website information is collected in a standard internet log to enable the CCG to monitor how the website is used. This is done to find out things such as the number of visitors to the various parts of the site.</p> <p>From time to time, you may be asked to submit personal information about yourself (e.g. name and email address) in order to receive or use services on our website. Such services include bulletins, email updates, website feedback, requesting investigation of complaints and any other enquiries.</p> <p>By entering your details in the fields requested or sending us an email, you enable the CCG and its service providers to provide you with the services you select. Any information you provide will only be used by the CCG, or our agents or service providers, and will not be disclosed to other parties unless we are obliged or permitted to do so.</p>
How long we will keep the information	We will hold your personal information on our systems for as long as you use the service you have requested, and remove it in the event the purpose has been met or when you no longer wish to continue your subscription.
Who we will share the information with (recipients)	

Visitors to our Website- information collected

Purpose	Monitoring how the CCG's website is used. This is done to find out things such as the number of visitors to the various parts of the site.
Type of information Used	Identifiable: Personal - IP address, cookies
Legal basis	
How we collect (the source) and use the information	<p>When someone visits the CCG's website information is collected in a standard internet log to enable the CCG to monitor how the website is used. This is done to find out things such as the number of visitors to the various parts of the site.</p> <p>From time to time, you may be asked to submit personal information about yourself (e.g. name and email address) in order to receive or use services on our website. Such services include bulletins, email updates, website feedback, requesting investigation of complaints and any other enquiries.</p> <p>By entering your details in the fields requested or sending us an email, you enable the CCG and its service providers to provide you with the services you select. Any information you provide will only be used by the CCG, or our agents or service providers, and will not be disclosed to other parties unless we are obliged or permitted to do so.</p>
How long we will keep the information	We will hold your personal information on our systems for as long as you use the service you have requested, and remove it in the event the purpose has been met or when you no longer wish to continue your subscription.
Who we will share the information with (recipients)	

Information for Human Resources - recruitment

Purpose	The CCG will process information provided by applicants for the management of their application and the subsequent selection process.
Type of information Used	Anonymous – for shortlisting and selection purposes Identifiable: Personal such as name, address, date of birth etc.) - following the short-listing process
Legal basis	Article 6 – 6(1)(c) ‘...necessary for compliance with a legal obligation...’ For criminal conviction information (obtained via the Disclosure and Barring Service (DBS)) processing meets the requirements of Article 10 of the GDPR under Schedule 1, Part 1 of the Data Protection Act 2018 - processing in connection with employment, health and research - Processing necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law, social security law or the law relating to social protection. Relevant legislation: the provisions of the Safeguarding Vulnerable Groups Act 2006 as a basis for carrying our DBS checks.
How we collect (the source) and use the information	The recruitment process involves passing details provided by you on your application regarding your qualifications, skills and work experience, (but excluding your name, address and other personal data) to the short-listing and selection panels. After shortlisting full details provided by you on your application form will be provided to the interview panel. Details provided by you are also used to help fulfil our obligations to monitor equality and diversity within the organisation and process your application.
How long we will keep the information	Unsuccessful - Completion of recruitment process plus 6 months. *see specific reference to DBS. Successful – Transferred to the staff record; review with the intention to destroy 6 years after the staff member leaves employment or the 75 th birthday , whichever the sooner, if a staff record summary has been made.
Who we will share the information with (recipients)	

Human Resources- Staff Record

Purpose	The CCG holds personal and confidential information of its staff for employment-related purposes, such as recruitment, payment of salary, sickness and absence monitoring, disciplinary and grievance proceedings and professional development purposes.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health, racial or ethnic origin information)
Legal basis	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority</p> <p>GDPR Article 9(2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment...social protection law in so far as it is authorised by Union or Member State law.</p> <p>For criminal conviction information (obtained via the Disclosure and Barring Service (DBS)) processing meets the requirements of Article 10 of the GDPR under Schedule 1, Part 1 of the Data Protection Act 2018 - processing in connection with employment, health and research - Processing necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law, social security law or the law relating to social protection.</p> <p>Relevant legislation: the provisions of the Safeguarding Vulnerable Groups Act 2006 as a basis for carrying our DBS checks.</p>
How we collect (the source) and use the information	<p>The CCG uses information for the purposes of employment in a variety of ways including:</p> <ul style="list-style-type: none"> • Processing pay and pensions • Administering staff benefits • Facilitating staff training and progression • Informing investigations • Processing staff leavers, retirements and providing references.
How long we will keep the information	<p>Review with the intention to destroy.</p> <p>Trigger - Date staff employment terminates</p> <p>Period – Plus 6 years or the 75th birthday, whichever the sooner, if a staff record summary has been made.</p>
Who we will share the information with (recipients)	<p>The CCG shares information with a variety of organisation and individuals for a number of lawful purposes including:</p> <ul style="list-style-type: none"> • Public disclosure under Freedom of Information - e.g. requested names or contact details of senior managers or those in public-facing roles; • Disclosure of job applicant details - e.g. to named referees for reference checks, to the Disclosure & Barring Service for criminal record checks • Disclosure to employment agencies - e.g. in respect of agency staff; • Disclosure to banks & insurance companies - e.g. to confirm employment details in respect of loan/mortgage

	<p>applications/guarantees;</p> <ul style="list-style-type: none">• Disclosure to professional registration organisations - e.g. in respect of fitness to practice hearings;• Disclosure to Occupational Health professionals (subject to explicit consent);• Disclosure to police or fraud investigators - e.g. in respect of investigations into incidents, allegations or enquiries.
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Human Resources- Staff Record Summary

Purpose	The CCG holds personal and confidential information of its staff for employment-related purposes, such as recruitment, payment of salary, sickness and absence monitoring and professional development purposes.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health, racial or ethnic origin information) Information relating to criminal convictions (DBS checks).
Legal basis	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority</p> <p>GDPR Article 9(2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment...social protection law in so far as it is authorised by Union or Member State law.</p> <p>For criminal conviction information (obtained via the Disclosure and Barring Service (DBS)) processing meets the requirements of Article 10 of the GDPR under Schedule 1, Part 1 of the Data Protection Act 2018 - processing in connection with employment, health and research - Processing necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law, social security law or the law relating to social protection.</p> <p>Relevant legislation: the provisions of the Safeguarding Vulnerable Groups Act 2006 as a basis for carrying our DBS checks.</p>
How we collect (the source) and use the information	<p>The CCG uses information for the purposes of employment in a variety of ways including:</p> <p>The CCG uses information for the purposes of employment in a variety of ways including:</p> <ul style="list-style-type: none"> • Processing pay and pensions • Administering staff benefits • Facilitating staff training and progression • Informing investigations • Processing staff leavers, retirements and providing references.
How long we will keep the information	Review with the intention to transfer to place of deposit Trigger-Leave date plus 6 years, Period 75 th birthday
Who we will share the information with (recipients)	<p>The CCG shares information with a variety of organisation and individuals for a number of lawful purposes including:</p> <ul style="list-style-type: none"> • Public disclosure under Freedom of Information - e.g. requested names or contact details of senior managers or those in public-facing roles; • Disclosure of job applicant details - e.g. to named referees for reference checks, to the Disclosure & Barring Service for criminal record checks • Disclosure to employment agencies - e.g. in respect of agency staff; • Disclosure to banks & insurance companies - e.g. to confirm

	<p>employment details in respect of loan/mortgage applications/guarantees;</p> <ul style="list-style-type: none">• Disclosure to professional registration organisations - e.g. in respect of fitness to practice hearings;• Disclosure to Occupational Health professionals (subject to explicit consent);• Disclosure to police or fraud investigators - e.g. in respect of investigations into incidents, allegations or enquiries.
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Human Resources- DBS.

Purpose	The CCG holds personal and confidential information in relation to processes for using the Disclosure and Barring Service (DBS)
Type of information Used	Identifiable: Personal (such as name, address, date of birth, passport, driving licence and NI) and Special Category (health, racial or ethnic origin information)
Legal basis	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority</p> <p>GDPR Article 9(2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment...social protection law in so far as it is authorised by Union or Member State law.</p> <p>For criminal conviction information (obtained via the Disclosure and Barring Service (DBS)) processing meets the requirements of Article 10 of the GDPR under Schedule 1, Part 1 of the Data Protection Act 2018 - processing in connection with employment, health and research - Processing necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law, social security law or the law relating to social protection.</p> <p>Relevant legislation: the provisions of the Safeguarding Vulnerable Groups Act 2006 as a basis for carrying our DBS checks.</p>
How we collect (the source) and use the information	<p>Individuals provide by consent the information required by the DBS.</p> <p>This information is used for recruitment, professional registration and safeguarding purposes.</p>
How long we will keep the information	Destroy records from date of clearance within a period no longer than 6 months
Who we will share the information with (recipients)	The CCG shares information with the Disclosure & Barring Service for criminal record checks.

Human Resources- Occupational Health for staff under health surveillance

Purpose	The CCG holds personal and confidential information of its staff for employment-related purposes relating to their wellbeing and health.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health, racial or ethnic origin information)
Legal basis	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority</p> <p>GDPR Article 9(2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment...social protection law in so far as it is authorised by Union or Member State law.</p> <p>For criminal conviction information (obtained via the Disclosure and Barring Service (DBS)) processing meets the requirements of Article 10 of the GDPR under Schedule 1, Part 1 of the Data Protection Act 2018 - processing in connection with employment, health and research - Processing necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law, social security law or the law relating to social protection.</p> <p>Relevant legislation: the provisions of the Safeguarding Vulnerable Groups Act 2006 as a basis for carrying our DBS checks.</p>
How we collect (the source) and use the information	<p>The CCG uses information for the purposes of employment in a variety of ways including:</p> <ul style="list-style-type: none"> • Referrals to Occupational Health • Occupational Health Reports • Ensure staff wellbeing • Investigations • HR processes for managing sickness, capabilities and making reasonable adjustments.
How long we will keep the information	<p>Review with intention to destroy from the termination of employment. Records are kept until the 75th Birthday.*</p> <p>*Where they have been subject to radiation Plus 50 years from last entry or 75th birthday, whichever the longer.</p> <p>*Where they have been subject to asbestos Plus 40 years from last entry or 75th birthday, whichever the greater.</p> <p>For vaccinations and blood test results, records are kept from the date of treatment plus 40 years</p>
Who we will share the information with (recipients)	<p>The CCG shares information with a variety of organisation and individuals for a number of lawful purposes including:</p> <ul style="list-style-type: none"> • Disclosure to professional registration organisations - e.g. in respect of fitness to practice hearings; • Disclosure to Occupational Health professionals (subject to explicit consent);

	<ul style="list-style-type: none">• Referrals to promote an individuals wellbeing;• HR managers and Line managers;• Disclosure to police or fraud investigators - e.g. in respect of investigations into incidents, allegations or enquiries.
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Human Resources- Occupational Health - Reports

Purpose	The CCG holds personal and confidential information of its staff for employment-related purposes relating to their wellbeing and health.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health, racial or ethnic origin information)
Legal basis	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority</p> <p>GDPR Article 9(2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment...social protection law in so far as it is authorised by Union or Member State law.</p> <p>For criminal conviction information (obtained via the Disclosure and Barring Service (DBS)) processing meets the requirements of Article 10 of the GDPR under Schedule 1, Part 1 of the Data Protection Act 2018 - processing in connection with employment, health and research - Processing necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law, social security law or the law relating to social protection.</p> <p>Relevant legislation: the provisions of the Safeguarding Vulnerable Groups Act 2006 as a basis for carrying our DBS checks.</p>
How we collect (the source) and use the information	<p>The CCG uses information for the purposes of employment in a variety of ways including:</p> <ul style="list-style-type: none"> • Referrals to Occupational Health • Occupational Health Reports • Ensure staff wellbeing • Investigations • HR processes for managing sickness, capabilities and making reasonable adjustments.
How long we will keep the information	<p>Review with intention to destroy from the termination of employment. Records are kept until the 75th Birthday or Plus 6 years, whichever the sooner.</p> <p>For exposure monitoring, vaccinations and blood test results, records are kept from the date monitoring ceases or date of treatment plus 40 years.*</p> <p>*Where they have been subject to radiation Plus 50 years from last entry or 75th birthday, whichever the longer.</p> <p>*Where they have been subject to asbestos Plus 40 years from last entry or 75th birthday, whichever the greater.</p>
Who we will share the information with	The CCG shares information with a variety of organisation and individuals for a number of lawful purposes including:

(recipients)	The CCG shares information with a variety of organisation and individuals for a number of lawful purposes including: <ul style="list-style-type: none">• Disclosure to professional registration organisations - e.g. in respect of fitness to practice hearings;• Disclosure to Occupational Health professionals (subject to explicit consent);• Referrals to promote an individuals wellbeing;• HR managers and Line managers;• Disclosure to police or fraud investigators - e.g. in respect of investigations into incidents, allegations or enquiries.
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Human Resources- Employee References.

Purpose	The CCG holds personal and confidential information of its staff for providing employee references
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health, racial or ethnic origin information)
Legal basis	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority</p> <p>GDPR Article 9(2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment...social protection law in so far as it is authorised by Union or Member State law.</p> <p>For criminal conviction information (obtained via the Disclosure and Barring Service (DBS)) processing meets the requirements of Article 10 of the GDPR under Schedule 1, Part 1 of the Data Protection Act 2018 - processing in connection with employment, health and research - Processing necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law, social security law or the law relating to social protection.</p> <p>Relevant legislation: the provisions of the Safeguarding Vulnerable Groups Act 2006 as a basis for carrying out DBS checks.</p>
How we collect (the source) and use the information	The CCG uses information for the purposes of providing references to recruiting organisations, where they demonstrate consent has been provided.
How long we will keep the information	Review with intention to destroy from the provision of reference plus 1 year.
Who we will share the information with (recipients)	<p>The CCG shares information with a variety of organisations and individuals for a number of lawful purposes including:</p> <ul style="list-style-type: none"> • Disclosure of job applicant details - e.g. to named referees for reference checks.

Human Resources- Payroll and pension information.

Purpose	The CCG holds personal and confidential information of its staff for employment-related purposes, including the payment of salary and processing of staff benefits.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health, racial or ethnic origin information)
Legal basis	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority</p> <p>GDPR Article 9(2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment...social protection law in so far as it is authorised by Union or Member State law.</p> <p>For criminal conviction information (obtained via the Disclosure and Barring Service (DBS)) processing meets the requirements of Article 10 of the GDPR under Schedule 1, Part 1 of the Data Protection Act 2018 - processing in connection with employment, health and research - Processing necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law, social security law or the law relating to social protection.</p> <p>Relevant legislation: the provisions of the Safeguarding Vulnerable Groups Act 2006 as a basis for carrying our DBS checks.</p>
How we collect (the source) and use the information	<p>The CCG uses information for the purposes of employment in a variety of ways including:</p> <ul style="list-style-type: none"> • To make salary payments and deductions including salary sacrifice schemes. • To process staff benefits including but not limited to Pensions and Trade Union affiliation. • To deduct tax and NI.
How long we will keep the information	<p>Review with intention to destroy</p> <p>For income tax/NI [correspondence with HMRC] closure of tax year plus 6</p> <p>For sick pay and statutory maternity pay, closure of tax year plus 3</p> <p>For pensions, termination of employment plus 6 years</p>
Who we will share the information with (recipients)	<p>The CCG shares information with a variety of organisation and individuals for a number of lawful purposes including:</p> <ul style="list-style-type: none"> • Public disclosure under Freedom of Information - e.g. requested names or contact details of senior managers or those in public-facing roles; • Disclosure of job applicant details - e.g. to named referees for reference checks, to the Disclosure & Barring Service for criminal record checks • Disclosure to employment agencies - e.g. in respect of agency staff; • Disclosure to banks & insurance companies - e.g. to confirm

	<p>employment details in respect of loan/mortgage applications/guarantees;</p> <ul style="list-style-type: none">• Disclosure to professional registration organisations - e.g. in respect of fitness to practice hearings;• Disclosure to Occupational Health professionals (subject to explicit consent);• Disclosure to police or fraud investigators - e.g. in respect of investigations into incidents, allegations or enquiries.
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Human Resources- Concerns with staff behaviour when working with vulnerable groups.

Purpose	The CCG holds personal and confidential information of its staff for employment-related purposes relating to professional conduct.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health, racial or ethnic origin information)
Legal basis	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority</p> <p>GDPR Article 9(2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment...social protection law in so far as it is authorised by Union or Member State law.</p> <p>For criminal conviction information (obtained via the Disclosure and Barring Service (DBS)) processing meets the requirements of Article 10 of the GDPR under Schedule 1, Part 1 of the Data Protection Act 2018 - processing in connection with employment, health and research - Processing necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law, social security law or the law relating to social protection.</p> <p>Relevant legislation: the provisions of the Safeguarding Vulnerable Groups Act 2006 as a basis for carrying our DBS checks.</p>
How we collect (the source) and use the information	<p>The CCG uses information for the purposes of employment in a variety of ways including:</p> <ul style="list-style-type: none"> • For safeguarding staff and/or members of the public. • Support investigative processes. • Risk management
How long we will keep the information	<p>Review with intention to destroy after employment ceases plus 6 years, unless a legal case has been brought.</p> <p>For incidents relating to working with children Keep until retirement age or for 10 years if that is longer.</p>
Who we will share the information with (recipients)	<p>The CCG shares information with a variety of organisation and individuals for a number of lawful purposes including:</p> <ul style="list-style-type: none"> • Public disclosure under Freedom of Information - e.g. requested names or contact details of senior managers or those in public-facing roles; • Disclosure of job applicant details - e.g. to named referees for reference checks, to the Disclosure & Barring Service for criminal record checks • Disclosure to employment agencies - e.g. in respect of agency staff; • Disclosure to banks & insurance companies - e.g. to confirm employment details in respect of loan/mortgage applications/guarantees;

	<ul style="list-style-type: none">• Disclosure to professional registration organisations - e.g. in respect of fitness to practice hearings;• Disclosure to Occupational Health professionals (subject to explicit consent);• Disclosure to police or fraud investigators - e.g. in respect of investigations into incidents, allegations or enquiries.
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Human Resources- Mandatory leave entitlement.

Purpose	The CCG holds personal and confidential information of its staff for managing statutory leave entitlement, for example parental leave.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health, racial or ethnic origin information) Information relating to criminal convictions (DBS checks).
Legal basis	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority</p> <p>GDPR Article 9(2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment...social protection law in so far as it is authorised by Union or Member State law.</p> <p>For criminal conviction information (obtained via the Disclosure and Barring Service (DBS)) processing meets the requirements of Article 10 of the GDPR under Schedule 1, Part 1 of the Data Protection Act 2018 - processing in connection with employment, health and research - Processing necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law, social security law or the law relating to social protection.</p> <p>Relevant legislation: the provisions of the Safeguarding Vulnerable Groups Act 2006 as a basis for carrying our DBS checks.</p>
How we collect (the source) and use the information	The CCG uses information for the purposes managing the T&C of an employees contract.
How long we will keep the information	Review to intention to destroy from completion of entitlement plus 6 years
Who we will share the information with (recipients)	<p>The CCG shares information with a variety of organisation and individuals for a number of lawful purposes including:</p> <ul style="list-style-type: none"> • Public disclosure under Freedom of Information - e.g. requested names or contact details of senior managers or those in public-facing roles; • Disclosure of job applicant details - e.g. to named referees for reference checks, to the Disclosure & Barring Service for criminal record checks • Disclosure to employment agencies - e.g. in respect of agency staff; • Disclosure to banks & insurance companies - e.g. to confirm employment details in respect of loan/mortgage applications/guarantees; • Disclosure to professional registration organisations - e.g. in respect of fitness to practice hearings; • Disclosure to Occupational Health professionals (subject to explicit consent); • Disclosure to police or fraud investigators - e.g. in respect of investigations into incidents, allegations or enquiries.

Human Resources- Occupational Health – Accidents at work

Purpose	The CCG holds personal and confidential information of its staff for managing and responding to accidents at work.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health, racial or ethnic origin information)
Legal basis	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority</p> <p>GDPR Article 9(2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment...social protection law in so far as it is authorised by Union or Member State law.</p> <p>For criminal conviction information (obtained via the Disclosure and Barring Service (DBS)) processing meets the requirements of Article 10 of the GDPR under Schedule 1, Part 1 of the Data Protection Act 2018 - processing in connection with employment, health and research - Processing necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law, social security law or the law relating to social protection.</p> <p>Relevant legislation: the provisions of the Safeguarding Vulnerable Groups Act 2006 as a basis for carrying our DBS checks.</p>
How we collect (the source) and use the information	<p>The CCG uses information for the purposes of employment in a variety of ways including:</p> <ul style="list-style-type: none"> • Referrals to Occupational Health. • Assisting with H&S legislative matters. • Informing HR processes.
How long we will keep the information	Review with intention to destroy from the termination of Employment plus 40 Years.
Who we will share the information with (recipients)	<p>The CCG shares information with a variety of organisation and individuals for a number of lawful purposes including:</p> <ul style="list-style-type: none"> • Public disclosure under Freedom of Information - e.g. requested names or contact details of senior managers or those in public-facing roles; • Disclosure of job applicant details - e.g. to named referees for reference checks, to the Disclosure & Barring Service for criminal record checks • Disclosure to employment agencies - e.g. in respect of agency staff; • Disclosure to banks & insurance companies - e.g. to confirm employment details in respect of loan/mortgage applications/guarantees; • Disclosure to professional registration organisations - e.g. in respect of fitness to practice hearings; • Disclosure to Occupational Health professionals (subject to explicit consent);

	<ul style="list-style-type: none">• Disclosure to police or fraud investigators - e.g. in respect of investigations into incidents, allegations or enquiries.
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Leeds
Clinical Commissioning Group

Human Resources- Staff Training Records

Purpose	The CCG holds personal and confidential information of its staff for employment-related purposes, such as recruitment, payment of salary, sickness and absence monitoring and professional development purposes.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health, racial or ethnic origin information)
Legal basis	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority</p> <p>GDPR Article 9(2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment...social protection law in so far as it is authorised by Union or Member State law.</p> <p>For criminal conviction information (obtained via the Disclosure and Barring Service (DBS)) processing meets the requirements of Article 10 of the GDPR under Schedule 1, Part 1 of the Data Protection Act 2018 - processing in connection with employment, health and research - Processing necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law, social security law or the law relating to social protection.</p> <p>Relevant legislation: the provisions of the Safeguarding Vulnerable Groups Act 2006 as a basis for carrying our DBS checks.</p>
How we collect (the source) and use the information	<p>The CCG uses information for the purposes of employment in a variety of ways including:</p> <ul style="list-style-type: none"> • Carrying our personal development reviews. • Monitoring participation in mandatory, clinical and other training. • Providing for fair opportunity, informing the equality and diversity agenda.
How long we will keep the information	<p>Review, consider transfer to place of deposit</p> <p>Trigger, creation</p> <p>Period;</p> <p>*For clinical training records and records of significant training; keep until 75th birthday or 6 years following termination of employment.</p> <p>*For statutory and mandatory training records, completion of training plus 10 years.</p> <p>*For other training records, completion of training plus 6 years.</p>
Who we will share the information with (recipients)	<p>The CCG shares information with a variety of organisation and individuals for a number of lawful purposes including:</p> <ul style="list-style-type: none"> • Public disclosure under Freedom of Information - e.g. requested names or contact details of senior managers or those in public-facing roles; • Disclosure of job applicant details - e.g. to named referees for reference checks, to the Disclosure & Barring Service for

	<p>criminal record checks</p> <ul style="list-style-type: none">• Disclosure to employment agencies - e.g. in respect of agency staff;• Disclosure to banks & insurance companies - e.g. to confirm employment details in respect of loan/mortgage applications/guarantees;• Disclosure to professional registration organisations - e.g. in respect of fitness to practice hearings;• Disclosure to Occupational Health professionals (subject to explicit consent);• Disclosure to police or fraud investigators - e.g. in respect of investigations into incidents, allegations or enquiries.
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Leeds
Clinical Commissioning Group

Declarations of Interests, Gifts and Hospitality Publication

Purpose	The CCG is required to maintain and publish on its website registers of interests, gifts and hospitality for all staff of the CCG, as well as its Members, Governing Body and Committee Members
Type of information Used	Identifiable: Personal (name and job role)
Legal basis	GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority Statutory guidance for CCGs on <u>Managing Conflicts of Interest</u> under Section 14O of the National Health Service Act 2006 (as amended by the Health and Social Care Act 2012)
How we collect (the source) and use the information	The CCG maintains and publishes Registers of Interest and Gifts and Hospitality containing names, job roles, details of the interest and/or receipt of gifts/hospitality including the details of those supplying the gift/hospitality as per the guidance on Managing Conflicts of Interest.
How long we will keep the information	
Who we will share the information with (recipients)	The registers are published on the CCG's website. Information may be shared with NHS England.

National Fraud Initiative

Purpose	<p>The CCG is required by law 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 under the National Fraud Initiative.</p> <p>The Cabinet Office is responsible for carrying out data matching exercises.</p>
Type of information Used	Identifiable: Personal
Legal basis	<p>GDPR Article 6 (1)(c) – processing is necessary for compliance with a legal obligation to which the controller is subject.</p> <p>Relevant Legislation: Part 6 of the Local Audit and Accountability Act 2014 (LAAA).</p>
How we collect (the source) and use the information	<p>We participate in the Cabinet Office’s National Fraud Initiative: a data matching exercise to assist in the prevention and detection of fraud. We are required to provide particular sets of data to the Minister for the Cabinet Office for matching for each exercise, as detailed here. 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.</p> <p>Data matching by the Cabinet Office is subject to a Code of Practice.</p> <p>For further information on data matching at this authority, contact the CCG’s Corporate Services Manager</p>
How long we will keep the information	<p>The datasets used in the matching exercise by the Cabinet Office will be kept as per the Code of Data Matching Practice</p>
Who we will share the information with (recipients)	<p>The Cabinet Office and Counter Fraud Authority</p>

Fraud case files

Review with the intention to destroy
Case closure Plus 6 years

Subject Access Request

Purpose	The right of access, commonly referred to as subject access, gives individuals the right to obtain a copy of their personal data as well as other supplementary information. It helps individuals to understand how and why you are using their data, and check you are doing it lawfully.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health information) The CCG requires this information in order to investigate and help to resolve complaints
Legal basis	Article 15 of GDPR and Chapter 3, part 4, paragraph 94 of DPA 2018
How we collect (the source) and use the information	Leeds Clinical Commissioning Group is a commissioning organisation and does not hold individual medical records except with consent as part of processes such as Safeguarding, Continuing Care, Individual Funding Requests and Complaints or where there is a specific legal basis for doing so (e.g. s251). The organisation will also hold personal data relating to employees and contractors.
How long we will keep the information	Review with intention to destroy from closure of request plus 3 years. For appeals, from closure of appeal plus 6 years.
Who we will share the information with (recipients)	The data will be shared with the individual who requests it.

Freedom of Information (FOI) request

<p>Purpose</p>	<p>The Freedom of Information Act (2000) is part of the Government’s commitment to greater openness in the public sector. It enables members of the public to scrutinise the decisions of public authorities more closely and ensure that services are delivered properly and efficiently</p> <p>This legislation places an obligation on the CCG to make available to anyone certain information that we hold, with some specific exceptions. Access to information can be made through individuals or organisations requesting specific information or by accessing information made available by the public authority through the Publication Scheme, which is a specific part of the organisational website.</p>
<p>Type of information Used</p>	<p>All aspects of recorded information held by the CCG, including (but not limited to):</p> <p>Patient/Client/Service User information of a general, non-personal nature</p> <p>Certain types of Personnel/Staff information, especially where this concerns senior executives and board members</p> <p>Organisational and business sensitive information</p> <p>Structured and unstructured record systems - paper and electronic</p> <p>Photographic images, digital, text or video/audio recordings including CCTV</p> <p>All information systems purchased, developed and managed by/or on behalf of, the organisation</p> <p>Information held on paper, floppy disc, CD, USB/Memory sticks, computers laptops, tablets, mobile phones and cameras</p> <p>Documents and information that have been supplied by other organisations</p> <p>All documents and information created in the course of staff duties (even personal e-mails and potentially including information held on private equipment may fall within the scope of the Act and its Regulations)</p>
<p>Legal basis</p>	<p>The Freedom of Information Act (2000)</p>
<p>How we collect (the source) and use the information</p>	
<p>How long we will keep the information</p>	<p>Review with intention to destroy from closure of request plus 3 years. For appeals, from closure of appeal plus 6 years.</p>
<p>Who we will share the information with (recipients)</p>	<p>Members of the public and the media</p>

Environmental Information Regulations (EIR)

Purpose	This legislation places an obligation on the CCG to make available to anyone certain information that we hold. Access to information can be made through individuals or organisations requesting specific information or by accessing information made available by the public authority through the Publication Scheme, which is a specific part of the organisational website.
Type of information Used	Certain categories of public information are covered by the Environmental Information Regulations (2004). The Regulations cover information related to the environment such as emissions, land use, pollution, waste disposal etc. The regulations are similar to FOI but there is an even greater presumption of disclosure, exceptions (similar to FOI exemptions) are fewer and requests can be made verbally.
Legal basis	Environmental Information Regulations (2004).
How we collect (the source) and use the information	
How long we will keep the information	
Who we will share the information with (recipients)	

Template Dataset Name

Purpose	
Type of information Used	
Legal basis	
How we collect (the source) and use the information	
How long we will keep the information	
Who we will share the information with (recipients)	