



**Privacy Notice for Human Resources Operations, Centre for Health at Work (CHAW)
and Health & Safety within Devon and Cornwall Police / Dorset Police**
Version 1.0

Being transparent and providing accessible information to individuals about how we use personal information is a key element of the Data Protection Act and the General Data Protection Regulation (Regulation (EU) 2016/679).

Please note that details about the data controller and why we process personal information can be found in our overarching privacy notices (*please search for the words 'privacy notice' at www.devon-cornwall.police.uk or the words 'legal and privacy' at www.dorset.police.uk*).

The information being processed

HR Operations, CHAW and Health & Safety within Devon and Cornwall Police / Dorset Police is collecting:

- Personal information relating to any day-to-day Human Resources (HR) / personnel matters, which may include sensitive personal information regarding attendance management or health / medical matters;
- Personal information and sensitive personal information relating to any Health & Safety matter, including Fitness (within Devon & Cornwall only); and
- Sensitive personal information relating to any health / medical matters, including diagnostic and treatment information;

For the purpose of:

- Undertaking the duties of the employer for and on behalf of the employee i.e. contractual and non-contractual obligations;
- Using methods of consent for sensitive personal information, where necessary, to provide occupational health or preventative medical advice, and to undertake obligations in the field of employment; and
- Making recommendation and/or decisions for the benefit of the individual and the organisation.

The legal basis for processing this information is:

Article 6(1)

- a) Consent
- b) Performance of a contract
- c) Compliance with a legal obligation
- d) Protect the vital interests of the data subject
- e) Performance of a task carried out in the public interest



Article 9(2)

- a) Data subject has given explicit consent
- b) Carrying out the obligations of controller or data subject in the field of employment.

Who do we share your personal information with?

To ensure that **HR Operations, CHAW and Health & Safety** within **Devon and Cornwall Police / Dorset Police** provides you with an efficient and effective service we will sometimes need to share your information between teams within **Devon and Cornwall Police / Dorset Police** as well as with our partner organisations that support the delivery of the service you may receive. In this case, the information collected above could be shared with any of the following and will be assessed on a case by case basis:

Internal:

- Individuals;
- Line managers;
- Managers within the line management structure i.e. second line manager, Senior Management Team (SMT);
- Independent panel chair and members - Stage three appeals;
- CHAW;
- HR;
- Business Support Services;
- Finance / Payroll;
- Trauma Risk Management (TRiM)
- Peer Support Network;
- Professional Standards Department;
- Staff Associations (Trades Unions and Federation); and
- Legal Services.

External:

- Employment Tribunals;
- IMASS – Selected Medical Practitioner / Independent Registered Medical Practitioner provision;
- Police Medical Appeals Board (PMAB) – Health Management Ltd;
- Home Office;
- Independent Medical Specialists;
- Legal representatives, in the context of PMAB and Health & Safety;
- Peninsula Pensions;
- Kier Pensions;
- Dyslexia provisions and services;
- Health & Safety Executive;
- Independent Workplace Assessor, linked to Display Screen Equipment;
- Access To Work;
- GPs, Consultants, Therapists, Counsellors;
- Health Assured – Employee Assistance Programme (EAP);
- External Occupational Health provider for Dorset Police;
- Physiotherapy providers i.e. Nuffield Hospital;



- Anxiety and depression services;
- Professional medical bodies i.e. General Medical Council (GMC), United Kingdom Central Council for Nursing, Midwifery and Health Visiting (UKCC);
- NHS Trusts and hospitals;
- Suppliers of medical equipment (swabs etc.) via Miller; and
- Midland Pathology Services e.g. blood samples.

Disclosures of personal information are made on a case-by-case basis, using the personal information appropriate to a specific purpose and circumstances, and with necessary controls in place.

HR Operations, CHAW and Health & Safety within Devon and Cornwall Police / Dorset Police will also disclose personal information to other bodies or individuals when required to do so by, or under, any act of legislation, by any rule of law, and by court order.

HR Operations, CHAW and Health & Safety within Devon and Cornwall Police / Dorset Police may also disclose personal information on a discretionary basis for the purpose of, and in connection with, any legal proceedings or for obtaining legal advice.

We will only ever share your information if we are satisfied that our partners or suppliers have sufficient measures in place to protect your information in the same way that we do. We will never share your information for marketing purposes.

How do we keep your personal information safe?

Please refer to the overarching privacy notices (*please search for the words 'privacy notice' at www.devon-cornwall.police.uk* or the words 'legal and privacy' at www.dorset.police.uk).

What are your rights?

Please refer to the overarching privacy notices (*please search for the words 'privacy notice' at www.devon-cornwall.police.uk* or the words 'legal and privacy' at www.dorset.police.uk).

How long will we keep your personal information?

All personal data relating to HR Operations day-to-day activity will be retained for Termination of Employment +6+1 years excepting:

Description	Retention Period
Fit notes	Current tax year + 3 years
Grievance documentation	Closure of the case +6+1 years
Accident reporting and investigation	6 years
Health and Safety assessments including Display Screen Equipment, Manual handling, Work Activity, Pregnancy, Return to Work, Lone Working and Personal Emergency Evacuation Plan	Termination of Employment +3 years
Exercise Rehabilitation	Termination of Employment +6+1 years



Pre-employment medical records, where the role is not taken up	12 months
Health (surveillance) records	40 years, as stipulated by the NHS and British Medical Association
Medical records	Termination of Employment +6+1 years or until individual surpasses age 75, unless there is a recognised clinical need or statutory requirement to keep it for longer

An exception to the retention periods above is personal and sensitive personal data relating to certain pension's benefits i.e. ill health retirement, injury on duty (IOD) and early release of deferred pension benefits, where data is retained, due to police pensions regulations allowing for the review of IOD payments.

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Details of transfers to third country and safeguards

Your personal and sensitive data is predominantly stored and processed on servers based within the European Economic Area (EEA). There may be occasions when your personal data is shared with countries outside of the EEA, for example:

- Information relating to personnel matters for secondees, deployed to overseas roles, or individuals on a career break overseas; or
- Individuals living abroad who seek to receive their pension benefits early or who might be in receipt of an injury on duty claim; or
- Personal data relating to individuals in the army reserves, or similar organisation, who may be mobilised overseas.