

# PCC Staff Privacy Notice

## August 2025

Date policy approved by EMT	
Date policy approved by Business Committee	
Date policy approved by Council	
Date policy was Equality Screened	
Scheduled review date	

--	--	--	--	--

**Your Voice,  
Our Journey**

[www.pcc-ni.net](http://www.pcc-ni.net)

## **Patient and Client Council Staff Privacy Notice**

This privacy notice tells you what to expect us to do with your personal information when you work for us.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- Who we share information with
- How to complain

### **Contact details**

#### **Post**

12-22 Linenhall Street,  
Belfast,  
BT2 8BS

#### **Telephone**

0800 917 0222

#### **Email**

info@pcc-ni.net

## **What information we collect and use, and why**

### **1 INTRODUCTION**

The PCC recognises the importance of protecting personal and confidential information in all that we do, all we direct or commission, and takes care to meet its legal duties. Key legislation includes:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Access to Health Records (Northern Ireland) Order 1993 (AHR)
- The Freedom of Information Act 2000 (FOI)
- The Environmental Information Regulations 2004 (EIR)
- The Human Rights Act 1998 (HRA)
- Other relevant Health Service Regulation and
- The Common Law Duty of Confidentiality

We collect or use the following personal information for a number of purposes such as **staff recruitment, employee relations, payroll, absence management, performance management administration and management:**

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Gender
- Photographs (eg staff ID card)
- Copies of passports or other photo ID (for recruitment)
- Marital status
- Next of kin or emergency contact details
- Political, conflict of interest or gift declarations
- Security clearance details (eg basic checks and higher security clearance)
- Performance records (eg reviews, disciplinary records, complaints or disciplinary action)
- Training history and development needs
- Pension contributions
- Absence information and sickness records

Information is also used to run and improve the management of the organisation, for example:

- To check and report on the effectiveness of the PCC;
- Ensure that money is being used appropriately to pay for the services the PCC provides.

We also collect or use the following special category information for **staff recruitment, administration and management**. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Health information
- Sexual orientation information

## **Salaries and pensions**

We collect or use the following personal information as part of **managing salaries and pensions**:

- Job role and employment contract (eg start and leave dates, salary, changes to employment contract or working patterns)
- Time spent working (eg timesheets or clocking in and out)
- Expense, overtime or other payments claimed
- Leave (eg sick leave, holidays or special leave)
- Maternity, paternity, shared parental and adoption leave and pay

We also collect or use the following special category information for **managing salaries and pensions**. This information is subject to additional protection due to its sensitive nature:

- Trade union membership

## **Staff health and wellbeing**

We collect or use the following personal information for **managing staff health and wellbeing**:

- General health and wellbeing information

- Occupational health referrals and reports
- Sick leave forms or fit notes (eg Statement of Fitness for Work from a GP or hospital)
- Accident at work records
- Access needs or reasonable adjustments

We also collect or use the following special category information for **managing staff health and wellbeing**. This information is subject to additional protection due to its sensitive nature:

- Health information

## Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. Read more about the right of access.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. Read more about the right to rectification.
- **Your right to erasure** - You have the right to ask us to delete your personal information. Read more about the right to erasure.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. Read more about the right to restriction of processing.
- **Your right to object to processing** - You have the right to object to the processing of your personal data. Read more about the right to object to processing.

- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. Read more about the right to data portability.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. Read more about the right to withdraw consent.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

## **Our lawful bases for the collection and use of your data**

Our lawful bases for collecting or using personal information as part of **staff recruitment, administration and management** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legal obligation** – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **Vital interests** – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- **Public task** – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information as part of **managing salaries and pensions** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information as part of **managing staff health and wellbeing** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

## **Where we get personal information from**

We collect your information from the following places:

- Directly from you
- Employment agency
- Security clearance providers
- Occupational Health and other health providers
- Pension administrators or government departments (eg HMRC and DWP)
- Trade Unions

## **How long we keep information**

The PCC will only retain information for as long as necessary, in line with the Department of Health (DoH) Good Management Good Records (GMGR). For further information, please refer to the following DoH link:

[Good management, good records | Department of Health \(health-ni.gov.uk\)](https://www.health-ni.gov.uk/good-management-good-records)

## **Who we share information with**

In some circumstances, we may share information with the following organisations:

### **Business Services Organisation**

BSO process recruitment, manage our HR for PCC, manage PCC Payroll and Occupational health in relation to staff's health and wellbeing

We have a joint controller relationship with Business Services Organisation. We process your personal information with that joint controller for the following reason: Business Services Organisation (BSO) provide a wide range of services such as HR, Payroll, Occupational Health, Legal and Retained Recruitment through service level agreements with PCC. Therefore BSO will be privy to staff personal information and data.

## **How to complain**



If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

**Phone:** 0800 917 0222

**Email:** [info@pcc-ni.net](mailto:info@pcc-ni.net)

 [@PatientClient](https://twitter.com/PatientClient)

 [@PatientAndClientCouncil](https://www.facebook.com/PatientAndClientCouncil)