

# Privacy Notice for the All Wales Locum Register (AWLR)

## 1. Introduction

NHS Wales is made up of several health organisations that include the NHS Wales Shared Services Partnership (NWSSP). NWSSP is hosted under Velindre University NHS Trust and supports NHS Wales through the provision of a comprehensive range of high quality, customer focused [support functions and services](#).

NWSSP are working in partnership with Welsh Government to deliver [Primary Care Sustainability Services](#) to GPs and GP Practices in Wales. As part of the implementation of the All Wales Locum Register (AWLR) for Primary Care, NWSSP and Welsh Government have worked with NWSSP Legal and Risk and Primary Care Services.

Any following references to 'We' and 'us' refers to the NHS Wales Shared Services Partnership as a "hosted" body under Velindre University NHS Trust.

We recognise the need to treat Personal information in a fair and lawful manner. Personal information held by us will not be processed unless the requirements for fair and lawful processing can be met. This Privacy Notice provides a summary of how we will ensure that we do that, by describing:

- The categories of personal information we handle;
- The purpose(s) for which it is being processed;
- The person(s) it may be shared with.

This Notice also explains what rights you have to control how we use your information.

## Our contact details

	<b>NWSSP Employment Services</b>	<b>NWSSP Information Governance Manager</b>
<b>Address</b>	NWSSP Headquarters Unit 4-5 Charnwood Court Heol Billingsley Parc Nantgarw CF15 7QZ	Companies House Crown Way Cardiff CF14 3UZ
<b>Email</b>	<a href="mailto:NWSSP.PrimaryCareWNWRS@Wales.nhs.uk">NWSSP.PrimaryCareWNWRS@Wales.nhs.uk</a>	<a href="mailto:Tim.knifton@wales.nhs.uk">Tim.knifton@wales.nhs.uk</a>
<b>Telephone</b>	01792 860498/860490	

## 2. What type of information we have

In order to carry our activities and obligations within the All Wales Locum Register (AWLR) and processing duties as the AWLR Data and Reporting administrator for Primary Care GPs and GP Practices in Wales, we currently collect and process the following information:

### **All Wales Locum Register:**

- AWL Reference Number; unique to the registered GP
- GMC Number
- First Name
- Surname
- On Medical Performers List
- Status
- Date of Request
- Date Registered
- Revised Registration Date
- Confirmation Email Sent
- Date Withdrawn
- Contact Email Address

### **Wales Medical Performers List:**

- **GP Status of:**
  - Included
  - Provisional Inclusion
  - Conditionally Included
  - Contingently Included
  - Included – GMC/GDC/GOC Suspension
  - Provisional Inclusion – with Conditions
- **On list as:**
  - All with exception of
    - GP Trainee (F2)
    - Shropdoc only

### **Health Boards:**

- Local Health
- LHB Areas prepared to work

### 3. How we get the information and why do we have it

The information has been assessed for fairness of processing and the following describes how the information has been provided and processed:

- The Personal information we process for the purposes of the AWLR is fed into the system from the original Registration Document completed by each GP. This registration request process has now migrated to [Locum Hub Wales](#) as this offers a more streamlined solution for registration.
- A notification email is sent to NWSSP from Locum Hub Wales with the information detailed within Section 3. It is important to note that the NWSSP still processes all applications so it is locally processed within the organisation.
- We access the Medical Performers List (MPL) via secure log in to confirm inclusion on the list using the GMC Number provided by the GP. We can only register a GP on the AWLR if they have an approved status on the MPL. The GP will indicate their preferred areas to work and we record these in the MPL. The GP can decide if these are shared with GP Practices or not.
- The NWSSP Data and Reporting Administrator will use the provided email contact address to confirm registration to the GP. We have this information to enable us to register any GP in Wales who wants to be covered under The Scheme for General Medical Indemnity (GMPI) for any Locum work carried out in Wales. [GMPI Guidance](#) states that for any Locum working in Wales to be eligible for indemnity under the Scheme for GMPI must be registered on the AWLR and working to the Terms of the Register.
- In addition to the AWLR, we gather information from NWSSP Primary Care Services who notify us of a change to a GPs Status or if they are to be removed from the MPL. This information is critical as it could impact on their GMPI cover. NWSSP Legal and Risk Services will contact the AWLR Data and Reporting Administrator to confirm a GP was registered at a specific time point if a query or concern is raised against that GP and confirm that the conditions for GMPI cover have been met.
- We use the data to inform registrant of changes to the AWLR and inform of related services that are linked to the register.
- We use the data to populate anonymised reports for Official Statistics of Locums in Wales.
- In Wales, the legal basis for Welsh Government to collect and process data on the GP workforce is laid out in the National Health Service (Wales) Act 2006.

The Welsh Ministers, in accordance with their powers contained in the NHS (Wales) Act 2006, may collect and process data on the general practice workforce in Wales.

Under the General Data Protection Regulation (GDPR) Article 6 (Lawfulness of Processing), the lawful bases we rely on for processing this information are:

- (b) Processing is necessary for the performance of a contract that the data subject is party to;
- (c) Processing is necessary for compliance with a legal obligation to which the controller is subject;
- (e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- (f) Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party

#### **4. What we do with the information**

We use the information that you have given us in order to:

- Register you on the All Wales Locum Register (AWLR) and be covered under The Scheme for General Medical Practice Indemnity (GMPI)
- Register your GMPI Status on the Medical Performers List, GP Practices can access the [Public Facing MPL](#) and search for a Locum GP they are engaging and confirm GMPI Cover
- Update your prepared to work areas on the Medical Performers List
- Enable us to provide accurate and current workforce information re Locums to fulfil reporting obligations to Welsh Government and Health Boards
- To assist the administration and participation of the scheme for General Medical Practice Indemnity (GMPI).
- To inform all registrants of relevant changes, benefits and initiatives of the Welsh Government Primary Care Sustainability Strategy, to include but not limited to Wales National Workforce Reporting System (WNWRS), The Scheme for General Medical Practice Indemnity (GMPI), GPWales and Locum Hub Wales.

We may share this information with NWSSP (internal departments), Welsh Government, Health Education and Improvement Wales (HEIW), NHS Wales Health Boards (Primary Care Leads) and NHS Wales Informatics Service (NWIS).

There are a number of reasons why we share information. This can be due to:

- Our obligations to comply with current legislation.
- Our duty to comply with contractual arrangements.
- Our duty to comply with the need to perform a public task.
- Our duty to comply with any Court Order which may be imposed.
- Sharing information with internal departments to ensure smooth running and transition of services (i.e. GMPI and Primary Care Services).

Any disclosures of Personal information are always made on a case-by-case basis, using the minimum personal data necessary for the specific purpose and circumstances and with the appropriate security controls in place. Information is only shared with those agencies and bodies who have a "need to know" or where you have consented to the disclosure of your Personal information to such persons.

## **5. How we store your information**

Your information is securely stored on NWSSP data servers that are situated within the UK in a central location. Access to the system is controlled through a secure login with access level permissions allocated for the role of the user and giving those users access to areas they only need.

When extracting and validating data for the purposes of the Welsh Government Primary Care Census, NWSSP will extract the data from the AWLR which is then anonymised and sent to the Welsh Government through the NHS secure file sharing portal. NWSSP will hold the data securely on a NWSSP server supported by NWIS to complete the validation exercise.

We will only retain information for as long as necessary and review any data held by us for longer than three years. We will store data electronically and will dispose of information by deleting it securely.

As the AWLR is a workforce system maintained by NWSSP AWLR Data and Reporting Administrator, it is advised that records are maintained in line with local Records Management Policy, and retention and destruction schedules that determine the minimum length of time records should be kept.

For the purposes of General Medical Practice Indemnity (GMPI) cover, it is advised that NWSSP retain records of GPs who are no longer registered on the AWLR. This is to ensure that details of registration can be obtained if there is a need under the scheme for GMPI.

## 6. Security of your Information

We take our duty to protect your Personal information and confidentiality very seriously and we are committed to taking all reasonable measures to ensure the confidentiality and security of Personal information for which we are responsible, whether computerised or on paper.

Your Personal information will not be sold on to any third party by us, or any agency that holds it for the purposes listed above.

Under the NHS Confidentiality Code of Conduct, we are also required to protect your information, inform you of how your information will be used, and where appropriate to allow you to decide if and how your information can be shared.

Everyone working for the NHS is subject to the Common Law Duty of Confidence. Information provided in confidence will only be used for the purposes advised and consented to by yourself, unless it is required or permitted by the law.

Each NHS employer in Wales including NWSSP has appointed a Senior Information Risk Owner (SIRO) who is accountable for the management of all personal information assets and any associated risks and incidents.

All staff that handle confidential information are required to undertake biennial classroom based Information Governance (IG) training. All staff will also complete online mandatory eLearning modules annually.

Completion of regular IG training is a requirement of Data Protection Legislation. The training will ensure that staff are aware of their responsibilities regarding the safe and appropriate use of Person-identifiable, confidential information.

## 7. What if the data All Wales Locum Register holds is incorrect?

It is important that the information which we hold is up to date. If any of the stored AWLR personal information changes or if they are currently inaccurate then it is important that you review this and reconcile with your original confirmation email or in your [Locum Hub Wales Account](#).

For GP Status changes or corrections to the Medical Performers List please contact [Primary Care Services](#).

## 8. Your rights

Under current Data Protection legislation, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal data in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

If you wish to make a request please contact us at

[NWSSP.PrimaryCareWNWRS@Wales.nhs.uk](mailto:NWSSP.PrimaryCareWNWRS@Wales.nhs.uk)

Tel: **01792 860498 / 0490** and or

NWSSP Employment Services,

NWSSP Headquarters

Unit 4-5 Charnwood Court

Heol Billingsley

Parc Nantgarw

CF15 7QZ

## 9. How do I complain?

In the first instance, you should contact the NWSSP Complaints Officer.

If we are unable to resolve your complaint, you can also complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data. The ICO's address is:



Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Helpline number: 0303 123 1113

[www.ico.gov.uk](http://www.ico.gov.uk)

## **10. What laws are relevant to the handling of personal information?**

The law determines how organisations can use personal information. The key legislation governing the use of information is listed below:

- UK Data Protection Act 2018
- General Data Protection Regulation 2018
- Human Rights Act 1998
- Computer Misuse Act 1990
- Regulation of Investigatory Powers Act 2000

In relation to the use of AWLR information the law is primarily set out in Data Protection Legislation.

For the purposes of the DPA, NWSSP is the "Data Controller" (the holder, user and processor) of your information.

## **11. How can you get access your personal data?**

Current Data Protection Legislation gives the right to access the information which is held about you. You must make your request in writing to NWSSP (see Section 2).

You will need to provide:

- Adequate information [for example full name, address, date of birth, staff number, etc.] so that your identity can be verified and your personal data located;
- An indication of what information you are requesting to enable us to locate this in an efficient manner.



We aim to comply with requests for access to personal data as quickly as possible. We will ensure that we deal with requests within a calendar month of receipt unless there is a reason for delay that is justifiable under current legislation or further clarification is needed.

## **12. Data Protection Notification**

As well as the NWSSP, each Health Board and NHS Trust is a 'Data Controller' under Data Protection Legislation. We are required to notify the Information Commissioner that we process Personal information and the reasons why. These details are publicly available from the:

Information Commissioner's Office  
Wycliffe House  
Water Lane,  
Wilmslow, SK9 5AF  
[www.ico.gov.uk](http://www.ico.gov.uk)

## **13. Other Bodies**

Each NHS organisation in Wales and Welsh Government is responsible for protecting the public funds it manages. To do this we may use the information we hold about you to detect and prevent crime or fraud. We may also share this information with other bodies that inspect and manage public funds.

We will not routinely disclose any information about you without your express permission unless we are obliged to due to a legal / statutory duty.

## **14. Changes to our privacy notice**

We aim to keep our Privacy Notice under regular review and will revise as guidance and law changes.