

# Privacy Notice for the Wales National Workforce Reporting System (WNWRS)

## 1. Introduction

The [NHS Wales Shared Services Partnership \(NWSSP\)](#) is an independent organisation, owned and directed by [NHS Wales](#), hosted under Velindre University NHS Trust. NWSSP 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 GP Practices in Wales. As part of the implementation of the Wales National Workforce Reporting System (WNWRS) for primary care, NWSSP and Welsh Government have worked with GPC Wales, Primary Care departments in NHS Wales Health Boards and Health Education and Improvement Wales (HEIW).

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.

## 2. Our contact details

	NWSSP Employment Services	NWSSP Information Governance Manager
<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	

## 3. What type of information we have

In order to carry our activities and obligations within the WNWRS system and as the WNWRS data and reporting administrator for Primary Care GP Practices in Wales, we currently collect and process the following information:

- **Practice contact details;** w-code, practice name, address, post code, contact email address and locality.
- **Practice Manager/Practice System User details;** name, job role and email address and telephone number.
- **Practice staff personal identifiable information;** names (forename, other names and surname), date of birth, National Insurance number (NINO) and professional registration.
- **Personal demographics;** gender and ethnicity.
- **Employment record information;** staff role, staff group, contract type, contracted hours, working hours, source of recruitment, date joined, termination date, reason for leaving and destination.
- **Education and training;** qualifications, registered interests and special interests.
- **Welsh language competencies;** reading, writing and speaking skills.
- **Absence information;** Absence category, start and end date, absence status, absence cover information.
- **Locum usage;** Forename, Surname, professional registration and hours worked for the quarter.
- **Vacancy information;** Vacancy start and end date, staff group and role, whole time equivalent/hours, vacancy status and vacancy cover status.

- **Workforce planning questions;** Practice risks/issues, recruitment and retention challenges, skill shortages/challenges, workforce structure challenges and development requests.

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

The Personal information we process is provided to us directly through your GP Practice Management and the WNWRS. Initially, this was completed through the WNWRS data migration exercise (as a pre-system implementation data request). The WNWRS is now the direct source for GP Practice Management to provide us with information.

The system is accessed through a secure login.

In addition to the WNWRS, we gather information from the NHS Electronic Staff Record (ESR), the Wales Medical Performers List (MPL) and professional registration bodies. This information is used for validation and to identify inaccuracies held within the WNWRS data.

The reason why we collect this information is listed below in section 5.

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

## 5. What we do with the information

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

- Enable GP Practices and NWSSP to provide data for the workforce reporting module within the WNWRS.\*
- Enable GP Practices to provide accurate and current workforce information to fulfil the reporting obligations to Welsh Government, Health Boards and NHS Health Education and Improvements Wales.\*\*
- Enable GP Practices to provide accurate and current workforce information to comply with the GMS contract obligations.
- To assist the administration and participation of the scheme for General Medical Practice Indemnity (GMPI).
- To assist the Premium Payment Scheme administration with GP Partner identification and data validation.

*\*Personal information is not displayed in the WNWRS reporting module, but individual GP Practices (Practice Management) can access reports containing personal data from their GP Practice workforce data.*

*\*\*When providing reporting data to the Welsh Government for the Primary Care Census, NWSSP converts the date of birth to display only the age in years. We pseudonymised the National Insurance Number and convert it into a unique number, then provide the professional registration for validation against previous census data. This removes the need for current manual reporting and enables GP Practices to comply with legislation and GMS contract requirements.*

We may share this information with NHS Digital (system provider), 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.

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

Your information is securely stored in the WNWRS and data servers that are situated within the UK in a central location, on the premises of the system supplier and developer. 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.

For quarterly data extraction and validation purposes, NHS Digital will extract data from the WNWRS holding it securely on a NHS Digital server. Once the data validation exercise is completed, the data is uploaded onto the WNWRS to populate the reporting module.

When extracting and validating data for the purposes of the Welsh Government Primary Care Census, NHS Digital will extract the data from the WNWRS send it to NWSSP 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 WNWRS is a workforce system maintained by the GP Practice Management process, 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 GP Practices retain records of staff who are no longer employed by the GP Practice if they are to be removed from the WNWRS. This is to ensure that details of employment can be obtained if there is a need under the scheme for GMPI.

## **7. 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. They also appoint a Caldicott Guardian who is responsible for the management of patient information and their confidentiality.

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

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.

## **8. What if the data WNWRS holds is incorrect?**

It is important that the information which we hold is up to date. If any of the stored WNWRS personal information changes or if they are currently inaccurate then it is important that you review this with your GP Practice Management to ensure it is updated at source.

When data is extracted from the WNWRS we use an extraction date to identify that the reported data is from information provided up to this date. The WNWRS reporting module indicates the quarterly extraction period from which the data is provided.

NWSSP and Health Board Primary Care Services will work with GP Practice Management to improve data quality and accuracy within the system before each quarterly data extraction.

## 9. Your data protection rights

Under 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 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

## 10. How do I complain

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

You can also complain to the ICO if you are unhappy with how we have used your data. The ICO's address:



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)

## **11. 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
- Freedom of Information Act 2000
- Computer Misuse Act 1998
- Regulation of Investigatory Powers Act 2000

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

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

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

The UK Data Protection Act 2018 / General Data Protection Regulation (GDPR) gives the right to access the information which is held about you. You must make your request in writing to your GP Practice Management or 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.

### **13. 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)

### **14. 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.

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

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