**Strategic Ambitions Programme**

**Staff Privacy Notice**

**Background**

The Norwich University Hospitals Group (NWUHG), formed in May 2025 —comprising three NHS Foundation Trusts as data controllers, is launching a strategic programme to create a clinically-led, evidence-based blueprint for future acute clinical services and workforce planning.

**Who are we?**

The Norfolk and Waveney University Hospital Group Trusts are:

* James Paget University Hospitals NHS Foundation Trust
* Norfolk and Norwich University Hospitals NHS Foundation Trust
* Queen Elizabeth Hospital King’s Lynn NHS Foundation Trust

The three Trusts will be acting as joint data controllers for the purposes of the EPR software. According to UK Data Protection legislation, joint controllers are organisations which, between them, decide on the purpose and manner for the processing and have the same or shared purposes.

**What this notice is about**

This notice is to make you aware of how the strategic programme will use employee related personal data, and your rights in relation to the activity. **This notice supplements the existing staff/ employee related privacy notices of the three Trusts, available on their Trust intranets/ websites. To see a summary of this notice, please view its abbreviated notice available** [**here**](file:///\\3140-b\ae$\dxr28\NWUHG\Clinical%20Strategy\Core%20Documents\Abbreviated%20Privacy%20Notice%20-%20September%202025%20-%20NWUHG%20Strategic%20Ambitions%20Programme_v2.docx)**.**

1. **Purpose of the activity:**

* To scope, analyse and consider actions to take forward in relation to improving the satisfaction of the statutory establishing purpose context of the Trusts, ref. s43 NHS Act 2006, given the decision of the Trusts to form the NWUHG in May 2025:
  + A diagnostic and design exercise to inform the development of clinical services, estates and infrastructure, and our workforce.

1. **Legal Basis – on what basis in law?**

The data protection lawful reasons for collecting or using personal information for the activity are as follows:

* **Statutory - Laws of Parliament**
* **NHS Act 2006:**
* **s47** - power to do anything which appears to be necessary or expedient for the purpose of or in connection with organisational functions
* **s63** – duty to exercise functions effectively, efficiently and economically.”
* **s72** – duty to co-operate with each other in exercising functions
* **Data Protection Act 2018 and UK General Data Protection Regulation (GDPR)**
* **Personal Data**
* **Article 6(1)(c)** - Processing is necessary for compliance with a legal obligation to which the controller is subject.
* **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 vested in the controller.
* **Special Category Data**
* **Article 9(2)(h) -** Processing is necessary for the provision of health or social care or treatment or the management of health or social care systems and services.

1. **Who we will share information to- the recipients**

* **The Norfolk and Waveney ICB Data Hub,** who will pseudonymise (make it less identifiable) data before transfer to Strasys.
* **Strasys,** the contracted supplier who will do the analysis to inform the strategy

1. **Where we will collect information from – the source of information**

* Trusts systems such as ESR and others from the information already collected as part of existing Trust processes

1. **How long we shall keep and use information for – the retention period**

* Six (6) months

1. **What information will be used for the activity**

|  |  |  |  |
| --- | --- | --- | --- |
| * **Personal data:** | | | |
| Employee Number | Employee Gender | Employee Age | Employee place of work |
| Employee Post code – partial | Assignment Number | Assignment Status | Assignment Category |
| Primary Assignment | Employee Role / Employee Category | FTE | Employee Latest Start Date |
| Recruitment Source | Pay Grade/ Pay Scale Description | NI Number – pseudonymised | Employee Absence Dates and Codes |
| Start Date /Termination Date | Leaving Reason | Length of Service (Years /months) |  |
| * **Special category data:** | | | |
| Ethnicity | | | |

1. **Exercising Fairness and Protecting information**

* We have undertaken a robust data protection impact assessment process.
* We have conducted data protection by design & default activities.
* We have put in place measures to protect the security of information.
* The recipient organisations are under contract and will only process personal information on our instructions, and where they have agreed to treat the information confidentially and to keep it secure.

**Your information rights and further information**

Information rights available are:

|  |  |
| --- | --- |
| Right to information about how the data is being handled | Yes, via this notice |
| Right of access to the information | Yes |
| [Right to rectification](https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/right-to-rectification/) (correct inaccuracies) | Yes |
| Right to erasure (deletion) | No |
| Right to restrict the information being used | No, because of public interest reasons |
| Right to portability (transfer the information) | No, because of the legal basis |
| Right to object to the information being used | No, because of the legal obligation legal basis |

[You can read more about your data protection rights here](https://ico.org.uk/for-organisations/advice-for-small-organisations/create-your-own-privacy-notice/your-data-protection-rights/#roa)

As part of providing the activities that are needed, you are not subject to automated processing, including profiling, which may produce legal effects concerning you or similarly affect you.

**Advice, Concerns, Complaints**

To find out more information about your information rights, to make a complaint or to exercise a data subject right about how we process data. please contact your individual Trusts Data Protection Officers/ Information Governance Teams via:

* James Paget University Hospitals NHS Foundation
  + [**Information.Governance@jpaget.nhs.uk**](mailto:Information.Governance@jpaget.nhs.uk)
* Norfolk and Norwich University Hospital
  + [**info.gov@nnuh.nhs.uk**](mailto:info.gov@nnuh.nhs.uk)
* Queen Elizabeth Teaching Hospital NHS Foundation Trust
  + [**IGHelp@qehkl.nhs.uk**](mailto:IGHelp@qehkl.nhs.uk)**.**

If you are unhappy with the response or how we have used your data, you can make a complaint to the Information Commissioner’s Office via:

* Information Commissioner’s Office
* Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
* Tel: 01625 545 740 [https://www.ico.org.uk/make-a-complaint](https://ico.org.uk/make-a-complaint/)

**Changes to this notice**

We may modify or amend this privacy notice at our discretion at any time. When we make changes to this notice, we will amend the last modified date at the top of this notice. Any modification or amendment to this privacy notice will be applied to you and your data as of that revision date. We encourage you to periodically review this privacy notice to be informed about how we are protecting your data.

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