

# NHS Streamlining: Recommendations for GDPR Compliance

The new General Data Protection Regulation (GDPR) came into effect on the 25<sup>th</sup> May 2018. This document provides two recommendations to help ensure that NHS organisations comply with the guideline when transferring data via the inter-authority transfer (IAT) process.

## 1. Offer Letters

North West Streamlining recommends that the following statement is included in offer letters:

“By accepting this offer, you accept that your personal data may be transferred from another NHS organisation and if and when your employment transfers to another NHS organisation or you accept an offer within another NHS organisation. This is in accordance with the streamlining principles aimed at improving efficiencies within the NHS. Please note that you have the right to object to your information being shared.”

## 2. Privacy Notices

North West Streamlining recommends that the following statement is included in privacy notices:

“Electronic Staff Record: On commencement of employment with the Organisation, your personal data will be uploaded to the Electronic Staff Record (ESR). ESR is a workforce solution for the NHS which is used by the Organisation to effectively manage the workforce leading to improved efficiency and improved patient safety.

Streamlining: In accepting employment with the Organisation, you accept that the following personal data will be transferred, in accordance streamlining staff movement principles, if you accept an offer with another NHS organisation, or your employment transfers to another NHS organisation, or in some cases if you are seconded to another NHS organisation:

- Personal information (Name, address, NI number etc) – to enable the new NHS employer to verify who you are.
- Employment information (your grade, employment dates, salary, post, sickness information etc) – to enable the new NHS employer to ensure you are paid correctly and can calculate appropriate NHS holiday and sickness entitlements.
- Training compliance/competency information – so that you should not need to repeat some nationally recognised training, including statutory and mandatory/core skills training.
- Full details of the exact data items shared can be supplied if required.

Please be advised that immunisation and vaccination data is not currently transferred in all organisations, but may be in the future. However, please be assured that this data will not be shared without your permission – consent will be sought at such a time as the Organisation would like to share that data.

Inter Authority Transfer (IAT) is the process by which certain personal data is transferred from one NHS organisation to another when you accept an offer or your employment transfers. NHS organisations have a legitimate interest in processing your data in this way in establishing the employment of a suitable workforce. The streamlining staff movement principles include data sharing arrangements which are aimed at improving efficiencies within the NHS both to make costs savings for Organisations but also to save you time when your employment transfers. Please be advised you have the right to object to your information being shared.”