



Staff Privacy Notice

1. Introduction

Under the UK General Data Protection Regulation (GDPR) and Data Protection Act 2018 (Data Protection Law), we must tell you why we collect your information, how we use it and if we will share it. This notice has been updated taking into account the Data Use and Access Act 2025. This privacy notice applies to our employees, bank and agency workers, locums, students, applicants, contractors, and volunteers. It does not form part of any contract of employment or other contract to provide services. We update it from time to time, so it is best always to check on the intranet for the latest version.

It is important you tell us about changes to information we hold about you. It is the responsibility of the staff member to ensure that their employee record is up to date and maintained.

2. Who we are and what we do

2.1 Cygnet is a group of companies whose business is providing a wide range of health and social care services for young people and adults within the UK. We collect and use your information to staff these services and business support functions. Each company in the group may, to the extent necessary, collect and use information about you.

2.2. All Cygnet companies are registered at the address below.
18 Kings Hill Avenue, Kings Hill, Kent, ME19 4AE.

2.3 Cygnet is a data controller registered with the Information Commissioner's Office (ICO). Each company in the Cygnet group has its own ICO registration number.

Company Name	Companies House	ICO Registration	Nature of business
Caireach Limited	05276348	ZA462583	Residential care facilities
Cygnet Behavioural Health Limited	03977299	ZA462355	Psychiatric healthcare facilities
Cygnet Learning Disabilities Limited	02111989	ZA126317	Residential care facilities
Cygnet (DH) Limited	08529052	ZA079627	Residential care facilities
Cygnet (OE) Limited	03872364	Z5406736	Residential care facilities
Cygnet Care Services Limited	02683377	Z5195051	Residential care facilities
Cygnet Clifton Limited	06486927	Z1842355	Residential care facilities
Cygnet Health Care Limited	2141256	Z466114X	Psychiatric and residential healthcare facilities
Cygnet Learning Disabilities Midlands Limited	02626319	ZA126691	Residential care facilities
Cygnet NW Limited	4059699	ZA462350	Psychiatric healthcare facilities
Cygnet Surrey Limited	4590303	ZA462348	Psychiatric healthcare facilities
Everycorner Limited	08501568	ZA462373	Residential care facilities

Staff Privacy Notice

Isand (Domiciliary Care) Limited	07705437	ZA462577	Residential care facilities
Isand Limited	05276369	ZA462587	Residential care facilities
Relativeto Limited	08167401	ZA462580	Residential care facilities
Short Ground Limited	06846986	ZA462364	Residential care facilities
Cygnet Newton House Limited	02045357	ZC109652	Psychiatric healthcare facilities
Stepping Stones Resettlement Unit Limited	03220818	ZB681696	Residential care facilities
Woodrowe Healthcare Limited	11465289	ZA533022	Residential care facilities

3. Data Protection Officer (DPO)

3.1 Our Data Protection Officer (DPO) oversees what we do with your information so that we comply with Data Protection Law.

3.2 If you have any concerns or questions about our use of your personal information, you can email dataprotection@cygnethealth.co.uk or write to Cygnet Data Protection Officer, Cygnet Health Care, 2nd Floor, Southside Building, 31 Hurst Street, Birmingham, B5 4BD.

4. Information about you that we collect and use

4.1 Cygnet collects information about you that is necessary for the roles you have with us. Cygnet may collect this information from various sources including:

- You.
- Agencies – these may include employment and credit reference agencies.
- Former employers and your nominated referees.
- Regulators for the services we provide and for you as an individual.
- Organisations for independent verification of accreditations, assessment or test results, awards, certifications, memberships, qualifications, registrations etc. which you have notified to us.
- HMRC and other government departments/agencies.
- Pension administrators and staff benefit providers.
- CCTV systems installed at our sites for the prevention and detection of crime, and maintaining the safety and security of service users, staff, and visitors.
- The Disclosure and Barring Service (DBS) or Disclosure Scotland including the Protecting Vulnerable Groups (PVG) scheme that it manages.
- Electronic monitoring of your access to Cygnet sites (e.g. swipe cards) and your use of our information assets, systems, applications, and networks.
- Cygnet colleagues, Cygnet service users, visitors to Cygnet sites, and any other person/organisation that complains about your conduct at work or shares with us safeguarding concerns or concerns about your suitability to work in a service for children and / or vulnerable adults; and
- Public domain information like social media accounts/profiles and posts/blogs/videos and other activity or report searchable on the internet or published in print media.

4.2 Personal information may include your:

- Name, date of birth and National Insurance number.
- Home address, email address, and telephone number(s).
- Next of kin and emergency contact information

Staff Privacy Notice

- Copy documents to verify your identity, address and/ right to work in the UK.
- Education and previous work experience
- Bank account details, payroll records, and tax status information.
- Recruitment / engagement, onboarding, acceptance of Cynet policies, start date and, if different, the date of your continuous employment, contract, probation period, attendance, capability, conduct, holidays, and other absences paid or unpaid, performance, training, and development.
- Pay and benefits information.
- Personal relationships with co-workers.
- Grievance and disciplinary information.
- Location of employment or workplace.
- Information about your driving if you drive a vehicle for us as a work task.
- Professional membership / registration information e.g. NMC PIN; and
- Reason for leaving.

4.3 More sensitive information may include your:

- Specific health data including pre-employment screening, medical conditions, disabilities, injury or harm in work related incidents, sick leave, fit notes, return to work interview records.
- Biometric data.
- Trade union membership
- Racial or ethnic origin.
- Religious / philosophical beliefs.
- Sexual orientation and sex life; and
- Criminal activity data – information about allegations, convictions, investigations, and proceedings.

5. Our purposes and lawful basis for processing your information

5.1 Cynet's purposes include being able to:

- Verify your identity, address, and right to work in the UK,
- Verify your eligibility and suitability to work in our services that provide regulated activities for which there are Government requirements for fit and proper persons employed.
- Decide whether to offer employment or other engagement and determine the terms of it.
- Ensure both the impact of your duties on your health and the impact of your health on your work duties are assessed.
- Manage our workforce, including setting rotas, filling shift vacancies, and rostering.
- Pay you and, if you are an employee, make deductions for e.g. Income Tax and National Insurance contributions.
- Comply with statutory automatic pension enrolment duties.
- Provide benefits to you.
- Keep up-to-date records including use of self-service desktop and mobile apps.
- Manage your attendance, capability, conduct, performance, training, and development and where appropriate obtaining medical opinion to assist this management.
- Deal with grievance, disciplinary and other HR procedures fairly.

Staff Privacy Notice

- Monitor your use of our information and communication systems as part of appropriate technological and organisational measures for data security as required by Data Protection Law.
- Comply with Court and Tribunal Orders, health and safety law and other legal obligations for our business.
- Cooperate with regulators who have statutory powers to require us to share information to assist them.
- Make arrangements to safeguard and promote the welfare of our service users and provide high quality health and social care services to them.
- Fulfil any other safeguarding duties.
- Maintain mandatory and other prudent insurance cover.
- Prevent or detect crime on our premises.
- Comply with the terms of our contracts with public authorities and other funders of care packages for service users.
- Respond to complaints and legal claims, which could be from you, colleagues, Service users or other persons / organisations.
- Keep accounting and auditing records and conduct other business management and planning.
- Conduct data analytics studies to review and better understand employee retention and attrition rates; and
- Monitor equal opportunities.

5.2 Processing includes any action we take with your information. Under Data Protection Law we must have at least one lawful basis. We may have more than one. We explain each lawful basis below.

5.3 Contract - Cynet uses your information where it is necessary for a contract with you or taking steps at your request before entering into that contract.

5.4 Legal Obligation – Cynet uses your information where it is necessary to comply with a legal obligation.

5.5 Legitimate interests – Cynet may use your information where it is necessary for our legitimate interests or those of a third party. In Data Protection Law some legitimate interests are 'recognised' meaning they are for pre-approved purposes that are in the public interest. Cynet will first carry out a balancing test to check whether your rights override legitimate interests only if they are not for one of these pre-approved purposes that we set out below:

- crime prevention.
- public security.
- national security or defence.
- safeguarding.
- emergencies; or
- sharing personal information to help other organisations perform their public tasks or official functions.

5.6 Consent – Cynet may use your information with your consent in circumstances where we are able to give you a real choice including the ability to withdraw your consent so that we stop the processing.

Staff Privacy Notice

5.7 Public task - Cygnet may use your information where it is necessary to perform a specific task in the public interest that is set out in law.

5.8 Vital interests – Cygnet may use your information where it is necessary for emergency medical care, and you are unconscious or otherwise incapable of giving consent to the processing.

6. Conditions for processing more sensitive information

6.1 Under Data Protection Law we must meet an extra condition where we process more sensitive information.

6.2 When we process information about your health, racial or ethnic origin, religious beliefs, sexual orientation, and sex life (also known as special category data), at least one of the reasons below applies:

- Employment law.
- Health or social care.
- Public health.
- Statistics for research.
- Equality of opportunity or treatment.
- Racial and ethnic diversity at senior levels.
- Prevention or detection of unlawful acts.
- Regulatory requirements.
- Safeguarding of adults at risk and / or children; or
- Disclosure to an elected representative.

6.3 If we process information about criminal convictions, allegations / investigations, and proceedings, at least one of the reasons at 6.2 above and /or below applies:

- You have given consent to the processing.
- Protection of vital interests where you cannot consent.
- You have put the information in the public domain; or
- It is necessary for legal claims.

7. Monitoring of systems and communications

To protect services user, residents, staff and systems, we do monitor communications and systems. Areas that we monitor are:

- Email and Teams
- Internet and System Activity
- Access to clinical and business systems
- Building access
- CCTV in our premises
- Workload monitoring

This list is not intended to be exhaustive, and Cygnet retain the right to monitor where necessary in line with the duties of your role and to keep the company and its data secure.

8. Sharing your information

8.1 Some sharing may happen only with your consent, but Cygnet will rely on another lawful basis for most sharing. We will share your information within Cygnet as required for our purposes whilst maintaining role-based access controls so that colleagues with no need to see it will not see it. All staff must sign a confidentiality agreement; in some cases, this is



Staff Privacy Notice

included within your employment contract and comply with Cygnet policies to abide by Data Protection Law.

8.2 We will only share your personal information with other individuals or organisations (third parties) where we have a lawful basis for doing so and meet an extra condition if more sensitive information is included. We will share the minimum amount of information necessary taking an approach to what information is relevant that is proportionate to our purpose.

8.3 There may be times where we must share your information because of a legal obligation, such as a Court or Tribunal Order or a request from a regulator using statutory powers to require disclosure as part of their duties to investigate complaints, incidents, or professionals' fitness to practise. We may share with DBS or Disclosure Scotland, the Police, other law enforcement agencies, and organisations with safeguarding duties or other public protection functions.

8.4 We may also share with third parties such as referees, previous and current employers, staffing agencies, educational establishments, and regulators for professions (such as the GMC and NMC). This may be, for example, to verify information about your previous experience, qualifications, and professional registrations or to investigate concerns that may exist about you or your work, or another registered professional or their work. We may also share information about you in connection with the revalidation processes of regulators for professions.

8.5 If another individual requests access to their personal information any opinion you have expressed that relates to them may be treated as part of their information. This applies to records you have made working for Cygnet, which includes emails you have sent from your Cygnet work email address or from a personal email address to a Cygnet work email address. Your opinion may be disclosed together with your name and job title / role to that individual unless there is a reason in Data Protection Law to exempt it from disclosure.

8.6 We may share information about you with service users, their families, and advisers. This may be to respond to questions, complaints, or claims, including from you. In each case, we will share only such information as is relevant. To consider an appropriate response we may have to share with our insurers and external advisers e.g. lawyers.

8.7 If you bring a legal claim against Cygnet relating to your employment including your reason for leaving then we may have to share your information with our insurers and external advisers, HM Courts & Tribunal Service or the Scottish Courts and Tribunal Service, and ACAS if you choose to use their early conciliation service.

8.8 Where we have contracts with public authorities, we may share your information with them if they need it for dealing with requests made under the Freedom of Information Act (FOIA) appropriately. As separate registered data controllers those public authorities will need to consider your privacy rights before releasing information about you.

8.9 We may share information about you with third party suppliers, for example in relation to Human Resources (HR) and business expense claim systems, workforce management services, employee benefits schemes, including health, pension and life assurance schemes, information technology systems, electronic learning programmes, document storage, or shredding facilities. Examples of the third parties that supply services to us are set out below:

Third party supplier	Service
Workday, IRIS, HMRC	Provider of payroll services
Workday, DBS Services	Applicant tracking and recruitment
Multiple providers listed in ROPA	Managed IT services



Staff Privacy Notice

Aviva	Pension provider
-------	------------------

For full details please see the Record of Processing Activities (ROPA) which is maintained by the Data Protection Team.

8.10 Third party suppliers may be data processors who contract with us to use your information only for purposes we specify with security measures at least equal to our own. Workday is a data processor because Cygnet decides what information is held about you in Workday. Some suppliers may be data controllers in respect of your information. For example, Reward Gateway (UK) Ltd will be the data controller for personal information you give to them if you choose to register for a Cygnet Rewards account and take up any discount offered. To enable Reward Gateway (UK) Ltd to check your eligibility for a Cygnet Rewards account we will provide two pieces of personal information about you such as your postcode, start date with Cygnet or date of birth. Please read the Reward Gateway (UK) Ltd privacy notice more information.

9. Use of Artificial Intelligence and Automated Processing

We may use technologies, including artificial intelligence tools (such as Microsoft Copilot), to support administrative tasks, data analysis and productivity.

These tools assist staff decision making but do not make decisions about you with human involvement. The only case where this may apply is when applying for a role as a clinical or registered professional and not providing this information during the application process.

10. Your rights under Data Protection Law

Data Protection Law gives you individual rights around the use of your personal information. These are:

- **The right to be informed.**
You have the right to know what information we hold about you and how we use it.
- **The right to access your information.**
You have the right to access the information that Cygnet holds about you. This is often called making a Subject Access Request (SAR). Please see more information about making a SAR in Section 9.
- **The right to rectification**
You have the right to ask us to update your records if you think they are not accurate.
- **The right to erasure (sometimes called the right to be forgotten)**
In certain circumstances you have a right to have your information erased but not where our lawful basis for processing is either public task or legal obligation (please see section 5 above).
- **The right to restrict processing.**
If you feel that either the information, we hold about you is not accurate or you wish to raise another issue with us about what we do with it, you can ask for restrictions on processing, e.g. sharing, whilst we investigate. If you are a current employee, you can ask your line manager for restrictions on processing your information. Otherwise please contact the Cygnet Data Protection Officer (please see section 3 above).
- **The right to data portability**
This right is limited to information we collected with your consent or the purpose of performing or entering into a contract with you. It is a right to have the information sent to you or another data controller you nominate in a machine-readable format.

Staff Privacy Notice

- **The right to object**
This is a right to give us reasons why you object to Cygnet processing your information and tell us if you wish us to stop processing. Whether it is available depends on our lawful basis for processing (please see section 5 above). It does not apply where our lawful basis is legal obligation or contract or vital interests. Where our lawful basis is public task, we may not agree to stop if the processing is for the defence of legal claims.
- **Rights around automated processing including profiling**
Cygnet does not currently use your information to make decisions about you without the involvement of an authorised employee or data processor, so these rights do not apply. We will update this privacy notice if this changes.
- **Right to complain to the Information Commissioner's Office (ICO)**

You have a right to complain to the ICO if you feel Cygnet is not complying with Data Protection Law and / or you are unhappy with any decision we have made about one of your other rights above. You can call the ICO's helpline on 0303 123 1113 or find information on how to complain to the ICO on their website <https://ico.org.uk/> www.ico.org.uk The ICO may expect you to have complained to us first. To do this you can send an email to dataprotection@cygnethealth.co.uk or post a letter to Cygnet Data Protection Officer, 2nd Floor, Southside Building, 31 Hurst Street, Birmingham, B5 4BD.

11. More information about making a SAR

11.1 If you make a SAR, we will follow the ICO's guidance on what is your personal data. When you send and receive emails as an employee, they are not automatically your personal data. The email could be about a patient or business administration. Unless you are the focus of the email and it has significant influence on how you are treated, then it is unlikely to count as your personal data. We are commenting on this because employees have made requests for copies of any emails in which their name appears. We do not have to comply fully with such requests. The right to make a SAR is not a right to receive copies of emails or other documents. It is a right to access your personal data. Where the simplest way for us to provide the information in the document is to send a copy, then we will.

11.2 Some information is exempt from disclosure on a SAR. It is not possible to explain fully here. However, if we have given or received a confidential reference about you, then that is likely to be exempt from disclosure. This means we will not give you access to the information in it. We may also decline to give you information if doing so will frustrate the purpose for which it was collected. If Cygnet is conducting an investigation, then you may not be able to access information gathered about you until Cygnet make it available to you in that investigation process.

11.3 If you would like any further information about our data processing or wish to exercise any of your rights, then please read the Information Governance policies on the intranet.

11.4 If you are unhappy with the way we handle your personal data then you may complain to the ICO. They have a live chat service ico.org.uk/livechat, or you can call their helpline on 0303 123 1113. However, the ICO recommends you complain directly to the data controller first so please contact our Data Protection Officer (DPO) whose details are listed below:

Michelle Crump – Group Data Protection Officer dataprotection@cygnethealth.co.uk



Staff Privacy Notice

10. How long we keep your information

Cygnet has a records management and data quality policy with a record retention schedule this is available in the policies area on the intranet. It will be reviewed and updated periodically. Currently staff records are retained for six years from the date of leaving. Payroll and incident data is retained for up to ten years.

11. Transfers of personal data

Cygnet is owned by an American Company Universal Health Services (UHS). We may share your personal information with UHS, especially in relation to filling senior leadership roles in our business. The appropriate security safeguards for this sharing under Data Protection Law are known as binding corporate rules. We do not routinely transfer your personal data outside the UK, but when this is necessary, we ensure that we have appropriate safeguards in place.