Medicare People

HEALTHCARE STAFFING

Data Protection - Data Subject Rights Policy

Policy title	Data Protection - Data Subject Rights Policy
Organisation	Medicare People Limited
Service	Healthcare staffing
Policy owner	Managing Director
Version	2.0
Date	01/11/2026
Next review	November 2027

1. Purpose

> Update (November 2026): the UK GDPR and Data Protection Act 2018 have been amended by the Data (Use and Access) Act 2025. Since 19 June 2026 anyone can complain directly to Medicare People about how we use their personal information. We acknowledge complaints within 30 days, investigate without undue delay and tell the person the outcome. They can also complain to the Information Commissioner's Office (ICO).

This policy outlines the rights of Data Subjects and the processes to follow if a Data Subject wishes to exercise any of these rights.

2. Scope

This policy applies to everyone who works for or on behalf of Medicare People: office and management staff, and the nurses, healthcare assistants, support workers and carers we supply to care providers, whether employed, engaged through an umbrella company or self-employed.

3. Responsibilities

- The Managing Director has overall responsibility for this policy and for making sure it is followed and kept up to date.
- Managers and the compliance team make sure staff and workers understand the policy, follow it in practice and get the training and support they need.
- Everyone covered by this policy must follow it and raise any concerns with their manager or the compliance team straight away.

4. Statement

Medicare People process various types of data for job applicants, employees, former employees, workers, contractors, and clients. We are fully aware of our obligations under the General Data Protection Regulation (GDPR) to process data lawfully and ensure that the rights of Data Subjects (primarily clients and employees) are correctly observed.

5. Procedure & Guidance

Data Subject Rights

Under GDPR, clients and employees (referred to as Data Subjects) have the following rights regarding their data:

- The right to be informed
- The right of access
- The right to correct any inaccuracies
- The right to have information deleted
- The right to restrict data processing
- The right to data portability
- The right to object to data processing
- The right to regulate automated decision-making and profiling

The Right to Be Informed

Data Subjects have the right to know how Medicare People process their data and the reasons for processing. We provide this information through a privacy notice, which explains what data we collect, how we collect and process it, the purposes of processing, and the lawful basis for processing. Data Subjects can obtain a copy of the privacy notice at no cost.

We also have a separate privacy notice for job applicants. If we intend to use data already collected for a different purpose, Data Subjects will be informed in advance.

The Right of Access

Data Subjects have the right to access their personal data held by Medicare People. More information is available in our Subject Access Request policy.

The Right to Correct Data

Data Subjects have the right to have their data corrected if it is inaccurate or incomplete. To request data rectification, Data Subjects should complete the Data Rectification Form. We will respond to data rectification requests within one month, or up to three months for complex requests. If no action is taken, Data Subjects will be informed of the reasons and their right to complain to the Information Commissioner and seek a judicial remedy.

If rectified data was disclosed to third parties, we will inform them of the rectification where possible and inform the Data Subject of the third parties involved.

The Right to Have Information Deleted

Data Subjects have the right to have their data deleted from our systems where there is no compelling business reason to continue processing it. This right applies in the following circumstances:

- The data is no longer necessary for the original purpose.
- Data Subjects withdraw their consent, and no other lawful basis exists for processing.
- Data Subjects object to processing, and there is no overriding legitimate interest.
- The data was unlawfully processed.
- The data must be deleted due to a legal obligation.

Requests for data deletion should be made using the Data Deletion Request form. We will delete the data unless it is processed for reasons such as freedom of expression, legal compliance, public interest tasks, public health, archiving, research, or legal claims. If a deletion request is not complied with, the Data Subject will be informed of the reason. If complied with, the Data Subject will be informed when the data is deleted. Third parties will be notified where possible, unless it causes a disproportionate effect.

The Right to Restrict Data Processing

Data Subjects can request to restrict the processing of their data in certain circumstances. This means we will continue to hold the data but stop processing it. This applies when:

- Data Subjects contest the accuracy of the data.
- Data is processed for public interest tasks or legitimate interests, and Data Subjects object.
- Data was processed unlawfully.
- We no longer need the data, but Data Subjects need it for legal claims.

Requests for data restriction should be made using the Data Restriction Request form. We will continue to hold but not process the data unless Data Subjects consent or processing is required for legal claims. Third parties will be notified where possible, unless it causes a disproportionate effect. Data Subjects will be informed in advance if any restriction is lifted.

The Right to Data Portability

Data Subjects have the right to obtain and use their data for their own purposes. This means they can receive their personal data in a structured, machine-readable format and transmit it to another data controller. This right applies when:

- Data Subjects provided the data.
- Processing is based on consent or a contract.
- Processing is carried out by automated means.

We will respond to data portability requests without undue delay and within one month. For complex requests, this period may be extended.

6. Monitoring and review

This policy is reviewed every year, or sooner if legislation, guidance or our services change, or if an incident, complaint or audit shows it needs updating. The review is recorded in the version history below.

7. Legislation and guidance

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025
- Information Commissioner's Office (ICO) guidance

Version history

Version	Summary
1.0	Original policy
2.0	1 November 2026 – restyled to the Medicare People brand, structure standardised, legal references updated