

Privacy Statement

Introduction

This Privacy Statement sets out what you can expect of Team Prevent UK Ltd (Data Controller and Processor) in relation to how we look after your data and information. This is in line with the core principles of the General Data Protection Regulations, the Data Protection Bill and the Faculty of Occupational Medicine's guidance on data processing and consent.

Confidentiality is fundamental to the work of all Occupational Health Staff. Occupational Health Professionals are bound by an ethical code of conduct in the same way that they would be in a General Practice or Hospital. All members of the Occupational Health Team understand their responsibility to protect sensitive and personal information and have given an undertaking that they will do so.

Team Prevent UK Ltd is registered with the Information Commissioner's Office (Z9823811).

Why do we need to process your data?

We have a contract with your employer that requires us to look after the Occupational Health and wellbeing needs of their workforce. We therefore need to keep a record of the work that we do so that we can remain compliant with health and safety law, protect the health of employees and ensure that people are fit to do their jobs. Looking after your health in the work place is also in the legitimate interests of both you and your employer.

The General Data Protection Regulations require us to define a Lawful basis for processing your data and information. We have reviewed the purposes of our processing activities, and have identified the most appropriate lawful basis (or bases) for the activities we carry out as being under Article 6 item (f) legitimate interests, and under Article 9(2) item (h) for the purposes of occupational medicine.

What data do we store and how long do we keep it for?

The personal information we store about employees is: full name, title, date of birth, address, contact telephone numbers, work email address and personal email address.

We also hold information about your health in the form of an Occupational Health record which will include details of any medical examinations and health assessments that you have had from the time you joined your employer. The Occupational Health record will also include advice and reports that have been provided, with your consent, to your employer.

Throughout the duration of our contract with your employer, as their Occupational Health Provider, Occupational Health records are held by us for the period of your employment and for a minimum of six years after you have left employment. After this time if we have permission from your employer then the Occupational Health record will be deleted.

There is however a requirement under Health and Safety Legislation to retain certain health records relating to Health Surveillance for a period of 40 years, these records will be held separately on our system and will not be deleted until they are 40 years old.

If our contract ends with your employer we will no longer process any information or data about you and all your personal data and health records will be passed your employer's next Occupational Health Provider. If you decide that you do not want your records to transfer to a new provider these will instead be retained by Team Prevent and will not be deleted for a minimum of six years.

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What do we do with your data?

Personal Information such as your name, address and email address is used for the following purposes:

- To arrange and book appointments with the Occupational Health Team.
- To contact you if we need to move or change an appointment.
- To contact you to undertake a telephone or online video appointment.
- To verify that we are speaking to the correct person, if you phone us to query your health records.
- To send text message reminders about your appointment.
- To contact you for feedback about your appointment with Occupational Health by text message or email.

Depending on the nature of your job your Health Records may be used for the following purposes:

- To determine your fitness to work.
- To assess if you need any adjustments or support in the workplace because of a health condition.
- To establish if any risks in the workplace may have an adverse affect on your health.
- To provide information about your fitness to work back to your employer.

For all our customers we routinely carry out an analysis of Health Data that we have recorded about their workforce in order to identify key trends and patterns in activity and health. This data is fully anonymised which means it is impossible to identify any individual from the information.

You should be aware that all clinical and administrative staff working at Team Prevent, including our Nurses and Doctors work as a team, and may share the information with their colleagues within the Occupational Health team as part of their role to ensure effective communication in the protection and management your health at work, unless you expressly ask them not to.

We will never use your information for promotional or marketing purposes.

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Your rights in respect of the data processing

Can I withdraw consent for any of my information to be used in the way described above?

You have a right to withdraw your consent for us to contact you about Occupational Health matters at any time. You can also withdraw your consent for us to provide information about your health to your employer. If you choose to do this we will be obliged to notify your employer of your decision.

It is important to understand that if you withdraw consent this may mean that your employer may have to make decisions without the benefit of impartial occupational health input and advice. To withdraw consent you can write to us at the address given in the contact section at the bottom of this privacy notice.

Can I request a copy of my records?

You can request a full or part copy of your Occupational Health records at any time by writing to us at the address given in the contact section at the bottom of this privacy notice.

Can I ask request that my records are deleted?

Because processing your information and data for the purpose of Occupational Health is in the legitimate interests of both you and your employer, we cannot accommodate requests for health records to be deleted. These records may also be required in a court of law should there be any dispute about your employment in the future, or if there was a health related incident at your employer's premises that required formal investigation.

You can however request factual information that is incorrect to be changed or removed from your records but you cannot alter the opinion of a clinical professional. You can also request that personal details, such as your email address or address, are deleted as long as we can retain sufficient information to be able to identify your health record.

To request any deletions or changes you can contact us at address given in the contact section at the bottom of this privacy notice.

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How do we ensure that your data remains secure?

All data and information is held on our secure system which is compliant with Cyber Essentials standards for security and is subject to annual penetration testing.

Access to any data held on our system is restricted to nominated employees within Team Prevent who are required to have access to the data in order to provide an Occupational Health service. They can only access the data using Team Prevent's secure IT Network and we have a strong password policy in place that requires users to change their password frequently and use a password of sufficient complexity.

We use special anti-virus and anti-malware software in order to help reduce the risk of any malicious computer virus or cyber-attack on our computers and we have a programme in place that ensures all software security updates are applied as soon as they are released. We also ensure that all your data is fully encrypted when it is being stored or moved (for example when we send a report to your employer) so in the highly unlikely event of it being stolen, it cannot be accessed and used.

The information and data we hold about you stays within the European Union at all times.

When will we share information with other people?

When we provide any information to your employer then this is restricted to an opinion on whether or not you are medically fit to do a particular task and whether any modifications or adjustments are recommended. In the course of any interaction that you may have with our Occupational Health service, there may be some information that is already known by other parties outside of the Occupational Health department, such as details provided by your GP on a FIT NOTE. We will always obtain your consent to release any information.

Depending on the contract that we have with your employer we may, during the course of our occupational health service, transfer some of your information to other clinical or specialist professionals who carry out occupational health service interventions in partnership with our company. Examples of this are if you are referred to support services such as counsellors, physiotherapists and laboratory services providers who may need your personal details in order to be able to provide you with support or treatment or process blood tests.

We use third party expertise to support our IT network and infrastructure and in the electronic scanning of medical records. All third parties are bound by the same strict codes of conduct and practice in relation to confidentiality and have restricted access to Occupational Health records and information.

We will never share your information with third parties or your employer for promotional or marketing purposes.

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Visitors to our main corporate website and cookies

When someone visits www.teamprevent.co.uk the web-site uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the site.

Google Analytics is only used with our main promotional corporate website www.teamprevent.co.uk and no personal information is stored on this website. Our secure on-line customer portal is not registered with Google Analytics and does not use cookies.

The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

If you want to find out more about google analytics you can visit their information page <http://www.google.com/policies/privacy/ads/#toc-analytics> If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 25th October 2018.

Contact details

Team Prevent contact details for all Data Protection matters are below. These are also the contact details for our Data Protection Officer:

Team Prevent UK Ltd
Rickyard Barn, Pury Hill Business Park
Nr Alderton, Towcester,
Northamptonshire NN12 7LS

01327 810 262
igsupport@teamprevent.co.uk

If you believe we are processing your personal data not in accordance with the law you can complain to the Information Commissioner's Office at www.ico.org.uk

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