



**PAM Group**

PAM Group Ltd

# PAM Group- Privacy Policy (HP017)

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## Document Change Control

Version	Date	Author	Approver	Change Detail
0.1	18/02/2025	Pippa Boulton	DPO	Creation/authoring of Policy
0.2	22/02/2025	Pippa Boulton	DPO	Additional sections added
1.0	13/03/2025	Pippa Boulton	DPO	Finalised for Publication

**Policy Owner:** Data Protection Team

**Review Frequency:** Annually, or a full policy review could be triggered after legislation changes, or significant changes in case law or guidance.

**Next Scheduled Review:** 13/03/2025

**Approved by:** Pippa Boulton, Data Protection Officer

**Distribution:** Internal / External

*For any queries regarding this policy, please contact the policy owner.*

## 1. General statement

Welcome to PAM Group Limited ("we", "our", "us"). We are committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, disclose, store, and safeguard your data when you use our services or interact with us in any other way.

“PAM Group” consist of a group of companies:

- People Asset Management Limited
- PAM Occupational Health Solutions Limited
- PAM Wellbeing Limited (formerly ToHealth Limited)
- Corporate Health Ireland (CHI) is a trading name of PAM Group. CHI is operated in Ireland as EHA Corporate Limited, Shelomar Occupational Medicine Ltd and EHA Limerick (these companies are wholly/majority owned subsidiaries of PAM Group), please refer to <https://chi.ie/privacy-policy/>

We provide specialist health services and products as follows:

- Occupational Health Medicals, Management Reports, and Drug and Alcohol Screening
- Health Screening Assessments
- Physiotherapy and Counselling Therapy
- Employee Assistance Programs
- Health Products and Vaccines

This privacy policy is intended to inform you about the information we collect, hold, and use about you. This policy does not provide exhaustive detail and explanation. However, we do keep and maintain accurate and details records about how your information is used, this is called a Records of Processing Activities (ROPA), as set out in Article 30 of the UK GDPR.

## 2. Data we collect

PAM Group employs specialist clinicians who provide advice and medical treatment. These include doctors, specialist nurses, physiotherapists, counsellors, psychologists, psychiatrists, nutritionists, physiologists, wellbeing advisors, legal advisors, and debt advisors.

We hold your employer’s occupational records; these are health and personal data records that were held for your safety and wellbeing at work. Authorised healthcare

professionals may only hold occupational health records as set out in the UK Data Protection Act (2018) s(204)<sup>1</sup>.

Where we provide Occupational Health services and/or Employee Assistance Programme\* (EAP) services, we hold information about our clients employees which will include personal details, e.g. Name, Home address, Date of Birth, Job details and/or medical records. We need this information to be able to provide accurate advice to you but also information to your employer ensuring that work does not damage your health, and you are fit for the work you do.

All medical data is held securely and only accessed by PAM Group workers. Your Employer will have access to our system and a specific hierarchy is in place that determines which managers have access to your profile. Occupational Health reports and medical records are kept separately within our system managers do not have access to your medical records.

**\*N.B.** Employee Assistance Programme confidential data about you is also held on our secure system but segregated from other records. This data is stored by PAM in order to provide this service to you and it is not shared with your employer. At the end of a contract with your employer, this data will be securely and confidentially deleted after 30 days of the contract end date.

### 3. How do we collect your data?

Most of the time, you will provide us with your personal data directly, or your data may be supplied by your organisation/business. Data is shared by your employer either in the form of a referral or email when booking an appointment for you. PAM will also collect data about you when you attend for assessment by completing a health questionnaire and through discussion with the health professional during either a face to face or telephone consultation. When collecting data about you in this way we will also obtain your consent to continue.

### 4. Why we collect your data

We may collect information about you that has been directly provided by you as follows:

- You have made a complaint to us.
- You made an enquiry to us.
- You have applied for a vacancy with us.

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<sup>1</sup> [Data Protection Act 2018](#)

- You have requested information from us.

We use your data held in the delivery of our services, such as:

1. We need personal data, e.g. name address, and date of birth in order to identify and verify the correct person and in some cases where we need to communicate with your health care provider this is the standard identification used within the NHS.
2. We need your personal contact details e.g. telephone and email to assist us in communicating with you when booking appointments.
3. We will collect and will create medically confidential data so that our clinicians can provide professional advice based on your health fitness and wellbeing.
4. We operate a secure occupational health IT system which requires any user of our service including employees referred or managers making referrals to be registered as an employee within our system.
5. We may retain telephone recordings. This type of data is held for the training and monitoring of our colleagues. Any voice recording is destroyed after 30 days and does not form part of your medical records.

## 5. Processing of your data

When your health data<sup>2</sup> is processed for the purpose of delivering our services to you or on behalf of your employer PAM Group acts a data controller. Your employer will also function as a separate data controller for personal data that they process in relation to their employees.

Your data is processed by PAM Group for the purposes of delivering or administrating the services to you or our client. We will always process your personal data in accordance with Data Protection laws and this Privacy Policy.

Your data is held in an electronic format in the United Kingdom. If your employer is based in Ireland, then your data is stored in Ireland.

When your employer becomes a client of PAM Group the historical occupational health records held by the previous occupational health provider are normally transferred to PAM Group. You will have been consulted on this transfer by your employer. During the time that PAM Group provides your occupational health service, we will create and add our records to your occupational health file. If your employer leaves PAM Group your occupational health file will be transferred to your new occupational health provider,

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<sup>2</sup> Health data is bound by the duties of confidentiality and under the Guide to Professional Conduct and Ethics for Registered Medical Practitioners (Amended) (2024),,,,, it cannot be disclosed without consent with some exceptions, such as a court order or under health and safety when the safety of yourself or others are at risk.

and you should be consulted on that change at that time. PAM Group will not retain a copy of your records after your employer leaves us.

All health information is processed using our secure clinical systems, OHIO and Fit4jobs. We will process data using email internally within our business and to our clients (your employer). Processing via email will not include medical reports or clinical data this is only processed using our secure systems. Our colleagues may occasionally use Microsoft Teams chat or SMS platforms for informal communication these include Microsoft Teams Chat, WhatsApp, and SMS. Informal communications will not include any health information or personal identifying data. All informal communications using Microsoft Teams is currently deleted every 7 days and will not form part of any formal data processing.

## 6. Sharing data

Where we use Associates, or any subcontracted labour, they work using the same systems as our employees do and any data processed is held in our systems. We may share your data with:

- Service providers and partners who assist us in conducting our business, or services provided to you.
- Law enforcement or regulatory agencies if required by law.
- Other third parties, but with your consent.

We use the following subcontractors to provide our services to you:

**Egress** [www.egress.com](http://www.egress.com) are used to process secure email for prior sight processing. It is necessary to validate an employee's access to the Egress systems that they first register on the Egress platform this requires them to enter their name, email, create a password and enter a telephone number.

If you already have an Egress account, there is no need to create a second account for PAM. You have the right to ask us to have the Egress data to be deleted, however you must register with egress if you wish to use our "prior sight" processing service.

**AWS (Amazon Web Services)** – Our dedicated Amazon Web Services (AWS) infrastructure is managed and monitored using AWS security solutions, including threat detection, managed antivirus, automated OS updates, and scheduled backups (daily incremental and weekly full backups). Backups are securely stored offsite.

**Raiys** - [www.raiys.com](http://www.raiys.com) are used to provide a health and wellbeing app and provide health screening and lifestyle improvement plans. They may collect personal data that is held by them on their secure platform and is used by Raiys to target health and well-

being plans. No personal data is shared by Raiys and PAM. Anonymised statistical data is provided to PAM to develop health and well-being. A Data Subject is entitled to request that any personal data held by Raiys be deleted.

**Synlab** [www.synlab.co.uk](http://www.synlab.co.uk) are our medical laboratory partner used to assess diagnostic testing as part of our Drug and Alcohol Services .

**TDL** [www.tdlpathology.com](http://www.tdlpathology.com) are used to process time sensitive blood samples.

**Innuvi** [www.innuvi.com](http://www.innuvi.com) are our laboratory partner used to process blood results as part of our Health Screening service.

**HSE Science and Research Centre** [www.hsl.gov.uk/about-us/location](http://www.hsl.gov.uk/about-us/location) used for biological testing and monitoring to management risk, prevent illness and protect people at work.

## 7. Legal Basis for Processing your data

We hold and process information in relation to the occupational health and wellbeing services we offer to clients and to our own employees. We therefore rely on the following legal bases for processing data as set out in the UK Data Protection Act (2018) and the Regulation (EU) 2016/679 (General Data Protection Regulation) (UK GDPR)<sup>3</sup>.

### I. **Data Protection Act – UK (2018) Schedule 1 Part 1 s(2)**

*“Health or social care purposes.*

*2 (1) This condition is met if the processing is necessary for health or social care purposes.*

*2 (2) In this paragraph “health or social care purposes” means the purposes of.  
(a) Preventative or occupational medicine.....”*

- II. **UK GDPR Article (6)(1)(b)** - Processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract; And or
- III. **UK GDPR Article 9(2)(h)** - Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems.
- IV. **UK GDPR Article 9(2)(i)** processing is necessary for reasons of public interest in public health.

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<sup>3</sup> GDPR is a European legislation that the UK adopted GDPR into UK law (UK GDPR) following the United Kingdom’s European Union (Withdrawal) Act 2018.



## 8. Medical Records

PAM clinicians may require medical reports from your healthcare professionals e.g. GP or a specialist Consultant. If required PAM will always obtain your written consent before obtaining the report. Before you give your consent to allow PAM to obtain any report you will be advised of:

1. The reason the report is needed.
2. Your rights under the Access to Medical Reports Act (1988).
3. Your right to see a copy of the report (prior sight) being sent to PAM if you wish.
4. That PAM will send a report to your employer based on the medical report sent to us. It will not be the actual report that your Healthcare provider sends to us.
5. How you can see the report that PAM sends to your employer

Where PAM is required to send a report to your employer and the report is being written by an Occupational Health Physician (Doctor), you will have the opportunity to see the report before it is sent to your employer. Reports are only sent to employees via our secure email procedures. If the report being sent to your employer is written by an Occupational Health Advisor (Nurse) you can obtain a copy of the report from your manager.

## 9. Transfers of data

Your information will not be sent outside of your home territory as follows:

**United Kingdom** - Data collected, processed, and stored for our UK clients is held in UK data centres (AWS).

**Ireland** - Data collected, processed, and stored for our Ireland clients is held in data centres (AWS) in Dublin.

## 10. Your Rights

Below is a list of your rights in relation to the personal data we collect, process and store. To make an application for any of the below please contact us using [sar@pamgroup.co.uk](mailto:sar@pamgroup.co.uk). All your rights will be considered within one calendar month of receipt but could be extended if your request is deemed complex.

### 10.1 The right to access your personal data.

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process.

## 10.2 The right to rectify inaccurate data.

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

## 10.3 The right to have your data erased <sup>4</sup>

You have the right to ask us to erase your personal information in certain circumstances.

## 10.4 The right to restrict the processing of your data <sup>5</sup>

You have the right to ask us to restrict the processing of your information in certain circumstances.

## 10.5 The right to object to the processing of your data <sup>6</sup>

You have the right to object to processing if we are able to process your information because the process forms part of our public tasks or is in our legitimate interests. However, we do not process your data for these reasons, so restriction of processing is therefore not applicable.

## 10.6 The right to data portability <sup>7</sup>

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated.

## 10.7 The right not to be subject to automated decision-making, including profiling.

PAM Group do not use automated decision-making or profiling to provide our services.

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<sup>4</sup> [Your right to get your data deleted | ICO](#)

<sup>5</sup> [Your right to limit how organisations use your data | ICO](#)

<sup>6</sup> [The right to object to the use of your data | ICO](#)

<sup>7</sup> [Your right to data portability | ICO](#)

## 11. Data Retention

We will retain your personal data only for as long as is necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We have highlighted some particular instances below:

Record Description	Retention Period
Telephone Voice Recordings	30 days
Employee Liability Claims	3 Years
Limitation Act Claims	6 Years
Industrial Disease Records	40 Years
Rail Workers Sentinel Medicals & Drug and Alcohol testing	10 years

## 12. Data Protection Complaints

If you have any questions about this Privacy Policy, or our data practices, please contact our **Data Protection Officer (DPO) - Pippa Boulton** - in the first instance:

**PAM Group Limited**, Holly House, 73-75 Sankey Street, Warrington, WA1 1SL

Telephone: 01925 227000

Website: <https://www.pamgroup.co.uk/>

You also have a right to complain directly to the Information Commissioner's Office (ICO), if you feel that PAM Group has not responded effectively to your complaint:

### **Information Commissioners Office**

Wycliffe House, Water Lane, Wilmslow, SK9 5AF

Telephone: 0303 123 1113

Website: <https://ico.org.uk/>

## Definitions & Acronyms

Term	Definition
DPO	Data Protection Officer
SOP	Standing Operating Procedure
OHIO	<i>Occupational Health Information Online</i> – PAM Group’s bespoke online platform for HR and managers to make referrals, make appointments, obtain reports, refer employees, and gain access to management information
Fit4Jobs	PAM Group’s employment health screening service.
Data subject	Means an individual who is the subject or personal data
Personal data	Any information relating to any person that can be used to identify them either directly or indirectly, such as their name, identification number, address, web browsing data or other factors specific to physical, psychological, genetic, mental, economic, cultural, or social identity of that person.
Special Category data	Information on racial or ethnic origins, political opinions, religious or philosophical beliefs, trade union membership, health, sex life and sexual orientation, and genetic or biometric data.
Health data	Means the name, address, date of birth, email, telephone numbers, medical history, clinical information including notes and assessment forms, reports and medical data obtained, collected, and processed (including for the avoidance of doubt the medical opinion and clinical assessment) by PAM in the provision of the Services.
Subject Access Request (SAR)	Is an individual’s right to access and receive a copy of their personal data, along with supplementary information.
Classification Tier 1	Publicly available

## Related Policies & References

Reference	Location
Data Protection Policy	Internal/SharePoint
Data Incident/Breach Management Policy	Internal/SharePoint
Information Security Policy	External and Internal/SharePoint
Consultation Policy	External and Internal/SharePoint