



Staff Health Ltd: Public Privacy Notice

- **Document Reference:** SH-GDPR-PN-2026
- **Organisation:** Staff Health Ltd (Company Number: 12551815)
- **Data Controller:** Prof Kaveh Asanati (Managing Director & Specialist Occupational Health Physician)
- **Last Review Date:** June 2026
- **Next Scheduled Review Date:** June 2027
- **Document Classification:** Public

1. Introduction

Staff Health Ltd provides specialist occupational health services and clinical insourcing services to NHS Framework partners, Local Authorities, public sector bodies, and corporate clients. In delivering these clinical services, we act as a Data Controller for personal and special category data.

We process all personal data strictly in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This privacy notice explains how we collect, use, store, share, and protect your information.

2. The Types of Data We Process

We collect and process various categories of data depending on your relationship with us:

2.1. For Patients and Referred Employees

- **Personal Data:** Full name, date of birth, contact details (address, telephone number, email address), and employer name.
- **Special Category Data:** Occupational health referral forms, clinical histories, physical and mental health metrics, workplace health surveillance results, and formal fitness-for-work assessments compiled by our medical practitioners.

2.2. For Staff and Subcontracted Clinicians

- **Personal Data:** Contact details, qualifications, employment history, bank account details for payroll, and tax identifiers.
- **Professional Credentials:** Professional registration verification, medical indemnity certificates (specifically MDDUS membership details), and training logs.



2.3. For Corporate Clients, Suppliers, and Enquirers

- **Commercial Contact Information:** Names, job titles, business email addresses, and phone numbers of organisational representatives.

3. Lawful Bases for Processing Data

We must establish a valid legal ground under the UK GDPR to process your data. We rely on the following bases:

3.1. Personal Data (Article 6)

- **Contract (Article 6(1)(b)):** Processing is necessary to perform our service contracts with corporate clients, NHS trusts, and our staff.
- **Legal Obligation (Article 6(1)(c)):** Processing is necessary to comply with UK employment and health and safety legislation.
- **Legitimate Interests (Article 6(1)(f)):** Processing is necessary to manage our business operations, respond to direct enquiries, and track service delivery.

3.2. Special Category Data (Article 9)

- **Health or Social Care (Article 9(2)(h)):** Processing is necessary for preventive or occupational medicine, the assessment of the working capacity of the employee, and medical diagnosis managed by occupational health professionals.

4. How We Collect and Store Your Information

We collect information directly from you during clinical consultations, and from third parties such as referral forms submitted by your employer's HR department.

We store all data in highly secure environments:

- **Clinical Records:** Stored in secure cloud repositories using **Tresorit**, which enforces zero-knowledge end-to-end encryption (E2EE) to guarantee that only authorised clinical staff can access the files.
- **Operational and HR Files:** Retained on secure, restricted directories within our **Microsoft 365 Business Standard** corporate SharePoint library, protected by multi-factor authentication (MFA) and role-based access limits.

5. How We Share Your Information



We do not sell or lease your personal data. We only share data with authorised third parties to deliver our services or meet legal obligations:

- **Your Employer:** For occupational health referrals, we only share the final, formal fitness-for-work certificate with your employer's designated HR contact. We do not disclose detailed clinical consultation notes or medical histories without your explicit written consent, unless required by statutory regulations.
- **Chartered Accountants:** We share basic payroll and subcontractor invoicing records securely with ASM Chartered Accountants to satisfy corporate financial reporting requirements.
- **Regulatory Bodies:** We may share information with organisations like the General Medical Council (GMC) or public health bodies if legally required.

6. Data Retention

We do not keep personal data longer than necessary. Our standard retention periods are:

- **Clinical and Health Records:** Retained for a minimum of 6 years after the termination of employment or referral. Health surveillance records involving hazardous exposure are retained for 40 years as required by UK health and safety regulations.
- **Financial and Invoice Records:** Retained for 7 years to meet HM Revenue & Customs (HMRC) requirements.
- **HR Files:** Retained for 6 years following the cessation of employment or contract.

7. Your Data Protection Rights

Under UK data protection legislation, you hold specific rights regarding your personal information:

- **Right of Access:** You can request copies of the personal data we hold about you by submitting a Subject Access Request.
- **Right to Rectification:** You can ask us to correct inaccurate or incomplete information.
- **Right to Erasure:** You can request that we delete your personal data under certain conditions, subject to statutory retention overrides for medical records.
- **Right to Restrict Processing:** You can ask us to limit how we use your data.
- **Right to Object:** You can object to us processing your personal data in certain circumstances.



To exercise any of these rights, please contact our Data Controller at our registered office.

8. Contact Information & Complaints

If you have any questions about this privacy notice or how we handle your data, please contact us:

- **Postal Address:** Flat 66 Chelsea Vista, Imperial Wharf, London, SW6 2SD
- **Email:** tenders@staff-health.co.uk

If you remain unsatisfied with our response, you have the right to lodge a complaint with the **Information Commissioner's Office (ICO)**, the UK supervisory authority for data protection:

- **Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF**
- **Helpline:** 0303 123 1113
- **Website:** www.ico.org.uk