

COMPANY PRIVACY POLICY

What is the purpose of this policy?

The Health and Safety Service Limited (The HSS) is committed to protecting the privacy and security of your personal data.

This privacy policy has been developed to inform you about how we collect and process your personal data through the use of our training and consultancy services.

It is important that you read this policy, along with any other policy or statement we may provide in relation to data protection, so that you are fully aware of how and why we are using your personal information.

Who controls your information?

Depending on how you interact with The HSS we may act as either the data processor or data controller in relation to your personal data.

Our training courses include those that are accredited by the Construction Industry Training Board (CITB) and the Institute of Occupational Health (IOSH). In these circumstances we are bound by the supplier agreements with both organisations to ensure that your personal data is processed securely.

Any privacy notices or statements provided by either of these parties in relation to the processing of your personal data under these will take precedent over this policy.

For all in house training, we will be the data controller.

Some of our consultancy activities may require the collecting and processing of your personal data – such as accident and investigation reporting, hazard identification and risk assessments, audit reporting. In most of these cases it will be your employer who is the data controller and The HSS will act as a data processor on their behalf.

What is the legal basis for using your personal data?

Many factors may dictate why we collect your personal data. These can include:

Legal Basis	Example
To perform a contract with you	If you have signed a booking form to participate in one of our courses, we will need your contact details in order to process your certificate.
We have a legitimate interest to do so	Completing customer satisfaction/feedback forms ensures we are providing the best possible service to you.
You have provided consent	You have subscribed to our quarterly newsletter as you wish to receive the latest news and information regarding health, safety and the environment. In most cases, especially for marketing purposes you can withdraw your consent at any time.
To comply with the law	Assisting the HSE with investigations

What personal data do we hold and how do we use it?

Personal data relates to any information about an individual from which that person can be identified. For example, name, address, or e-mail address.

The HSS may collect some or all of the following personal data about you:

Activity and Data	Type of Data	Why is it collected	Lawful basis for processing
Applying to participate in one of our training courses, either online, via e-mail, or via telephone.	Name, e-mail address, postal address, telephone number.	So that we can get confirmation of your intention to intend the course, and to contact you in case of any changes or cancellation; send out your certificates at the end of the course.	To perform a contract or potential contract with you.
Participating in a CITB accredited course such as the Site Safety Plus Site Managers Safety Training Scheme.	In addition to the above - CITB registration number, date of birth, national insurance number.	In addition to the above - CITB will add your details to their card scheme database to support the process of obtaining a CSCS card and verification activities.	To perform a contract or potential contract with you.
Participating in an IOSH accredited course such as IOSH Managing Safely.	In addition to the above – job title	In addition to the above – IOSH will add your details to their certificate database.	To perform a contract or potential contract with you.
Completing course / consultancy evaluations.	Name	To assist The HSS with continual improvement of our services.	Necessary for our legitimate interests.
Signing up to our quarterly newsletter.	Name, e-mail address.	So that we can add you to our newsletter recipient database and send you our newsletter every quarter.	To perform a contract with you. If you are not, or have never been a member, you will have given consent if you have signed up through our website. You can withdraw your consent at any time in writing to info@thehss.co.uk .
Signing up to our membership services.	Name, e-mail address, postal address, telephone number, bank details.	So that we can provide our membership services to you.	To perform a contract with you.
Completing documentation as part of our member services, including but not exclusive to health and safety policy, risk assessments, method statements, incident investigations etc.	Name, e-mail address, telephone number, job title.	For us to record the safety arrangements and responsibilities for our members; so that we can contact you as part of your membership.	To perform a contract with you.

Sharing personal data

There are circumstances within our activities that require us to share your personal information, or that we receive your personal data from third parties. The reasons for this may be where we are required to by law; where it is necessary to administer the working relationship with you or your organisation; or where there is another legitimate interest to do so.

In order for you to fulfil our obligations as an accredited training provider of specific CITB and IOSH courses, and to fulfil our contract with you, we will need to collect and pass on your data to the relevant body.

As part of our membership contract with you, we may assist with some of your organisation's internal activities. This can include reviewing certain documentation such as induction and training records, conducting incident investigations, and providing a health and safety policy with associated responsibilities and arrangements.

Were there has been, or potentially could be, a serious incident or breach of legislation we may be legally required to share information with the Health and Safety Executive (HSE) or other enforcement agencies in order to ensure the safety and security of our premises or any other premises we visit. This evidence may contain your personal information.

We will only use your personal information for the purposes for which we collected it. We will ensure that whilst your personal data is in our possession it is kept safe and secure. We will not sell or share your personal data to any third parties other than the ones identified for us to fulfil our contractual and legal obligations.

How long do we keep your information for?

The HSS will only retain your information for as long as it is necessary for the purpose it was collected for. This also considers any legal, accounting or reporting requirements.

Records of certification from our training courses (including CITB and IOSH) will be kept for a period of 5 years. All CITB issued certificates carry an expiry date of 5 years. We will keep a record of certification to support any claims or requests against lost certificates.

Documents relating to our membership services will be kept for 6 years after the end of the contract in case it is needed to assist with supporting any legal action.

If you have withdrawn consent from our newsletter database your personal information will be removed from our systems with immediate effect.

In most other circumstances we will retain records for a period of 3 years, unless otherwise stated in the company's record control register.

Your Legal Rights

It is important that the personal data we collect is accurate and current. Please ensure that you inform The HSS of any changes that may be relevant to the information we hold.

Under certain circumstances, by law you have the right to:

- Request access to your personal information. Known as a data subject request. If we receive a data subject request in writing, then we will provide you with a copy of the personal data The HSS holds.
- The right to correction enables you to have incomplete or inaccurate information updated.
- The right to erasure or the right to be forgotten. You can request that your personal data we hold is deleted or removed if there is no good reason for the HSS to continue processing it.
- The right to object to processing, where the HSS is relying on a legitimate interest. However, we may be able to continue processing even if you object – as long as our legitimate grounds override your interests or rights.
- You can request that the processing of your data is restricted. For example, you can suspend the processing of your personal information if you want The HSS to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to another party.
- Withdraw consent where we are relying on your consent to process your personal data. For example, you no longer wish to receive our newsletters.

You will not have to pay a fee to access your personal information. However, The HSS may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, The HSS may refuse to comply with the request in such circumstances.

To ensure that personal data is not disclosed to anyone other than the person making the data subject request, we may ask for specific information to help confirm the identity of the person making the request.

To request your data, or if you have any complaints about how we process your information, please contact The Health & Safety Service Limited in writing to either info@thehss.co.uk or our postal address: **The Health & Safety Service Limited, Suite 5 Maple House, Queensway Business Park, Queensway, Telford, Shropshire TF1 7UL.**

If you are still unsatisfied with the way The HSS has dealt with your request, then you can make a complaint to the Information Commissioner's Office via their website www.ico.org.uk or by post at: **Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.**

For further information, please find below links to the following privacy statements.

Construction Industry Training Board (CITB) - <https://www.citb.co.uk/utility-links/privacy-policy-cookies/>

Institute of Occupational Health and Safety (IOSH) - <https://www.iosh.co.uk/Privacy-Notice.aspx>

Construction Skills Certification Scheme (CSCS) = <https://www.cscs.uk.com/privacy-cookies/>

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Review: 1st June 2024