
London School of Hygiene and Tropical Medicine
and is committed to protecting your personal data.

Please read this notice carefully. It describes why and how we collect and use personal data in the context of the Occupational Health Service and provides information about your rights under data protection laws.

This Privacy Notice applies to personal data provided to either by individuals themselves or by third parties in the course of us providing the Occupational Health Service. It should be read in conjunction with the following documents:

For existing LSHTM staff: [LSHTM Privacy Notice for Staff](#)
For existing LSHTM students: [LSHTM Privacy Notice for Students](#)
[LSHTM's other Privacy Notices](#)

We keep this Privacy Notice under regular review. We may withdraw or modify this Notice at any time and we may supplement or amend it by reference to additional policies and guidelines from time to time. Any changes we make to this Privacy Notice in the future will be posted on the relevant pages of the LSHTM external website, the LSHTM Health and Safety intranet pages and communicated through The Charities newsletter and in e-mail communications to students. We may also notify you in other ways from time to time about the processing of your personal data in connection with the Occupational Health Service.

This Privacy Notice was created on 30 April 2021.

Service. Clients may include the following categories of individuals:

LSHTM employees (current and previous)

LSHTM students (current and previous)

Visiting academic or research staff, honorary staff and secondees

Contractors, consultants and temporary/casual workers

In addition, and incidental to personal data relating to individuals in the above categories, LSHTM may process limited personal data concerning the following:

Emergency contacts/next of kin provided by any of the categories of individuals listed above

Establishing baseline health records where you may be working with substances and agents which have the potential to cause disease.

Monitoring your health if you continue to be exposed to workplace allergens or substances which may cause disease.

Overseeing the monitoring of your health if required for your work with Ionising Radiation Sources.

Advising on the management of accidents and exposures in the course of your work.

Ascertaining your fitness to undertake work or study overseas, in line with the LSHTM Offsite Working Policy and recommending vaccinations and measures to protect your health as appropriate.

Providing advice and support to you in the management of a work-related health problem or a health problem that affects you at work

to enable LSHTM to discharge its statutory duties towards our staff, students and others under the Health and Safety at Work etc. Act 1974 and other laws, regulations and rules relating to health and safety

to enable LSHTM to

performance of its core purposes of research and education, as laid down by law and its responsibilities to its staff, students and others in relation to these core purposes

(iv) *Consent*

While we expect it to be the case there may be some rare circumstances where we need to process your personal data outside the lawful bases set out above.

_____, we will seek your consent to process your personal data for that specific purpose. We will take all reasonable steps to ensure that any consent you provide is freely given (i.e. you have a genuine choice), specific, informed and unambiguous. We will explain to you how you can withdraw your consent at the time of you giving it. You do withdraw consent, this will not affect the lawfulness of processing based on your consent before your withdrawal.

Privacy Notice and other documents relating to Occupational Health Service, in general refer to LSHTM relying on consent as a lawful basis for processing your personal data under the data protection legislation. This is because as both a public authority and an employer and LSHTM endeavours to avoid the use of consent in order to lawfully process personal data and instead relies, wherever possible, on other lawful bases for doing so, such as those referred to above.

Legal conditions relied on for the processing of special categories of personal data:

(i) *Employment law obligations and rights*

In the course of providing the Occupational Health Service, LSHTM will process certain special categories of personal data relating to members of LSHTM staff (such as data in our role as an

is necessary in order for us to meet our obligations, or give effect to or an individual staff member

Examples of this are where processing special categories of personal data is necessary enable LSHTM to meet our obligations as an employer under the Health and Safety at Work etc. Act 1974, the Control of Substances Hazardous to Health (COSHH) Regulations 2002, the Equality Act 2010 and any other relevant legislation.

Substantial Public Interest

The data protection legislation allows special categories of personal data to be processed where this is necessary for reasons of substantial public interest, subject to certain conditions, restrictions and limitations.

When processing special categories of personal data (such as data concerning health) outside the employment context condition outlined above does not apply. LSHTM shall

statutory, etc and government purposes. This shall include the processing of special categories of personal data relating to individuals who are not (or no longer) LSHTM employees including LSHTM students, visiting staff contractors or consultants

These statutory purposes include the following

Statutory duties under the Health and Safety at Work etc. Act 1974, the Control of Substances Hazardous to Health (COSHH) Regulations 2002, the Equality Act 2010, etc.

As previously described in the Privacy Notice, LSHTM may process personal data,

We would be unable to provide the Occupational Health Service and achieve each of the substantial public interest benefits set out in this section if we were unable to process special categories of personal data (data concerning health).

(iii) *Public interest in the area of public health*

We may in certain circumstances process special categories of personal data (including, for example, data concerning health) where this is necessary for reasons of public interest in the area of public health. This may include protecting against serious cross-border threats to health (such as COVID-19) and responding to new threats to public health, e.g. as a result of new research findings in relation to COVID-19 or new official

When sharing information internally as described above, LSHTM will ensure that the amount of information shared is kept to the minimum necessary for the relevant purpose.

It may be necessary for LSHTM to share your personal data with external third parties in the context of providing the Occupational Health Service. Examples of where this may be necessary are provided below:

External providers of occupational health services

LSHTM may share your personal data with external organisations that we engage to provide occupational health services as part of the overall service provision by LSHTM to Clients.

This includes our current provider, the Royal Marsden NHS Foundation Trust, to whom LSHTM has outsourced a range of services.

Third-party service providers – cloud-based software applications

We will share your personal data with third party service providers that help us provide our occupational health and safety information management systems in particular, where those systems rely on cloud computing solutions. This includes Civica UK Limited,

When we share your personal data with a third party as set out above, it may, in certain cases, involve transferring your personal data to a recipient outside of the United Kingdom. Where it is this necessary and the recipient is in a country which the UK government has decided does not have adequate data protection laws, we will make sure that appropriate safeguards are in place to protect your information and your rights under applicable data protection laws.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have established procedures to deal with any suspected personal data breach and will notify you and any applicable

A right to restrict our processing of personal data held by us about you. This right will only apply in certain circumstances e.g. where you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data on the grounds that our processing is unlawful but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but you require the data for the purposes of dealing with legal claims.

A right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to require us to transfer this personal data to another organisation. Again, this right will only apply in certain circumstances.

A right to object to our processing of personal data held by us about you. Again, this right will only apply in certain circumstances.

A right to ask us not to use information about you in a way that allows computers to make decisions about you and ask us to stop (in practice, this right is highly unlikely to apply in the context of the processing activities to which this Privacy Notice relates - see section 15 below)

In certain circumstances, we may need to restrict your rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (the maintenance of legal privilege) or otherwise as permitted by law.

If you wish to exercise any of the above rights, please contact us using the details set out at section 17 below.

Separately, if you wish to have access to information from your health record (if we are required to maintain one for you for health surveillance purposes under applicable legislation), you may do so by requesting a copy directly using the following email address: Occupationalhealth@lshtm.ac.uk that, for security reasons, we will need to verify your identity before releasing information to you.

LSHTM does not use automated processing and decision making without manual intervention. This includes in relation to data received in the context of LSHTM Occupational Health Service

LSHTM maintains a data protection registration with the Information Commissioner's Office, the independent authority which oversees compliance with the data protection laws. Our registration number is Z7513362

LSHTM has appointed a Data Protection Officer to oversee compliance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).