

Privacy Notice – Safety, Health & Environment

1. Introduction and purpose

This Privacy Notice is for individuals whose data is processed by LTE Group in relation to health and safety accidents, incidents and near misses.

This Notice provides information that is in addition to information contained in our [colleague and student privacy notices](#) and [Data Protection Policy](#). Please do read these documents to understand our practices and if you have any questions, please contact us using the details provided below.

2. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Some of the personal data collected in relation to health and safety reporting will be classed as being 'special category personal data*', for example information relating to health conditions or disabilities. Access to and sharing of this information is controlled very carefully.

The categories of personal information that we may collect, store, and use about you may include:

	Affected person	Witness	Next of kin
Name and contact information	✓	✓	✓
Next of kin details	✓		
Site where incident occurred	✓	✓	
Type of incident	✓	✓	
Date, time, and location of incident	✓	✓	
Description of incident*	✓	✓	
Information about your health, any disability and/or medical condition*	✓		
Actions taken/treatment given following the incident	✓	✓	
Health and sickness records*, details of time off work			
Witness/affected person information	✓	✓	
Photographs, CCTV or security camera footage and documentary evidence	✓	✓	

We may collect further personal data directly from you as part of our investigation into your reported injury or ill health.

3. How is your personal information collected?

Incident reporting information is typically collected through our incident reporting form/process, but may also be collected from third parties such as witnesses, affected persons and other interested parties.

4. How will we use information about you?

The information we collect will allow us to record health and safety accidents, events and near-misses that happen on our premises or to our colleagues, students or visitors. All incidents will be investigated to establish what lessons can be learned to prevent them from reoccurring and so that we can implement any necessary additional safeguards (such as training and procedures).

The information is also retained in line with our Health and Safety retention schedule in the event of any claims for damages.

Data protection laws require us to meet certain conditions before we are allowed to use your personal data in the manner described in this Privacy Notice, including having a "lawful basis" for the processing. Where we process special category personal data we are required to establish an additional lawful basis for processing that data.

Some of the below grounds for processing will overlap and there may be several grounds which justify our use of your personal information. We may process your personal information without your knowledge or consent where this is required or permitted by law.

Purpose	Lawful Basis
To assist in providing first aid or other emergency assistance	<ul style="list-style-type: none"> To comply with our legal obligations Where it is in a person's vital interests Where it is in our/your legitimate interests
To appropriately report specific health and safety incidents to the Health and Safety Executive (HSE), which meet the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) Health and Safety Executive reporting requirements	<ul style="list-style-type: none"> To comply with our legal obligations: processing of certain personal data is necessary for compliance with the RIDDOR
Log, investigate and conduct follow up activities relating to accidents, to assist with ensuring the health, safety and welfare of our colleagues, students, and visitors	<ul style="list-style-type: none"> To comply with our legal obligations: processing of personal data is necessary for compliance with the Workplace (Health, Safety and Welfare) Regulations 1992
Log, investigate and conduct follow up activities relating to accidents, to assist with assessing and controlling risks to protect our colleagues	<ul style="list-style-type: none"> To comply with our legal obligation: processing of personal data is necessary for compliance with the Management of Health and Safety at Work Regulations 1999
Log, investigate and conduct follow up activities associated with health and safety 'near miss' incidents not meeting the RIDDOR requirements	<ul style="list-style-type: none"> Where it is in our/your legitimate interests: the processing is necessary for the purposes of the legitimate interests pursued by us – the legitimate interest is to appropriately investigate near miss incidents and to take appropriate follow up action to keep our students, staff and visitors safe
To produce Personal Emergency Evacuation Plans (PEEPs)	<ul style="list-style-type: none"> To comply with our legal obligations Where it is in our/your legitimate interests

Do we need your consent?

We do not generally process your personal data based on your consent (as we can usually rely on another lawful basis, as outlined in the table above).

5. If you fail to provide personal information

If you fail to provide certain information when requested, we may be prevented from complying with our statutory obligations under health and safety law.

6. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. Data sharing

We may share your personal data with parties that are essential to complying with our legal and contractual obligations, e.g. colleagues working in the Safety, Health and Environment department and senior management. We sometimes need to share this information externally for legal purposes, including (but not limited to): solicitors, insurers, occupational health providers, and the Health and Safety Executive. We will also share personal information with law enforcement or other authorities if required by applicable law.

A full register of who we may share your personal data with and why is available on request: dpo@ltegroup.co.uk

All parties who we share data with are required to take appropriate security measures to protect your personal information, in line with our policies. We do not allow our third-party partners/service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Your data may be transferred outside of the UK, for example, where we use third party providers to deliver our services, such as externally hosted software or cloud providers who store data globally. We undertake strict due diligence on all partners to ensure that they have the adequate safeguards in place to protect your data under Article 46 GDPR.

8. Data retention

Dependent on the nature of the incident, we are sometimes required to hold health and safety information for up to 40 years. We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, subject to our statutory obligations.

Full details of retention periods are available in our [Records Management Policy](#) and [Data Retention Schedule](#) (also available on request from dpo@ltegroup.co.uk).

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once we no longer require access to your personal information we will retain and securely destroy it in accordance with our data retention policy and applicable laws and regulations.

9. Your individual rights in connection with personal data

Subject to certain conditions, you have the following rights in relation to your personal data:

Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request erasure of your personal information where there is no good reason for us continuing to process it.

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.

Request the transfer of your personal information to another party.

Suspend processing of your personal information, for example if you want us to establish the accuracy of the data we are processing.

If you wish to invoke any of the above rights, please contact us via email: dpo@ltegroup.co.uk or by raising a ticket via the [Colleague Self-Service Portal](#).

Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk>).

10. If you are unhappy with how we have handled your data

If you are unhappy with how we have handled your data, you may lodge a formal complaint with the following department:

The Company Secretary & General Counsel

LTE Group
Whitworth House
Ashton Old Road
Manchester
M11 2WH

dpo@ltegroup.co.uk

If you do not wish to discuss your complaint with us, or you are unhappy with our response, you also have the right to lodge a complaint with a supervisory authority, the Information Commissioner's Office (ICO).

Further information is available on the ICO website, or via telephone:

<https://ico.org.uk/global/contact-us/>
0303 123 1113

More information on the ICO's complaint procedure can be accessed at:
<https://ico.org.uk/make-a-complaint/>