PAM Assist Privacy Policy

**About PAM Assist**

PAM Assist is a trading name of PAM Wellbeing Limited a part of the PAM Assist. PAM Assist is engaged by its clients who are employers to provide an Employee Assistance Programme. This is a confidential service that includes the provision of counselling and welfare advice services.

“PAM Assist” is part of PAM Group which consists of People Asset Management Limited, PAM Wellbeing Limited, PAM OH Solutions Limited and To Health Limited and PAM Health. We provide confidential employee assistance including:

* 24/7 support
* Psychological welfare assessments
* Counselling
* Healthcare advice
* Welfare rights advice including debt advice and benefits advice
* Legal guidance

PAM Assist has appointed James Murphy as its Data Protection Officer. Our Registered Office is Holly House, 73-75 Sankey Street Warrington Cheshire WA1 1SL

**Who is the Policy for?**

This policy is for people where we process their data to allow us to deliver services. They are mostly our client’s employees we will also provide support to an employee family members in some circumstances. PAM Assist is committed to ensuring we hold your data securely this policy explains:

* What we hold?
* Why we hold it?
* How long we hold it for?

PAM Assist holds “Personal and Special Information” as defined by the GDPR and Data Protection Regulations. We treat our responsibilities very seriously as an organisation and as individuals we will always treat your information as important and ensure that we protect its use, access and accuracy. PAM Assist is registered with the Information Commissioners Office Registration Number: Z9280152, we hold ISO 9001 (Quality Management) accreditation, ISO 27001 (Information Security Management) accreditation and the Faculty of Occupational Health SEQOHS accreditation.

**Why do we hold your data?**

PAM Assist provides employee assistance services including counselling, legal guidance, welfare rights advice and healthcare advice. PAM Assist employs specialist clinicians who provide advice and therapy treatment. These nurses, counsellors, psychologists, welfare rights advisors and solicitors..

All data is controlled by an Authorised Healthcare professional as set out in the Data Protection Act (2018) s(204). We treat any special data including counselling notes and assessment notes as medically confidential.

When you visit our website, a record of your visit is made. This data includes your device’s IP address. That data is used completely anonymously, in order to determine the number of people who visit our website and the most frequently used sections of the site. This enables us to continually update and refine the site. If you use any forms on the website to send an email to us, a record will also be made of your email address and your telephone number.

The following table sets out how we handle your personal data and our legal basis for doing so under GDPR and the Data Protection Act 2018.

|  |  |
| --- | --- |
| **What we do** | **Our legal basis under GDPR** |
| Use the personal data that you provide on our web forms and questionnaires | Article 6(1)(b) - when you provide us with your personal data, for instance to obtain a quote for our services, this is a necessary step to take at the request of the data subject prior to entering into a contract |
| Provide our core services of Employee Assistance Programme | Article 6(1)(b) - this is necessary for the performance of a contract with you, our data subject |
| Contact you regarding the services we provide | Article 6(1)(f) - we need to contact you for our legitimate interests so that we can gather more information for the provision of our services, or to deliver those services most effectively |
| Retain your data under our data retention policy after your contract has expired | Article 6(1)(f) - we need to retain your personal data for only as long as necessary under the law to protect our legitimate interests |

The following table sets out the categories of personal data that we obtain.

|  |  |
| --- | --- |
| **Personal Data** | **Explanation** |
| Name, postal address, email address, website, identification number, location data, online identifier - these are classed as personal data | This data is provided by you on our web forms and questionnaires, either to obtain a quote from us, subscribe to one of our newsletters, request a service from us or as part of a new or existing contract or enquire about becoming an associate counsellor with PAM Assist.  |
| Special categories of personal data are racial or ethnic origin, political opinions, sex life, sexual orientation, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying a natural person, or data concerning health | This data may be provided by you on our web forms and questionnaires, or verbally during our service delivery and most regularly in relation to the utilisation of PAM Assist’s Employee Assistance services. |

We may collect, hold, use and disclose the information collected to compile statistical data and to; maintain our database; develop/improve our website; respond to any email enquiries; notify you of any upcoming marketing, training or other events that you have opted in to; provide you with publications; manage quality control; manage systems administration and attend to compliance issues.

PAM use the information held in the delivery of our services.

1. We need personal information e.g. name address, 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 information used with the NHS.
2. We need your personal contact details e.g. telephone and email to assist us communicating with you when booking appointments.
3. We need and will create medically confidential information so that our clinicians can provide professional advice based on your health fitness and wellbeing.
4. We operate a secure occupational health IT system this 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 data is held for the training and monitoring of our colleagues. Any voice recording is destroyed after 31 days and does not form part of your medical records

All medical information is held securely and only accessed by PAM Assist workers. No EAP data is shared with your employer the service is completely confidential. Anonymised statistical data is shared with an employer however no individual can be identified from the data provided.

 X We do not and will never sell your information to anyone else.

X We do not share your information with anyone else except in case of emergency see below and we will always obtain your consent before we provide information.

X We will not use your information to sell you anything or promote any services that are not related to the provision of healthcare services or EAP services.

**What is in case of emergency?**

Unfortunately PAM Assist is called upon when a person is at their most vulnerable and in many cases we help. If our colleagues feel that a person is in a position where they plan to commit an act that will injure or place others at risk, we may decide to contact emergency services such as police, ambulance fire brigade or a GP. The purpose of this notification is for the protection of others. Where our colleagues want to use your data for other purposes we will obtain your consent before doing so.

**Data Processing**

PAM Assist acts as a Data Controller for the processing of your data. As part of our service delivery we may use associate counsellors on a subcontract basis they act as our data processors. Most of the information we hold is electronic in some limited cases we do still hold paper records. Our computer servers are located in England and your information is not stored or held outside the UK.

During the time that PAM Assist provides your EAP service we will create and add our records to your file. If your employer leaves PAM Assist or you leave your employer’s employment your file will be destroyed by PAM Assist. We will not retain a copy of your records after your employer leaves us. For the avoidance of any doubt EAP counselling and assessment notes do not form part of any occupational health records.

**Data Retention**

In all cases PAM Assist Data Retention Policy is:

|  |  |
| --- | --- |
| **Reason to retain records** | **Time Period** |
| Telephone voice recordings | 31 Days |
| Storage and processing of personal and special data | 60 days after notification that the employee has left the employers employment**Or**60 days after termination of the services being provided to your employer |

**Legal Information**

The UK Data Protection Regulations are specific about the treatment of personal and special data, you have the right to receive a copy of your records by making a Subject Access Request in writing. To request a copy of your Data Please submit your request to the Data Controller, PAM Assist, Holly House, 73-75 Sankey Street, Warrington, Cheshire, WA1 1SL or email sar@pamgroup.co.uk

PAM Assist will only use qualified clinicians when we provide advice or services to you or your employer our clinicians are regulated and authorised by, Nursing Midwifery Council, General Medical Council, Health Care Protection Council, and British Association of Counselling and Psychotherapy

A copy of this Privacy Policy is available at our website [www.pamassist.co.uk](http://www.pamassist.co.uk) and [www.pamassist.com](http://www.pamassist.com)

Any complaints or praise can be sent to the Managing Director Pam Assist, Holly House, 73-75 Sankey Street Warrington Cheshire WA1 1SL or visit the or contact us via our website at [www.pamgroup.co.uk/contact-us](http://www.pamgroup.co.uk/contact-us) . PAM Assist also operates an online feedback service please use our PAM Listen service at [www.pamgroup.co.uk/contact-us](http://www.pamgroup.co.uk/contact-us) select “Leave Feedback”.

If you are unhappy at how PAM have processed your data you can contact the Information Commissioners Office at [www.ico.org.uk](http://www.ico.org.uk) or write to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

**James Murphy**

**Data Protection Officer**

**PAM Assist**

Policy Review date 31.1.2021