



Privacy Notice

Occupational Health Assessments & Fitness-for-Work Certification (UK & Republic of Ireland)

1. Who We Are

ACI Training and Consultancy Ltd (ACI) provides occupational health assessments and fitness-for-work certification services to employers and candidates in the United Kingdom and the Republic of Ireland.

Contact details:

- Address: Euro House, Bulwark Road, Chepstow, NP16 5JN
- Email: safe@aci.training
- Phone: 01291 624451

For the purpose of occupational health assessments, we typically act as an independent data controller, as we determine how health information is assessed and recorded. Your employer (or prospective employer) is a separate data controller in respect of how they use the outcome of the report.

2. Scope of This Notice

This notice applies where you:

- Are referred for a fitness-for-work assessment
- Complete a health questionnaire
- Are subject to a pre-employment health screening

We operate across both UK and Irish jurisdictions. While the UK Access to Medical Reports Act 1988 applies only in Great Britain, similar rights are delivered in Ireland through GDPR transparency, access and consent requirements.

3. What Data We Collect

We collect only data necessary for occupational health purposes, including:

Personal data

- Name, contact details, date of birth
- Employment details (role, duties, referral reason)

Health data (special category data)

- Information about your physical or mental health relevant to work
- Functional limitations (e.g. mobility, concentration, fatigue)
- Relevant medical history where proportionate
- Medication or treatment relevant to fitness for role



Health data is classified as special category data under GDPR and requires additional protection.

4. How We Collect Your Data

We obtain your data from:

- You directly (forms, consultations, questionnaires)
- Your employer or referring organisation (role and referral details)
- Medical professionals (e.g. GP/specialist), only where appropriate and lawful

We will always be transparent about how your data is collected and used, as required under GDPR.

5. Purpose of Processing

We process your information to:

- Assess your fitness for work
- Identify any functional limitations or risks
- Recommend reasonable workplace adjustments
- Provide a fitness-for-work opinion to your employer
- Comply with legal, regulatory and professional obligations

In line with Irish Data Protection Commission expectations, occupational health disclosures should normally be limited to minimum necessary information, such as fitness status and functional impact, rather than full clinical detail.

6. Lawful Basis for Processing

Because we process health data, we rely on both:

Article 6 (General processing)

- Legitimate interests (safe recruitment and employment decisions)
- Legal obligations (e.g. workplace safety)
- Consent (where specifically relied upon)

Article 9 (Health data)

- Occupational health / assessment of working capacity
- Employment law obligations
- Explicit consent (particularly when obtaining GP/specialist reports)

Organisations must identify both a lawful basis and a condition for processing health data under GDPR.

7. Consent and Medical Reports (UK / Ireland)

United Kingdom (where applicable)

If we request a report from your GP or treating doctor:

- The Access to Medical Reports Act 1988 (AMRA) may apply
- You have the right to see the report before it is sent
- You may request amendments
- You may withhold or withdraw consent

Republic of Ireland

- There is no equivalent AMRA legislation
- Your rights arise under GDPR, including right of access and right to rectification
- Explicit consent is required where appropriate
- We will apply the same protections in practice across both jurisdictions

8. Who has access to the data?

Only OH staff have access to OH records. Please note that as part of our commitment to quality, your records may be subject to audit by an external regulatory body, but all data will be anonymised.

In entering into a contract with us to provide fitness to work certificates, you are specifically agreeing that we provide a report detailing the findings and this will be sent to your appointed representative (usually your Recruitment Company's Compliance Department).

In addition, we may need to share your personal information with your GP (if you consent), a regulatory authority, law enforcement agency or government agency to comply with the law.

We share only the minimum necessary information, typically:

- Fit / Not Fit / Fit with Adjustments
- Functional restrictions (e.g. lifting, hours, driving)
- Recommended workplace adjustments
- Review dates

We do not normally disclose diagnosis, full medical history, or detailed clinical notes, unless it is necessary and proportionate, and you have provided explicit consent.

9. International Data Processing (UK–Ireland)

- Both UK GDPR and EU GDPR may apply
- Your data may be processed in the UK and/or EEA
- Transfers are conducted under recognised legal mechanisms (e.g. adequacy decisions)

10. Data Retention

We retain occupational health data only as long as necessary for:

- Clinical and occupational health purposes
- Legal and regulatory requirements
- Complaint handling and audit

Retention is limited in line with GDPR principles of data minimisation and storage limitation.

Retention periods:

Records are retained for as long as they may be needed to support occupational health decision-making, meet our professional and contractual duties, and respond to any legal claims within the relevant timeframes. This may mean keeping information for several years after the service has ended, with extended retention where the nature of the case, level of risk, or legal obligations require it.

11. Data Security

We use appropriate technical and organisational measures to protect your data, including:

- Secure systems and controlled access
- Confidentiality obligations for staff
- Protection against unauthorised disclosure

GDPR requires organisations to ensure integrity and confidentiality of personal data.

12. Your Rights

You have the right to:

- Access your data
- Request correction of inaccurate information
- Request deletion (where applicable)
- Restrict or object to processing
- Data portability (where applicable)
- Withdraw consent where it applies

You may also request to see your report before release (where agreed or applicable) and add comments or challenge accuracy.

You have rights under UK GDPR and/or EU GDPR, depending on where your data is processed. These include the right to request access to the personal data and occupational health records we hold about you, including copies of any occupational health report or fitness-for-work opinion. You may ask us to correct factual inaccuracies, such as incorrect dates, employment details or medical information.

Where a report contains a professional or clinical opinion, you may ask for it to be reviewed if you believe it is based on inaccurate or incomplete information. However, a clinical opinion will not normally be changed solely because you disagree with the judgement reached.



Where appropriate, we may add a note recording your comments or disagreement alongside the record.

You may also have the right to request deletion, restriction of processing, objection to processing, data portability, and withdrawal of consent where consent is the lawful basis being relied upon. These rights are not absolute and may be limited where we are required to retain information for legal, clinical, professional, audit or defence-of-claims purposes. Access may also be restricted where disclosure would be likely to cause serious harm to you or another person, or where it would reveal information about another individual.

If you withdraw consent for information to be obtained or shared, this may affect our ability to complete the occupational health assessment or issue a fitness-for-work certificate.

13. Complaints

If you have concerns, contact us in the first instance.

You may also complain to:

- UK: Information Commissioner's Office (ICO) – Helpline: +44 (0)303 123 1113
- Ireland: Data Protection Commission (DPC) – Helpline: +353 (0)1 765 0100

14. Updates to This Notice

We may update this notice periodically to reflect changes in law, guidance or our services.