



Improving health and wellbeing

# Privacy Notice

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January 2020

## Document control

Document Title	Privacy Notice
Author	People Team
Date	January 2020

## Document history

Version	Date	Author	Comments
2.0	18/12/2019	People Team	Amended – formatting and updated with complaints procedure
1.0	18/05/2018	Renee Popplewell	Initial issue

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## 1 SCOPE

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This policy applies to all staff, associates and anyone whose personal data is collected by Attain, in line with the requirements of the GDPR. Individuals of whom we collect, store and process their personal data are known as 'Data Subjects'

## 2 RESPONSIBILITIES

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- 2.1 The Senior Administrator is responsible for ensuring that this notice is made available to data subjects prior to Attain collecting and/or processing their personal data.
- 2.2 All Employees of Attain who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

## 3 PRIVACY NOTICE

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### 3.1 Who are we?

Attain is the largest independent health advisory and delivery organisation in the UK. We only work with the NHS and its partners.

We have a powerful combination of clinical, management consulting, analytical, transformation and commercial expertise and we invest our expertise and energy to making the NHS and patients better.

Registered Address: Attain, 289 High Holborn, London, WC1V 7HZ

Our Data Protection Team can be contacted directly here:

- [dataprotection@attain.co.uk](mailto:dataprotection@attain.co.uk)
- 0203 435 6590

### 3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Attain to process personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting the data protection team via email on [dataprotection@attain.co.uk](mailto:dataprotection@attain.co.uk) and following the Withdrawal of Consent Procedure.

### 3.3 Disclosure

Attain outsources the processing of certain functions and/or information to third parties. When we do outsource the processing of your personal information to third parties or provide your personal information to third-party service providers, we oblige those third parties to protect your personal information in accordance with the terms and conditions of this Policy, with appropriate security and enforceable contractual measures.

### 3.4 Retention period

We will keep your personal data for as long as reasonable for the purpose it was provided. We will periodically review our interactions with you and may delete your data if we have not interacted for some time.

### 3.5 Your rights as a data subject

At any point while we are in possession of, or processing your personal data, you the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.

- Right to judicial review - if in the event that Attain refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.3 above) in the processing of your personal data.

### 3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Attain (or third parties as described in 3.3 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Attain's Senior Information Risk Owner (SIRO).

The details for each of these contacts are:

	<b>Supervisory authority contact details</b>	<b>Senior Information Risk Owner (SIRO) contact details</b>
Contact Name:	Information Commissioner's Office	Struan Coad
Address line 1:	Wycliffe House	289 High Holborn
Address line 2:	Water Lane, Wilmslow	London
Address line 4:	Cheshire	
Address line 5:	SK95AF	WC1V 7HZ
Email/Web:	<a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a>	dataprotection@attain.co.uk
Telephone:	0303 1231113	0203 435 6590

To learn more about making a complaint, please refer to our Complaints Procedure in section 6.

## 4 PRIVACY STATEMENT

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Attain is strongly committed to protecting personal data. This privacy statement describes why and how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for any of the purposes described in this privacy statement or as otherwise stated at the point of collection.

Personal data is any information relating to an identified or identifiable living person. Attain processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

#### 4.1 When and how we share personal data and locations of processing

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards.

Personal data held by us may be transferred to:

- Third party service providers
- Third party organisations that provide us with outsourced services
- Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation

#### 4.2 Our processing activities

##### Business Contacts

###### Collection of personal data

Attain processes personal data about contacts (existing and potential clients and/or individuals associated with them) using a customer relationship management system (CRM).

The collection of personal data about contacts and the addition of that personal data to Attain's CRM is initiated by an Attain user and will include name, employer name, contact title, phone, email and other business contact details. In addition, the CRM may collect data from Attain's email (sender name, recipient name, date and time) and calendar (organiser name, participant name, date and time of event).

###### Use of personal data

Personal data relating to business contacts may be visible to and used by Attain users to learn more about a client or opportunity they have an interest in, and may be used for the following purposes:

- Administering, managing and developing our businesses and services
- Providing information about us and our range of services
- Making contact information available to Attain users
- Identifying clients/contacts with similar needs

Attain does not sell or otherwise release personal data contained in the CRM to third parties.

#### Data retention

Personal data will be retained on the CRM for as long as it is necessary for the purposes set out above (e.g. for as long as we have, or need to keep a record of, a relationship with a business contact).

## Employees and Recruitment Applicants

We collect personal data concerning our own employees and recruitment applicants as part of the administration, management and promotion of our business activities.

Employees and recruitment applicants should refer to the Privacy Policy for Employees.

## Suppliers and other third parties

#### Collection of personal data

We collect and process personal data about our suppliers (including subcontractors and individuals associated with our suppliers and subcontractors) in order to manage the relationship, contract, to receive services from our suppliers and, where relevant, to provide professional services to our clients.

#### Use of personal data

We use personal data for the following purposes:

- Receiving services  
We process personal data in relation to our suppliers and their staff as necessary to receive the services. For example, where a supplier is providing us with outsourced services, we will process personal data about those individuals that are providing services to us.
- Providing professional services to clients  
Where a supplier is helping us to deliver professional services to our clients, we process personal data about the individuals involved in providing the services in order to administer and manage our relationship with the supplier and the relevant individuals and to provide such services to our clients (for example, where our supplier is providing people to work with us as part of an Attain team providing professional services to our clients).
- Administering, managing and developing our businesses and services  
We process personal data in order to run our business, including:
  - managing our relationship with suppliers;
  - developing our businesses and services (such as identifying client needs and improvements in service delivery);
  - maintaining and using IT systems;
  - administering and managing our website and systems and applications.

- Security, quality and risk management activities  
We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data.
- Complying with any requirement of law or regulation  
As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

#### Data retention

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation).

Personal data may be held for longer periods where extended retention periods are required by law or regulation and in order to establish, exercise or defend our legal rights

## 5 NATIONAL DATA OPT OUT

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Attain is not a required organisation under the NHS Data Opt Out Operational Policy Guidance. Attain only requests data anonymised in line with the ICO code of practice on anonymisation, which is not subject to the requirements of DCB3058 Compliance with National Data Opt-outs. Where Attain has been retained by any health and social care organisation as defined by the Operational policy guidance as either providing healthcare services or as a data processor or controller we will comply with their requirements under the policy.

## 6 COMPLAINTS PROCEDURE

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6.1 This procedure addresses complaints from data subject(s) related to the processing of their personal data, Attain's handling of requests from data subjects, and appeals from data subjects on how complaints have been handled.

6.2 All Employees are responsible for ensuring any complaints made in relation to the scope of this procedure are reported to the Data Protection Team.

6.3 The Senior Administrator is responsible for escalating any complaints to the appropriate member of the management team, who may vary depending on the nature of the complaint.

6.4 Attain has clear guidelines on [www.attain.co.uk](http://www.attain.co.uk), under the 'Contact us' section. The complaint is sent directly to the Data Protection team's mailbox, enabling the data subject to lodge a complaint.

6.5 Data subjects are able to complain to Attain about:

- how their personal data has been processed
- how their request for access to data has been handled
- how their complaint has been handled
- appeal against any decision made following a complaint

6.5.1 Complaints are to be resolved within 1 month.

6.5.2 Appeals on the handling of complaints are to be resolved within 3 months. All appeals are escalated to Attain's Data Controller (Managing Director) for resolution upon receipt of appeal from Data subject(s).

If Attain fails to act on a data subject's access request within the appropriate timeframe, or refuses the request, it sets out in clear and plain language the reasons it took no action/refusal. Attain will also inform the data subject(s) of their right to complain directly to the supervisory authority. In doing so, Attain provides the data subject(s) with the contact details of the supervisory authority (also see section 3.6 of the Privacy Notice) and informs them of their right to seek judicial remedy.

## 7. DOCUMENT OWNER AND APPROVAL

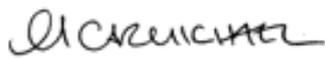
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The Senior Administrator is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirement of the GDPR.

A current version of this document is available to all members of staff on SharePoint.

This policy was approved by the Board of Directors on 19<sup>th</sup> February 2020 and is issued on a version controlled basis under the signature of the Managing Director (MD).

Signature:

A handwritten signature in black ink, appearing to read "M. CREICHER".

Date: 19<sup>th</sup> February 2020



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## Contact

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289 High Holborn, London  
WC1V 7HZ, United Kingdom  
0203 435 6590  
[contacts@attain.co.uk](mailto:contacts@attain.co.uk)  
[www.attain.co.uk](http://www.attain.co.uk)