



## **FITNESS POLICY– PRIVACY NOTICE**

**Last updated: June 2025**

Scottish Fire and Rescue Service (SFRS) is committed to protecting your personal information. The processing of personal data is covered by the General Data Protection Regulation 2018 and Data Protection Act 2018.

This privacy notice explains the information SFRS (“we”) are collecting about you, why we have collected it and how it will be used.

Process owner: **Health and Wellbeing (People Directorate)**

This notice relates to the following categories of data subject:

**Employees and Recruiting Applicants**

### **Why are we collecting your information?**

We are committed to providing a proactive, supportive Wellbeing Service that promotes good health and wellbeing for all employees and applicants joining the Service.

Physical fitness is a crucial component that contributes to an employee's performance and safety while conducting operational tasks and is also important for physical and psychological wellbeing.

We must apply consistent fitness standards for **operational** individuals with the same job description and demands. Fitness standards apply during the recruitment process of operational roles.

To support us in achieving these requirements, we have developed a [Fitness Policy](#) along with an associated [Fitness Procedure](#), designed on research of [Development of Occupational Fitness Standards for UK Fire and Rescue Services](#) conducted by the University of Bath, commissioned by the Chief Fire Officers Association, now National Fire Chiefs Council (NFCC) and adapted from Fitness Management Framework as outlined by NJC Joint Working Group [Firefighter Fitness Joint Working Group](#).

Although there is not a requirement to undertake fitness assessments for non-operational employees, we recognise the importance of health and wellbeing for everyone. The benefits of leading a healthy lifestyle enhance employee wellbeing, workplace motivation and life outside of work, along with reducing workplace sickness and stress. For these reasons, we offer health and wellbeing opportunities across the Service.

The Fitness [Policy](#) and [Procedure](#) detail our Fitness Testing Standards, in line with legislative requirements and best practice. Implementation supports the ongoing Wellbeing Recovery Plan and [Privacy Notice](#) and will ensure compliance with the fitness standards contained within these documents.

It is necessary to coordinate the timing of assessments by station and watch to within a 3-year cycle of assessments to enable efficient completion of assessments that maintains compliance with this Procedure. Consequently, you may be required to complete fitness assessments more frequently to keep alignment with your substantive station / watch. The requirement for you to complete a fitness assessment will be at the discretion of the Health and Wellbeing team.

In addition, Health and Wellbeing support Wholetime, On-call Firefighter recruitment and conduct ParQs (Fitness Assessment & Physical Activity Readiness Questionnaire), Blood Pressure and Fitness assessments during the selection process. During the recruitment process, the Health and Wellbeing team may perform spirometry to ensure candidates do not have Asthma that could impact performance in an operational role.

## **How do we collect the information about you?**

Your fitness information is collected from you at each stage of the Fitness Assessment applied by the Health and Wellbeing team by appointment and may be conducted by a designated On-call Support Watch Commander (OCSWC).

Processes involved in the Fitness assessment are:

- Chester Treadmill;
- Chester Step;
- Multistage Shuttle Run Test;
- Cardiovascular Risk Assessment;
- Movement Screen;
- Blood Pressure;
- Height;
- Weight;
- Body Mass Index;
- Waist to Height Ratio.

## **What information is being collected?**

Personal information:

- Name;
- Age;
- ID / Brigade Number (if applicable);
- Contact details;
- GP Name and Address.

Special Category information:

- Fitness Score;
- Medical information;

- Lifestyle assessment;
- Cardiovascular Risk Assessment;
- Movement Screen;
- Blood Pressure;
- Waist to Height Ratio;
- Height and Weight;
- BMI;
- Step Height;
- Heart Rates at 1-minute intervals.

### **Legal basis for the processing**

Before we process your data, we need a legal basis for doing so.

This is covered under the Data Protection Laws below:

Personal information:

- the data subject has given consent to the processing of his or her Personal Data for one or more specific purposes – Art. 6(1)(a) **(Non-Operational employees only)**;
- processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract – Art. 6(1)(b);
- processing is necessary for compliance with a legal obligation to which the controller is subject – Art 6(1)(c).

Special Category Information:

- the data subject has given explicit consent to the processing of those Personal Data for one or more specified purposes – Art. 9(2)(a) **(Non-operational employees only)**;

- processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law – Art. 9(2)(b); We are legally obliged under common law, the Health and Safety at Work etc. Act (1974) and The Management of Health and Safety at Work Regulations (1999).

### **How the information will be used?**

Your results will be used to determine whether you have a risk of cardiovascular disease, health risk or risk to remain on operational duty. Consequently, you can be removed from operational duty, during this period fitness support is provided to support improvement in aerobic fitness and another fitness test is conducted to measure improvements.

Outcomes will be compared with every assessment to highlight improvements; trends change that may need addressed in support of health benefits.

If, as an operational employee, you meet a fitness standard regarded as unfit, you will receive a development plan to support progression to the optimal fitness standard. If you fail to meet the minimum operational fitness standard and deemed operational unfit, you will be temporarily removed from operational duty and provided wellbeing support to improve fitness levels, to allow your return to operational duty.

The initial support period will be up to 12 weeks. Thereafter, a reassessment of fitness will be completed. However, if you are believed to have the potential to attain the standard required to return to operational duties sooner, a reassessment may be brought forward.

Your Line Manager, Wellbeing Practitioner (Fitness) and People Adviser will work collaboratively to ensure that continued appropriate support is provided to you to regain the required level of physical fitness.

Your fitness will be reassessed at the end of the review period. If you attain the required standard, you will be able to return to full operational duties. However, if not, you will progress to the formal stages of the Managing Employee Performance Policy.

### **Who do we share your information with?**

The Wellbeing team will monitor the effect of assessment processes through regular reporting to the People Directorate Management Team. This will allow assessment of the potential impact of existing and new assessments on Wellbeing, operational availability, and any adverse impact it may have on groups of people with a protected characteristic.

Stakeholders will include: Wellbeing Tactical Action Group, Wellbeing Management Group, all Operational Employee, Wellbeing team, Resourcing and TSA in addition OCSWCs who are currently supporting Wellbeing Recovery. OCSWCs do not have access to Cority but do conduct fitness assessments and forward your information by email to Health & Wellbeing to progress any further requirements and record immediately on your medical / fitness record. Once recorded on your record all other sources are deleted.

Your information is managed in confidence and only shared with those within their remit for the purposes of the processing.

Referring to recruitment, during this process, the Health and Wellbeing team collaborate in preparation for recruitment with regular meetings with Training, the Resourcing team and face to face with candidates on the day of Fitness assessments.

### **How do long we hold your information for?**

Fitness records will be held for the duration of employment and for a further 6 years after the employee leaves or 75 years of age (whichever is soonest). Pre-placement

medical information will be discarded after 2 years, if the individual does not subsequently accept the job offer.

Your fitness results will be saved and uploaded to your medical record (Cority). A copy of any support plan will be maintained in your medical record and Electronic Personal Record File (ePRF). A copy will also be forwarded to the Local Senior Officer / Area Commander and the relevant People Adviser.

### **Automated decision-making?**

The information we have collected will not be used to make any automated decisions about you.

### **Requesting access to your personal data and your rights**

Under data protection legislation, you have many rights regarding your personal data. You have the right to:

- be informed of how we will process it;
- request a copy of what we hold about you;
- have it deleted (where we do not have a legal requirement to retain it);
- have it rectified, restricted;
- object to us using it;
- data portability (in certain circumstances).

Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

To act on any of the above rights or if you have any concerns about how we are using your personal information, please contact the Data Protection Officer (contact details below).

However, if you are unhappy with the way we have processed your information or how we have responded to your request to exercise any of your rights in relation to

your data, you can raise your concerns directly with the Information Commissioner's Office, Tel. No. 0303 123 1113 or in writing to:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

For more information about your rights:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

To complain to the Information Commissioner's Office:

<https://ico.org.uk/concerns/>

We are a Data Controller for personal data. Our details have been registered with the Information Commissioner's Office (ICO) and our register number is Z3555625. The ICO's register can be viewed online at <http://ico.org.uk>

If you would like to discuss anything in this privacy notice, please contact:

Carol Wade, Information Governance Manager / Data Protection Officer

Email: [carol.wade@firescotland.gov.uk](mailto:carol.wade@firescotland.gov.uk)

**Review date: June 2026**