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Registered as a Company limited by Guarantee

**The Shires, Astonbury Farm, Astonbury Lane, Aston, Stevenage, Herts, SG2 7EG**

Registered in England No. 5906167

Registered office: The Shires Astonbury Farm Astonbury Lane Aston Stevenage Herts SG2 7EG

**Bedfordshire & Hertfordshire Local Medical Committee Ltd**

**Privacy Notice**

**We understand how important it is to keep your information safe and secure and we take this very seriously. We have taken steps to make sure your information is looked after in the best possible way and we review this regularly.**

**Please read this Privacy Notice (‘Privacy Notice’) carefully, as it contains important information about how we use the information we collect, store, and use about you.**

1. **Why we are providing this Privacy Notice**

We are required to provide you with this Privacy Notice by Law. It explains how we use the information we collect, store, and hold about you. If you are unclear about how we process or use your information, or you have any questions about this Privacy Notice or any other issue regarding your information, then please contact our Data Protection Lead (see paragraph 3 below).

The Law says:

1. We must let you know why we collect information about you;
2. We must let you know how we use any information we hold on you;
3. We need to inform you in respect of what we do with it;
4. We need to tell you about who we share it with or pass it on to and why; and
5. We need to let you know how long we can keep it for.

In this Privacy Notice Bedfordshire & Hertfordshire Local Medical Committee Limited (‘**the LMC’** ) is referred to as ‘we’, ‘us’, ‘our’ or ‘the LMC’. We also refer to any personal data that may be used to identify you as ‘your information’.

1. **About Us**

We are Bedfordshire & Hertfordshire Local Medical Committee Limited, with our registered address: The Shires, Astonbury Farm, Astonbury Lane, Aston, Stevenage, Herts, SG2 7EG. We are a company registered in England and Wales, company number 5906167.

The LMC provides the representative voice of general practice in the counties of Bedfordshire and Hertfordshire. We work with GPs to ensure their views and experiences are heard and we seek to ensure these are understood by all our NHS and care partners and together we seek to deliver the best care for patients. The aim of the LMC is to support GPs and practices to aspire to excellence in patient care by advising on and promoting the development of all aspects of General Practice.

As the representative body for all GPs in Bedfordshire and Hertfordshire, the LMC supports practices in several ways including:

* Negotiating on behalf of practices with NHSE/ICBs and other organisations on issues that affect general practice;
* Supporting individual practices and GPs going through a period of difficulty and providing pastoral support;
* Providing practices with information about local and national health policies, contracts and legal and ethical matters pertaining to the running of the complex business of general practice.

Local medical committees are statutory organisations recognised in the NHS Act 2006 (amended Health & Social Care Act 2012) and as such have statutory obligations under part 6 of the NHS Regulations 2004.

We are the data controller of your information. There may be times where we also process your information. This means we use it for a particular purpose and, therefore, on those occasions we may also be data processors of your information. The purposes for which we use your information are set out in this Privacy Notice.

1. **Data Protection Lead**

If you have a query or need any further information about this Privacy Notice or wish to make a complaint, please email our Data Protection Lead at lmcadmin@bhlmc.co.uk or write to the Data Protection Lead at: The Shires, Astonbury Farm, Astonbury Lane, Aston, Stevenage, Herts, SG2 7EG:

1. **Why we collect and use your information**

All information collected by the LMC will only be used for the legitimate purpose of fulfilling the LMC’s function. This includes:

* Providing you with information on local and national policies and contract changes in the form of newsletters and email correspondence.
* Providing pastoral care and support using the method most appropriate for you (personal mobiles/emails etc).
* Providing information on our training courses and other LMC events via email and newsletters.
* Providing invitations and information about local and national consultations.
* Carrying out elections on behalf of ICBs for locality positions via post and email, as well as conducting LMC sub committee elections.
* Carrying out administrative functions including billing/invoicing.
* Gathering information to support the delivery of practice away days.
* Providing you with resilience support via our online tools.
* Conducting surveys to obtain opinions of our constituents on national and local issues.
* Exercising our rights as set out in agreements and contracts with suppliers.
* Carrying out job interviews for any vacancies at the LMC.
1. **What information we collect about you**
* Your name;
* Your surgery/company address (if applicable);
* Your home address (if supplied by you);
* Your email address (work or personal / both – if supplied by you);
* Your phone number (work/mobile –if supplied by you);
* Your gender and ethnicity (if supplied by you).

If you are a member of one of the LMC sub committees, we will also hold additional information in order for us to make any sessional payments including:

* Bank account details (surgery / personal/ limited company);
* Address (personal/company)

We will only disclose this information to third parties to comply with contractual duties eg. external accountants/payroll provider.

If you are a member of the LMC Board, we will also hold additional information needed to comply with your legal obligations as a company director:

* Date of birth and gender,
* National insurance number,
* Photo identification and proof of address;
* Any other information required by Companies House.

We will only disclose this information to third parties to comply with contractual duties for example Companies House.

Additional information may be gathered from you if you are participating in a practice / partnership away day and/or utilising the LMC online resilience tool. The information you provide will be used to create individual reports which will be shared with you and may also be used to create a partnership report when combined with your colleague’s responses. Your anonymised data may also be used for statistical analysis of all respondents, to help identify themes and trends that will allow us to improve the online resilience tool, and in some instances, we may use your anonymised data for research purposes.

1. **Lawful basis for using your information**

The law states that we must collect your information in accordance with a legal basis. We will only use any information that you provide in accordance with the principles of retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (“UK GDPR”) the Data Protection Act 2018 and any other relevant legislation, regulation or guidance. The lawful basis for collecting and using your information as set out above will depend on the information concerned and the specific context in which it is collected.

We will normally collect information from you where:

We have your consent to do so (you have a right to withdraw this consent at any time);

We require the information to perform a contract with you;

The processing is in our legitimate interests and is not overridden by your data protection interests or fundamental rights or freedoms;

The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority invested in us;

We have a legal obligation to process the information.

Where we ask you to provide information to comply with a legal requirement or to perform a contract with you we will make this clear at the time and we will let you know whether the provision of your information is mandatory and if so any consequences of not providing this information.

**Special category or sensitive information**

The law provides special protection for certain kinds of information that is particularly sensitive.

This relates to information about your health status, racial or ethnic origin, political views, religious or similar beliefs, sex life or sexual orientation, genetic or biometric identifiers, and trade union membership.

The law allows us to process such information:

* In the course of our legitimate activities (with appropriate safeguards) as a local medical committee on condition that the processing relates solely to the members or to former members of our organisation or to persons who have regular contact with the LMC and on condition that the information is not disclosed outside the LMC without your consent.
* Where you have provided us with your explicit consent to use any special category data for a specified purpose(s).

If you have any questions concerning the lawful basis on which we collect your information, please contact our Data Protection Lead (see paragraph 3 above).

1. **How long we retain your information**

We will keep information for as long as you are practising as a GP, a practice manager or are a member of staff at a practice within Bedfordshire & Hertfordshire, or until we are notified otherwise, or we may keep information for a longer period if you request us to do so. However, we do not keep your information any longer than we consider is reasonably necessary or as set out in our data retention & disposal policy.

1. **Who we share your information with**

We may pass on your information if we have a legal obligation to do so. We will not share your information with other organisations for market research or commercial purposes and we will not pass on your details to other websites.

There may also be occasions where we provide information about you in an anonymised form. If we do so, then none of the information we provide to any other party will identify you as an individual and cannot be traced back to you.

We will not pass your data onto any third parties. It will be held until such time when you request that it is removed, or the LMC chooses to remove it in accordance with our data retention and disposal policy.

We may share your information with third parties such as ICBs, NHSE, GMC, PCSE as follows and for the purposes (**‘Purposes’**) as set out below:

* **PCSE and/or ICBs** for the purpose of levy payments
* **General Practitioner Committee** in order to administer their regional elections.
* **All constituents** will be provided with the names of committee members when we declare results of the LMC elections. The names of committee members are also displayed on our website[**.**](http://www.lmc.org.uk/)
* **Speakers, training providers, sponsors of an event or the venue hosting an event** may for administrative purposes be provided with your name, dietary requirements, and any access requirements (due to any disability). By completing the registration form you are agreeing to allow the LMC to use the information provided for the administration and delivery of the training and to retain your details on our database. Any information shared with funding organisation will be for monitoring purposes only.
* **Interview panel** if you apply for a position at the LMC

**Direct Marketing**

We will not share your information for marketing purposes.

**Education /Training**

As part of the ongoing service the LMC provides to Practices, training and education mailings will be circulated to relevant contacts on our database from time to time.

1. **Your data protection rights**

You have the right to:

* to be informed if your information is being used.
* request access to the information that we have collected about you. We are obliged to provide this to you free of charge within one month of receipt of your request (unless your request is complex or you have made numerous requests in which case it may take us longer). If your request is unfounded, excessive, or repetitive we may charge a reasonable administrative fee.
* request the correction of any information held about you that is inaccurate or incomplete. We encourage you to inform us of any changes to your information so that we can ensure that the data we hold on you is accurate and up to date.
* request the deletion or removal of your information where your information is no longer necessary for the purpose for which it was collected/processed, where there is no appropriate reason for us to continue processing it or where we have processed your information unlawfully. However, your request for deletion/removal may not always be met for legal reasons. You will be informed of these reasons when you make your request.
* object to the processing of your information for a particular purpose or purposes. If we agree with your objection, we will stop using your information. If we feel there are strong and legitimate reasons to continue using your information despite your objections, we will continue to do so, and we will inform you of the reasons.
* restrict the processing of your information for example when you challenge the accuracy of the data we hold on you and we are verifying that data.
* request portability of your information. This means you have a right to receive the information you provided to us in a way that is accessible and machine-readable. You also have the right to ask us to transfer your information to another organisation if this is technically feasible.
* not to be subject to automated individual decision-making and profiling (known as automated processing) if the decision affects your legal rights or has an important effect on you in some other way.
* withdraw your consent at any time where we process your information on the basis of your consent. Please note that if you withdraw your consent, we may not be able to continue to provide you with our services. We will inform you of this at the time you withdraw your consent.

For further information on your rights please go to: <https://ico.org.uk/your-data-matters/>

1. **Right to object and complain**

If you have concerns about the way we handle your personal data or you have a complaint about how we have used or handled your personal data, then please contact our Data Protection Lead who will try and resolve any query or concern you may have. You also have a right to raise any concern or complaint with the Information Commissioner’s Office: <https://ico.org.uk>

1. **Pastoral Care**

Part of the LMC’s function is to provide pastoral care to constituent GPs within Bedfordshire and Hertfordshire. We have a dedicated team of experienced GPs who provide this service, led by our Medical Director.

What we do with your information:

* If you contact the LMC for support your request will be passed to the Medical Director, with your consent, via a secure email.
* The Medical Director will make contact via the communication method you have requested (for example your mobile/email) to have an initial discussion.
* It may then be that your case is passed, with your consent, to another member of the Pastoral Care Team to support you.
* There may be occasions when informal notes are taken, but any information is kept confidential and secure and only used for the purpose of assisting you*. (Any notes will be kept electronically and securely on our CRM system (hosted by AppDrawn) where only the LMC executive team and the pastoral care appointed lead have access should it be necessary).*
* Your consent will be sought to share your information with a third party, for services such as occupational health, mediation, counselling, and subject to relevant GMC guidelines.
* Any information will be kept in accordance with our data retention and disposal policy*,* unless the Pastoral Care team feels the matter is ongoing or we need to keep it for a longer period of time.
1. **Cookies (Google analytics)**

Our website uses cookies to enable certain core functionality such as allowing you to log in to your account and make online bookings for events. These cookies do not contain any sensitive or personal information, and only act as a mechanism for our server to identify your user account as you move around the website.

When you visit our website, you are also prompted to allow us to collect additional information about how you use the website. This data is anonymised and is used to allow us to identify trends on our website to enable us to make necessary improvements. For example, this anonymised data allows us to see how many people have visited a certain page on our website in a given month. Unless you click the "allow cookies" option, we do not collect this data or store the Google Analytics tracking cookie that enables this functionality on your device.

For more information on ‘Cookies and similar technologies’ go to the website <https://ico.org.uk>

We use Icestar Media to help maintain and host our website (details of their privacy notice can be found here: [Privacy and Cookies | IceStar Media Ltd](https://www.icestarmedia.com/contact-us/privacy-and-cookies/)

We also use a Customer Relationship Management system hosted by AppDrawn and details of their privacy notice can be found here: [Privacy Policy | AppDrawn | Watford, London, UK](https://www.appdrawn.com/privacy-policy)

**Hyperlinks**

Our website contains hyperlinks to other third-party websites. We do not take any responsibility, legal or otherwise, for any third-party websites which you may access through links from the LMC website. Please ensure you read the Privacy Notice of every website you visit.

1. **Virtual meetings and training**

We currently deliver all our LMC meetings and training programmes on the following platforms:

* Zoom: <https://zoom.us/docs/en-us/privacy-and-security.html>
* Teams: <https://docs.microsoft.com/en-us/microsoftteams/teams-privacy>

Information about how each platform uses your information is set out in their privacy policies/notices.

1. **Third party engagement/suppliers**

Where we use third parties to process or use your information on our behalf we ensure that we have a robust agreement in place which makes it clear that they must be compliant with GDPR and any other relevant data protection legislation. We also make it clear that the information they may receive about you from us is only used in a manner consistent with the aims of the LMC and this Privacy Notice.

1. **Security and storage of your information**

We take the security of your information very seriously and we do everything we can to ensure that your information is always protected and secure. We regularly update our processes and systems and we also ensure that our staff are properly trained. We also carry out assessments and audits of the information that we hold about you and make sure that, if we provide any other services, we carry out proper assessments and security reviews.

In most circumstances, we hold your information electronically. It is password protected and held securely on either our internal computer systems or on a third-party secure server. In some instances, your information can be accessed by mobile devices which are password protected.

Where paper records are retained, these are held securely in a locked filing cabinet within the LMC office. Only members of the LMC management and administration team have access to this information.

1. **Contacting you**

We are obliged to protect any confidential information that we hold about you and we take this very seriously. It is imperative that you let us know immediately if you change any of your contact details so as to ensure that the information we hold about you is up to date and correct.

1. **Telephone recordings**

We do record telephone calls for training and monitoring purposes and these recordings are kept for 14 days and would only be listened to by the Chief Executive Officer in exceptional circumstances.

1. **Covid-19 pandemic and your information**

We have an obligation to protect our staff and employees’ health so we would also ask all visitors to consider government advice before they decide to come to our offices.

1. **Changes to our privacy notice**

Please note that this Privacy Notice will be regularly reviewed and updated in line with current data protection legislation, regulation, and guidance. You should check this Notice occasionally to ensure you are aware of the most recent version that will apply each time you access this website.