

# Privacy GDPR Policy



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Derby & Derbyshire Local Medical Committee Ltd (DDLMC Ltd) & Derby & Derbyshire Local Medical Committee.

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## Introduction

DDLMC Ltd understands how important it is to keep your personal information safe and secure. We take this responsibility seriously and regularly review our processes to ensure that your information is protected.

This Privacy Notice explains how we collect, use, store, and protect your personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant guidance applicable to Local Medical Committees (LMCs).

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 LMC Compliance Lead (see below).

## About Us

DDLMC is the statutory representative body for GPs and their Practices, operating across Derby & Derbyshire. We exist solely to represent, advise, and support GPs and their Practices. 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. The purposes for which we use your information are set out in this Privacy Notice.

## **LMC Compliance Lead**

Hayley Scott – Practice Liaison Officer & Operations Lead

Email: [ddlmc.office@nhs.net](mailto:ddlmc.office@nhs.net) Telephone: 01332 913800

Contact the LMC Compliance Lead if:

- You have any questions about how your information is being held.
- If you require access to your information or if you wish to make a change to your information.
- If you wish to make a complaint about anything to do with the information we hold about you.
- Or any other query relating to this Privacy Notice and your rights

We offer confidential reporting of unacceptable behaviors or data management. This is managed by Hayley Scott, who is responsible for convening a small group to consider any matters submitted. The membership of the group is determined by the named person as those most appropriate to discuss the matter confidentially and the group will be chaired by the Chair, The Chief Executive Officer or Medical Director, as appropriate. No minutes will be taken of the meeting and confidentiality will be maintained. The named person will update the executives with a spreadsheet to include the date the issue was raised, how the issue was raised, when it was discussed by the group, the outcome, when the outcome was feedback to the reporter and any learning or changes made as a result.

### **Why we are providing this privacy notice**

We are required by law to provide you with this Privacy Notice. It explains:

- what information we collect about you
- Why we collect information about you
- How we use the information we hold
- Who we share it with and why
- How long we retain your information
- Your rights in relation to your personal data

### **What information we collect about you**

We may collect personal and professional information including contact details, practice information and records of interactions.

We record your name, role, contact details (including emails, practice address, telephone number), GMC number (if you are a GP), contacts with the LMC office. This may include

email correspondence, letters, details of event bookings and summaries of telephone conversations. This may relate to mailings sent by the LMC, individual advice /support, and pastoral support. This information is held securely and confidentially. If you are Committee member, or executive we will, in addition to the above information, collect your date of birth, home address, national insurance number, emergency contact details, financial details including bank account and sort code for the purpose of paying you.

If you are an employed member of staff, please refer to the staff handbook for a full list of the data we hold.

### **Special Category Data**

We may process sensitive data where necessary with appropriate safeguards and legal basis.

### **How we use the information we hold**

We use personal data to carry out our role as an LMC including representation, communication, support and administration. To communicate with you as constituent GPs, Committee and Board members, practice managers and other members of the wider practice team in order to gather and disseminate knowledge, advice and bespoke information.

This is part of your membership offering by DDLMC. All information collected will only be used for the legitimate purpose of fulfilling the LMCs' function. This shall include sending you information such as bulletins, newsletters, mailings, elections on behalf of the LMC / ICBs / Federations/PCNs/the BMA (GPC), pastoral care, events/training, bespoke information and guidance be it on a locality, practice or individual level, surveys for the purposes of LMC or BMA functions.

We only collect data that is necessary and regularly review it.

### **Pastoral Care**

Part of the LMCs' function is to provide pastoral care to constituent GPs across Derby & Derbyshire. The service is led by our Medical Director.

If you contact us by post, email, phone, or using the contact us on our website a small team of administrators monitor this. They will pass on emails to the Medical Director. Either the administrator or the Medical Director will then make contact with you either by email or by telephone if you have provided this information to make an appointment with a Medical Director to discuss your needs further. You are likely to be offered telephone or face to face support. The Medical Director may make notes to help identify the support you need for your situation. Any notes will be disposed of securely (via shredding) Outbound email correspondence will be kept in line with our privacy notice if it does not contain any

personal sensitive information. If it is deemed to contain sensitive information, then the email will be stored in the medical directors nhs.net one drive.

### **Microsoft Teams**

We record events/webinars for the purpose of uploading them to our website and to ensure that they are available to those who have not been able to attend the live event. You will be informed if a recording is to be made and your agreement for the recording to be made will be sought via an automatic prompt generated by the meeting software. All recordings will be deleted in line with our Retention Policy. Meetings of the LMC Board and Committees may be recorded for the purpose of ensuring the accuracy of the minutes. Recordings will be retained for a maximum of six months (and may be deleted sooner if the minutes have been signed off).

### **WhatsApp Groups**

From time to time, we will utilise the Committee WhatsApp group to be used by the office team and Committee members as a means of communication. We will always ask for consent to add members to the group and you may opt to leave the group at any time.. Anyone leaving the organisation or standing down from a Committee will be automatically deleted from the committee.

GP Contract Broadcast Group. We will communicate with GPs across the county from time to time using the GP Broadcast group, the purpose of this group is to share information from the BMA and other important updates pertaining to GPs. Members of the group joined by invite and can remove themselves at anytime.

### **Who do we share it with and why**

Where we do ask for your information, this is to ensure we provide you with information that we believe is important to your membership of the LMC. We may pass on your information if we have a legal obligation to do so, otherwise, 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 may 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.

Your information may be shared with third parties (for example ICBs, DDGPPB) for the following purposes: -

Elections: The use of email addresses held on the LMC system may be used for / ICB / Federation / PCN/DDGPPB and BMA (GPC) election purposes or for internal committee elections.

Levy Collections: Practice name and patient population details will be shared between the LMC and ICBs in order to process voluntary levy collections. Relevant mandates are held by the LMC and shared with the ICB.

Training/Events: Subject to each individual's permission, delegate lists (excluding personal information) may be provided to trainers and/or event sponsors.

General Support: Where we have your explicit consent, on a case by case basis, your details may be shared with appropriate support services.

Honoraria: If you are a Committee or Board member, your information will be processed via the Nuvo payroll system in order to pay honoraria and will be provided to HMRC for tax purposes.

Direct Marketing: We will not share your information for marketing purposes unless we have your consent.

Education / Training: As part of the ongoing service the LMC provides to practices, training and education mailings will be disseminated to relevant contacts on our database from time to time. This may include communications sent on behalf of, or in collaboration with, organisations such as the The Hub Plus Derbyshire (**GPTF Ltd**), where this is relevant to your role within primary care. Contact details used for these communications typically include name, professional role, NHS.net email address, and associated practice.

### **Third Party Engagement / Suppliers**

Where we use third parties to process or use your information, we ensure that we have a robust agreement in place which makes it clear that they must be compliant with the UK GDPR, the principles of Regulation (EU)2016/679 (General Data Protection Regulation), (where applicable) and any other relevant data protection legislation. We are clear that the information they may receive from us (about you) is only used in a manner consistent with the aims of the LMC and this Privacy Notice.

### **Cookies (Google Analytics)**

When visiting our website <https://www.derbyshirelmc.org.uk/> we have engaged the third party service of Google Analytics to collect standard internet log information and details of visitor behavior patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we want to collect personally identifiable information through our website, we will be up front about this and will make it clear when we collect information and, in this instance, will explain what we intend to do with it. We will ask for your consent to do this should we need to collect and do something different

with any information where prior consent has not already been obtained. Our website search facility is powered by [Hotfoot Design](#).

Search queries and results are logged anonymously to help us improve our website and search functionality. No user-specific information is collected by either the LMC or any third party. Hyperlinks Our website contains hyperlinks to other third-party websites. If you go to another website from our website it is important that you read the Privacy Notice on that website to find out what they do with your information. We take no legal responsibility or otherwise for the content or use of information, personal or otherwise, on other websites.

We use social media platforms including Facebook, LinkedIn, and X (formerly Twitter) to communicate with our audience and to analyse engagement with our content.

We access aggregated and anonymised data provided by each platform's analytics tools (e.g. Facebook Insights, LinkedIn Analytics, X Analytics), which may include:

- Engagement data (likes, shares, comments, click-through rates)
- Audience demographics (such as approximate age range, location, or interests)
- Technical information (such as device type or access times)

We do not collect or process this data in a way that directly identifies individual users.

### **Bespoke Systems and Software**

We use a range of systems and software to support the delivery of our services. These systems may process limited personal data where necessary.

- Salesforce – A database used to store and manage practice details and contact records, including names, professional contact details (such as NHS.net email addresses), and associated practice information.
- Email Blaster (Newsletter Platform) – Used to distribute communications and newsletters. The data stored includes name, NHS.net email address, and practice name.
- 3CX Telephone System – Used to manage telephone communications. Calls are not recorded and no personal data is stored within this system.
- Microsoft SharePoint and Microsoft Teams – Used for secure document storage, internal collaboration, and communication. These systems may contain personal data where relevant to service delivery and are managed in accordance with Microsoft security standards.

- Hotfoot Design – We work with Hotfoot Design as a third-party provider to maintain the security and performance of the LMC website. They may have access to limited data where necessary to provide support and maintenance services.

All third-party providers are required to comply with UK GDPR and act as data processors where applicable, processing personal data only on our instructions and under appropriate contractual agreements.

We ensure that appropriate technical and organisational measures are in place to protect personal data processed through these systems.

### **How Long We Retain Your Information**

Your information will be retained in line with current law, national guidance and our current Information Retention Policy. However, we do not keep your information any longer than we consider reasonably necessary.

### **Legal Basis for Processing**

We process personal data under legitimate interests, legal obligations, contract, and consent where relevant.

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 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, code of practice or guidance. The legal basis for using your information is as follows;

- a) Under UK GDPR Article 6(1) (a) ‘the data subject has given consent to the processing of his or her personal data for one or more specific purposes’
- b) Under UK GDPR Article 6(1)
- (c) ‘processing is necessary to comply with a legal obligation to which the controller is subject’ c) Under UK GDPR Article 6(1) (e) ‘processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller’
- d) Under UK GDPR Article 6(1) (f) ‘processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child’ Where you have given your consent for us to use your information you have the right to withdraw your consent at any time. Committee and Board Members If you are a Committee or Board member the legal basis for processing your information is: a) Under UK GDPR Article 6 (1)

(b) 'Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract' b) Under UK GDPR Article 6(1) (c) 'processing is necessary for compliance with a legal obligation to which the controller is subject' c) Under UK GDPR Article 6(1) (e) 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller' Where we process any special category/sensitive information the legal basis is as below. Suppliers and/or Contractors Where we use your services pursuant to a contract we have with you, the legal basis for processing your information is:

e) Under UK GDPR Article 6 (1) (b) 'Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract' Special category/sensitive information The Law provides special protection for certain kinds of information that is particularly sensitive. This is 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. In addition to establishing a legal basis for processing your information under Article 6 of the UK GDPR as set out above, where we process special category data belonging to you, we must also identify a separate condition for processing under Article 9 of the UK GDPR.

These special category conditions are:

- a) Under UK GDPR Article 9(2) (b) '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 in so far as it is authorised by domestic law or a collective agreement pursuant to domestic law providing for appropriate safeguards for the fundamental rights and the interests of the data subject' b) Under UK GDPR Article 9(2) (d) 'processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects' Where you have provided us with your explicit consent the special category condition is: c) Under UK Article 9(2) (a) 'the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where domestic law provides that the prohibition referred to in paragraph 1 may not be lifted by the data subject'

## **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. See our [SAR policy here](#).
- 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. You also have a right to object to us using your information for direct marketing. This means we must stop using your information if you object.
- 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: [Your data protection rights | ICO](#)

## **Right To Object and Complain**

You have the right to object to your information being used in some or all of the ways as described in this Privacy Notice. Please contact our LMC Compliance Lead and [view our complaints policy](#) should you have any questions or issues with the use of your information as described here. You have the right to complain about the management of your information. In the first instance please refer your complaint to the LMC Compliance Lead as detailed above. If you remain dissatisfied with our response you may complain to the ICO <https://ico.org.uk/global/contact-us/>

## **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 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 the Cloud. 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, accessed by the LMC management and administration team only.

## **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.

We have procedures in place to respond to breaches and notify the ICO where required.

## **If English Is Not Your First Language**

If English is not your first language, you can request a translation of this Privacy Notice. Please contact our LMC Compliance Lead.

## **Complaints**

You may complain to the ICO at [www.ico.org.uk](http://www.ico.org.uk)

## **Changes to Policy**

Please note that this Privacy Notice will be regularly reviewed and updated in line with current data protection legislation, regulations and guidance. This Privacy Notice was last updated on 16th June 2026.