

LOGO AND ADDRESS TO BE UPDATED

[date]

[Address of Applicant]

Dear [name of Applicant]

SUBJECT ACCESS REQUEST

I write to provide our response to your request, as per your [letter/email] dated [DATE].

This letter provides our response to your request for information under article 15 of the General Data Protection Regulation (“GDPR”). This entitles an individual to access personal data held about them by an organisation, subject to any relevant exemptions.

Information requested under the GDPR

You have requested all items of your personal data which are held or processed by the Humberside Group of Local Medical Committees Limited [amend as necessary e.g. where applicant has only requested data within a certain timeframe, or data held by certain employees].

Steps we have taken to comply with your request

In order to locate the personal data held by us which is within the scope of your data subject access request under article 15 GDPR, we have undertaken:

- An extensive search of our general databases, records and systems of correspondence in order to locate information which relates to you.
- We have also contacted individuals and internal groups who are likely to have personal data, for instance in emails, in order to locate the personal data held by us.
- [Insert any other steps taken to comply with the request]

Information included with this letter

I **enclose** within this letter the information which we hold about you and also set out below the information which you are entitled to under article 15 GDPR.

As regards information about you specifically, we can confirm the following more specific information in relation to the areas covered under Article 15 GDPR and the data existing on the date your request was made:

The purposes for which your personal data is processed

Your information has been used for one or more of the following purposes:

General

- Providing information services (for example, emailing you our newsletter, telling you about specific issues relating to GPs, telling you about relevant events and training);
- Monitoring and improving our website;
- Legal and regulatory purposes.

We also use your data for the following purposes: **[delete as appropriate]**

Represented GPs

- *To exercise our statutory functions;*
- *The ongoing maintenance of our relationship with GPs;*
- *Running elections to our Local Medical Committees and holding elections on behalf of CCGs*
- *Representation – as part of our representative function we need to know how many GPs we represent, in which locations and how the workforce is split between sessional and partner GPs. We also use personal data to service our two representative committees.*
- *Pastoral Care & Fair Process – We use personal data to provide help, support and advice to individual GPs in relation to difficulties they may be experiencing in their work or personal lives. This information may also be used for the purpose of ensuring that fair process is followed in relation to any performance management or investigative activity undertaken by NHS England, the GMC etc.*

Business users

- *The ongoing maintenance of our relationship with our constituents, partner organisations, suppliers and their representatives*

Job applicants

- To evaluate you as a potential employee, contact you about the recruitment process, take up references and conduct pre-employment checks

Event attendees

- To manage attendance at events, collect payment from you and to circulate information in advance and after the event (e.g. presentations and CPD certificates). It may also be used to request feedback

Annual survey

- To gather opinions with the aim of evaluating and improving LMC services.

Your personal data is now being processed in order to comply with your subject access request.

The information that comprises your personal data:

This may include **[amend as appropriate]**

Website users

- general demographic information, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and number of clicks.
- We may also track information provided to us by your browser or by our mobile application when you use our website. This could include information such as the website you came from (known as the “referring URL”), the type of browser you use, the device from which you connected to the website and the time and date of access
- name, address and email address

Represented GPs

- Name and contact details
- Organisation related details
- Professional details
- Demographic identifier information
- Employment details
- Correspondence with or about you
- Voting details
- Financial details
- Login details

- *Device information*
- *Website usage*
- *Trade union membership*
- *Health information*

Business contacts

- *Name and contact details;*
- *Organisation related details*
- *Login details*
- *Device information*
- *Correspondence with or about you*
- *Website usage*

Job applicants

- *your name, address and contact details, including email address and telephone number*
- *details of your qualifications, skills, experience and employment history*
- *information about your current level of remuneration, including benefit entitlements*
- *whether or not you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process*
- *information about your entitlement to work in the UK.*

Event attendees

- *Information about who you are including your name, contact details and employing organisation*
- *Additional information you may be asked to provide for some events as part of the booking process*
- *Your credit/debit card details if the event has a delegate fee and you are paying with a personal banking card*

Annual survey

- *name, role and place of work.*

The recipients or classes of recipients of personal data to whom the data was or may have been disclosed

We may previously have shared elements of the information about you with:

- Our staff, contractors and professional advisors;
- Other professional agencies and organisations who provide services to us;
- Your GP practice;
- [insert details of anyone else that you are aware of / delete as appropriate]

We have not made any international transfers of your data.

Any information available to us as to the source of the data

We have obtained information about you from:

- Our staff, contractors and systems;
- Other professional bodies as detailed above;
- Yourself

How long data is kept for

We generally keep your personal data for up to [insert number of years data is retained, depending on what type of data it is, or any criteria used to determine the retention period].

Ensuring intelligibility

To the best of our knowledge, there are no unusual abbreviations or technical terms in the enclosed information. However, if you consider that there are terms which you would like assistance in understanding, please let us know.

Automated decision making

We do not engage in “automated decision making”, which means decisions made about you solely by automatic means without any human involvement at all.

Redactions and third party information

Your right under GDPR is to the information which we hold about you. You do not have a right to see all documentation that is held, although where possible and as a matter of discretion, we have also provided contextual information in addition to your personal data.

If appropriate:

We do also hold information which is about you but which also includes information which is about third parties. Under GDPR (and the associated Data Protection Act 2018), we are required to avoid affecting the “rights and freedoms of others” in our responses to subject access requests. This means that we can only provide this information to you if we have the consent of the third party, or if it is reasonable in all the circumstances to release the information to you. We have therefore made redactions from (or otherwise removed) the information where we do not have consent to release and where, having taken account of all the circumstances, it would not be reasonable in all the circumstances to release the information to you.

In this respect we have in particular taken into account the types of information held, duties of confidentiality owed to the other parties and whether it is appropriate to seek to obtain their consent to disclosure.

We have decided that it is reasonable to disclose to you certain information which involves you and third parties, including, for instance, where you have already had sight of that information previously or will know the content and involvement of the third parties concerned.

In other cases we have redacted (or otherwise not disclosed) or anonymised the third parties concerned, because we have determined that it is not reasonable in all the circumstances to disclose those details to you. We appreciate that in some cases you may recall or seek to predict who these individuals may be. However, we do not consider it is appropriate to release their details, or information about them, to you in connection with this subject access request.

There is no right under the GDPR to see information which is entirely about other people.

There is some information which we have not supplied because it is exempt from disclosure because [insert reasons]

Your rights in connection with personal data

You may be interested to know of certain rights that you have in connection with your personal data.

In particular, you have the right to ask us to correct any inaccurate personal data that we hold about you. You can also seek to restrict the processing of your personal data under certain circumstances. You may also, under certain circumstances, have the right to object to our processing of your data (particularly marketing), or to request from us the erasure of your personal data.

You also have the right to make a complaint to the data protection supervisory authority in the UK, the Information Commissioner. For further information, see the Information Commissioner's Office website at <https://ico.org.uk/>.

Next steps

We have done our best to respond to your request and hope that you have found our approach helpful. Please do not hesitate to contact the team on humberside.lmcgroup@nhs.net if you have any queries regarding this information.

Yours sincerely

Dr Zoe Norris
Chief Executive Officer Medical Director

Enc: Copy of the information we hold about you