

## LMC Services Yorkshire CIC

### 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. ABOUT US

We are LMC Services Yorkshire CIC ('GPMplus') trading as GPMplus.

Our registered address is 1<sup>st</sup> Floor, 87-89 Leeds Road, Harrogate, HG2 8BE. We are a company registered in England as a company limited by guarantee, company number 13084683.

We offer a referral service to our members and to any member of any interested Local Medical Committee ("**LMC**") whereby the member can access a discrete and confidential mentoring service ("**the Service**") delivered by one of our Mentor's via our website. We also offer access to the Company's wellbeing education service.

The referring LMC does not provide us with any personal information relating to the member they have referred ("**Mentee**"). It merely directs the Mentee to our website and our Service. The Mentee then chooses whether to register and provide personal details.

We are the Data Controller of the information we receive.

The purposes for which we collect and use your information are set out in this Privacy Notice.

#### 2. DEFINITIONS

In this Privacy Notice the following words are used as set out below:

- LMC Services Yorkshire CIC, trading as GPMplus is referred to as 'we', 'us', 'our', or GPMplus
- 'Your information' means personal data that may be used to identify you as an individual'
- 'Mentor' means the individual providing the mentoring service to the Mentee

- ‘Mentee’ means any GP, nurse, practice manager or any other practice staff registered on the GPMplus website for the mentoring service
- ‘Contractor’ means an individual engaged by the Company to provide the Services
- ‘Referral Service’ means the referral service provided by GPMplus
- ‘Service’ means the mentoring service provided by the Mentor

### 3. 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 clause 4 below).

The Law says:

- We must let you know why we collect information about you
- We must let you know how we use any information we hold on you
- We need to inform you in respect of what we do with it
- We need to tell you about who we share it with or pass it on to and why
- We need to let you know how long we keep it for

### 4. DATA PROTECTION LEAD

Our Data Protection Lead is Stacey Fielding, head of Operations for YORLMC Ltd.

If you have a query or need any further information about this Privacy Notice, require access to your information or wish to make a change to your information, or wish to make a complaint, please email the Data Protection Lead at:

**Email:** [info@gpmplus.co.uk](mailto:info@gpmplus.co.uk)

**Postal Address:** 1<sup>st</sup> Floor, 87-89 Leeds Road, Harrogate, HG2 8BE

**Telephone Number:** 01423 879922

### 5. WHY WE COLLECT AND USE YOUR INFORMATION

All information collected will only be used for the purpose of providing the Service as described in this Privacy Notice.

#### A. IF YOU ARE A MENTOR

We will collect and use the information you have provided for the purposes of:

- Arranging an interview with you
- Providing you with a Consultancy Agreement
- Providing you with a secure IT portal to manage mentoring sessions and bookings
- Putting you in touch with your Mentee for the initial meeting

- Paying your fee
- Contacting you to arrange any relevant training
- Contacting you to arrange any peer support
- Providing you with a zoom account to allow you to deliver on-line mentoring sessions

## **B. IF YOU ARE A MENTEE**

If you are a Mentee and have registered on our website or are accessing our Service, we will collect and use the information you have provided for the purposes of:

- Creating a contact file once you have registered with GPMplus. The contact file will only be visible to us, you, and your Mentor;
- Matching you to a Mentor based on the preferences you have set out in your registration details and availability
- Contacting you to arrange the initial appointment with your Mentor
- Keeping electronic records of all communications between us, you and your Mentor
- Keeping electronic records of your consultation notes and your final action plan
- Contacting you to participate in a survey to evaluate your experience

## **C. IF YOU ARE A LOCAL MEDICAL COMMITTEE (LMC)**

If you are the named contact at an LMC and you are either funding a Mentee placement or facilitating a match for your Mentee then we will collect your contact details for the purpose of:

- Providing you with a data usage report in respect of your referred Mentee as and when required.
- Providing you with promotional material in relation to our Service.

## **D. IF YOU ARE A CONTRACTOR**

We will collect and use the information you have provided for processing via the Sage payroll system in order to make payments to you, and also to provide information to HMRC for tax purposes.

## **E. IF YOU ARE USING OUR EDUCATION SERVICES**

If you use our educational services, you will be attending training courses and or/accessing support materials (documents and videos) produced by GPMplus by registering on our website. We will collect and use the information you have provided for the purposes of:

- Creating a contact file.
- Contacting you to arrange education dates and share materials
- Contacting you with information on further educational services that may be of interest to you
- Keeping electronic records of all communications between us
- Contacting you to participate in a survey to evaluate your experience

## **6. INFORMATION WE MAY COLLECT ABOUT YOU**

We may collect (as necessary) the following information from you:

- Name
- Email
- Mobile /land line number
- Contact Address
- Gender
- Date of birth
- Ethnicity
- Year that you qualified

**Additionally, if you are a Mentor we will collect:**

- Your GMC number or equivalent
- Your national insurance number
- bank account and sort code for the purpose of paying you
- Your bio and your photograph which will be displayed on the website;  
<https://www.gpmplus.co.uk/mentors>

**Additionally, if you are a Mentee:**

- We will require the reason why you have requested mentoring sessions including any personal information relating to the reason for the mentoring.

**Additionally, if you are a contractor we will collect:**

- Your national insurance number, bank account and sort code for the purpose of paying you

## 7. FURTHER INFORMATION

In order to provide and deliver the service we will collect and store the following information:

- Any email correspondence between Mentor and Mentee
- Summaries of telephone conversations between Mentor and Mentee
- Any electronic records including consultation notes in respect of the Service.

This information shall only be shared between the Mentor and the Mentee.

## 8. LAWFUL BASIS FOR USING YOUR INFORMATION

The law states that we need a lawful basis to collect and use your information. 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 lawful basis for collecting and using your information will depend on the information concerned and the specific context in which it is collected.

We will normally use your information where:

- We have your consent to do so (you have a right to withdraw this consent at any time). For example any information provided by the Mentee via a submission on our website shall be provided with the consent of the Mentee for registration on our website for educational services
- We require the information to perform a contract with you. For example a Mentor will be engaged by GPMplus by virtue of a contract to provide mentoring services.
- The processing is in our legitimate interests (where we have a business or commercial reason to use your information) and this is not overridden by your data protection interests or fundamental rights or freedoms
- We have a legal obligation to process the information

## 9. HOW LONG WE RETAIN YOUR INFORMATION

We will keep your information for as long as necessary but in any event in accordance with our [record retention and disposal policy](#), with current law, national guidance policy.

During any Mentoring session the Mentor may make some handwritten notes and these will be disposed of securely at the end of any mentoring session or handed to you.

## 10. WHO WE SHARE YOUR INFORMATION WITH

**If you are a Mentor:** We share your details with the accounts officer in order to process your payments. We share your name, email address and phone number details with your Mentees in order for you to communicate with them. We share the photo and biography that you have provided to us in order for us to include this on our website. We share anonymised demographic details with commissioners and stakeholders for reporting purposes and we also share your details with your training provider.

**If you are a Mentee:** We share your details with your Mentor including your name, email address, phone number and a brief summary of the reasons you are accessing the Service. We also share anonymised demographic and mentoring needs and outcomes with commissioners and stakeholders for reporting purposes.

**If you are a Contractor:** We share your details with the accounts officer in order to process your payments. We also share your details with Mentees and Mentors for the purposes of escalating queries.

If you access our Company's wellbeing education service we will share speakers, trainers, sponsors of an event or the venue hosting an event on behalf of the Company's wellbeing education service. If you have chosen to attend, they may, for administrative purposes be provided with your name, dietary requirements, and any access requirements (due to any disability).

We may pass on your information, but only if we have a legal obligation to do so.

**If you are using our Educational Services:** We share with the trainer your name, your job title, the name of your employer and any surveys for appraisal purposes.

## 11. ANONYMISED DATA

Your information may be used to report trends to the relevant commissioner. This information will be anonymised which means it cannot identify you as an individual and cannot be traced back to you.

## 12. DIRECT MARKETING

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

## 13. YOUR DATA PROTECTION RIGHTS

You have the right 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;
- 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 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/>

## **14. 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 the Data Protection Lead 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 Data Protection Lead as detailed above. If you remain dissatisfied with our response you have a right to raise any concern or complaint with the Information Commissioner's Office: <https://ico.org.uk/>

## **15. 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 Data Protection Lead for further information.

## **16. COOKIES (GOOGLE ANALYTICS)**

Our website uses cookies to enable certain core functionality such as allowing you to log in to your account and make bookings on 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 and make 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 <https://ico.org.uk/your-data-matters/online/cookies/>

## **17. 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 their Privacy Notice on that website to find out what it does with your information and their policies may differ from ours. We take no responsibility legal or otherwise for the content or use of information, personal or otherwise, on other websites.

## **18. 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 the UK 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 GPMplus and this Privacy Notice.

We use an organisation called Improval hosted by 23 Lobsters Ltd **and** Fourteen Fish acting as a data processor to maintain our database, website, and emails. It may be necessary during the course of these activities that Improval/Fourteen Fish will require access to your information but please rest assured that this is secure and done in compliance with data protection legislation and under a data processing agreement.

## **19. 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.

The website portal is maintained by Fourteen Fish/Improval who are the website hosts and providers and any information is stored securely and processed by them under an appropriate supplier agreement and data processing agreement.

Most of your information is held 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 GPMplus office.

Save and Except for information relating to a Mentee, only members of the LMC management and administration team may have access to any other information relating to the mentoring service.

## **20. 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.

## **21. 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.

**This Privacy Notice was last updated November 2024**

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