



Fair Processing Notice for CBC Health Federation's Healthcare Services

Urgent Primary Care

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Spirometry

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Pharmicus

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The above healthcare services are all part of Community Based Care Health Federation Limited:

CBC Health Federation
Queen Street Business Centre
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Caldicott Guardian: Tom Schatzberger

Senior Information Risk Owner: Sarah Errington

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CBC is made up of the following Divisions:

Non-clinical

- Bureau
- Central Team

Clinical

- Pharmicus
- Spirometry
- Urgent Primary Care

The Urgent Primary Care Division deliver the following Healthcare Services:

- GatDoc (primary care out of hours service)
- Extended Access (EA)
 - Smoking Cessation
 - Alcohol Brief Interventions
- Urgent Treatment Centres (UTC)

Other CBC Healthcare Services include:

- Cervical Screening
- Long Acting Reversible Contraception (LARC)
- Vaccination Services
- Women's Health Network

This document has been created to explain to you why we collect information about you in our healthcare services, the types of personal data we hold about you and how we may use this information for the benefit of your health and wellbeing. The document advises you on how we allow your health record to be made available to other organisations, across a variety of healthcare and other settings. It also outlines how we keep it secure (confidential) and what your rights are in relation to this. This Fair Processing Notice is available on our website: [Governance | cbchealth](#).

See our separate Fair Processing Notice for CBC Health Federation's non-healthcare divisions, which is also available on our website.

Why we collect information about you

In our healthcare services we aim to ensure the highest standard of medical care for our patients. To do this we keep records about you, your health and the care we have provided or plan to provide to you.

The Health Care Professionals (HCP), who provide you with care, have access to records about your health and any treatment or care you have received previously (e.g. NHS 111, GP surgery, NHS Trusts, Community Services, laboratory results etc). These records help us to provide you with the best possible healthcare, and:

- Provide a basis for all health decisions made by HCPs with and for you;

- Make sure your care is safe and effective;
- Work effectively with others providing you with care.

NHS health records may be electronic, on paper or a mixture of both and we use a combination of working practices and technology to ensure that your information is kept confidential and secure.

We keep a record of all our information processing activities, including those involving the use of personal information. In the register, we record, where we get the information from, with whom we share it and how, the legal basis allowing us to process personal information and the security arrangements in place to protect it.

What kind of information do we use?

As your Service Provider, we process information within a clinical system that is linked to your electronic health record. Your healthcare record contains sensitive information about you and your health and your wellbeing. The following list provides an example of the types of information (both past and present) that can be held within your record that our HCPs have access to:

- Demographic details about you and contact details (name, date of birth, address, telephone number, email address, NHS Number, gender, sex, religion, marital status etc.)
- Any contact the service has had with you such as face to face consultations and telephone advice
- Notes and reports about your health
- Details about your treatment and care including diagnoses (this can include physical disabilities and mental health conditions)
- Medications, vaccinations, pathology results (e.g. blood tests) and allergies
- Social care involvement
- Results and investigations
- Hospital correspondence and correspondence from other health and social care settings (including x-rays, discharge letters and referrals)
- Relevant information from other HCPs, relatives or those who care for you
- Relationships/next of kin/carer information etc.

To ensure you receive the best possible direct care, your records are used to facilitate the care you receive.

What is direct care?

The term 'direct care' means a clinical, social, or public health activity concerned with the prevention, investigation and treatment of illness and the alleviation of suffering of individuals. It includes supporting individuals' ability to function and improve their participation in life and society. It includes the assurance of safe and high-quality care and treatment through local audit, the management of untoward or adverse incidents, person satisfaction including measurement of outcomes undertaken by one or more registered and regulated health or social care professionals and their team with whom you have a legitimate relationship for your care.

Sharing Information with Other Organisations

For Direct Care Purposes

Who are our Partner Organisations?

After you have been seen in one of our Services, your consultation will be shared with your registered GP Practice, and this will form part of your medical records. We will only pass on specific information to other parts of the healthcare system if there is a genuine clinical need for it. Anyone who receives information from us is also under a legal duty to keep it confidential. If you are referred to or attend another health or care organisation, your information may be shared with them in order that you receive the best and safest possible care. Examples of these organisations include:

- NHS Trusts
- NHS Community Services
- NHS 111
- Hospital Laboratories (when we send samples to the hospital lab, the results also become part of the hospital record and will be viewable by hospital staff if they are involved in your care now or in the future)
- Your registered GP Practice
- Other Urgent and Unscheduled Care services (e.g. A&E, Minor Injury Units (MIU), Urgent Treatment Centres)
- Community based nursing teams and services
- Community pharmacy
- Safeguarding
- Palliative care services or teams
- NHS mental health services
- Private sector providers such as hospitals, care homes, hospices, contractors providing services to the NHS.
- Ambulance Trusts
- Local authority health and social care services (including Public Health)
- NHS Digital

You can object to your personal information being shared with other healthcare providers, but you should be aware that this may, in some instances affect your care, as important information about your health might not be available to healthcare staff in other organisations.

To ensure you receive the best possible care, your records are used to facilitate the care you receive. Information held about you may be used to help protect the health of the public and to help us manage the NHS.

Sharing Information with Other Organisations

For purposes other than Direct Care

We don't routinely share information with the following, but it may be necessary on occasion to share your information, subject to strict agreements on how it will be used, with the following organisations. This will be aggregated or anonymised where possible:

- Integrated Care Board

- North of England Commissioning Support (NECS)
- Social Care and Health
- Local Authorities
- General Medical Council
- Care Quality Commission
- Medical Indemnity Companies
- Police
- Public Health Services Ombudsman

Sensitive personal information (including special categories of data) may also be used in the following cases:

- To respond to patients or carers.
- Where we have received consent from individuals to be able to use their information for a specific purpose.
- We have special permission for health and research purposes (granted by the Health Research Authority).

Information held about you may be used to help protect the health of the public and to help us manage the NHS. Information may be used for clinical audit to monitor the quality of the service provided and to plan NHS services. It may also be used for professional development, appraisal and revalidation purposes.

Some of this information will be held centrally and used for statistical purposes, such as NHS performance and activity. Where we do this, we take strict measures to ensure that individual patients cannot be identified.

Information may be requested for Care Quality Commission purposes. Where we do this, we take strict measures to ensure that individual patients cannot be identified. During Care Quality Commission inspections, the inspectors are required to review patient records, chosen at random.

We may also process your information when investigating concerns, complaints or legal claims. It could also be used to help staff to review the care they provide to make sure it is of the highest standards, training and educating staff.

The NHS Care Record Guarantee for England sets out the rules that govern how patient information is used in the NHS and what control patients can have over this.

The [NHS Constitution](#) establishes the principles and values of the NHS in England. The constitution sets out rights for patients, public and staff. It outlines NHS commitments to patients and staff, and the responsibilities that the public, patients and staff owe to one another to ensure that the NHS operates fairly and effectively. All NHS bodies and private and third sector providers supplying NHS services are required by law to take account of the constitution in their decisions and actions.

The [NHS complaints guidance](#) explains how patients can give feedback or make a complaint about NHS care or treatment. It includes information on the NHS complaints arrangements, and what patients can expect when they make a complaint. The guidance should be read alongside the NHS Constitution.

The Department of Health and Social Care has also produced [supplements, including the NHS Constitution handbook](#), that explains in greater detail the rights and pledges contained in the constitution.

Who else may ask for your information

Healthcare Professionals who you have seen in any of our Healthcare Services may require information retrospectively from your clinical records for the purposes of professional development activities, including audit and reflection, which will involve the review of clinical records for the joint purpose of quality improvement and appraisal, and also to follow up outcomes of decisions made during the episode of care provided. Some of this information will mean we need to request access to specific records from your registered GP.

Safeguarding - to ensure that adult and children's safeguarding matters are managed appropriately, access to identifiable information will be shared in some limited circumstances where it's legally required for the safety of the individuals concerned.

Requests from solicitors, social services, other government departments and life assurance companies received by CBC Health Federation may be redirected to your registered GP practice to handle depending on the information that is requested. CBC will only release information that has been generated as a result of your direct contact with our services.

Sharing your information without consent

We will normally ask you for your consent, but there are times when we may be required by law to share your information without your consent, for example:

- Where you have become hospitalised and the provider requires medical information such as medication.
- There is an over-riding public interest in using the information e.g. to safeguard an individual, or to prevent a serious crime.
- Where we encounter infectious diseases that may endanger the safety of others, such as meningitis or measles (but not sensitive information such as HIV/AIDS);
- Where a formal Court Order has been issued;
- Where there is a legal requirement, e.g. if you have committed a Road Traffic Offence.

Legal basis

The Legal basis for processing health data is covered under Article 6 (1)(e) of the UK General Data Protection Regulation where "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" and Article 9 (2)(h) where "processing is necessary for the purposes of preventative or occupational medicine for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union Or Member State law or pursuant to contract with a health professional...".

Where there is a need for information to be processed in the interests of the health and safety of others, for example to report an infectious disease such as meningitis or measles, the legal basis under GDPR is Article 6 (1)(c) '....for compliance with a legal obligation....', and Article 9 (2) (h) as above.

Where consent from individuals is required, the legal basis is 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' and Article 9 (2) (a) 'the data subject has given explicit consent to the processing of those personal data for one or more specified purposes...'.

How do we maintain confidentiality of your records?

We are committed to protecting your privacy and will only use information collected lawfully in accordance with the UK General Data Protection Regulation, and Data Protection Act 2018 (which is overseen by the Information Commissioner's Office), Human Rights Act, the Common Law Duty of Confidentiality and the NHS Codes of Confidentiality and Security.

Every member of staff who works for an NHS organisation has a legal obligation to keep information about you confidential. Anyone who receives information from an NHS organisation has a legal duty to keep it confidential. All persons employed by our organisation sign a confidentiality agreement that explicitly makes clear their duties in relation to personal information and data concerning health, and the consequences of breaching that duty.

Please be aware that your information will also be accessed by non-clinical members of staff to perform tasks enabling the functioning of the service. These are, but not limited to:

- Appointment booking and management.
- Referrals to other services.
- Handling correspondence in relation to your health and your contact with our services.
- Photocopying or printing documents for referrals to other healthcare professionals.
- Handling, printing, photocopying and postage of documents relating to your care.
- Investigating concerns, complaints or legal claims.
- Production of activity reports.

We maintain our duty of confidentiality to you at all times. We will only ever use or pass on information about you if others involved in your care have a genuine need for it. We will not disclose your information to any third party without your permission unless there are exceptional circumstances (e.g. life or death situations) or where the law requires information to be passed on.

The [Code of practice on confidential information](#) applies to all our staff, and they are required to protect your information, inform you of how your information will be used, and allow you to decide if and how your information can be shared. All staff are expected to make sure information is kept confidential and receive annual training on how to do this. This is monitored and can be enforced through disciplinary procedures.

We also ensure the information we hold is kept in secure locations, restrict access to information to authorised personnel only and protect personal and confidential information held on equipment such as laptops with encryption (which masks data so that unauthorised users cannot see or make sense of it).

To protect your confidentiality, we will not normally disclose any medical information about you over the telephone, unless we are sure that we are talking to you. We will not disclose information to your family, friends and colleagues about any medical matters at all, unless we know that we have your consent to do so.

We ensure external data processors that support us are legally and contractually bound to operate and prove security arrangements are in place where information that could or does identify a person is processed.

We have a senior person responsible for protecting the confidentiality of patient information and enabling appropriate information sharing. This person is called the Caldicott Guardian. The Caldicott Guardian is Tom Schatzberger, General Practitioner and CBC Clinical Lead, who can be contacted using the contact details at the top of this document. We also have a Senior Information Risk Owner (SIRO) who is responsible for owning information risk. The SIRO is Sarah Errington, CBC's Lead Nurse. The Data Protection Officer for CBC Health is also named at the top of this notice.

We are registered with the Information Commissioner's Office (ICO) as a data controller which describes the purposes for which we process personal data. A copy of the registration is available from the ICO's website by searching our company name – Community Based Care Health Federation Limited.

EMIS Shared Care Record

CBC's UPCS Extended Access Service uses the EMIS Shared Care Record for the provision and recording of healthcare interventions. EMIS is used in CBC's Extended Access Service, Cervical Screening, Spirometry and Long Acting Reversible Contraception services. The Pharmicus division have direct log in access to the General Practice's EMIS systems. Staff working in the Pharmicus division are bound by the privacy notice of the data controller, i.e. each GP Practice they support, and will comply with their privacy notices, as they will outline how patient data is processed and protected.

This privacy notice does not cover how the GP Practices process personal information. We encourage you to read the privacy notices on the relevant GP Practice websites.

EMIS is the clinical software system on which your Gateshead GP practice stores and records your personal and healthcare data (commonly known as "the GP record").

Your EMIS GP record is shared with certain local healthcare providers involved in the provision of your healthcare - of which Enhanced Access is one - subject to your GP practice's Fair Processing Notice.

You may opt out of having your EMIS record shared in this way by informing your GP practice in writing. Opting out may, however, affect the quality of the care our service is able to provide. Having access to your EMIS record means that our Enhanced Access GPs have access to the same information as your registered GP. This is very helpful in providing you with the safest and most appropriate care.

SystemOne

SystemOne is the clinical software system through which you would be referred from NHS 111 to our GatDoc service, and Urgent Treatment Centres. Our HCPs record details of your consultation on SystemOne, and this is transmitted electronically to your registered GP practice to form part of your GP record. SystemOne is also used in the Urgent Treatment Centre based at the Queen Elizabeth Hospital Trust.

The Pharmicus division have direct log in access to the General Practice's SystmOne systems. Staff working in the Pharmicus division are bound by the privacy notice of the data controller, i.e. each GP Practice they support, and will comply with their privacy notices, as they will outline how patient data is processed and protected.

SystmOne is the clinical software system on which your Newcastle GP practices store and record your personal and healthcare data (commonly known as "the GP record").

Record a Vaccination Service (RAVS)

The Record a Vaccination Service (RAVS) allows CBC to record COVID-19 vaccinations. Vaccinations recorded in RAVS are visible in your GP record held by your registered GP practice and form part of your healthcare record.

Summary Care Record (SCR)

The Summary Care Record is a National scheme linked to the NHS Spine to share information about the medicines you are prescribed, brief details of your Medical History, your care wishes and any allergies or adverse reactions you have experienced with providers of NHS healthcare such as Hospitals, Urgent Treatment Centres or Out-of-Hours (OOH) GP services, of which our GatDoc OOH service is one. This information is automatically uploaded to the NHS Spine, a central NHS database, from your GP record.

As well as storing your Summary Care Record, the NHS Spine is also used for the electronic transportation of referral letters to hospitals and medication requests to a pharmacist of your choosing.

Healthcare Professionals at other organisations will only be able to access your SCR with your permission or in an emergency if your permission cannot be sought. This might be important if you need urgent medical care when the GP practice is closed. They do so via their own software systems which also interface with the NHS Spine.

You have the right to opt-out of having a summary care record by informing your registered GP practice in writing, though this can place your health at risk if that information is not available in an emergency.

Great North Care record (GNCR)

Your GP, local hospital, social care, community or mental health team all hold different electronic records about you. This means your complete health and care record is like a jigsaw puzzle, with the pieces held in different places.

The Great North Care Record is a Regional initiative which joins the pieces of the puzzle together and allows health and care professionals to see a more complete picture, reducing the need for you to repeat information. Your record is automatically available for staff involved in your care to access.

CBC is a partner in the Great North Care Record which means that some of our services are able to view this record. This really helps our GPs to understand your medical history and provide you with the best care.

If you require any further information on the Great North Care Record, including how to opt out of sharing your record, please visit the GNCR website at:

<https://www.greatnorthcarerecord.org.uk/information-for-patients/>

Remote Consulting

Where remote consulting is in operation, appropriate technology and safeguards will be used.

Telephone Call Recording

All incoming and outgoing calls in the Urgent Primary Care Service are recorded (UTC and GatDoc). Only outgoing calls in our Extended Access service are recorded.

When contacting NHS 111 to access Urgent Primary Care both in and out of hours, incoming and outgoing telephone calls are recorded for training and monitoring purposes. When the UPCS clinician contacts you, these calls are also recorded.

In the Phramicus division all incoming and outgoing calls are recorded for training and monitoring purposes.

These recordings must be made, stored and disclosed under the provisions of the relevant legislation. These electronic sound files do not form part of your medical record however they can be used to provide useful information in the event of a complaint or claim.

Under the provisions of the UK GDPR, you have a right to be provided with copies of information that is held about you, and this includes recordings of telephone consultations (please refer to the section on making a subject access request below).

Meeting recording

CBC Health Federation relies on legitimate interests as its legal basis to record meetings. A policy is in place for guidance on the recording of meetings. Participants must be notified at the start of a meeting if it is to be recorded. Recording is for the purpose of producing accurate minutes and the note taker will delete the recording as soon as the minutes are completed. By agreement, meetings may be recorded to allow access to relevant people retrospectively. Where this happens, recordings are stored in a secure location with managed access controls.

Use of CBC Health Federation's website

CBC Health Federation is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using our website, then you can be assured that it will only be used in accordance with our Website Privacy Notice and in conjunction with this Fair Processing Notice.

You may be assured that:

- Information you supply using any electronic form(s) on the website will only be used for the purpose(s) stated.
- Your information will not be shared with third parties.

Right of Access to your Health Information

The UK GDPR and DPA 2018 allows you to find out what information about you is held on a computer and in manual records. Where information from which you can be identified is held, you have the right to ask to:

- Be informed why, where and how we use your information.
- View this or request copies of the records by making a subject access request – also see below.
- Ask for your information to be corrected if it is inaccurate or incomplete.
- Ask for your information to be deleted or removed where there is no need for us to continue processing it. Note that healthcare information is a special category and cannot be deleted.
- Ask us to restrict the use of your information for non-direct care purposes or for any information we hold that is not part of your healthcare record.
- Ask us to transfer your information to another healthcare organisation.
- Object to processing and ask us to stop processing information about you where we are not required to do so by law – although we will first need to explain how this may affect the care you receive.
- Be informed about any automated decision making and profiling if this were to be carried out. And challenge any decisions made without human intervention (automated decision making).
- Withdraw consent where applicable.

These rights apply in circumstances where relevant conditions are met and will be determined on a case by case basis.

It is important that you tell us if any of your details such as your name, address or telephone number have changed or if any of your details such as date of birth is incorrect for this to be amended. You have a responsibility to inform us of any changes so our records are kept accurate and up to date for you.

Access to personal information

Under the UK General Data Protection Regulation (UK GDPR), you have the right to ask any organisation whether they are using or storing your personal information. You can also ask them for copies of your personal information, verbally or in writing. This is called the right of access and is commonly known as making a Subject Access Request or SAR.

Making a Subject Access Request (SAR)

If you would like to make a 'subject access request', this can be accepted either verbally, or in writing to Quality and Governance Team to cbchealth.governance@nhs.net.

As the provider of Urgent Primary Care, LARC, Pharmicus, Spirometry and Vaccination Services, we only hold details of contacts you have made with our services. If you are making a Subject Access Request for your full GP medical record, you will be signposted to your registered GP practice. If you are making a SAR for your full hospital record, you will be signposted to the relevant hospital.

If we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding it

- Tell you who it could be disclosed to, and
- Let you have a copy of the information in an intelligible form

You will need to give us adequate information e.g. full name, address, date of birth, NHS number etc., to enable us to identify you and provide the correct information. Where a telephone recording is requested, you will be required to provide the telephone number the call was made from along with other details including date and time to allow a search to be undertaken on the telecommunications system.

You will be informed whether a charge will be made for printed copies (a charge will only be made where a request is deemed unfounded or excessive, in line with GDPR Article 12).

You will receive a response within one calendar month. Where the request is excessive you will be informed if it will take longer for us to respond to your request but this will not exceed a further two months.

Individuals captured by CCTV images

CCTV may be used at premises for the purpose of crime prevention and detection and the apprehension and prosecution of offenders and is provided by the following:

NHS Property Services

- The Bede Centre - Spirometry, LARC, Enhanced Access, Cervical Screening

Gateshead Health NHS Foundation Trust

- Queen Elizabeth Hospital, Gateshead: GatDoc, Enhanced Access and the Urgent Treatment Centre

Access to images captured at the above locations are dealt with in line with the appropriate organisation's CCTV Policy, a copy of which can be requested from the relevant service lead.

Records Retention - How long do we hold information for?

All records will be retained in line with the Records Management Code of Practice for Health and Social Care 2021 and will not be held for longer than necessary. The code of practice sets out the required standards of practice in the management of records for those who work within or under contract to NHS organisations in England based on current legal requirements and professional best practice. Confidential information is securely destroyed in accordance with this code of practice. This complies with Article 5 of the GDPR Principle 5.

Your right to object

If you are happy for the personal data CBC Health Federation's Healthcare Services hold on you to be used as described in this Fair Processing Notice, you do not need to do anything.

If you do not want your personal data being extracted and used for the purposes described in this Fair Processing Notice, then you need to let your registered practice know as soon as possible in writing to the Practice Manager. You have the right to object, but this may affect our ability to provide you with healthcare if you wish to access our Healthcare Services.

Please note that withdrawing your consent from sharing data may, in some circumstances, cause a delay in you receiving care which may be detrimental to your health if we or other organisations do not have access to a complete care record.

Your right to opt out

In some instances, you are allowed to request that your confidential information is not used beyond your own care and treatment and to have your objections considered. To support this, patients are able to register objections to either prevent their identifiable data being released outside of the GP Practice (known as a Type 1 objection) or to prevent their identifiable data from any health and social care setting being released by NHS Digital (known as a Type 2 objection) where in either case it is for purposes other than direct patient care.

Type 1 opt outs can be recorded by your registered GP practice, who will add a special read-code, or electronic flag, to your GP record. This should prevent identifiable information about you being extracted from your GP record and uploaded to any other organisation, for purposes other than direct care.

Your GP practice can no longer register your Type 2 opt out, therefore you need to register your choice directly via the 'Your NHS Data Matters' website, www.nhs.uk/your-nhs-data-matters. Your registered GP practice will signpost you to this. See the document "How the NHS and care services use your information" on our website.

If your wishes cannot be followed, you will be told the reasons (including the legal basis) for that decision. There are certain circumstances where a person is unable to opt out, but these are only where the law permits this, such as in adult or children's safeguarding situations.

You have a right in law to refuse or withdraw previously granted consent to the use of your personal information. There are possible consequences of not sharing, such as the effect this may have on your care and treatment, but these will be explained to you to help with making your decision.

If you wish to exercise your right to opt-out, or to speak to somebody to understand what impact this may have, if any, please contact your registered GP Practice.

What is the right to know?

The Freedom of Information Act 2000 (FOIA) gives people a general right of access to information held by or on behalf of public authorities, promoting a culture of openness and accountability across the public sector.

What sort of information can I request?

In theory, you can request, any information held, that does not fall under an exemption. Under this legislation, you may not ask for information that is covered by the UK GDPR/DPA. Your request must be in writing and can be either posted or emailed to cbchealth.governance@nhs.net or the address at the top of this notice.

Concerns About Sharing Your Information

If you have any concerns about how we use or share your information, or you do not wish us to share your information, then please contact us.

Complaints or Queries

We aim to meet the highest standards when collecting and using personal information. For this reason, we take all complaints we receive about this very seriously. We encourage people to bring concerns to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. If you have any queries or concerns about how your information is managed at CBC Health Federation, please contact cbchealth.governance@nhs.net.

Information will be held for the purposes of the complaint and will be used in the investigation and as part of any necessary enquiries.

If you have any further queries on the uses of your information, please contact:

Kate Watson
Quality and Governance Lead & Data Protection Officer
CBC Health Federation
Queen Street Business Centre
117 Queen Street
Gateshead
NE8 2ST

Email: cbchealth.governance@nhs.net

If you are not content with the outcome of your confidentiality and data protection concern / complaint raised with the service, you have the right to apply directly to the Information Commissioner's Office for a decision.

Information Commissioner's Office (ICO)

For independent advice about data protection, privacy, data sharing issues and your rights you can contact:

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

Telephone: 0303 123 1113 (local rate) Monday to Friday between 9am to 5pm (excluding bank holidays).

Email: casework@ico.org.uk

Visit the ICO website here <https://ico.org.uk/>

Changes to this Fair Processing Notice

We keep our Fair Processing Notice under regular review. This Fair Processing Notice will be periodically reviewed and updated. This notice was last updated in May 2026. Continued use of services will signify that you agree to any such changes.