



## Community Based Care Health Federation Limited Fair Processing Notice

**CBC Health Federation**

Queen Street Business Centre  
117 Queen Street  
Gateshead  
NE8 2ST

**Caldicott Guardian:** Tom Schatzberger

**Senior Information Risk Owner:** Sarah Errington

**Data Protection Officer:** Kate Watson

**Telephone:** 0191 497 7710

**ICO Registration No:** Z2917237

**Website:** <https://www.cbchealth.co.uk/>

**Community Based Care Health Federation Limited is made up of the following divisions/services:**

| Division            | Service/Function                                                                                                                                                                                                                                                                                                                                        |
|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Non-clinical</b> |                                                                                                                                                                                                                                                                                                                                                         |
| Bureau              | Document Management<br>Call and Recall                                                                                                                                                                                                                                                                                                                  |
| Central Team        | Admin<br>Business Development<br>CDRC<br>Communications (including social media)<br>Data Analysis<br>Finance<br>Freedom to Speak Up<br>Governance<br>Human Resources                                                                                                                                                                                    |
| <b>Clinical</b>     |                                                                                                                                                                                                                                                                                                                                                         |
| Pharmicus           | Pharmicus Hub<br>PCN Support                                                                                                                                                                                                                                                                                                                            |
| Spirometry          | Spirometry                                                                                                                                                                                                                                                                                                                                              |
| Urgent Primary Care | GatDoc<br>Extended Access (EA)<br>Urgent Treatment Centres (UTC) <ul style="list-style-type: none"> <li>• Women's Health</li> <li>• Long Acting Reversible Contraception (LARC)</li> <li>• Cervical Screening</li> <li>• Smoking Cessation</li> <li>• Alcohol Intervention</li> <li>• Vaccination Services</li> <li>• Women's Health Network</li> </ul> |

CBC's Clinical Healthcare divisions/services are those that are highlighted in grey in the table above. A separate Fair Processing Notice exists for CBC Healthcare Services.

## INTRODUCTION

This notice tells you what to expect CBC Health Federation (CBC) to do with your personal information when you contact us or use one of our services.

It sets out:

- What types of personal data we hold
- Why we can process your information
- The purpose for which we are processing it
- How we may use that information in the course of our business and to provide our services
- Who we may share it with and why
- How we keep personal information secure
- Your data protection rights

CBC Health Federation will ensure that data is always processed in accordance with the provisions of relevant data protection legislation, including the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR).

## KEY DEFINITIONS

### Data processing

Data processing is any activity that involves the use of personal data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring personal data to third parties.

### Types of Personal Data

#### Personal data

Personal data is any information identifying a data subject (a living person to whom the data relates). It includes information relating to a data subject that can be identified (directly or indirectly) from that data alone or in combination with other identifiers CBC Health Federation possesses or can reasonably access. Personal data can be factual (for example, a name, email address, location or date of birth) or an opinion about that person's actions or behaviour.

#### Sensitive personal data

Sensitive personal data is a special category of information which relates to a data subject's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data. It also includes personal data relating to criminal offences and convictions.

This notice is supported by information contained in CBC Health Federation's Record of Processing Activities, which sets out the information CBC holds, the purpose for which the data is held and the lawful bases on which it is processed. CBC Health Federation may process personal information

without your knowledge or consent, in compliance with this notice, where this is required or permitted by law.

If the purpose for processing any piece of data should change, CBC Health Federation will update the record of processing activities with the new purpose and the lawful basis for processing the data and will update the Fair Processing Notice accordingly.

## **FAIR PROCESSING PRINCIPLES**

All personal information is held and processed in accordance with the UK General Data Protection Regulation (UK GDPR) and all other relevant legislation and guidance.

In processing personal data, the following principles will be adhered to. Personal data will be:

1. Used lawfully, fairly and in a transparent way;
2. Collected only for valid purposes that are clearly explained and not used in any way that is incompatible with those purposes;
3. Relevant to specific purposes and limited only to those purposes;
4. Accurate and kept up to date;
5. Kept only as long as necessary for the specified purposes; and
6. Kept securely.

## **PURPOSE FOR PROCESSING**

Personal information will only be processed when there is a lawful basis for doing so.

Most commonly, CBC Health Federation will use personal information in the following circumstances:

When it is needed:

- To process job applications;
- To undertake necessary due diligence associated with employment, either salaried, session or bank;
- To perform staff members' contracts of employment;
- To share information with you about vacancies or workforce initiatives;
- For financial/accounting purposes;
- For the investigation of complaints, incidents or litigation;
- To respond to an enquiry;
- To respond to a request for information;
- To process a membership application and maintain an up to date membership list;
- To book a meeting room;
- To register you for an online meeting;
- To provide healthcare services;
- To analyse data for service improvements.

Service users may be asked to complete a patient experience survey for contact they have had with our Clinical services, although they are not obligated to respond to this. Where they have completed the survey, their response is logged for the purposes of service improvement. Responses are logged anonymously unless a service user has provided their name and contact number to receive a response

to their feedback. In these circumstances a record will be kept of their personal details, the feedback they wished to receive a response on, and the details of our response.

CBC Health Federation may also use personal information in the following situations, which are likely to be rare:

- When it is necessary to protect staff members' interests (or someone else's interests); or
- When it is necessary in the public interest.

CBC may process special categories of personal information in the following circumstances:

- In limited circumstances, with explicit written consent;
- To meet legal obligations;
- For the provision of healthcare;
- When it is needed in the public interest, such as for equal opportunities monitoring, or in relation to the Pension Scheme (SPPA); or
- When it is needed to assess working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, CBC may process this type of information where it is needed in relation to legal claims or where it is needed to protect an individual's interests and the individual is not capable of giving consent, or where an individual has already made the information available.

## **COLLECTION/PROCESSING OF DATA**

### **Information Received Directly**

Most of the personal information we process is provided to us directly by you.

## **BUREAU - DOCUMENT MANAGEMENT/CALL AND RECALL**

We will access patient records via logins provided by the GP practice we are supporting. The Bureau team will access patient correspondence via the GP Practice clinical system. This information is not downloaded from the systems. A record of the Bureau's team activity is recorded to enable monthly invoices to be raised to the relevant practices. No personal information is recorded apart from the employee's name and number of documents processed.

## **CENTRAL TEAM**

### **Admin**

To book a room for you we will need to process some personal information. Our purpose for processing this information is to enable us to contact you in relation to your booking arrangements.

To register for a remote meeting, we will need an email address from you. The purpose for collecting this information is so we can provide you with the meeting details. We use Microsoft Teams for these meetings. This site uses non-essential cookies.

When you contact us to make an enquiry, we collect information, including your contact details, so that we can fulfil our responsibilities to respond to it.

Your details will be processed by our Admin team and used only for the purpose of your booking or enquiry, and to contact you accordingly. Information will not be held longer than necessary.

### **Business Development**

We access an online portal pertaining to business development opportunities advertised as available for tender from other providers. Only named leads within the company hold essential information to enable the organisation to decide on whether to place an application to tender to provide a service. The information is recorded in a secure area on the company network only accessible by the named leads. The information does not include personal data or information, but corporate commercial information about the tender opportunities.

### **CDRC**

Clinical templates and referral forms are designed/amended and stored in EMIS Resource Publisher. These forms are used by practices across Gateshead and other areas. No personal information is contained in these forms.

### **Communications**

We produce an internal staff newsletter which is shared with all employed staff via survey monkey. We also produce an internal newsletter for our sessional workers in our Urgent Primary Care Services. We conduct stakeholder surveys capturing the views of our stakeholders. Responses can be sent anonymously in some circumstances. Details are shared with CBC's Chief Executive and Directors. Senior Managers see results but no details of individuals completing the form. We also conduct a staff survey, the People's Promise, via survey monkey. This is completed anonymously however details of the department/service are collected for analysis purposes.

### **Social Media**

CBC Health Federation has a Facebook page, X, Instagram and Linked In accounts. These are managed by a member of staff within the organisation. Their responsibilities include scheduling and publishing posts, which may be shared from other organisations or created in-house, including content from sources such as gov.uk campaigns or Gateshead GP Practices. They also monitor and respond to comments and direct messages, ensuring appropriate engagement with the audience. Additionally, they oversee post reactions, removing any inappropriate content, and share relevant posts into other Facebook groups to increase reach and engagement.

CBC has a social media policy which informs staff about the way in which they might be featured in posts. If staff comment on a social media post, they are taking the responsibility for this as potentially highlighting they work for the company, however there is no obligation for staff to engage in any way with social media. Staff who are publishing posts on social media are aware that they will be personally named under CBC Health Federation on each published post. Staff who respond to comments and direct messages must include their name (when commenting as CBC Health Federation).

Any engagement made with social media posts by the public will be stored on the relevant social media platform according to each platform's data use policy. CBC Health Federation will have access to any users on social media according to each platform's data use policy. CBC does not use this data in any way, other than to respond to comments or direct messages. No

personal information will be requested in an open forum. If required to help with a query this will be done via private messaging only. The public will be directed to the relevant service contact in the first instance to minimise any sharing of personal information via a social media site.

### **Data Analysis**

Reports are produced on a regular basis, to provide assurance that we are fulfilling contractual obligations and to improve the quality of the services we deliver.

Information that is gathered and summarised in reports are:

- Activity type
- Division/service
- Clinician's name and activity per hour
- Appointments used and unused
- Appointments allocated to practices/PCNs
- Did Not Attend (DNA) rates
- Waiting list/referral lists

Reports are used for internal purposes to monitor service provision and performance, and these are anonymised or pseudonymised where applicable. Reports shared with third parties, such as commissioners, are also anonymised in most circumstances. Patient identifiers, such as NHS number, are only shared where there is a contractual reason to do so, for the purpose of service monitoring or payment.

### **Human Resources**

Will collect personal information about individuals employed or engaged by CBC Health Federation through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. CBC Health Federation's agreed process for job applications is via a third party, NHS Jobs. We may also collect additional information from third parties including former employers. Information you provide in any job application includes name, address, telephone number, qualifications, and equality and diversity information such as gender, marital status, sexual preference, religion/belief, disability. This information is stored on NHS Jobs. See NHS Jobs privacy notice for assurance on how they process your information. During the shortlisting process the recruiting manager does not have access to any of the candidate's sensitive personal information, however once candidates are shortlisted the candidates name and contact details will be shared with the recruiting manager to enable them to invite the candidates to interview.

We also hold the details you pass on to us when you submit an expression of interest via our website. These details include your name, email address and contact number, along with the types of vacancies you would be interested in hearing about. This information is accessible to an administrator and service lead responsible for processing the information and responding to you when vacancies or workforce initiatives match your preferences.

We do not collect more information than we need to fulfil our stated purposes and will not keep it longer than necessary. Our purpose for processing this information is to assess your suitability for a role you have applied for and to help us develop and improve our recruitment process. We will use the information you provide during the recruitment process to progress your application with a view to offering you an employment contract with us, or to fulfil legal or regulatory requirements as necessary.

## **Finance**

Limited personal information may be required for the purpose of processing invoices received from individuals, which may include address and bank details. Invoices from companies do not contain personal information. The payroll systems include all relevant personal information for the purpose of processing. Financial information is only processed by the Finance Team, and in exceptional circumstances the Chief Executive and HR Manager, in accordance with this notice and any other relevant legislation.

## **Freedom to Speak Up**

When a concern or case is raised with the Freedom to Speak Up Guardian (FTSUG), details of the conversation are recorded and stored securely in a confidential file. Access to this information is restricted solely to the Guardian.

These records are maintained to support the Guardian in appropriately managing and addressing each individual case. Information about the individual is not shared unless there is a potential risk to patient safety, staff, or the individual raising the concern. If these details need to be shared the individual will be supported and informed.

The Freedom to Speak Up Guardian also produces a quarterly report for the National Guardian's Office. This report contains no identifiable information and is used to highlight themes, learning, and improvements.

## **Governance**

We need information from you to enable us to investigate complaints, incidents and claims properly, and to understand what has happened. A case file will be set up which will include your contact details and any other information you have given us about the other parties in your complaint. Our purpose is to investigate and respond to you. No third parties have access to your personal information unless the law allows them to do so. However, if you have made a complaint that involves records held by another organisation, we usually have to disclose your identity to them in the course of obtaining any information relevant to the investigation of your complaint. We will always ask for your consent before requesting information about you from them. If you don't want information that identifies you to be shared with a third party, we'll try to respect that. However, it is not always possible to handle a complaint on an anonymous basis, so we'll contact you to explain this. You may need to contact the other organisation separately if you do not consent to us seeking this on your behalf. If you are acting on behalf of someone making a complaint, we'll ask for information to satisfy us of your identity and where relevant, ask for information to show you have authority to act on someone else's behalf. Information relating to incidents, complaints and litigation is held by the Quality and Governance Team. Compliments are shared with service managers and named individuals. Where an individual receives a compliment, they may wish to discuss the details anonymously in their appraisal with their line manager. Similarly, where an individual has been the subject of a complaint, they may discuss the details anonymously in their appraisal.

CBC Health Federation uses the Ulysses Incident and Risk Management System to record its governance activity, including incidents, complaints, compliments, litigation and risk registers. The system is administered by the Quality and Governance Team.

To respond to a request for information, we need information from you to enable us to locate the information you are looking for. This enables us to comply with our legal obligations under the legislation we are subject to. An electronic case file is set up containing the details of your enquiry which includes your contact details and any other information you have given us. We will also store information that falls within the scope of your enquiry. If you are making an enquiry about your

personal data or are acting on behalf of someone making such a request, then we'll ask for information to satisfy us of your identity. If it's relevant, we'll also ask for information to show you have authority to act on someone else's behalf. If the request is about information we have received from another organisation we will routinely consult the organisation concerned to seek their view on disclosure of the material. Alternatively, you may need to approach them directly, and you will be advised if this is the case. Our purpose for processing your personal data is so we can fulfil your information request to us.

To become a member of CBC Health Federation, you will be directed via a link on our website, to a membership application form. On submission, your application will be processed internally in line with company law as set out in our Articles of Association. Membership details will be held in a database hosted by a third-party membership management platform called Membermojo. Your personal details will be held and processed securely. Membermojo Privacy Policy is contained within the following security information: [Security of Your Membership Data](#). A named member of staff within our Quality and Governance Team is responsible for the management of this process and the membership list will be used to communicate relevant information about CBC Health Federation to its members, e.g. arrangements for our Annual General Meeting.

### **Clinical Healthcare Services**

Your information is processed for the purposes of providing healthcare services from our healthcare divisions listed below:

- Pharmicus
- Spirometry
- Urgent Primary Care Services
- Vaccination Services

Personal data is held in accordance with the UK General Data Protection Regulation (UK GDPR) and all other relevant legislation and guidance. A separate Fair Processing Notice is in place for our range of Healthcare Services and is available on our website: [Governance | cbchealth](#).

### **Information received indirectly**

We also receive personal information indirectly, from the following sources in the following scenarios:

- Information is received from NHS Jobs for recruitment purposes. Personal information is only shared with the HR Team after the appointment stage. No personal information is shared with the recruiting manager during the shortlisting process. The information is processed in line with HR policies and procedures.

### **CBC Health Federation's Record of Processing Activities**

CBC's record of processing activities includes details that relate to information we process. From time to time, CBC may collect additional personal information in the course of its business activities. If CBC requires to obtain additional personal information, this notice will be updated or a separate privacy notice will be created setting out the purpose and lawful basis for processing the data.

## **CCTV**

Closed-circuit television (CCTV) operates both inside and outside of CBC's Head Office building for security purposes. This is not operated by CBC Health Federation, so we are not the data controller. This falls under the control of the building landlord, Whitehall UK, who would need to be contacted directly regarding any queries. Requests relating to CCTV footage should be submitted in writing to the Site Management, Queen Street Business Centre, 117 Queen Street, Gateshead, NE8 2ST. Their Privacy Notice is available here: [QSBC Privacy Policy 2026.pdf](#)

## **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. Only recordings of corporate meetings are permitted. Participants must be notified at the start of a meeting if recording is necessary. Recording is only permitted for the purpose of producing accurate minutes and the note taker will delete the recording as soon as the minutes are completed.

## **Telephone call recording**

Telephone calls to incoming and outgoing lines are recorded for training and monitoring purposes. These electronic sound files can provide useful information in the event of a complaint or claim. Such recordings must be made, stored and disclosed under the provisions of the relevant legislation and guidance (Records Management Code of Practice 2021). Any recordings of conversations in Urgent Primary Care Services will be summarised in the electronic patient record at the time the patient is contacted. Recordings will be destroyed after 6 years unless there is an exemption prohibiting destruction, as legislation instructs.

## **Use of AI**

CBC operates a Use of AI policy to ensure that staff follow guidance on the appropriate use of AI for work purposes. The policy stipulates which AI tools are approved for use within the organisation and what they may be used for. Processing of personal data within approved AI tools is discouraged however policies have been implemented to ensure the security of data within our Microsoft environment and retention schedules have been applied as part of those security measures.

## **Visitors to our office**

We meet visitors at our head office, including:

- External training providers;
- Meeting attendees;
- Job applicants;
- Suppliers and tradespeople;

We keep a record of visitors to our head office for the purpose of security and safety.

## **Visitors to our website**

Please refer to our Website Privacy Notice on our website: [Governance | cbchealth](#).

## LEGAL BASIS FOR PROCESSING OF PERSONAL DATA

We must have a legal basis for processing information under the UK General Data Protection Regulation (UK GDPR). The lawfulness of processing must fulfil one of the following from Article 6 of the UK GDPR:

- (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes.
- (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;
- (c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- (d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- (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;
- (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.

If the information we need to process contains special category data, such as health, religious or ethnic information, a lawful basis from Article 9 must also be met.

- (a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes,
- (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....;
- (c) processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
- (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;
- (e) processing relates to personal data which are manifestly made public by the data subject;
- (f) processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- (g) processing is necessary for reasons of substantial public interest,
- (h) processing is necessary for the purposes of preventive 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
- (i) processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices,
- (j) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes

For each different purpose that we process your information, a different legal basis applies. Here are some examples:

The Legal basis for the processing health data is covered under Article 6 (1)(e) of the 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...’.

Where we process your information for the purpose of recruitment and subsequently the processing of your staff record, the legal basis is Article 6 (1) (b), ‘necessary to perform a contract or to take steps at your request, before entering a contract’ and Article 9 (2) (b), ‘ our obligations in employment and the safeguarding of your fundamental rights’ as well as DPA (2018) Schedule 1 Part 1 (1). For the processing of applicant criminal convictions and offences we rely on DPA (2018) Schedule 1 Part 2 paragraph 6 (2) (a).

If you provide us with any information about any reasonable adjustments, you require under the Equality Act 2010 the lawful basis we rely on for processing this information is article 6(1)(c) to comply with our legal obligations under the Act.

For the processing of payroll and invoicing the legal basis is Article 6 (1) (b), ‘necessary to perform a contract or to take steps at your request, before entering a contract’. Although some invoices may include names, addresses and bank details, no special categories of data should be included in this type of processing.

### **Consent to data processing**

CBC Health Federation does not require consent to process most types of data. In addition, CBC Health Federation will not usually need consent to use special categories of personal information to carry out legal obligations or exercise specific rights in the course of its official duties.

In circumstances where consent to the collection of data has been necessary, processing and transfer of personal information for a specific purpose, you have the right to withdraw consent for that specific processing at any time. Once CBC Health Federation has received notification of withdrawal of consent it will no longer process information for the purpose or purposes originally agreed to, unless it has another legitimate basis for doing so in law.

If CBC Health Federation makes an automated decision based on any particularly sensitive personal information, you will be asked for explicit written consent unless processing is justified in the public interest. CBC Health Federation will put in place appropriate measures to safeguard your rights. You will not be subject to decisions that will have a significant impact based solely on automated decision-making, unless CBC Health Federation has a lawful basis for doing so and has given you prior notification.

## **RETENTION OF DATA**

CBC Health Federation will only retain personal information for as long as necessary to fulfil the purposes it was collected for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of personal information are set out in CBC Health Federation's record of processing activities which acts as our internal record of our data assets.

When determining the appropriate retention period for personal data, CBC Health Federation will consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes for which the personal data is processed, whether CBC Health Federation can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances CBC Health Federation may anonymise personal information so that it can no longer be associated with individuals, in which case CBC Health Federation may use such information without further notice to individuals. After the data retention period has expired, CBC Health Federation will securely destroy personal information.

We keep personal information for a specified time according to the type of information it is. We will then dispose of your information by deleting it from the computer network or shredding any information that is held in paper format.

## **DATA SECURITY AND SHARING**

### **Data security**

CBC Health Federation has put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Measures in place include hard copy personal data being stored in locked cabinets and computerised personal data being password protected, and backups taken are encrypted. Access to personal information is limited to those staff members, contractors and other third parties who have a business need to know. They will only process personal information on CBC Health Federation's instructions and are subject to a duty of confidentiality. CBC Health Federation expects staff members handling personal data to take steps to safeguard personal data in line with this notice as well as our internal IT and Information Governance policies. All staff are bound to a duty of confidentiality and receive mandatory annual training in Data and Cyber Security Awareness, Information Governance and Confidentiality.

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. CBC Health Federation's Caldicott Guardian is Dr Tom Schatzberger, CBC's Clinical Lead. We also have a Senior Information Risk Owner (SIRO) who is responsible for owning information risks. The SIRO is Sarah Errington, who is CBC's Lead Nurse working within the company. They are supported by CBC's Senior Management Team who meet monthly to discuss information governance activity and compliance.

CBC Health Federation is registered with the Information Commissioner's Office (ICO) as a data controller. A copy of our registration is available from the ICO's website by searching for our company name.

### **Data sharing**

CBC Health Federation ensures that where external data processors are used to provide elements of services for us, they 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 contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

In some circumstances we are legally obliged to share information. For example, under a court order or where required in handling complaints or investigations. In any scenario we will satisfy ourselves that we have a lawful basis on which to share the information and document our decision making.

CBC Health Federation requires third parties to respect the security of personal data and to treat it in accordance with the law. CBC may share personal information with third parties, for example in the context of the possible sale or restructuring of the business. CBC Health Federation may also need to share personal information with a regulator or to otherwise comply with the law. e.g. the Care Quality Commission or the Public Health Service Ombudsman.

CBC Health Federation may also share personal data with third-party service providers where it is necessary to administer the working relationship with staff members or where CBC Health Federation has a legitimate interest in doing so. The following activities may in the future, be carried out by third-party service providers: payroll, pension administration, benefits provision and administration, IT services.

CBC Health Federation shares activity data with its commissioners for the purpose of service monitoring. This information is normally anonymised beforehand however in some instances the NHS number is shared in order to track the patient pathway from primary through to secondary care.

## **YOUR DATA PROTECTION RIGHTS**

### **Accuracy of data**

CBC Health Federation will conduct regular reviews of the information it holds to ensure the relevancy of the information. Individuals/third parties are under a duty to inform CBC Health Federation of any changes to their circumstances. Where an individual/third party has concerns regarding the accuracy of personal data held by CBC Health Federation, they should contact CBC Health Federation to request an amendment to the data.

### **Your rights**

Under certain circumstances, you have the right to:

**Your right of access** - You have the right to ask us for copies of your personal information. (commonly known as a “data subject access request”).

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances. This right does not apply where our legal basis for processing your information is ‘public task’ or ‘legal obligation’.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances, where CBC is relying on a legitimate interest (or those of a third party) to lawfully process it.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

The lawful basis for your processing can affect which rights are available to you. For example, some rights will not apply:

|                      | Right to erasure | Right to portability | Right to object                    |
|----------------------|------------------|----------------------|------------------------------------|
| Consent              |                  |                      | ✗<br>but right to withdraw consent |
| Contract             |                  |                      | ✗                                  |
| Legal obligation     | ✗                | ✗                    | ✗                                  |
| Vital interests      |                  | ✗                    | ✗                                  |
| Public task          | ✗                | ✗                    |                                    |
| Legitimate interests |                  | ✗                    |                                    |

If you wish to make a request on any of the above grounds, you should contact CBC in writing. Please note that, depending on the nature of the request, CBC may have good grounds for refusing it which will be dependent upon why we are processing your information. If that is the case, you will be given an explanation, and our decision will be recorded.

## Data subject access requests

You will not normally have to pay a fee to access personal information (or to exercise any of the other rights). However, CBC may charge a reasonable fee if the request for access is clearly unfounded or excessive. Alternatively, CBC may refuse to comply with the request in such circumstances. Any such decisions will be recorded.

CBC may need to request specific information from you to help confirm your identity and ensure the right to access the information (or to exercise any of the other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

To request a copy of the records we hold about you please contact CBC Health Federation.  
[cbchealth.governance@nhs.net](mailto:cbchealth.governance@nhs.net)

## **COMPLIANCE WITH THIS NOTICE**

### **The Company's responsibility for compliance**

If you have any questions or concerns about this notice or how CBC handles personal information, you can contact us at [cbchealth.governance@nhs.net](mailto:cbchealth.governance@nhs.net) or write to us at our registered address:

CBC Health Federation  
Queen Street Business Centre  
117 Queen Street  
Gateshead  
NE8 2ST

You have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, if you remain dissatisfied with the way in which we have handled your data.

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

Telephone: 0303 123 1113 (local rate) or 01625 545 745

Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

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

### **Data security breaches**

CBC Health Federation has incident reporting and investigation procedures to deal with any data security breach and will notify you and any applicable regulator of an actual or suspected breach where legally required to do so.

In certain circumstances, CBC will be required to notify the Information Commissioner's Office of a data security breach within 72 hours of the breach. Therefore, if you become aware of a data security breach it is imperative that you report it to CBC immediately.

### **Privacy by design**

CBC will have regard to the principles of this notice and relevant legislation when designing or implementing new systems or processes (known as "privacy by design"). We have a Data Protection Impact Assessment policy in place and assessments are carried as appropriate where new data processing activities are being considered or where changes to existing processes are being considered.

### **Changes to this notice**

We keep our fair processing notice under regular review to make sure it is up to date and accurate. If we make any changes, we will post the updated notice on our website. Continued use of CBC services will signify that you agree to any such changes.

**Last updated:** May 2026