

Privacy Notice: Patient Consultation Recordings for GP Medical Student Placements using 23 Lobsters LTD platform (provider of the Improval system)

We take looking after your data very seriously and this information is to ensure you have full facts about this and gives details about who to contact if you have any questions

Effective date: 09/03/2026

This notice explains how The University of Buckingham (the University) processes personal data when medical students record patient consultations in General Practice (GP) settings for teaching purposes using the Improval (23 Lobsters LTD) platform.

Who We Are

- Data Controller: The University of Buckingham, Faculty of Medical and Health Sciences, Chandos Road, Buckingham, MK18 1EG
- Contact: Alison Westerbrook Lead Placement Co-Ordinator, Faculty of Medicine and Health Sciences. Direct Line: +44 (0)1280 827564 Extension: 7564 or The Practice Manager at your practice (via reception)
- For the avoidance of doubt, the GP Practice remains the controller for your clinical care record. This notice covers only the educational recording.
 - This means the GP practice is still responsible for your medical records, and the information below only relates to the recording of the consultation which is for educational benefit for the student.

Purpose of Collecting Your Information (i.e why we ask if we can record the consultation)

Your information is collected and used to:

- Facilitate supervised teaching, feedback, and reflective learning during GP placements, including PCF teaching sessions.
- Enable students to develop consultation skills in accordance with General Medical Council (GMC) guidance.
- Evidence learning outcomes within the relevant academic module(s). Your consultation recording is not used for clinical decision-making, marketing, or research without separate, explicit consent.

What Information We Collect (ie what is recorded on video)

- Video and audio of your consultation with the medical student. The video is only of you and the student and the doctor consulting together.
- Health Information (known as Special category data) discussed or observed during the consultation.

- Incidental identifiers that may be visible or audible (for example, your name or date of birth if mentioned).
- Other personal data (metadata) associated with the recording (e.g., date, time, course/cohort, student and facilitator identifiers).
- Records of your consent (verbal and written).

Important safeguards:

- Intimate examinations will not be recorded.
- The camera will be switched off at any time if you wish, and you may ask to stop the recording at any point.
- You may view the recording before confirming your consent.
- All recordings are carried out in line with GMC guidance on the making and use of visual and audio recordings of patients.

How We Use Your Information (what we do with the recording)

We use your information to:

- Review the recording to deliver feedback and teaching within the University's GP placement programme (including PCF teaching).
- Allow access to the recording only for those directly involved in the teaching activity described below.

The recording is created only via the Improval (23 Lobsters LTD) platform. It is not downloaded to personal devices, uploaded to other platforms, or otherwise distributed. There is no automated decision-making or profiling based on your data.

Lawful Basis for Processing (ie what valid legal reason support video recording in an educational setting)

Because recordings include personal data and health information, we rely on:

- Article 6(1)(a) UK GDPR – your consent; and
- Article 9(2)(a) UK GDPR – your explicit consent to process special category data (health information).
- Article 6(1)(e) UK GDPR – Public task, as the processing is necessary for the performance of a task carried out in the public interest, namely undergraduate medical education and training.
- Article 9(2)(h) UK GDPR – Health or social care, as the processing is necessary for the management of healthcare education and professional training,

Your consent is entirely voluntary and can be withdrawn at any time (see “Your Rights” below). Refusing or withdrawing consent will not affect your clinical care in any way.

If You Choose Not to Provide Health Information

You do not have to agree to your consultation being recorded. If you do not want the consultation recorded, please tell Reception or inform the student/clinician. This will not affect your consultation or care. If you have consented but later change your mind, you may withdraw your consent and request deletion of the recording (see “Your Rights”).

Who Has Access to Your Information (the video recording)

Access is strictly limited to:

- The medical student(s) involved in the consultation.
- Primary Care Clinical Facilitators and relevant GPs supervising the student(s).
- Medical students attending the scheduled Primary care Facilitators small group teaching/feedback sessions.
- Improval (23 Lobsters LTD) , as the University’s UK based platform/service provider (processor), for secure hosting and support. Improval (23 Lobsters LTD) does not use your data for its own purposes.

We do not otherwise share your information with third parties unless we are legally required to do so.

How We Protect Your Data

We implement appropriate technical and organisational measures, including:

- Recording exclusively via the Improval (23 Lobsters LTD) App and platform (no local device or removable media storage).
- Role-based access controls limiting who can view recordings.
- Encryption in transit and at rest within the platform.
- Secure user authentication and audit logging.
- Staff and student training on confidentiality and data protection.

Recordings are handled with the same degree of confidentiality as medical information used for educational purposes.

Where Your Data Is Stored and International Transfers Your data is hosted on UK-based infrastructure. The University does not transfer your data outside the UK. Any Improval (23 Lobsters LTD) sub-processors (if engaged) will be subject to University approval and UK data protection requirements.

How Long We Keep Your Data

- Recordings: retained for maximum of 6 weeks from the date of recording, after which they are permanently deleted.
- Consent records (verbal/written): retained either in the patient record or inline with the GP Practice consent processes as evidence of consent.

Your Rights

Under UK data protection law, you have the following rights:

- Right to be informed about how your data is used (this notice).
- Right of access to your personal data.
- Right to rectification of inaccurate personal data.
- Right to erasure (in particular, you may withdraw consent and request deletion of the recording; the University will delete the recording promptly and in any event within the 6-week retention period, unless a lawful exception applies).
- Right to restrict processing in certain circumstances.
- Right to data portability (where applicable).
- Right to object to processing in certain circumstances.
- Rights in relation to automated decision-making and profiling (not applicable here, as none takes place).

As we are processing your personal data based on your consent, you have the right to withdraw your consent at any time. This will not affect the lawfulness of any processing carried out before you withdraw your consent.

If you wish to exercise any of these rights, or if you have any questions about how we use your data, please contact us at: Alison Westerbrook Lead Placement Co-Ordinator, Faculty of Medicine and Health Sciences. Direct Line: +44 (0)1280 827564 Extension: 7564 or The Practice Manager at your practice (via reception) and we will help you

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you have the right to lodge a complaint with the Information

Commissioner's Office (ICO): <https://ico.org.uk/concerns/>

Contact Us

If you have any questions about this privacy notice or wish to exercise your rights, please contact: Alison Westerbrook Lead Placement Co-Ordinator, Faculty of Medicine and Health Sciences. Direct Line: +44 (0)1280 827564 Extension: 7564 or The Practice Manager at your practice (via reception) who will help you

For more information, please see the University's Data Protection Policy and Procedure ([Data Protection Policy | University of Buckingham](#))

Notes for patients:

- Only people directly involved in the teaching will see the video.
- You may ask to stop the recording at any time and may view the recording before confirming your consent.
- Intimate examinations are not recorded.
- Refusing or withdrawing consent is not a problem and will not affect your consultation in any way.