Data Protection Policy — Dr Karen H Simpson Expert Reports Ltd

October 2026

1. About this policy

Dr Karen H Simpson Expert Reports Ltd ("the Company") provides independent expert medico-legal reports and advice on instruction from solicitors, other agencies and the Court. Its work covers personal injury, clinical negligence, professional standards, fitness to practise, family and other cases.

Since February 2026 the Company has provided no clinical care.

Dr Simpson remains licensed and on the GMC register. Claimants are examined face to face at Spire Hospital Leeds; the Company does not prepare records-based desktop condition and prognosis reports.

The Company is the data controller for the personal data it handles. Dr Simpson is registered with the Information Commissioner's Office (ICO), registration Z8229445, which renews annually. The registration is in Dr Simpson's personal name; the ICO has confirmed this is acceptable.

2. Legal framework

The Company processes personal data in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025.

Dr Simpson also follows the GMC's guidance on confidentiality and the duties of an expert witness under Civil Procedure Rules Part 35 and the equivalent rules in other courts.

3. What personal data the Company holds

The Company holds the data it needs to prepare reports and run the business:

- **Case documents** supplied by the instructing party: medical and hospital records, GP records, DWP and occupational records, witness statements, other experts' reports, surveillance evidence and Court documents.
- **Information gathered at examination:** the claimant's history, examination findings and Dr Simpson's notes.
- **Work in progress:** dictation, draft and final reports, chronologies, answers to questions and joint statements.
- **Business data:** names and contact details of claimants, solicitors and agencies, plus case references and billing information.

Most case data is health data, which the law treats as special category data. It arrives on paper, on encrypted media such as DVDs, by email, or through a secure online portal usually run by the instructing party.

4. Lawful basis

The Company does not rely on consent to process case data. Its lawful bases are:

Data	Lawful basis (UK GDPR Article 6)	Special category condition (Article 9)
Case documents, examination findings, reports	6(1)(f) legitimate interests: providing independent expert evidence on instruction	9(2)(f) establishment, exercise or defence of legal claims, or courts acting in their judicial capacity
Billing and accounts	6(1)(b) contract with the instructing party; 6(1)(c) legal obligation (HMRC)	Not applicable
Disclosure to protect someone at serious risk (section 8)	6(1)(d) vital interests or 6(1)(f)	9(2)(c) vital interests, or the relevant DPA 2018 Schedule 1 condition

Claimants are told how their data will be used in the letter confirming their appointment. This is information, not a request for consent. It gives them time to raise questions through their solicitor before the examination.

5. Who the Company shares data with

Instructing solicitors, agencies and the Court are controllers in their own right. They are responsible for sending data to the Company lawfully and securely; the Company is responsible for it once received. The Company uses these processors, each of which must have written terms meeting UK GDPR Article 28:

Processor	What they do	Case data?
Personal assistant	Case administration, diary, invoicing	Yes
Self-employed medical typists	Transcribe dictation	Yes
Google (Gmail, Google Calendar)	Business email and diary	Yes
Anthropic (Claude)	AI assistance for Dr Simpson, e.g. drafting records chronologies	Yes
PPM Solutions (Clearcourse)	Case tracking and invoicing	Identifiers only
Xero and Dext	Accounting	Billing data only

Case data may also go, through or with the agreement, or at the request, of the instructing party, to barristers, other experts, regulators, the DWP, the police or the Court. Accountants, medical indemnity insurers and debt recovery services receive billing data only.

6. Storage and security

Case documents are held as PDFs on Dr Simpson's password-protected, encrypted computer. Cloud services are limited to those listed in section 5. If there is a need to transport data then this is stored on encrypted hard drives that are kept either in Dr Simpson's direct possession or locked in a secure environment.

- **Paper and DVDs** are kept in a locked room, scanned to PDF, then securely destroyed within six weeks of receipt.
- **Email** uses Gmail with two-step verification. Personal data sent by email goes as password-protected files or through the instructing party's secure portal.
- **Dictation** from the Olympus recorder is sent to the typist as encrypted or password-protected files and deleted once the transcript has been checked.
- **Online portals** are accessed only with Dr Simpson's own username and password.
- **AI tools:** Dr Simpson uses Claude to help prepare documents such as records chronologies. Settings that allow her data to be used to train the model are switched off. She checks all AI output against the source records, and the opinions in every report are her own.
- **Home working:** the PA and typists keep case data on password-protected devices, never on shared or family computers, and always away from others' view.

7. Retention and destruction

Data is kept only as long as needed, then securely destroyed or deleted:

Data	Kept for
Paper documents and DVDs	Until scanned; no more than 6 weeks from receipt
Dictation files	Until the transcript has been checked
All case files, including final reports and case emails	Until the instructing solicitors confirm the case has concluded and no appeal is pending, then securely destroyed
Billing and accounting records	7 years (HMRC requires at least 6)

The instructing party is asked to confirm when a case has concluded.

8. Disclosure in exceptional circumstances

Dr Simpson may need to share information with a claimant's or defendant's own healthcare professionals to meet her GMC duties. Rarely, she may need to share it with others where there is a serious concern for patient safety, public safety, mental capacity or child protection.

Where time allows, she will first seek advice from the GMC, her medical defence organisation or the Court, and will tell the instructing party unless doing so would increase the risk or there are legitimate confidentiality issues.

9. Individuals' rights and subject access requests

Individuals have the right to access their data, have it corrected, object to or restrict its use, and in some cases have it erased. Some rights are limited where data is held for legal proceedings or is covered by legal professional privilege.

Subject access requests for medico-legal data are handled by the Company, not Spire Hospital. The Company responds within one month, extendable by two months for complex requests, and normally makes no charge. It will consult the instructing party before releasing documents that party supplied.

10. Data breaches

Anyone working for the Company who suspects a breach (a lost device, a misdirected email, unauthorised access) tells Dr Simpson straight away. Processors must notify the Company without undue delay.

1. Dr Simpson contains the breach and records it in the breach log, even if it is not reportable.
2. If the breach is likely to risk people's rights and freedoms, she reports it to the ICO within 72 hours of becoming aware of it.
3. If the risk is high, she tells the people affected without undue delay.
4. She informs the instructing party and, where appropriate, her medical defence organisation.

11. Staff, review, contact and complaints

The PA and typists work under written confidentiality and data processing terms and they receive information governance training via Spire Leeds Hospital or by on-line education. This policy is reviewed every year and whenever the Company's work or systems change.

Questions about this policy go to Dr KH Simpson at Spire Leeds Hospital Jackson Avenue Leeds LS8 1NT. Anyone unhappy with how the Company handles their data can complain to the ICO at ico.org.uk/make-a-complaint or on 0303 123 1113.