



Improving lives **together**

Norfolk and Waveney Integrated Care System

Norfolk and Waveney Integrated Care System - Privacy Notice for Secondary Use of Data

July 2022

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Who we are?

[Norfolk and Waveney Integrated Care System \(ICS\)](#) is a collaboration of local health and care organisations working together to improve the health, wellbeing and care of people living in Norfolk and Waveney. Many of these services are Commissioned by NHS Norfolk and Waveney Clinical Commissioning Group (CCG). In 2022, the CCG will become the Norfolk and Waveney Integrated Care Board.

Our partnership includes local GP practices, hospitals, community care providers, social services, urgent and emergency care teams, and mental health care providers. This includes:

- East Coast Community Healthcare Community Interest Company
- Integrated Care 24 (IC24)
- James Paget University Hospitals NHS Foundation Trust
- NHS Norfolk and Waveney Clinical Commissioning Group
- Norfolk and Norwich University Hospitals NHS Foundation Trust
- Norfolk and Suffolk NHS Foundation Trust
- Norfolk Community Health and Care NHS Trust
- Norfolk County Council
- Queen Elizabeth Hospital King's Lynn NHS Foundation Trust

What is the 'secondary use of data'?

One of our aims is to make better use of data and digital technology to help us manage the local health and social care system. As this use of data is not for your direct care, e.g., during an appointment with a doctor, this is called the *secondary use of data*. Examples of this include Population Health Management and Risk Stratification. This use allows us to provide the services that are needed, in the right areas, helping to promote good health and social care.

As part of providing the services that are needed, you are not subject to automated processing, including profiling, which may produce legal effects concerning you or similarly, affect you.

What is a Privacy Notice?

This Privacy Notice tells you about the data we collect and hold about you, what we do with it, how we look after it and our intentions on sharing your data to support your health and social care.

This notice is focused on how our local health and care system uses data collectively within Norfolk and Waveney. Specific details of how each organisation uses data can be found in their Privacy Notices, which can be found on their websites.

Our commitment to Data Protection and Confidentiality

The UK General Data Protection Regulation (GDPR), as incorporated into the Data Protection Act 2018 (DPA 2018), grants individual's certain information rights, designed to enable citizens to be informed about how their data will be used, and provide an opportunity to object, restrict, remove, or rectify any personal data about them.

This Notice describes how the Norfolk and Waveney Health Care Partnership intend to use your information, and provide assurance that your information will be:

- Processed lawfully
- Restricted to only the health and social care data that our partner organisations hold about you
- Stored in a secure environment
- Restricted to authorised health and social care staff
- Only be used to inform care and how we manage our local health and social care system

If you would like more information about how a specific organisation within this partnership processes your personal data, including how you can exercise your privacy rights, please refer to Privacy Notices on their website. A list of our members' websites may be found [here](#).

How will the NWHCP use your information?

Across the NWHCP, our aim is to manage the secure transfer of the data it collects, processes and stores in an effective and efficient way that will be used to support the care we provide. NWHCP has developed a centralised data store called the Health and Care Data Architecture (HCDA) which will enable us to consolidate data in a single secure environment. We can then link data from an individual's interactions with health and care professionals and create a single record that can be used for management of our health and social care system.

The HCDA is a Microsoft Azure cloud-based information system, hosted by Norfolk and Norwich University Hospital NHS Foundation Trust, which enables carefully authorised health and social care staff to securely access, process and store your data. The HCDA does not create added information about you; it is a store to collate existing information created by individual health and social care providers.

What personal data will we use?

Participating organisations within the NWHCP will securely transfer the following personal data into the HCDA. The personal data will be the information which you have provided to these organisations along with any reports or reviews you have made following that information.

- Demographic information such as: name, address, phone number
- NHS number
- Medical conditions
- Treatment provided and contact the individual has had with the organisation
- Care plans

- Emergency department treatment
- Discharge summaries
- Medication reviews
- Physical and mental health reports
- Care and support plans, and reviews
- Social care records
- Results of investigations, such as x-rays, scans, and laboratory tests

Please note that this list is not exhaustive, and the data provided will vary between organisations depending upon the services they provide.

How will we process your data?

To better manage local health and social care services, the HCDA helps us bring together data from all our member organisation into one place. Every request to use your data will require approval from an NWHCP governance body. To ensure that we use this data responsibly, it will only be used with the following principles:

- **Anonymisation First.** Where possible, data will be anonymised before it is used. We do not always need to identify you when using data to plan services. We need to know about the prevalence of health and social care needs - not who specifically needs it.
- **Pseudonymised Second.** If we cannot use anonymised data, we will use data where a known reference number replaces your identifiable data. This reference number, and who it relates to, is only known by key members of staff. The advantage of pseudonymised data is that we can reidentify people when or if it is clinically necessary to do so. Where this happens, only staff involved in your care will be told of this.
- **Identifiable Last.** In very exceptional circumstances, we may use your data for clinical research, subject to ethical review and approval. This is granted by the Confidentiality Advisory Group, which is part of the NHS Health Research Authority, who have a legal authority under the NHS Act 2006.

Please note that Section 171 of the Data Protection Act 2018 states: *It is an offence for a person knowingly or recklessly to re-identify information that is de-identified personal data without the consent of the controller responsible for de-identifying the personal data.*

The lawful basis for processing your data

The NWHCP will use the following GDPR Articles as the lawful reasons for processing your personal data:

- 6(1)(d) - processing is necessary to protect the vital interests of the data subject or of another natural person
- 6(1)(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

- 9(2)(h) - ...the provision of health or social care or treatment or the management of health or social care systems and services
- 9(2)(i) - processing is necessary for reasons of public interest in the area of public health

In addition to these lawful reasons, the NHS Act 2006 sets out the legal requirements of organisations delivering services under an NHS Standard Contract.

Overseas transfers of personal data

The HCDA will be hosted on Microsoft Azure data centres located in London and Cardiff. Your personal data will not be transferred outside of the UK.

How long do we keep personal data?

Your personal data is kept securely and in line with the [Records Management Code of Practice for Health and Social Care 2021](#).

National Data Opt-Out

The National Data Opt-Out was introduced on 25 May 2018, enabling people to opt out from the use of their data for research or planning purposes, in line with recommendations of the National Data Guardian in their [Review of Data Security, Consent and Opt-Outs](#).

You can view or change your National Data Opt-Out choice at any time by using the online service at <https://www.nhs.uk/your-nhs-data-matters/> or by clicking on 'Your Health' in the NHS App and selecting "Choose if data from your health records is shared for research and planning".

As your opt-out choice is recorded against your NHS Number, we can ensure that your choice is respected. The NWHCP will not use your data where you have indicated that you do not want your data used for planning and research purposes.

Your information rights and further information

To find out more information about your information rights, please:

- Contact the Data Protection Officer for our member organisations.
NWHCP.IGPeerGroup@nsft.nhs.uk
- Email the NWHCP Information Governance Service Team
NWHCP.IGPeerGroup@nsft.nhs.uk
- To make a complaint about how we process your data, please contact us NWHCP.IGPeerGroup@nsft.nhs.uk. If you are unhappy with our response or how we have used your data, you can make a complaint to the ICO via:
- Contact the Information Commissioner's Office
Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Tel: 01625 545 740 <http://www.ico.gov.uk/>