

# How your personal information is used by NHS Bradford District and Craven Clinical Commissioning Group

## (Privacy Notice)

April 2020

Please click on the highlighted text within the notice for links to further information.

Click the link for a [Glossary](#) of definitions used throughout this notice.

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## 1 Who we are and what we do

<b>Data Controllers</b>	<b>NHS Bradford District and Craven Clinical Commissioning Group</b>
<b>Address</b>	<b>Scorex House Bolton Road Bradford BD1 4AS</b>
<b>Data Protection Officer (DPO)</b>	<b>Susan Hall</b>
<b>DPO Contact Details</b>	<a href="mailto:shall6@nhs.net">shall6@nhs.net</a>

Bradford District and Craven CCG is responsible for planning and designing local health services in Bradford. We do this by 'commissioning' or buying health and care services including:

- Planned hospital care
- Unplanned care (urgent care)
- Rehabilitation care
- Community Health Services
- Mental Health and learning disability services
- Some primary care, including GP services

We are also responsible for arranging unplanned care services for our registered patients and for commissioning services for any unregistered patients who live in Bradford. All General Practices in Bradford are members of our Clinical Commissioning Group.

We manage the performance of services that we commission to make sure that they are safe, provide high quality care and meet the needs of local people. Part of this performance management role includes responding to any concerns from our patients about these services.

## 2 How we use your personal information

The purpose of this notice is to inform you of the type of information (including personal information) that the CCG holds as a Data Controller, how that information is used, the legal basis for using the information, who we may share that information with, and how we keep it secure and confidential.

It covers information we collect directly from you or collect indirectly from other individuals or organisations for the CCG's registered populations.

This notice applies to all information held by the CCG relating to individuals, whether you are a patient, service user or a member of staff. This notice was last reviewed in April 2020.

## 3 Types of information we hold

We need to use information about you in various forms and will only use the minimum amount of information necessary for that purpose. Where possible, we will use information that does not identify you.

The CCG uses and processes several different types of information, click on the links below for more information:

1. [Identifiable](#) - information which contains personal details that identify individuals such as name, address, email address, NHS Number, full postcode, date of birth.
2. [Pseudonymised](#) - individual level information where individuals can be distinguished by using a coded reference, which does not reveal their 'real world' identity
3. [Anonymised](#) - data which is about you but from which you cannot be personally identified.
4. [Aggregated](#) – grouped information about individuals that has been combined to show general trends or values without identifying individuals

Throughout this Notice you will see reference to an organisation called NHS Digital. They are the national provider of information, data and IT systems for commissioners (such as the CCG), analysts and clinicians in health and social care. NHS Digital provides information based on identifiable data passed securely to them by Primary and Secondary Care Providers who are legally obliged to provide this information.

Our records may be held on paper or in a computer system.

#### **4 Details of information used for specific purposes**

##### **4.1 Use of Anonymised Data**

We use anonymised data to plan health care services including:

- Checking the quality and efficiency of the health services we commission;
- Preparing performance reports on the services we commission;
- Working out what illnesses people will have in the future, so we can plan and prioritise services and ensure these meet the needs of patients;
- Reviewing the care being provided to make sure it is of the highest standard.

##### **4.2 Use of Pseudonymised (De-identified) Information**

We use de-identified information in our role as commissioner including:

- [Commissioning](#) - to plan, design, purchase and pay for the best possible care available for you; look at the care provided by different providers across our area to make sure that together they support the needs of the local population; performance manage contracts; to prepare statistics on NHS performance to understand health needs and support service redesign, modernisation and improvement; to help us plan future services to ensure they meet our local population needs; and
- [Risk Stratification](#) - to identify groups of patients who would benefit from some additional help from their GP or care team. The aim is to prevent ill health and possible future hospital stays, rather than wait for you to become sick. Only de-identified information is accessible to the CCG in order to help us plan the most appropriate health services for our population.

- [Infection Prevention and Control](#) – to meet certain Research and Development obligations as a CCG as well as commissioning

### **4.3 Use of Personal and Sensitive (Identifiable) Information**

As a CCG, we do not routinely hold medical records or confidential patient data with some limited exceptions.

There are some categories of personal data for which special safeguards are required by law, known as special category or sensitive data. This includes records relating to health, sex life, race, ethnicity, political opinions, trade union membership, religion, genetics and biometrics.

The following list includes examples of where we collect and use personal information. Please click on each of the following examples for information on the purpose, the type of information used, the legal basis identified for the collection and use of the information, how we collect and use the information required, any third parties we may share the information with and your rights regarding the use of the information including, where relevant, your right to opt out.

#### **Patient Information**

- [Invoice Validation](#)
- [Complaints](#)
- [Individual Funding Requests \(IFR\)](#)
- [Personalised Commissioning](#)
- [Personal Health Budgets \(PHBs\)](#)
- [Safeguarding](#)
- [Patient and Public Involvement](#)
- [Infection Prevention and Control](#) (Please note that the national portal used to review Post infection reviews (PIRs) does show patient identifiable information. However, this has been granted to all CCGs as part of the national roll out).
- [Serious Incident Reports](#) (Please note the CCG does not see patient information on these serious incident reports as these are all anonymised. However, when on occasion the CCG does receive independent investigation reports (which are published on the NHSE website) in general, it does view patient identifiable information).
- [Freedom of Information Requests](#)
- [Assuring Transformation \(Learning Disability Data\)](#)
- [Care and Treatment Reviews](#)
- [Visitors to our Website](#)

#### **Staff Information**

The CCG as an NHS Employer need to process information in relation to staff. This information is used in a variety of ways to ensure staff are paid, that the CCG complies with employment law or to provide other services related to their employment. For more details about how staff information is used, please click on the following:

- [Information for Job Applicants](#)
- [Human Resources](#)
- [Declarations of Interests, Gifts and Hospitality Publication](#)
- [National Fraud Initiative](#)

## **Children Information**

[Please this website link for our Privacy Notice for children.](#)

## **5 Sharing Information with Health and Care organisations**

Information Sharing Agreements and contracts will be in place ensuring that where we share information, this meets both the requirements of the Health and Social Care Act 2012 and the current Data Protection legislation ensuring that your confidentiality and rights are respected.

The CCG is actively working with health and social care partners to ensure that where you receive a referral, for example for community services, all the relevant information that organisation requires in order to offer you the right service is available. We are also working with the hospitals that provide services to our population to ensure that if you find yourself in an emergency situation, relevant and potentially lifesaving information from your GP record will be available, showing any latest tests and any allergies you may suffer from, which the hospital clinicians will need to know.

Whenever a new arrangement is made to share information externally, both with health and social care organisations and with third party suppliers, we will ensure that a legal basis has been identified, using a tool called a Data Protection Impact Assessment, which will highlight any risks to your information and ensure they are resolved before any sharing takes place.

## **6 Our Commitment to Data Privacy and Confidentiality**

We are committed to protecting your privacy and will only process personal confidential data in accordance with the General Data Protection Regulation, the Data Protection Act 2018, the Common Law Duty of Confidentiality, Professional Codes of Practice and the Human Rights Act 1998.

The CCG maintains a set of regularly updated policies and procedures covering all aspects of information governance. These can be found here:

[Policies for NHS Bradford District and Craven CCG](#)

Everyone working for the NHS has a legal and contractual duty to keep information about you confidential.

All identifiable information that we hold about you will be held securely and confidentially. We use administrative and technical controls to do this. All health and social care organisations are required to provide annual evidence of compliance with applicable laws, regulations and standards through the Data Security and Protection toolkit where the CCG's report is published.

Our staff, contractors and committee members receive appropriate and ongoing training to ensure that they are aware of their personal responsibilities and have contractual obligations to uphold confidentiality, enforceable through disciplinary procedures. Staff are trained to ensure how to

recognise and report an incident and the organisation has procedures for investigating, managing and learning lessons from any incidents that occur.

In the circumstances where we are required to use personal identifiable information, we will only do this if:

- The information is necessary for your direct healthcare, or
- We have received explicit consent from you to use your information for a specific purpose, or
- There is an overriding public interest in using the information:
  - In order to safeguard an individual,
  - To prevent or detect a serious crime or in the case of Public Health or other emergencies, to protect the health and safety of others, or
  - There is a legal requirement that allows or compels us to use or provide information (e.g. a formal court order or legislation), or
  - We have permission from the Secretary of State for Health and Social Care to use certain confidential patient identifiable information when it is necessary for our work

**7 Your information will not be sent outside of the United Kingdom where the laws do not protect your privacy to the same extent as the law in the UK.**

Some provider invoices for patient care submitted to Clinical Commissioning Groups for payment are processed via NHS Shared Business Services. They provide support services for the NHS, providing finance and accounting solutions. NHS SBS also use offshore service provider called Sopra Steria who are based in India. Both NHS SBS and Sopra Steria have met the necessary information governance standards to process data overseas.

**We will never sell any information about you for profit.**

NHS Digital, the central repository of NHS information, is not allowed to sell data for profit but operates on a cost recovery basis. It is allowed to charge for the cost of processing and delivering the service, but not for data itself. The charge depends on the type of application, amount of data requested, and the amount of work that NHS Digital will need to do.

**8 Your Rights**

Under the General Data Protection Regulation, all individuals have certain rights in relation to the information which the CCG holds about them. Not all rights apply equally to all our processing activity as certain rights are not available depending on the lawful basis for the processing.

When you view an entry in our 'Use of Personal and Sensitive Information', we have highlighted which rights apply and which may not. To help understand why some may not apply the following should help.

Examples of where rights may not apply - where our lawful basis is:

- Processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller - then rights of erasure, portability do not apply.
- Legal Obligation - then rights of erasure, portability, objection, automated decision making and profiling do not apply.

If you require further details, please click [on this link](#) which will take you to the Information Commissioner's Office's website where further detail is provided in section 'When does the right apply'. These rights are:

- The right to be informed about the processing of your data
- The right of access to the data held about you
- The right to have that information amended in the event that it is not accurate
- The right to have the information deleted
- The right to restrict processing
- The right to have your data transferred to another organisation (data portability)
- The right to object to processing
- Rights in relation to automated decision making and profiling

Under the [NHS Constitution](#) you have the right to privacy and to expect the NHS to keep your information confidential and secure.

You have the right to be informed about how your information is used.

You have the right to request that your confidential information is not used beyond your own care and treatment, and to have your objections considered and where your wishes cannot be followed, to be told the reasons including the legal basis.

Opt-outs available at two levels:

### **Type 1 opt-out**

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If you do not want personal confidential information that identifies you to be shared outside your GP practice you can register a 'Type 1 opt-out' with your GP practice.

This prevents your personal confidential information from being used or shared for purposes other than your direct health care needs (i.e. secondary uses) and in particular circumstances required by law, such as a public health emergency like an outbreak of a pandemic disease.

Secondary uses include projects involved in risk stratification, "population health management", national clinical audits, research, healthcare planning, commissioning of healthcare services by CCGs, commercial and even political uses.

### **National data opt-out**

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The national data opt-out was introduced on 25 May 2018 and replaces the previous 'type 2' opt-out.

NHS Digital collects information from a range of places where people receive care, such as hospitals and community services. The new programme provides a facility for individuals to opt-out from the use of their data for research or planning purposes.

For anyone who had an existing type 2 opt-out, it will have been automatically converted to a national data opt-out from 25 May 2018 and will receive a letter giving them more information and a leaflet explaining the new national data opt-out.

The [national data opt-out choice can be viewed or changed at any time by using the online service](#). NHS Digital takes the responsibility for looking after care information very seriously. Please see the [NHS Digital information about how we look after information](#) for more detail..

NHS England recognises the importance of protecting personal and confidential information in all that we do, all we direct or commission, and takes care to meet its legal duties. See the [NHS England information about how we use your information](#) for more detail.

## 9 Queries and Complaints

If we do hold identifiable information about you, you can ask us to correct any mistakes by contacting us at the address below.

If you have any questions or complaints regarding the information we hold about you or the use of your information, please contact:

<b>Contact Role:</b>	Patient Support Team
<b>Address:</b>	Bradford District and Craven CCG Scorex House Bolton Road Bradford BD1 4AS
<b>Email:</b>	<a href="mailto:bdc.complaints@nhs.net">bdc.complaints@nhs.net</a>

**Alternatively, our Data Protection Officer is:**

<b>Data Protection Officer (DPO)</b>	Susan Hall
<b>DPO Contact Details</b>	<a href="mailto:shall6@nhs.net">shall6@nhs.net</a>

For independent advice about data protection, privacy and data-sharing issues, or to make a complaint about our handling of your information you can contact:

The Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Phone: 0303 1231113 or 01625 54 57 45

Website: <https://ico.org.uk/>

## 10 Details of information used for specific purposes

### 10.1 Commissioning

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	Hospitals and community setting organisations that provide NHS-funded care must by law submit certain information to NHS Digital about services provided to you and the population we serve. This information is known as commissioning datasets. The CCG obtains these datasets from NHS Digital which relate to patient registered with our GP Practices. This enables us to plan, design, purchase and pay for the best possible care available for you.
<b>Type of Information Used</b>	Different types of commissioning data are legally allowed to be used by different organisations within, or contracted to, the NHS. Identifiable – when disclosed from Primary and Secondary care services to NHS Digital Pseudonymised – the CCG may only receive this information in a pseudonymised format which does not identify individuals.
<b>Legal Basis</b>	Statutory requirement for NHS Digital to collect identifiable information. For use by the CCG: GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.
<b>How we collect (the source) and use the information</b>	The datasets we receive from NHS Digital have been linked and are in a format that does not directly identify you. Information such as your age, ethnicity and gender, as well as coded information about any clinic or Accident and Emergency attendances, hospital admissions and treatment will be included. We also receive information from the GP Practices within our CCG that does not identify you. We use these datasets for a number of purposes such as: Performance managing contracts Reviewing the care delivered by providers to ensure service users are receiving quality and cost effective care To prepare statistics on NHS performance to understand health needs and support service redesign, modernisation and improvement To help us plan future services to ensure they continue to meet our local population needs
<b>Data Processors</b>	Yorkshire <a href="#">Data Services for Commissioning Regional Office (DSCRO)</a> hosted by North of England Commissioning Support (NECS) obtains the identifiable information from the <a href="#">Secondary Uses Service (SUS)</a> at NHS Digital. The DSCRO also receives identifiable information directly from providers then pseudonymise the information and pass it to the CCG.
<b>Your Rights</b>	If you do not want the NHS to use information about you, collected

	<p>by your GP, then you can opt out by completing an opt-out form and returning it to your GP practice. There are different types or levels of opt-out available; Type 1 opt out is where you do not wish for your information to be shared outside of your GP Practice for any purpose other than your direct care and Type 2 opt out is where you do not wish for your information to be shared by NHS Digital.</p> <p>From 25 May 2018 the type 2 opt-out has been replaced by the national data opt-out. Type 2 opt-outs that have been recorded previously have been automatically converted to national data opt-outs. Further information about the Type 2 opt out and the conversion to the national data opt-out is available from <a href="#">NHS Digital</a>. Details of the national patient opt out can be found here: <a href="https://www.nhs.uk/your-nhs-data-matters/">https://www.nhs.uk/your-nhs-data-matters/</a></p> <p>With regards to Commissioning under GDPR you have the right:</p> <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To restrict or stop processing</li> <li>• To object to it being processed or used</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	<p>The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a>. The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1 Social Care 2016. The CCG only receives de-identified data.</p>
<b>Who we will share the information with (recipients)</b>	<p>This information is not shared outside of the CCG</p>

## 10.2 Risk Stratification

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	<p>Information from health and social care records, using the NHS Number provided via the <a href="#">Secondary Uses Service</a> (SUS) at NHS Digital, is looked at to identify groups of patients who would benefit from some additional help from their GP or care team. This is known as 'Risk Stratification'. Risk stratification involves applying computer based algorithms to secondary and primary care data to identify those patients who are most at risk from certain medical conditions and who will benefit from clinical care to help prevent or better treat their condition.</p> <p>The aim is to prevent ill health and possible future hospital stays, rather than wait for you to become sick. Neither we nor our Data Processors will at any time have access to your personal or confidential data. They act on behalf of your GP to organise this service with appropriate contractual and security measures only.</p>

	<p>Data processed are indicators such as your age, gender, NHS number and codes for your medical health to identify those who will benefit from clinical intervention.</p> <p>You have the right to opt out of your information being shared by NHS Digital; please see the Your Right to Opt Out section below.</p>
<b>Type of information Used</b>	<p>Only de-identified information (NHS number removed) is accessible to the CCG.</p> <p>Only GP Practices within the CCG have access to identifiable information (NHS Number) of their own patients in order to see who may benefit from additional help.</p>
<b>Legal basis</b>	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller.</p> <p>GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.</p> <p>A <a href="#">section 251</a> approval (CAG 7-04(a)/2013) from the Secretary of State, through the <a href="#">Confidentiality Advisory Group</a> of the Health Research Authority, enables the pseudonymised information to be sent to the CCG via NHS Digital in order to help us plan the most appropriate health services for our population.</p>
<b>How we collect (the source) and use the information</b>	<p>Primary Care data extracted from individual GP practices and Secondary Care data (collected nationally via the Secondary Uses Service): Inpatient, Outpatient, Accident and Emergency is passed to the Data Services for Commissioners Regional Office (DSCRO) so that the information can be linked. This information is passed to the North of England Commissioning Support Unit who provides the Risk Stratification tool (RAIDR) to GP Practices on behalf of the CCG. De-identified information is made available to the CCG to provide a picture of the health and needs of their local population, which enables:</p> <p>priorities to be determined in the management and use of resources; planning services; cover the range of potential questions, and issues they may need to consider, and to support and evidence decisions.</p>
<b>Data Processors</b>	<p><a href="#">Data Services for Commissioners Regional Office (DSCRO)</a> hosted by <a href="#">North of England Commissioning Support (NECS)</a> (using RAIDR tool)</p>
<b>Your Rights</b>	<p>If you do not want the NHS to use information about you, collected by your GP then you can opt out by completing an opt-out form and returning it to your GP practice. There are different types or levels of opt-out available; Type 1 opt out is where you do not wish for your information to be shared outside of your GP Practice for any purpose other than your direct care and Type 2 opt out is where you do not wish for your information to be shared by NHS Digital. From 25 May 2018 the type 2 opt-out has been replaced by the national data opt-out. Type 2 opt-outs that have been recorded previously have been automatically converted to national data opt-outs. Further information about the Type 2 opt out and the conversion to the national data opt-out is available from <a href="#">NHS Digital</a>.</p> <p>Details of the national patient opt out can be found here: <a href="https://www.nhs.uk/your-nhs-data-matters/">https://www.nhs.uk/your-nhs-data-matters/</a></p>

	<p>With regards to Risk Stratification under GDPR you have the right:</p> <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To restrict or stop processing</li> <li>• To object to it being processed or used</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	<p>The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a>. The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1 Social Care 2016. The CCG only receives de-identified data.</p>
<b>Who we will share the information with (recipients)</b>	<p>This information is not shared outside of the CCG</p>

### 10.3 Invoice Validation

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	<p><a href="#">Invoice validation</a> is part of the process by which providers of care or services get paid for the work they do.</p> <p>Invoices, with supporting information, are submitted to the CCG of their service for payment, but before payment can be released, the CCG need to ensure that the activity claimed for each patient is their responsibility. These invoices are validated within a special secure area known as a Controlled Environment for Finance (CEfF) to ensure that the right amount of money is paid, by the right organisation, for the treatment provided. The process followed ensures that only the minimum amount of information about individuals is used by a very limited number of people and is designed to protect confidentiality.</p>
<b>Type of information Used</b>	Identifiable (NHS number, date of birth or postcode) and Special Category (health information)
<b>Legal basis</b>	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller.</p> <p>GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.</p> <p>A <a href="#">section 251</a> approval (CAG 7-07(a)(c)/2013) from the Secretary of State, through the <a href="#">Confidentiality Advisory Group</a> of the Health Research Authority, enables the CCG to process identifiable information for the purpose of invoice validation within a Controlled Environment for Finance.</p>
<b>How we collect (the source) and use the information</b>	Organisations that provide treatment submit their invoices to the CCG for payment. The nominated secure area (Controlled Environment for Finance) receives additional information, including

	<p>the NHS Number, or occasionally date of birth and postcode, from the organisation that provided the treatment.</p> <p>NHS Digital sends information into the secure area, including the NHS number and details of the treatment received. The information is then validated ensuring that any discrepancies are investigated and resolved between the Controlled Environment for Finance and the organisation that submitted the invoice. The invoices will be paid when the validation is completed.</p> <p>The CCG does not receive any identifiable information for purposes of invoice validation. However, it does receive aggregated reports to help us manage our finances. Any information is received via a secure mail nhs.net email address.</p>
<b>Data Processors</b>	The Controlled Environment for Finance uses NHS Shared Business Services as a Data Processor
<b>Transfers of Data Overseas</b>	NHS SBS carry out some of their processing activity in India. Where this occurs it is governed by the use of approved Model Contract Clauses.
<b>Your Rights</b>	<p>If you do not want the NHS to use information about you, collected by your GP then you can opt out by completing an opt-out form and returning it to your GP practice.</p> <p>Type 2 opt outs apply to invoice validation - where you do not wish for your information to be shared by NHS Digital.</p> <p>From 25 May 2018 the type 2 opt-out has been replaced by the national data opt-out. Type 2 opt-outs that have been recorded previously have been automatically converted to national data opt-outs. Further information about the Type 2 opt out and the conversion to the national data opt-out is available from <a href="#">NHS Digital</a>. Details of the national patient opt out can be found here: <a href="https://www.nhs.uk/your-nhs-data-matters/">https://www.nhs.uk/your-nhs-data-matters/</a></p> <p>With regards to Invoice Validation under GDPR you have the right:</p> <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To object to it being processed or used</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	<p>The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a>. The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1</p> <p>Social Care 2016. The CCG only receives de-identified data.</p>
<b>Who we will share the information with (recipients)</b>	For Joint funded care, the local authority accesses the information via System One. The CCG does not exchange PID with them.

## 10.4 Complaints

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	Under the NHS Complaints Procedure, individuals have a right to complain to both providers and commissioners about services provided by the NHS. As commissioners, the CCG encourages complaints to be made directly to the provider and/or we generally obtain appropriate consent to forward the complaint to the provider to investigate and respond and for the CCG to be sent details of the outcome/copy of the response for assurance and contract monitoring purposes.
<b>Type of information Used</b>	Identifiable: Personal (such as name, address, date of birth) and Special Category (health information)
<b>Legal basis</b>	GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.
<b>How we collect (the source) and use the information</b>	When the CCG receives a complaint from a person, a complaint file is made up which will normally contain the identity of the complainant, the identity of the patient (where this is a different person) and any other individuals involved, plus details of the complaint, including health information. The CCG will only use the identifiable information we collect to process the complaint and to check the level of service we provide. Where the complainant is not the patient, the CCG will usually need to disclose the complainant's identity to whoever the complaint is about in order to obtain consent under the Common Law Duty of Confidentiality to proceed with the complaint and for the complainant to correspond with us on behalf of the patient.
<b>Data Processors</b>	Bradford District and Craven CCG Patient Support Team, together with other appropriate staff/managers within the CCG for the purposes of dealing with the complaint/concerns.
<b>Your Rights</b>	With regards to Complaints under GDPR you have the right: <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To restrict or stop processing</li> <li>• Object to it being processed or used</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a> . The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1 Social Care 2016. The CCG only receives de-identified data.
<b>Who we will share the</b>	Where complaints relate to a service we commission, such as

<b>information with (recipients)</b>	hospital care, the complaint will be shared with that organisation. The complainant will be informed where this occurs.
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### 10.5 Individual Funding requests (IFR)

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	To consider requests to fund specific treatment for you for a particular condition that is not covered in our contracts with providers. Individual Funding Requests provide payments required to receive specialist treatment, not routinely provided on the NHS, on a case by case basis.
<b>Type of information Used</b>	Identifiable: Personal (such as name, address, date of birth) and Special Category (health information) – to enable communication with healthcare providers on your care needs and proposed treatment.  Anonymous – to provide reports for analysis of individual funding requests made for consideration by the IFR Panel.
<b>Legal basis</b>	GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.
<b>How we collect (the source) and use the information</b>	Information required to make payments in relation to funding treatments is provided by you, along with relevant information from primary and secondary care regarding the referral for treatment that is not routinely commissioned or where you do not fit the eligibility criteria for access to an intervention. The CCG will only use the identifiable information we collect to process the request for funding.  This process is carried out with the consent of the patient to satisfy the Common Law Duty of Confidentiality.
<b>Data Processors</b>	North of England Commissioning Support
<b>Your Rights</b>	With regards to Individual Funding Requests under GDPR you have the right: <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To restrict or stop processing</li> <li>• To object to it being processed or used</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a> . The retention schedule is in line with the Records Management Code of Practice for Health and

	August 2018 - Version 1.1 Social Care 2016. The CCG only receives de-identified data.
<b>Who we will share the information with (recipients)</b>	The information may be shared with NHS or private providers of health services and/or supplies.

### 10.6 Personalised Commissioning

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	Where you have asked us to undertake assessments for Continuing Healthcare, Children’s Continuing Care or MH Sec 117 – a package of care for those with complex medical or mental health needs. We use your information in order to be able to make the appropriate arrangements for resulting care packages.
<b>Type of information Used</b>	Identifiable: Personal (such as name, address, date of birth) and Special Category (health information)
<b>Legal basis</b>	GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.
<b>How we collect (the source) and use the information</b>	The PCD team will collect, use, share and securely store information from/with the Local Authority (Social Services) and other organisations or individuals that are either directly or indirectly involved in the assessment, decision making process, the arranging of care, the funding and payment of care and appropriate monitoring of and audit of the safety and quality of care. This process is carried out with the consent of the patient to satisfy the Common Law Duty of Confidentiality.
<b>Data Processors</b>	NHS Bradford District and Craven CCG
<b>Your Rights</b>	With regards to Personalised Commissioning under GDPR you have the right: <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To restrict or stop processing</li> <li>• To object to it being processed or used</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a> . The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1 Social Care 2016. The CCG only receives de-identified data.
<b>Who we will share the</b>	The Local Authority (Social Services), Care Homes, health and care

<b>information with (recipients)</b>	organisations involved in delivering or arranging the continuing care required.
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### 10.7 Personal Health Budgets

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	A Personal Health Budget is an amount of money allocated to pay for your health and wellbeing needs agreed between you and your local NHS team. Personal Health Budgets help people with long term health conditions manage their care and support in a way that suits them. It helps them to have more choice and flexibility in the way their care and support needs are met. Any adult or child who is eligible for NHS Continuing Healthcare can have a Personal Health Budget if they want one. All individuals newly assessed as eligible for CHC living in their local community will receive one by default after 1st April 2019. There are plans to widen the availability of Personal Health Budgets in the future.
<b>Type of information Used</b>	Identifiable: Personal (such as name, address, date of birth) and Special Category (health information)
<b>Legal basis</b>	GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services. Relevant legislation: National Health Service (Direct Payments) Regulations 2013
<b>How we collect (the source)and use the information</b>	<p>Personal Health Budgets are managed in one of three ways or a combination of all three.</p> <ul style="list-style-type: none"> <li>• Notional - We tell you how much money is available for your care; you say how you want us to spend the money. If your local NHS team agree this meets your needs they arrange the care and support for you.</li> <li>• Third Party - An organisation looks after the money for you and you say how you want to spend it. If your local NHS team agrees this meets your needs, the organisation pays for the care and support you have chosen.</li> <li>• Direct Payments - Once your care plan has been agreed, we give you or your representative the money to buy and manage your own healthcare and support. Your local NHS team must agree that this meets your needs.</li> </ul> <p>You can spend your Personal Health Budget on any care or services that are set out in your care plan and agreed with your local NHS team. You will be able to use your Personal Health Budget for a range of things to help you meet your goals, for example therapies, personal care and equipment. You don't have to change the healthcare and support that is working well for you, but if there is something that isn't working, you can change that. Things you can't include in your plan will be explained to you at the beginning of the planning process. You will not need to pay for</p>

	emergency care and care you normally get from a GP. This process is carried out with the consent of the patient to satisfy the Common Law Duty of Confidentiality.
<b>Data Processors</b>	NHS Bradford District and Craven CCG
<b>Your Rights</b>	With regards to Personal Health Budgets under GDPR you have the right: <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To restrict or stop processing</li> <li>• To object to it being processed or used</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a> . The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1 Social Care 2016. The CCG only receives de-identified data.
<b>Who we will share the information with (recipients)</b>	The Local Authority (Social Services), health and care organisations involved in delivering or arranging the care required. The third party looking after your money where this has been arranged.

### 10.8 Safeguarding

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	Information is used to assess and evaluate safeguarding concerns so that we can work effectively with NHS partners and other agencies to help promote the welfare of children or adults and to protect them from abuse and neglect.
<b>Type of information Used</b>	Identifiable: Personal information (such as name, address, date of birth) and Special Category Data including e.g. medical, personal and family history.
<b>Legal basis</b>	GDPR Article 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...' GDPR Article 9(2)(b) 'processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of ...social protection law in so far as it is authorised by Union or Member State law.'  For the purposes of Article 9(2)(b), a wide range of acts relate to safeguarding powers and duties. These include e.g. the Children Acts 1989 and 2004, the Care Act 2014, the Crime and Disorder Act 1998, the Mental Capacity Act (2005), the Sexual Offences Act 2003, the Counter-Terrorism and Security Act 2015 and the Modern Day Slavery Act 2015. This list is not exhaustive.

<b>How we collect (the source) and use the information</b>	<p>The CCG may receive safeguarding related information from you directly, relatives, other Health and Social Care organisations or from other statutory and non-statutory agencies involved in safeguarding. We also have powers and obligations to share information that we think other agencies may need to help safeguard children or adults.</p> <p>Information is used to assess risks and to develop safeguarding plans. This often needs to be done in partnership with other agencies in order to effectively safeguard and promote the welfare of children or adults.</p> <p>We also use information to improve safeguarding practices by learning from the experiences of children, adults and their families. This can be in the form of statutory and non-statutory reviews, including e.g. Serious Case Reviews (Children) Safeguarding Adults Reviews, Domestic Homicide Reviews and Mental Health Homicide Reviews.</p> <p>Access to this information is strictly controlled. Where we need to share information, it will be transferred safely and securely and only shared with those who need to know as part of our multiagency safeguarding work.</p>
<b>Data Processors</b>	NHS Bradford District and Craven CCG
<b>Your Rights</b>	<p>With regards to Safeguarding under GDPR you have the right:</p> <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of request access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	<p>The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a>. The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1</p>
<b>Who we will share the information with (recipients)</b>	<p>Information may be shared with other statutory and non-statutory agencies involved in safeguarding adults and children. This can include e.g. other NHS organisations, Local Authorities, the Police, Probation Services, independent health and social care providers and not for profit organisations.</p>

### 10.9 Patient and Public Involvement

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	<p>If you have asked the CCG to keep you regularly informed and up to date about the work of the CCG or if you are actively involved in our engagement and consultation activities or patient participation groups, we will collect and use information you share with us. Where you submit your details to us for involvement purposes, we will only use your information for this purpose.</p>

Type of information Used	Identifiable: Personal (such as name, address, date of birth)
Legal basis	GDPR 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
How we collect (the source) and use the information	We will be collecting and using your information to enable us to keep you informed of any news, consultation activities or patient participation groups. Your information will be held securely and accessible only to those who need it for the purposes it was collected.
Data Processors	Membership Engagement Services – holds contact information provided for involvement purposes <a href="https://www.membra.co.uk/our-products/mes-engage/">https://www.membra.co.uk/our-products/mes-engage/</a> Bradford City Council
Your Rights	With regards to Patient and Public Involvement under GDPR you have the right: <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information we hold about you.</li> <li>• To have that information amended in the event that it is not accurate.</li> <li>• To have the information deleted</li> <li>• To restrict processing</li> <li>• To object to processing/withdraw your consent for processing</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> </ul>
How long we will keep the information	The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a> . The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1 Social Care 2016. The CCG only receives de-identified data.
Who we will share the information with (recipients)	This information is not shared outside of the CCG

#### 10.10 Infection Prevention and Control

Data Controller(s)	NHS Bradford District and Craven CCG
Purpose	CCGs collaborate with Public Health services and work closely with the organisations involved in providing patient care, to jointly identify and agree the possible causes of, or factors that contributed to a patient's infection.
Type of information Used	Identifiable: Personal (such as name, address, date of birth) and Special Category (health information)
Legal basis	GDPR Article 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...' GDPR Article 9(2)(j) '...necessary for reasons of public interest in the area of public health...or ensuring high standards of quality and

	safety of health care and of medicinal products or medical devices...' Related legislation: The Health and Social Care Act 2008: Code of Practice for the NHS for the Prevention and Control of Healthcare Associated Infections (revised January 2015) and Regulation 3 of The Health Service (Control of Patient Information) Regulations 2002
<b>How we collect (the source) and use the information</b>	CCGs participate in Post Infection Review in the circumstances set out in the Post Infection Review Guidance, issued by NHS England. The CCG receives this information from Healthcare providers. The CCG uses the results of the Post Infection Review to inform the mandatory healthcare associated infections reporting system and advice GPs appropriate action to improve infection prevention and control management.
<b>Data Processors</b>	NHS Bradford District and Craven CCG Primary and Secondary healthcare providers
<b>Your Rights</b>	With regards to Infection Prevention and Control under GDPR you have the right: <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a> . The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1 Social Care 2016. The CCG only receives de-identified data.
<b>Who we will share the information with (recipients)</b>	Information may be shared with Primary and Secondary healthcare providers and with the Local Authority who are responsible for Public Health with the CCG boundary.

### 10.11 Serious Incident Reports

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	The CCG collects and uses information from Serious Incident reports from Primary and Secondary Care Providers to ensure incidents are dealt with appropriately and lessons learnt.
<b>Type of information Used</b>	Identifiable: Personal (such as name, address, date of birth) and Special Category (health information) please note as above, for serious incidents reported from our providers, the CCG does not receive patient name, address but does receive DOB and GP address information
<b>Legal basis</b>	GDPR Article 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...'

	<p>Related legislation:  NHS Act 2006/Health and Social Care Act 2012.  GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.</p>
<b>How we collect (the source) and use the information</b>	<p>We are statutorily required to fully investigate and review incidents and will receive information from Primary and Secondary Care Providers. Where there is a requirement to provide incident reports externally, the information will be anonymised unless there is a legal requirement to provide your details. You will be kept informed of the requirements we are required to meet where information is to be shared externally.</p>
<b>Data Processors</b>	<p>NHS Bradford District and Craven CCG  Primary and Secondary healthcare providers</p>
<b>Your Rights</b>	<p>With regards to Serious Incident Reports under GDPR you have the right:</p> <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	<p>The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a>. The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1 Social Care 2016. The CCG only receives de-identified data.</p>
<b>Who we will share the information with (recipients)</b>	<p>Your information may be shared with Primary and Secondary healthcare providers involved in the incident.</p>

### 10.12 Freedom of Information requests

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	As a public authority, the CCG has a duty to respond to requests made under the Freedom of Information Act 2000 (FOIA), Environmental Information Regulations 2004 (EIR), and the Re-Use of Public Sector Information Regulations 2015 (RPSI).
<b>Type of information Used</b>	<p>Identifiable: Personal (full name and either email or postal address only. Any other information provided is additional to our requirements and may include job title or occupation, telephone numbers and reason for interest. Telephone numbers may occasionally be used when we need to contact the applicant.)  In cases of re-use requests, we need the organisations' names and re-use purposes.</p>
<b>Legal basis</b>	<p>GDPR Article 6(1)(c) 'processing is necessary for compliance with a legal obligation to which the controller is subject'  Relevant legislation: FOIA, EIR and RPSI.</p>

<b>How we collect (the source) and use the information</b>	<p>We will only collect identifiable information such as name and contact details provided by individuals making requests under the Freedom of Information Act 2000 (FOIA), Environmental Information Regulations 2004 (EIR) and the Re-Use of Public Sector Information Regulations 2015 (RPSI). This information will only be used to respond to such requests and in correspondence with individuals following appeals.</p> <p>The personal data we process is freely provided by applicants who wish to exercise their right to use the above legislation in order to access information held by or on behalf of the CCG.</p> <p>Where the individual is making a request under the Re-Use of Public Sector Regulations 2015, by law we also require the name of the organisation and the re-use purpose.</p>
<b>Data Processors</b>	<p>NHS Bradford District &amp; Craven CCG</p>
<b>Your Rights</b>	<p>With regards to Freedom of Information Requests under GDPR you have the right:</p> <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To restrict or stop processing</li> <li>• To object to it being processed or used</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> <li>• To complain to the Information Commissioner’s Office</li> </ul>
<b>How long we will keep the information</b>	<p>The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a>. The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1</p> <p>We keep personal data relating to FOIA, EIR and RPSI requests for no more than 4 years after the date of the request, except in the following cases:</p> <ul style="list-style-type: none"> <li>• Where a request involved an ‘internal review’ or a complaint to the ICO, or an appeal to any Tribunal personal details will be held for no more than 7 years.</li> <li>• Where a response to a request involved the withholding of information for reasons of FOIA exemptions, EIR exceptions or any other lawful reason, the corresponding personal details will be held for no more than 11 years.</li> </ul> <p>Databases of requests may also be held for statistical purposes for no more than 11 years, but this will only include applicant names. Social Care 2016.</p> <p>The CCG only receives de-identified data.</p>
<b>Who we will share the information with (recipients)</b>	<p>This information is not shared outside of the CCG.</p>

### 10.13 Assuring Transformation (Learning Disability Data)

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	<a href="#">Assuring Transformation (AT)</a> data collects information about individuals with learning disabilities and/or autism, who may have a mental health condition or behaviour that challenges, in in-patient settings, and provides it to the CCG. It gives the CCG broad oversight of their care.
<b>Type of information Used</b>	Identifiable: Personal (such as name, address, date of birth) and Special Category (health information)
<b>Legal basis</b>	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller.</p> <p>It is a statutory duty for the CCG to participate in this data collection. There are formal directions from the Secretary of State mandating the collection: (Health &amp; Social Care Act 2012) – in the General Guidance. The Information Standard Notice for this data collection was published on 6th January 2015 (<a href="#">SCCI2007 Amd 7/2014</a>).</p> <p>GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.</p> <p>A <a href="#">section 251</a> approval (CAG 8-02(a-c)/2014) from the Secretary of State, through the <a href="#">Confidentiality Advisory Group</a>, enables the flow of personal confidential data from organisations to commissioners, about the services that they provide for:</p> <ul style="list-style-type: none"> <li>• people in in-patient beds with learning disabilities and/or autism of,</li> <li>• any age</li> <li>• any level of security (general / low / medium / high)</li> <li>• any status under the Mental Health Act (informal or detained)</li> </ul> <p>However, the information cannot be shared if:</p> <ul style="list-style-type: none"> <li>• the individual has objected to the use of their information as part of the AT data</li> <li>• the individual lacks capacity to make their own decision</li> </ul>
<b>How we collect (the source) and use the information</b>	The AT data is sent to the CCG from healthcare providers and collected by NHS Digital on NHS England’s behalf. It covers all people with learning disabilities and/or autism that are being cared for in in-patient settings and includes: the number of people in in-patient settings; discharges and admissions; whether individuals have a care plan, a care co-ordinator, regular care reviews and access to independent advocacy; the age and gender of individuals; and the type of in-patient setting that is providing their care. The information collected is published in reports by NHS Digital. The reports don’t include any personal information, like names, birthdays or NHS numbers in them.
<b>Data Processors</b>	NHS Bradford District and Craven CCG
<b>Your Rights</b>	Under the NHS constitution you have the right to be informed about how your information is used. You also have the right to request that

	<p>your confidential information is not used beyond your own care and treatment, and to have your objections considered, and where your wishes cannot be followed, to be told the reasons including the legal basis. If you do not wish for your information to be included in the information sent to NHS Digital then please let the Patient Support Team know at <a href="mailto:fdc.complaints@nhs.net">fdc.complaints@nhs.net</a></p> <p>With regards to Assuring Transformation under GDPR you have the right:</p> <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To restrict or stop processing</li> <li>• To object to it being processed or used</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	<p>The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a>. The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1 Social Care 2016. The CCG only receives de-identified data.</p>
<b>Who we will share the information with (recipients)</b>	<p>Information will be received from healthcare providers and shared with NHS Digital and NHS England.</p>

#### 10.14 Medicines Management

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	<p><a href="#">Controlled Drugs Monitoring</a> - The CCG has a duty to assist the relevant Controlled Drug Accountable Officer (CDAO) of NHS England in the carrying out of the CDAO's functions under The Controlled Drugs (Supervision of Management and Use) Regulations 2013. These regulations aim to strengthen the governance arrangements for the use and management of controlled drugs.</p>
<b>Type of information Used</b>	Personal and medical details
<b>Legal basis</b>	<p>GDPR Article 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,</p> <p>GDPR Article 9 (2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.</p>
<b>How we collect (the source) and use the information</b>	<p>Medicines management staff access the patient clinical record from within a GP practice. They access personal and medical details in line with the current project and at all times with the knowledge and written consent of the GP practice. As a result of the information collected, recommendations may be made to a GP, or medicines may be amended and the patient informed by telephone or letter. Details</p>

	of the audit (which includes personal or sensitive data) is retained in a restricted folder (accessible only by members of the MMT) for a short period to allow for any queries raised as a result of the work to be answered after which time it is deleted – a maximum of 12 months.
<b>Data Processors</b>	The CCG does not use external data processors for this function
<b>Your Rights</b>	With regards to Medicines Management Reviews under GDPR you have the right: <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To restrict or stop processing</li> <li>• To object to it being processed or used</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a> . The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1 Social Care 2016. The CCG only receives de-identified data.
<b>Who we will share the information with (recipients)</b>	Personal data is shared between the CCG and local healthcare providers, including GP practices. They do this to facilitate the implementation of recommendations by the medicines management team

### 10.15 Care and Treatment Reviews

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	<a href="#">Care and Treatment Reviews (CTRs)</a> are part of NHS England's commitment to transforming services for people with learning disabilities, autism or both. CTRs are for people whose behaviour is seen as challenging and/or for people with a mental health condition. They are used by commissioners for people living in the community and in learning disability and mental health hospitals.
<b>Type of information Used</b>	Identifiable: Personal (such as name, address, date of birth) and Special Category (health information)
<b>Legal basis</b>	GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller. GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.
<b>How we collect (the source) and use the information</b>	Care and Treatment Reviews are independent panel meetings about your care arranged by the CCG. The CTR panel is made up or

	<p>professionals who are not involved in your everyday care. The panel members listen to you and to everyone involved in your care. They look at your notes and check that your care and plans are working well. They use this information and their own experience to decide what will improve your care and plans for the future. They speak up when they think your care could be different or better.</p> <p>CCGs have to understand people's needs, to plan for different levels of support at different times. They work with other health and social care services to find out who needs extra support or contact to make sure things are satisfactory. Any list of names will only be kept by the CCG if they are in receipt of funding from IFR or CHC. This list or register helps the CCG work with health and social care services. It allows them to arrange the extra support needed, if a CTR is needed, or extra help for carers. If you need a community CTR, you can join this register. Ask your care co-ordinator about it.</p> <p>If someone suddenly becomes very unwell and urgently needs to go into hospital, there might not be enough time for a community CTR. If this happens, an adult should have a hospital CTR within four weeks of going into hospital, or two weeks if you are a child or young person. This process is carried out with consent from the patient in order to satisfy the Common Law Duty of Confidentiality.</p>
<b>Data Processors</b>	NHS Bradford District and Craven CCG
<b>Your Rights</b>	<p>With regards to Care and Treatment reviews under GDPR you have the right:</p> <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To restrict or stop processing</li> <li>• To object to it being processed or used</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	<p>The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a>. The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1 Social Care 2016. The CCG only receives de-identified data.</p>
<b>Who we will share the information with (recipients)</b>	Information may be shared with the Local Authority, and primary and secondary healthcare providers.

#### 10.16 Visitors to our Website

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	Monitoring how the CCG's website is used. This is done to find out things such as the number of visitors to the various parts of the site.
<b>Type of information Used</b>	Identifiable: Personal (IP address)
<b>Legal basis</b>	GDPR Article 6(1)(e) – processing is necessary for the performance of

	<p>a task carried out in the exercise of official authority vested in the controller.</p> <p>GDPR Article 9(2)(h)- processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.</p>
<b>How we collect (the source) and use the information</b>	<p>When someone visits the CCG’s website information is collected in a standard internet log to enable the CCG to monitor how the website is used. This is done to find out things such as the number of visitors to the various parts of the site.</p> <p>From time to time, you may be asked to submit personal information about yourself (e.g. name and email address) in order to receive or use services on our website. Such services include bulletins, email updates, website feedback, requesting investigation of complaints and any other enquiries.</p> <p>By entering your details in the fields requested or sending us an email, you enable the CCG and its service providers to provide you with the services you select. Any information you provide will only be used by the CCG, or our agents or service providers, and will not be disclosed to other parties unless we are obliged or permitted to do so.</p> <p>We will hold your personal information on our systems for as long as you use the service you have requested, and remove it in the event the purpose has been met or when you no longer wish to continue your subscription.</p>
<b>Data Processors</b>	NHS Bradford District and Craven CCG
<b>Your Rights</b>	<p>With regards to the website service under GDPR you have the right:</p> <ul style="list-style-type: none"> <li>• To be informed about the processing of your information</li> <li>• (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To restrict or stop processing</li> <li>• To object to it being processed or used</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	<p>The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a>. The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1 Social Care 2016. The CCG only receives de-identified data.</p>
<b>Who we will share the information with (recipients)</b>	This information is not shared outside of the CCG.

## 10.17 Information for Job Applicants

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	The CCG will process information provided by applicants for the management of their application and the subsequent selection process.
<b>Type of information Used</b>	Anonymous – for shortlisting and selection purposes Identifiable: Personal such as name, address, date of birth etc.) - following the short-listing process
<b>Legal basis</b>	Article 6 – 6(1)(c) ‘...necessary for compliance with a legal obligation...’ For criminal conviction information (obtained via the Disclosure and Barring Service (DBS)) processing meets the requirements of Article 10 of the GDPR under Schedule 1, Part 1 of the Data Protection Act 2018 - processing in connection with employment, health and research - Processing necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law, social security law or the law relating to social protection. Relevant legislation: the provisions of the Safeguarding Vulnerable Groups Act 2006 as a basis for carrying our DBS checks.
<b>How we collect (the source) and use the information</b>	The recruitment process involves passing details provided by you on your application regarding your qualifications, skills and work experience, (but excluding your name, address and other personal data) to the short-listing and selection panels. After shortlisting full details provided by you on your application form will be provided to the interview panel. Details provided by you are also used to help fulfil our obligations to monitor equality and diversity within the organisation and process your application.
<b>Data Processors</b>	The Health Informatics Service (THIS) Bradford District Care NHS Trust NHS Jobs
<b>Your Rights</b>	<ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To restrict or stop processing</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a> . The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1 Social Care 2016. The CCG only receives de-identified data. Applicant data is held on NHS Jobs for 14 months.
<b>Who we will share the information with (recipients)</b>	Your information may be shared with Department of Works and Pension, NHS Trust, Occupational Health disclosure and barring services.

## 10.18 Human Resources

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG NHS Business Services Authority (for the Electronic Staff Record aspect)
<b>Purpose</b>	The CCG holds personal and confidential information if its staff for employment-related purposes, such as recruitment, payment of salary, sickness and absence monitoring and professional development purposes.
<b>Type of information Used</b>	Identifiable: Personal (such as name, address, date of birth) and Special Category (health, racial or ethnic origin information) Information relating to criminal convictions (DBS checks).
<b>Legal basis</b>	<p>GDPR Article 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</p> <p>GDPR Article 9(2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising the specific rights of the controller or of the data subject in the field of employment...social protection law in so far as it is authorised by Union or Member State law.</p> <p>For criminal conviction information (obtained via the Disclosure and Barring Service (DBS)) processing meets the requirements of Article 10 of the GDPR under Schedule 1, Part 1 of the Data Protection Act 2018 - processing in connection with employment, health and research - Processing necessary for the purposes of performing or exercising obligations or rights of the controller or the data subject under employment law, social security law or the law relating to social protection.</p> <p>Relevant legislation: the provisions of the Safeguarding Vulnerable Groups Act 2006 as a basis for carrying our DBS checks.</p>
<b>How we collect (the source) and use the information</b>	<p>The CCG use information for the purposes of employment in a variety of ways including:</p> <ul style="list-style-type: none"> <li>• Recruitment – application forms, collecting references, carrying out DBS checks, payroll and pension information.</li> <li>• Managing and monitoring annual leave and sickness.</li> <li>• Carrying our personal development reviews.</li> <li>• Referrals to Occupational Health</li> <li>• Disciplinary procedures.</li> <li>• Processing staff leavers, retirements and providing references.</li> <li>• Recruitment of temporary staff/student placements</li> <li>• Workforce information</li> <li>• Anonymous data sets used by NHS England / NHS Digital / NHS Jobs</li> </ul>
<b>Data Processors</b>	Bradford District Care NHS Foundation Trust – Payroll Supplier IBM (system supplier of the Electronic Staff Record - ESR) Methods Consulting Ltd – management of <a href="#">NHS Jobs</a> (recruitment website)
<b>Your Rights</b>	<p>Under GDPR you have the right:</p> <ul style="list-style-type: none"> <li>• To be informed about the processing of your information</li> </ul>

	<p>(this notice)</p> <ul style="list-style-type: none"> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	<p>The organisation has adopted the retention periods for health and non-health records as set out in the <a href="#">Records Management Code of Practice for Health and Social Care 2016</a>. The retention schedule is in line with the Records Management Code of Practice for Health and August 2018 - Version 1.1 Social Care 2016. The CCG only receives de-identified data.</p>
<b>Who we will share the information with (recipients)</b>	<p>The CCG shares information with a variety of organisations and individuals for a number of lawful purposes including:</p> <ul style="list-style-type: none"> <li>• Public disclosure under Freedom of Information - e.g. requested names or contact details of senior managers or those in public-facing roles;</li> <li>• Disclosure of job applicant details - e.g. to named referees for reference checks, to the Disclosure &amp; Barring Service for criminal record checks</li> <li>• Disclosure to employment agencies - e.g. in respect of agency staff;</li> <li>• Disclosure to banks &amp; insurance companies - e.g. to confirm employment details in respect of loan/mortgage applications/guarantees;</li> <li>• Disclosure to professional registration organisations - e.g. in respect of fitness to practice hearings;</li> <li>• Disclosure to Occupational Health professionals (subject to explicit consent);</li> <li>• Disclosure to police or fraud investigators - e.g. in respect of investigations into incidents, allegations or enquiries.</li> </ul>

#### 10.19 Declarations of Interests, Gifts and Hospitality Publication

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	The CCG is required to maintain and publish on its website registers of interests, gifts and hospitality for all staff of the CCG, as well as its Members, Governing Body and Committee Members
<b>Type of information Used</b>	Identifiable: Personal (name and job role)
<b>Legal basis</b>	<p>GDPR Article 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</p> <p>Statutory guidance for CCGs on <a href="#">Managing Conflicts of Interest</a> under Section 14O of the National Health Service Act 2006 (as amended by the Health and Social Care Act 2012)</p>
<b>How we collect (the source) and use the information</b>	The CCG maintains and publish Registers of Interest and Gifts and Hospitality containing names, job roles, details of the interest and/or receipt of gifts/hospitality including the details of those supplying the gift/hospitality as per the guidance on Managing Conflicts of Interest. Publicly available registers only include the details of those defined

	as 'decision-making' in line with statutory guidance.
<b>Data Processors</b>	N/A all processing undertaken within the CCG.
<b>Your Rights</b>	<p>In exceptional circumstances, where the public disclosure of information could lead to a real risk of harm or is prohibited by law, a person's name or other information may be withheld from the published registers. If you feel that substantial damage or distress may be caused to you or somebody else by the publication of information in the registers, you are entitled to request that the information is not published. Such requests must be made in writing to the CCG's Conflicts of Interest Guardian (bryan.millar@bradford.nhs.uk).</p> <p>Under GDPR you have the right:</p> <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To restrict or stop processing</li> <li>• To object to it being processed or used</li> <li>• Not to be subject automated decision-taking or profiling</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	In line with statutory guidance, details of interests declared (including offers of gifts and hospitality) of those classed as 'decision-making' remain on the public register for a minimum of 6 months [after the interest ceases]. In addition, the CCG retains a private record of historic interests and offers/receipt of gifts and hospitality for a minimum of 6 years after the date on which it expired.
<b>Who we will share the information with (recipients)</b>	The registers are published on the CCG's website. Information may be shared with NHS England.

### 10.20 National Fraud Initiative

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	<p>The CCG is required by law to protect the public funds it administers. It may share information provided to it with other bodies responsible for; auditing, or administering public funds, or where undertaking a public function, in order to prevent and detect fraud under the National Fraud Initiative.</p> <p>The Cabinet Office is responsible for carrying out data matching exercises.</p>
<b>Type of information Used</b>	Identifiable: Personal
<b>Legal basis</b>	<p>GDPR Article 6 (1)(c) – processing is necessary for compliance with a legal obligation to which the controller is subject.</p> <p>Relevant Legislation: Part 6 of the Local Audit and Accountability Act 2014 (LAAA).</p>
<b>How we collect (the source) and use the information</b>	<p>We participate in the Cabinet Office's National Fraud Initiative: a data matching exercise to assist in the prevention and detection of fraud. We are required to provide particular sets of data to the Minister for the Cabinet Office for matching for each exercise.</p>

	<p>Data matching involves comparing computer records held by one body against other computer records held by the same or another body to see how far they match. This is usually personal information. Computerised data matching allows potentially fraudulent claims and payments to be identified. Where a match is found it may indicate that there is an inconsistency which requires further investigation. No assumption can be made as to whether there is fraud, error or other explanation until an investigation is carried out.</p> <p>Data matching by the Cabinet Office is subject to a <a href="#">Code of Practice</a>.</p> <p>For further information on data matching at this authority, contact <a href="mailto:justin.williams1@nhs.net">justin.williams1@nhs.net</a></p>
<b>Data Processors</b>	Audit Yorkshire
<b>Your Rights</b>	<p>Under GDPR you have the right:</p> <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> <li>• To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	The datasets used in the matching exercise by the Cabinet Office will be kept as per <a href="#">the Code of Data Matching Practice</a>
<b>Who we will share the information with (recipients)</b>	The Cabinet Office and Counter Fraud Authority

### 10.21 Research & Development

<b>Data Controller(s)</b>	NHS Bradford District and Craven CCG
<b>Purpose</b>	<p>Under the Health and Social Care Act a CCG has the power to conduct, commission or assist the conduct of research into –</p> <p>(a) Any matters relating to the causation, prevention, diagnosis or treatment of illness; and</p> <p>(b) Any such matters connected with any service provider under the 2006 Act as the CCG considers appropriate.</p> <p>And also</p> <p>has a duty, when exercising its functions, to promote research and the use of evidence obtained from research</p>
<b>Type of information Used</b>	Identifiable: Personal
<b>Legal basis</b>	<p>GDPR Article 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</p> <p>GDPR Article 9(2)(j) Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union</p>

	<p>or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.</p> <p>Guidance on how to work in a research setting has been issued by the Health Research Authority, the public body responsible for the conduct of research, which can be found at: <a href="https://www.hra.nhs.uk/planning-and-improving-research/policies-standards-legislation/data-protection-and-information-governance/gdpr-detailed-guidance/">https://www.hra.nhs.uk/planning-and-improving-research/policies-standards-legislation/data-protection-and-information-governance/gdpr-detailed-guidance/</a></p>
<p><b>How we collect (the source) and use the information</b></p>	<p>Relevant and appropriate research always aims to answer a new question and contribute to the current body of medical and scientific knowledge, this is the purpose of research. The CCG will therefore participate in national and local programmes to derive new knowledge that can have a positive impact upon the services of the NHS.</p> <p>The service will therefore assist in the collection of data to support research activity. For personal identifiable data, full patient consent will be taken but the data will not be handled by the CCG R&amp;D team, only by the external study team (potentially from a local Trust or HEI).</p> <p>For pseudonymised data the CCG R&amp;D team may assist in the collection but would not routinely hold or transfer any data unless the research has received full approval from the Health Research Authority (HRA) and Research Ethics Committee (REC) for it to do so. For anonymised and or aggregated data the service will assist in collection and may hold or transfer the data depending on the approval received from the HRA and the REC.</p> <p>The service will work within the guidelines of the <a href="#">UK Policy Framework for Health and Social Care Research</a> (HRA and the UK Health Departments, published October 2017) This policy framework sets out principles of good practice in the management and conduct of health and social care research in the UK. These principles protect and promote the interests of patients, service users and the public in health and social care research, by describing ethical conduct and proportionate, assurance-based management of health and social care research, so as to support and facilitate high-quality research in the UK that has the confidence of patients, service users and the public.</p>
<p><b>Data Processors</b></p>	<p>N/A all processing done within the CCG</p>
<p><b>Your Rights</b></p>	<p>Under GDPR you have the right:</p> <ul style="list-style-type: none"> <li>• To be informed about the processing of your information (this notice)</li> <li>• Of access to the information held about you</li> <li>• To have the information corrected in the event that it is inaccurate</li> </ul>

	<ul style="list-style-type: none"> <li>To be notified of data breaches</li> </ul>
<b>How long we will keep the information</b>	All datasets for research projects are kept in line with the instructions of the Research Ethics Committee (REC) approving the research study and in line with. The REC determines these based on the Medical research Guidance ( <a href="https://mrc.ukri.org/documents/pdf/retention-framework-for-research-data-and-records/">https://mrc.ukri.org/documents/pdf/retention-framework-for-research-data-and-records/</a> ) for the type of study being undertaken.
<b>Who we will share the information with (recipients)</b>	<p>The research team works with a wide range of research organisations, each specifying their own data sets. Sharing of research data will only occur in line with the provisions of the individual HRA and REC decision about the project, usually this will contain all of the named stakeholders.</p> <p>In addition the research team may share anonymised data that would be accessible under an FOI, this data would also be shared with NHS England and the National Institute for Health Research Clinical Research Network. The results of research will be made available publicly via the website, events, newsletters and through social media.</p>

## Glossary

**Identifiable** - information which contains personal details that identify individuals such as name, address, email address, NHS Number, full postcode, date of birth.

**Pseudonymised** - individual level information where individuals can be distinguished by using a coded reference, which does not reveal their 'real world' identity

**Anonymised** - data which is about you but from which you cannot be personally identified.

**Aggregated** – grouped information about individuals that has been combined to show general trends or values without identifying individuals

**General Data Protection Regulation (GDPR)** – the main legislation on data protection binding all EU member states (including the UK) from May 2018

**Data Protection Act** – UK legislation to be introduced in 2018 in line with GDPR to expand on the EU Regulation and to provide for areas specifically excluded from GDPR (eg Law Enforcement). This Act will repeal the UK Data Protection Act 1998.

**Data Controller** – natural or legal person, public body, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**Data Processor** – natural or legal person, public authority, agency or other body which processes personal data on behalf of the data controller.

**Personal data** – any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Special Category (Sensitive) data** - categories of personal data for which special safeguards are required by law. This includes records relating to health, sex life, race, ethnicity, political opinions, trade union membership, religion, genetics and biometrics.

**Processing** – any operation or set of operations which is performed on personal data or on sets of personal data whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Data Protection Officer** – Under GDPR all Public Authorities must appoint a Data Protection Officer. The role of this person, who must be an expert in Data Protection Law is:  
Monitor CCG compliance with the GDPR

- Provide advice and assistance with regards to the completion of Data Protection Impact Assessments
- Act as a contact point for the Information Commissioners Office (ICO), members of the public and CCG staff on matters relating to GDPR and the protection of personal information
- Assist in implementing essential elements of the GDPR such as the principles of data processing, data subjects’ rights, privacy impact assessments, records of processing activities, security of processing and notification and communication of data breaches

**Primary Care** - Primary care settings include GP Practices, pharmacists, dentists and some specialised services such as military health services.

**Secondary Care** - Secondary care settings include local hospitals, rehabilitative care, urgent and emergency care (including out of hours and NHS 111), community and mental health services.

**Caldicott Guardian** – a senior person responsible for protecting the confidentiality of patient and service-user information and enabling appropriate information sharing. Each NHS and Social Care organisation is required to have a Caldicott Guardian.

**Senior Information Risk Owner (SIRO)** – an executive or member of the Senior Management Board of an organisation with overall responsibility for information risk across the organisation.

**Right of Access Requests** – The right a data subject has from the controller for confirmation as to whether or not personal data concerning him or her are being processed and, where that is the case, access to the personal data and further information about the processing.