

Trafford CCG Fair Processing Notice for Trafford Patients **Trafford Co-ordination Centre**

This leaflet is to inform you how Trafford CCG as Data Controller, processes and shares information about you as a patient for the **Trafford Co-ordination Centre (TCC)**.

The TCC Service

Trafford CCG identified the need to develop and implement a robust information sharing ethos that will ensure that we have the right information available to support the coordination and delivery of care and commissioning decisions.

Trafford CCG commission a company called Computer Sciences Limited ("CSC") to provide the Trafford Co-ordination Centre services. CSC act as a data processor for your personal information for the purpose of providing this service on behalf of Trafford CCG.

The TCC team is made up of health care professionals and administrators and will perform duties such as referral management, and care co-ordination. The TCC also generates a single integrated medical record for each Trafford patient which can be shared across our TCC partners to effectively support your direct care.

What details do we process?

The team of TCC health care professionals caring for you keep records about your healthcare and services provided to you, electronically. These details are listed as follows:

- Personal details such as name, address, date of birth, ethnicity and religion, NHS number and next of kin
- Contacts and episodes of care e.g. hospital admissions, outpatient clinic appointments and home visits.



- Notes and reports by health and social care professionals about your health
- Details and records about your treatment and care
- Results of x-rays, laboratory tests, and any other tests
- Housing Information/Care Homes
- Relevant information about people that care for you and know you well
- Basic details about associated people e.g. children, partners, carers, Relatives, etc

What do we use your information for?

We only use your personal confidential data for lawful purposes in order for us to effectively provide and administer the TCC service for purposes as listed below:

- To provide you with care/treatment and care plans, both now and in the future, ensuring that appropriate information is available to all those who treat you medically and care for you professionally.
- To ensure your care is safe and effective (i.e. clinical audit)
- To support you in managing your own care and work with health and social care professionals.
- To manage and plan the NHS and Council Services.
- Investigate any complaints or legal claims.

Trafford CCG only uses **pseudonymised** or **anonymised** patient data for business analysis, invoice validation and/or commissioning purposes.

Who do we share your information with?

The TCC Partners are made up of the following main integrated care organisations for Trafford patients:

- Pennine Care NHS Foundation Trust
- Your own Trafford GP Practice.
- Salford Royal NHS Foundation Trust
- Greater Manchester Mental Health NHS Foundation Trust



- University Hospital South Manchester NHS Foundation Trust
- Central Manchester University Hospitals NHS Foundation Trust
- The Christie NHS Foundation Trust
- Trafford Council
- CSC – NHS Business Partner/processor for the TCC
- Mastercall – Out of Hours Service

All these organisations will share your personal confidential data with the TCC.

You will always be asked for your explicit consent for identifiable information to be shared with 3rd party organisations which will be subject to strict data sharing agreements about how it will be used and how they will ensure your personal data is kept confidential and secure, for example: -

- housing departments;
- education services;
- voluntary community and social enterprise sector;
- the police;
- GM Fire and Rescue Service
- government departments.
- care homes
- Ambulance and Transport Services

All personal confidential data shared will be relevant, necessary and not excessive in accordance with the Caldicott review and Principles.

Managing the Data

We need to be able to move electronic information between the separate systems that provide information to support your care and the care processes. Data is also extracted and processed to support the operation of services and monitoring the delivery and management of the services.



How we keep your records secure and confidential

Each of the TCC Integrated Care Partner organisations has a responsibility under the Data Protection Act 1998 and forthcoming General Data Protection Regulations (May 2018) to protect every patient's personal information. Your records will be protected in the same way.

Staff working in Health and Social Care, have a legal duty to keep personal information, confidential and secure and only Health and Social Care registered professionals involved in your care are allowed to look at your record for the purpose of your direct care.

Where practicable you will be asked for your permission to view your record when you first come into contact (face to face or on the phone) with a registered health and social care professional or supporting administrator and only the parts that are relevant and necessary will be accessed in accordance to their role.

Every time a record is accessed the identity of the reader is recorded. You can request details of all the people who have accessed your record. Staff can be asked to give a reason why they have viewed your record and the Organisation's disciplinary policy will be applied if appropriate.

We keep paper and electronic records securely to prevent unauthorised access in line with the Data Protection Act 1998.

We will only ever access or share your information if it is in the best interest for your care. We will not disclose any information that identifies you to anyone outside your direct care team¹ without your express permission; unless there are exceptional circumstances such as when there is serious risk of harm to yourself or others or where the law requires it.



Risk Stratification

Trafford CCG (on behalf of GP practices) have procured an analytics software solution from Mede Analytics Ltd, who will also act as a data processor in respect of any personal data shared for the purpose of risk stratification, business commissioning and public health analysis, in accordance with the instructions of Trafford CCG and Trafford GP practice partners. The software solution allows personal data to be **pseudonymised*** at source and Mede Analytics will therefore not store or retain any personal confidential data. All patient data analysed is only re-identified for the purpose of direct care by Data Services for Commissioners Regional Office (DSCRO**) or a TCC clinician (only in agreement with and on behalf of your GP practice). Trafford CCG and public health will only have access to anonymous personal data for invoice validation, commissioning or business analytics.

To ensure the most accurate risk score is calculated, information taken from GP clinical systems is linked with information relating to A&E attendances, hospital admissions and outpatient appointments (obtained from NHS Digital/DSCRO). Further information taken from social, community and mental health care may also be used, as appropriate and where available.

All personal information is pseudonymised before any risk stratification analysis is undertaken.

***Pseudonymisation** - is a procedure by which the most identifying fields within a data record are replaced by one or more artificial identifiers, or pseudonyms. The purpose is to make the patient data record less identifying and therefore lower objections to its use. Data in this form is suitable for extensive analytics and processing.

****DSCRO** <http://content.digital.nhs.uk/dataservicesforcommissioners>



Keeping information up to date

If you consider that any part of the information held in your record is inaccurate, you can apply to have this corrected. If we agree that the information is incorrect, the alteration will be made. If we are not satisfied that the information is incorrect, a note will be made of the information you consider is inaccurate.

You will be given a copy of either the correction or the note.

Mobile Phone Number

We record mobile telephone numbers to enable us to contact you if an appointment has to be rearranged. Some services also provide a text / voice reminder service so that you can be reminded of your appointment. If you prefer not to be contacted in this way, please tell us so we can remove your number from the system.

Your rights

You can have a say in how the NHS uses information about you. If you do not wish your personal data to be used or shared with in the way that is described in this leaflet, please discuss the matter with us. You have the right to request that your confidential information is not used beyond your own direct care and treatment and to have your confidential your objections considered, and where your wishes cannot be followed, to be told the reasons including the legal basis.

The TCC centrally manage objections for your confidential information to be viewed or accessed.

Please contact the TCC for further information on:

0161 976 2555

For text relay the prefix is 18001



Your GP practice will also be able to manage your specific rights to object at practice level known as Type 1 and Type 2 objections explained below:

Type 1 objection

Patients can object to information about them leaving a general practice in identifiable form for purposes beyond their direct care so confidential information about them will not be shared.

Type 2 objection

Patients can object to information about them (from any health and social care setting) leaving NHS Digital (formerly known as HSCIC) in identifiable form for purposes beyond their direct care, so confidential information about them will not be sent to anyone by NHS Digital.

Please speak to your GP practice for more information or if you have any questions about objections.

Subject Access Requests

You have a right to request access to and / or request copies of any personal information we hold about you on our records (whether paper or electronic records).

Your request must be made in writing to:

Post: Subject Access Request – TCCG 1st Floor, Crossgate House, Cross Street, Sale, M33 7FT.

Email: jenna.lancaster@nhs.net

Points to note:

- You may be charged to be provided with a printed copy of the information held about you.
- We are required to respond to your request within 40 calendar days.



- You will need to provide adequate information (for example, full name, address, date of birth and clear instructions regarding the data you require) and proof of identification in order for your identity to be verified and to allow us to locate and retrieve the required information.

If you think any information we hold about you is inaccurate or incorrect, please let us know.

Freedom of Information Act 2000

If you want to request any information about the organisation, which is not your own personal data, please refer to the FOI policy and procedure on the Trafford CCG Website page or you can submit a Freedom of Information request to the Governance, Planning and Risk Team.

ICO Notification

The Data Protection Act 1998 requires organisations to lodge a notification with the Information Commissioner to describe the purposes for which they process personal information.

This information is publicly available at the Information Commissioners Office at:

Wycliffe House,
Water lane
Wilmslow,
Cheshire,
SK9 5AF

Tel: 01625 545745

Fax: 01625 524510

Website: www.ico.org.uk



Who is the Data Controller?

The Data Controller, responsible for keeping your information confidential is:

Trafford CCG
1st Floor
Crossgate House
Sale
M33 7FT

Further Information

If you would like further information about how Trafford CCG process your personal information and / or if you do not wish personal information to be used or shared in the way that is described in this leaflet, please contact us:

Information Governance Manager
Trafford CCG
1st Floor
Crossgate House
Sale
M33 7FT

Tel: 0161 873 9500

Email: carolyn.eadie@nhs.net

Alternative formats

If you need help to understand this document or you require it in another format such as large print, braille or in a different language please contact us on the details below:

Communications Team: 0161 873 9500

