



## Privacy Notice – Population Health Management

### Plain English explanation

Population Health Management (PHM) is aimed at improving the health of an entire population. It is being implemented across the NHS and this Practice is taking part in a project across Northamptonshire.

PHM is about improving the physical and mental health outcomes and wellbeing of people and making sure that access to services is fair, timely and equal. It helps to reduce the occurrence of ill-health and looks at all the wider factors that affect health and care.

PHM approach requires health care organisations to work together with communities and partner agencies, for example, GP Practices, community service providers, hospital and other health and social care providers.

These organisations will share and combine information with each other in order to get a view of health and services for the population in a particular area. This information sharing is subject to robust security arrangements.

PHM only uses pseudonymised data, where information that identifies you has been removed and replaced with a pseudonym. Your information will only be re-identified by relevant staff within our Practice in the case of us discovering that you may benefit from a particular health intervention.

You have a choice about whether you want your confidential patient information to be used in this way, but have an overriding responsibility to do what is in your best interests and comply with our legal obligations.

We are required by Articles in the UK GDPR to provide you with the information in the following 9 subsections:

<b>1) Data Controller</b> contact details	Eleanor Cross Healthcare Delapre Medical Centre Gloucester Avenue Northampton NN4 8QF
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<p><b>2) Data Protection Officer contact details</b></p>	<p>Hayley Gidman Midlands and Lancashire CSU FAO: Delapre Medical Centre Gloucester Avenue Northampton NN4 8QF</p>
<p><b>3) Purpose of the processing</b></p>	<p>The purpose of processing is to use linked data from primary, secondary and community care to understand population health more effectively.</p>
<p><b>4) Lawful basis for processing</b></p>	<p>The processing of personal data in the delivery of direct care and for providers' administrative purposes in this surgery and in support of direct care elsewhere is supported under the following Article 6 and 9 conditions of the UK GDPR:</p> <p><i>Article 6(1)(c) 'processing is necessary for compliance with a legal obligation to which the controller is subject'.</i></p> <p><i>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 vested in the controller'.</i></p> <p><i>Article 9(2)(h) 'processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems'.</i></p> <p><i>Article 9(2)(i) 'processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices'.</i></p> <p>We will also recognise your rights established under UK case law collectively known as the "Common Law Duty of Confidentiality"*.</p>
<p><b>5) Recipient or categories of recipients of the processed data</b></p>	<p>The data will be shared in order to provide this service with NEL Commissioning Support Unit (please see Privacy Notice – NEL Commissioning Support Unit) and Optum Health Solutions (UK) Limited, health and care professionals who contribute to your personal care.</p>
<p><b>6) Right to object</b></p>	<p>You have the right to object to some or all the information being processed under Article 21. Please contact the Data Controller or the practice.</p> <p>You should be aware that this is a right to raise an objection, that is not the same as having an absolute right to have your wishes granted in every circumstance.</p>
<p><b>7) Right to</b></p>	<p>You have the right to access the data that is being shared and have any</p>

<b>access and correct</b>	inaccuracies corrected.  There is no right to have accurate medical records deleted except when ordered by a court of Law.
<b>8) Retention period</b>	The data will be retained for the duration of the PHM project. Once the project has completed all personal information will be securely destroyed.
<b>9) Right to complain</b>	You have the right to complain to the Information Commissioner’s Office, you can use this link <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a> or call their helpline tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate).

\* “Common Law Duty of Confidentiality”, common law is not written out in one document like an Act of Parliament. It is a form of law based on previous court cases decided by judges; hence, it is also referred to as 'judge-made' or case law. The law is applied by reference to those previous cases, so common law is also said to be based on precedent.

The general position is that if information is given in circumstances where it is expected that a duty of confidence applies, that information cannot normally be disclosed without the information provider's consent.

In practice, this means that all patient information, whether held on paper, computer, visually or audio recorded, or held in the memory of the professional, must not normally be disclosed without the consent of the patient. It is irrelevant how old the patient is or what the state of their mental health is; the duty still applies.

Three circumstances making disclosure of confidential information lawful are:

- where the individual to whom the information relates has consented;
- where disclosure is in the public interest; and
- where there is a legal duty to do so, for example a court order.