

BNSSG Population Health Management/Analysis Data Flows – 1 million individuals

- 1 There is no legal basis under CLoC for the disclosure of personal confidential information, for secondary uses, outside of the care team No explicit permission of the individual, no legal obligation, not mandated under COPI 3(4)/COVID-19 Not overwhelmingly in the public interest ("life or death") This is not a disclosure for direct care purposes There is no approval under Regulation 5 of COPI 2002, by CAG, for any such disclosure (Class 6 support)
- 2 There is no legal basis under CLoC for SCW CSU to access, hold, link, and deidentify personal confidential information for secondary purposes No explicit permission of the individual, no legal obligation, not mandated under COPI 3(4)/COVID-19 Not overwhelmingly in the public interest ("life or death") This is not processing for direct care purposes There is no approval under Regulation 5 of COPI 2002, by CAG, for any such processing (Class 1, 4, 6 support)
- There is no legal basis under CLoC for the disclosure of personal confidential information, for secondary uses, to BNSSG CCG
   Pseudonymised information remains personal confidential information
   No explicit permission of the individual, no legal obligation, not mandated under COPI 3(4)/COVID-19
   Not overwhelmingly in the public interest ("life or death")
   This is not a disclosure for direct care purposes
   There is no approval under Regulation 5 of COPI 2002, by CAG, for any such disclosure (Class 6 support)
- There is no legal basis under CLoC for BNSSG CCG to access, hold, link, and analyse personal confidential information for secondary purposes No explicit permission of the individual, no legal obligation, not mandated under COPI 3(4)/COVID-19 Not overwhelmingly in the public interest ("life or death") This is not processing for direct care purposes There is no approval under Regulation 5 of COPI 2002, by CAG, for any such processing (Class 4, 5, 6 support)
- 5 There is no legal basis under CLoC for BNSSG CCG to deidentify personal confidential information for secondary purposes This is not processing for direct care purposes There is no approval under Regulation 5 of COPI 2002, by CAG, for any such processing (Class 1 support)

There is no approval under Regulation 5 of COPI 2002, by CAG, for any such processing (Class 1 support)

6 There is no legal basis under CLoC for the disclosure of personal confidential information, for secondary uses, BNSSG CCG to 3<sup>rd</sup> parties
 Pseudonymised information remains personal confidential information
 No explicit permission of the individual, no legal obligation, not mandated under COPI 3(4)/COVID-19
 Not overwhelmingly in the public interest ("life or death")
 This is not a disclosure for direct care purposes
 There is no approval under Regulation 5 of COPI 2002, by CAG, for any such disclosure (Class 6 support)

## There is no legal basis under CLoC for those 3<sup>rd</sup> parties to access, hold, link, deidentify and analyse further, personal confidential information for secondary purposes (non-research or research)

No explicit permission of the individual, no legal obligation, not mandated under COPI 3(4)/COVID-19

Not overwhelmingly in the public interest ("life or death")

This is not a disclosure for direct care purposes

There is no approval under Regulation 5 of COPI 2002, by CAG, for any such disclosure or processing (Class 1, 2, 3, 4, 5, 6 support)