

Reference: FOI 2122053

Subject: Population Health Management programme “System Wide Dataset”

I can confirm that the CCG does hold some of the information requested; please see responses below:

QUESTION	RESPONSE
<p>1. Has <i>BNSSG CCG Population Health Management programme – “System Wide Dataset”</i> now stopped processing personal confidential information for secondary uses, subsequent to the letter from NHSX and the concerns raised by the NDG?</p> <p>If not, and disclosure and processing continue, what is the legal basis for the disclosure of, and subsequent access to, personal confidential information for secondary uses processing (such as population health management) by contributing data controllers such as GP surgeries, and its subsequent linkage, deidentification, and analysis?</p>	<p>BNSSG CCG Population Health Management programme – ‘Systemwide Dataset’ does not process personal confidential information, data within the Systemwide Data set is processed for Commissioning purposes only and is pseudonymised before it is shared with the CCG. The concerns raised by the NDG and the subsequent letter from NHSX relates to shared records for direct care purposes, PHM systemwide data set is not used for this purpose.</p> <p>Data extractions from primary care clinical systems are covered by data sharing and data processing agreements between individual GP Practices (data controllers) and the data Processor(s) working to their instruction who pseudonymise data before transfer to the CCG.</p> <p>Data made available to the CCG from NHS Trusts occurs under contract with NHS Digital who process and pseudonymise activity data for commissioning purposes.</p> <p>As controllers of the data primary and secondary care ensure</p>

<p>i. Is it the explicit permission of each individual obtained prior to disclosure?</p> <p>ii. Or has authority been specifically granted for all such processing under Regulation 5 of COPI 2002 (HRA/CAG approval)?</p> <p>If so, please could you provide:</p> <ul style="list-style-type: none">o The CAG approval referenceo Which classes of support has your project been granted (https://www.legislation.gov.uk/ukxi/2002/1438/schedule/made), given that access to, linkage, deidentification, analysis, and further disclosure of, such information occurs	<p>that appropriate Privacy notices are available to patients informing them of the uses of the data and patients who have opted out of data sharing for planning and research purposes are excluded from the data before it is shared with CCG.</p> <p>i. Not applicable</p> <p>ii. Not applicable</p>
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The information provided in this response is accurate as of 27 May 2021 and has been approved for release by Sarah Truelove, Deputy Chief Executive and Chief Finance Officer for NHS Bristol, North Somerset and South Gloucestershire CCG.