

Greater Manchester Health and Social Care Partnership  
4th Floor  
3 Piccadilly Place  
London Road  
Manchester M1 3BN

Date: 16 September 2021

[REDACTED]  
Our Ref: GMFOI21/11

Dear Dr Neil Bhatia

**Re: Freedom of Information request (Our Ref: GMFOI21/11)**

Thank you for your Freedom of Information (FOI) request dated 9 September 2021.

Your exact request was: -

1. Could you kindly provide me with the latest DPIA that you rely on for, or which covers, such (non-COVID-19) secondary uses processing?
2. What is the legal avenue under the common law of confidentiality for the disclosure of, and subsequent access to, linkage, de-identification, data analysis, and any onward disclosure of information *for (non-COVID-19) secondary uses processing* by the GMCR?  
(That is, how is a breach of confidence avoided?)

Is the explicit permission of each individual obtained prior to disclosure?

Or has authority been specifically granted for all such processing under Regulation 5 of COPI 2002 (HRA/CAG approval)?

If so, please could you provide:

- o The CAG approval reference
- o Which classes of support has your project been granted  
(<https://www.legislation.gov.uk/ukxi/2002/1438/schedule/made> )

**The GM Health and Social Care Partnership response:**

*The Greater Manchester Care Record is currently only be utilised for covid-19 related research and analytics authorised within the COPI notice referenced. A Data Protection Impact Assessment is currently in development for uses beyond COPI that will include how the Common Law Duty of Confidentiality is to be set aside and the governance arrangements. Following consultation with stakeholders and approval with data controllers this will be made publicly available.*

We hope this information is helpful. However, if you are dissatisfied, you have the right to ask for an internal review. This should be requested in writing within two months of the date of this letter. Your correspondence should be labelled "Internal Review" and should outline

your concerns and/or the area(s) you would like the review to consider. Internal Review requests should be sent to:

GMHSCP c/o Jacqueline Chrystan  
4<sup>th</sup> Floor  
3 Piccadilly Place  
Manchester  
M1 3BN  
Email: [gm.hscinfo@nhs.net](mailto:gm.hscinfo@nhs.net)

Please quote the reference number GMFOI21/11 in any future communications.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner's Office (ICO) can be contacted at:

The Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow, Cheshire  
SK9 5AF  
Telephone: 0303 123 1113  
Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)  
Website: [www.ico.org.uk](http://www.ico.org.uk)

Please note there is no charge for making an appeal.

Please be aware that in line with the Information Commissioner's directive on the disclosure of information under the FOI Act, your request will be anonymised and published on our website as part of our disclosure log.

Yours sincerely



**Warren Heppollette**  
Executive Lead for Strategy and System Leadership