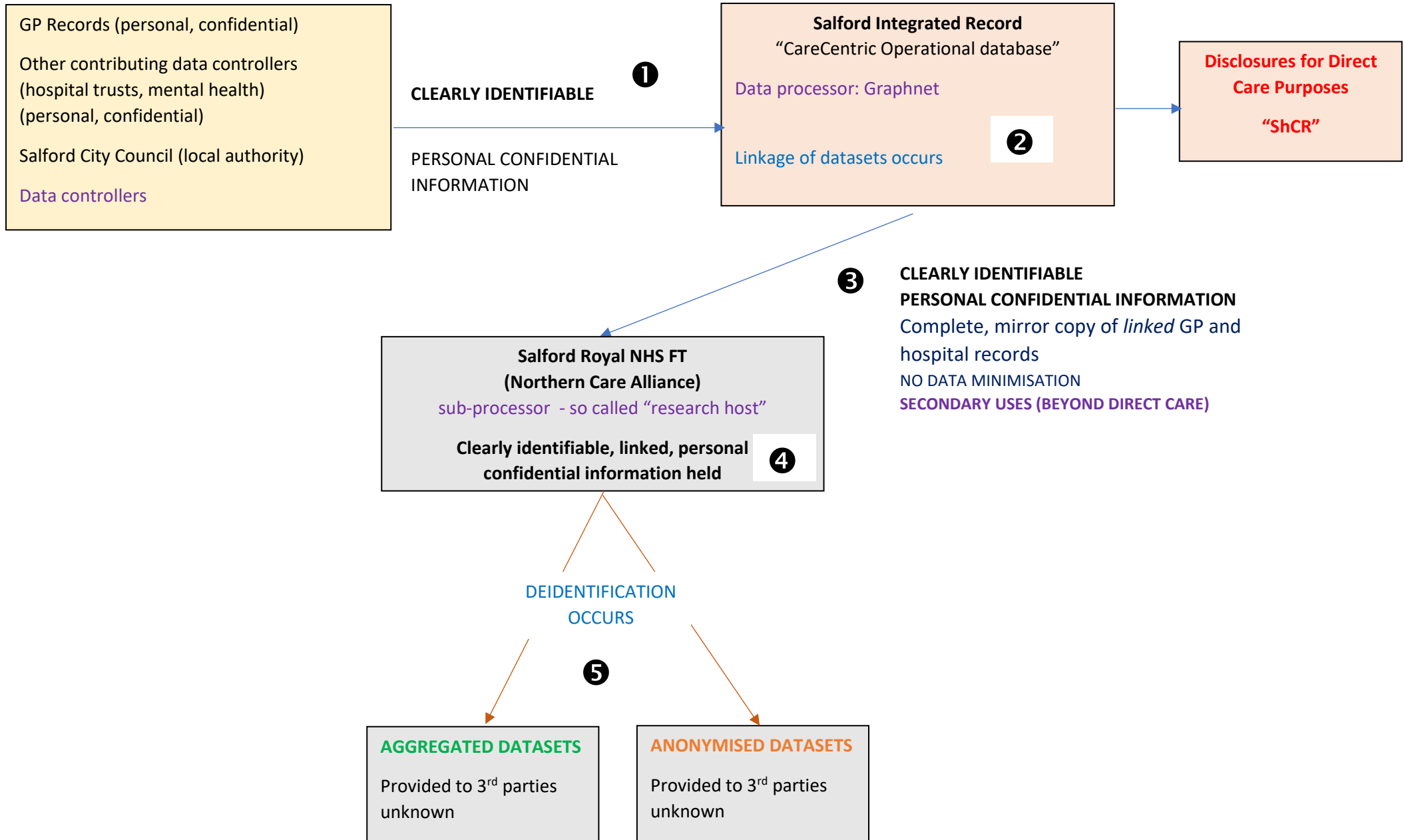


Salford Integrated Record Dataflow – 270,000 individuals



- 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)
“Implied consent” meets the CLoC for the disclosure to Graphnet *for direct care purposes only*
- 2 There is no legal basis under CLoC for Graphnet to access, hold, and link 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, 6 support)
- 3 There is no legal basis under CLoC for the disclosure of personal confidential information, for secondary uses, to SRNHSFT**
This remains clearly identifiable, 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)
That there might be a “data processing contract” does not in itself meet CLoC
- 4 There is no legal basis under CLoC for SRNHSFT to access, hold, 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 2, 3, 5, 6 support)
- 5 There is no legal basis under CLoC for SRNHSFT 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)