

# Privacy Notice – Risk Stratification for Case Finding

## Plain English explanation

NHS North East London Integrated Care Board (NEL ICB / NEL) processes identifiable and clinical data about you on behalf of your GP to support primary care in assessing the best provision and use of clinical services for you.

This data is used to assess whether you are receiving the most appropriate clinical care based on your whole clinical record held by your GP and to enable provision of services thereafter.

This processing is known as risk stratification for case finding.

Access to your information is strictly limited and only those who are directly involved in providing risk stratification services will have access to your personal information including the use of pseudonymised information which is used to limit re-identification and reduce risk of inappropriate access.

You have the right to object to your data being shared for risk stratification purposes and how you may register an objection, should you wish, is detailed below.

NEL ICB is committed to undertaking this processing in a fair and transparent manner which includes provision of this privacy notice and an ongoing patient engagement programme so that patients have the chance to understand the processing, have their voices heard, and where they wish to object to the processing.

We are required by Articles in the General Data Protection Regulations (GDPR) to provide you with the information.

Please visit our website at [www.northeastlondon.icb.nhs.uk](http://www.northeastlondon.icb.nhs.uk) and contact us if you have any questions: [nelondonicb.ig@nhs.net](mailto:nelondonicb.ig@nhs.net)

<b>1) Controller contact details</b>	Please contact your GP Practice.
<b>2) Processor contact details</b>	NHS North East London 4th Floor – Unex Tower 5 Station Street London E15 1DA <a href="http://www.northeastlondon.icb.nhs.uk">www.northeastlondon.icb.nhs.uk</a>
<b>2) Processor Data Protection Officer contact details</b>	NHS NEL DPO <a href="mailto:nelondonicb.ig@nhs.net">nelondonicb.ig@nhs.net</a>
<b>3) Purpose of the processing</b>	<b>Risk stratification</b> Your GP uses your data to provide the best care they can for you. As part of this process, your GP will use your personal and health data to undertake risk stratification, also known as case finding. Risk stratification involves applying computer-based algorithms, or calculations, to identify those patients registered with the GP Surgery who are most at risk from certain medical conditions and who will benefit from clinical care to help prevent or better treat their condition. To identify those patients individually from the patient community registered with your GP would be a lengthy and time-consuming process, which would by its nature potentially not identify individuals quickly and increase the time to improve care. NEL will automatically process your personal and confidential data without any staff being able to view the data. Typically, they will process your data using indicators such as your age, gender, NHS number and clinical

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	<p>codes including processing of patient event data, referrals, prescriptions, conditions and diagnoses to identify those who will benefit from clinical intervention.</p> <p>Processing takes place automatically and without human or manual handling. Data is extracted from your GP computer system, automatically processed, and only your GP is able to view the outcome, matching results against patients on their system.</p> <p>We have implemented strict security controls to protect your confidentiality and recommend this as a secure and beneficial service to you. At all times, your GP remains accountable for how your data is processed. However, if you wish, you can ask your GP for your data not to be processed for this purpose and your GP will mark your record as not to be extracted and it won't be sent to Provider Services Ltd who provide the risk stratification tool to the GPs on behalf of the ICB</p>
<p><b>4) Lawful basis for processing</b></p>	<p>GDPR Article 6(1)(e) – processing is necessary for the performance of a task carried out in the exercise of official authority vested in the controller.</p> <p>GDPR Article 9(2)(h) processing is necessary for the purposes of the provision of health or social care or treatment or the management of health or social care systems and services.</p> <p>A <a href="#">section 251</a> approval (currently - CAG 7-04(a)/2013) from the Secretary of State, through the <a href="#">Confidentiality Advisory Group</a> of the Health Research Authority, enables the pseudonymised information to be sent to the ICB via NHS Digital in order to help us plan the most appropriate health services for our population.</p> <p>The section 251 approval also supports processing of a whole population data to find those patients most at risk.</p> <p>As these processes operate under these lawful basis this processing is considered to meet the first data protection principle of fairness, or fair processing which includes the requirement for advising patients of the processing and patient engagement.</p>
<p><b>5) Recipient or categories of recipients of the shared data</b></p>	<p>Primary Care data extracted from individual GP practices and Secondary Care data (collected nationally via the Secondary Uses Service): Inpatient, Outpatient, Accident and Emergency, Out of Hours, Urgent Care, Community Nursing, Community Mental Health is passed to Prescribing Services Ltd who provide the Risk Stratification tool to GP Practices commissioned by the ICB.</p> <p>De-identified (data anonymised in line with the ICO Code of Practice) information is made available to the ICB to provide a picture of the health and needs of their local population, which enables priorities to be determined in the management and use of resources; planning services; cover the range of potential questions, and issues they may need to consider, and to support and evidence decisions.</p>
<p><b>6) Rights to object</b></p>	<p>If you do not want the NHS to use your personal information, collected by your GP for risk stratification / case finding purposes, then you can opt out by contacting NEL ICB at the address above. When patient details are extracted from primary care datasets then your details will not be extracted and processed for risk stratification.</p> <p>Objecting for processing for risk stratification only removes your records for processing for this purpose. Should you wish to remove your records from being processed for any purpose other than your direct care then you should contact your GP practice who will provide you with a form to complete for this purpose.</p>

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<p><b>7) Right to access and correct</b></p>	<p>With regards to Risk Stratification under GDPR you have the right:</p> <p>To be informed about the processing of your information, This privacy notice, supporting materials and wider patient engagement meet this right.</p> <p>To have access to the information held about you.</p> <p>To have the information corrected in the event that it is inaccurate.</p> <p>To restrict or stop processing.</p> <p>To object to your data being processed or used. This privacy notice tells you how you may object to this processing.</p> <p>Not to be subject to automated decision-taking or profiling.</p> <p>To be notified of data breaches.</p>
<p><b>8) Retention period</b></p>	<p>The data will be retained in accordance with the ICB rules outlined in the NHSE Records Management Code of Practice 2021. Specifically, for the Risk tool, the system will hold 3 years of data updated monthly to be used within the tool.</p>
<p><b>9) Right to Complain</b></p>	<p>You have the right to complain to the Information Commissioner’s Office about the way personal information about you is processed by an organisation.</p> <p>You can contact them at this link: <a href="https://ico.org.uk/global/contact-us/">https://ico.org.uk/global/contact-us/</a> or by calling their helpline on 0303 123 1113 (local rate) or 01625 545 745 (national rate).</p> <p>There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website).</p>
<p><b>10) National Data Opt Out</b></p>	<p>The National Data Opt Out allows you to choose a wider restriction on your data being processed for secondary uses (i.e. not direct care). This is further to your right to object only for case finding (section 6). To find out more or to register your choice to opt out, please visit <a href="http://www.nhs.uk/your-nhs-data-matters">www.nhs.uk/your-nhs-data-matters</a>. On this web page, you will:</p> <ul style="list-style-type: none"> <li>• see what is meant by confidential patient information.</li> <li>• find examples of when confidential patient information is used for individual care and examples of when it is used for purposes beyond individual care.</li> <li>• find out more about the benefits of sharing data.</li> <li>• understand more about who uses the data.</li> <li>• find out how your data is protected.</li> <li>• be able to access the system to view, set or change your opt-out setting.</li> <li>• find the contact telephone number if you want to know any more or to set/change your opt-out by phone; and</li> <li>• see the situations where the opt-out will not apply.</li> </ul> <p>You can also find out more about how patient information is used at: <a href="https://www.hra.nhs.uk/information-about-patients/">https://www.hra.nhs.uk/information-about-patients/</a> (which covers health and care research); and <a href="https://understandingpatientdata.org.uk/what-you-need-know">https://understandingpatientdata.org.uk/what-you-need-know</a> (which covers how and why patient information is used, the safeguards and how decisions are made).</p> <p>You can change your mind about your choice at any time.</p> <p>Data being used or shared for purposes beyond individual care does not include your data being shared with insurance companies or used for marketing purposes. Data would only be used in this way with your specific agreement.</p>

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