

Population Health Management Privacy Notice

This supplementary privacy notice has been written to provide detail on the data processing involved in the Population Health Management initiative.

What is Population Health Management?

A Population Health Management (PHM) programme has been introduced in Bath, Northeast Somerset, Swindon and Wiltshire to use linked data from your GP record and providers of health and care to understand population health more effectively. The programme only uses pseudonymised data -where information that identifies you has been removed and replaced with a unique identifier (pseudonym). This will only ever be reidentified if we think that you may benefit from a particular health intervention, in which case only the relevant staff within your practice will be able to see your personal information in order to offer you this service.

To carry out this programme, your pseudonymised data will be passed to the South Central and West (SCW) Commissioning Support Unit, who are part of NHS England, who will link this to other local and national data sources. These linked datasets will be securely shared with our external partner Optum and your Clinical Commissioning Group to carry out any further analysis needed to support improvements to the local populations health and to target health and social care resources effectively.

Only a small number of staff based within these organisations will be able to access this data and as this will be pseudonymised, in accordance with the ICO Anonymisation

Code of Practice, no one will be able to identify you within these organisations. As your GP practice, only we will be able to re-identify you from the unique identifier to offer you services.

You have a choice about whether you want your confidential patient information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt out your confidential patient information will still be used to support your individual care

The Aim of Population Health Management

Population Health Management (or PHM for short) is aimed at improving the health of an entire population. It is being implemented across the NHS and this Practice is taking part in a programme extending across Bath, Northeast Somerset, Swindon and Wiltshire.

PHM is about improving the physical and mental health outcomes and wellbeing of people and making sure that access to services is fair, timely and equal. It helps to reduce the occurrence of ill-health and looks at all the wider factors that affect health and care.

The PHM approach requires health care organisations to work together with communities and partner agencies, for example, GP practices, community service providers, hospitals and other health and social care providers.

These organisations will share and combine information with each other in order to get a view of health and services for the population in a particular area. This information sharing is subject to robust security arrangements.

How will my Personal Data be used?

The information will include personal data about your health care. This information will be combined and anything that can identify you (like your name or NHS Number) will be removed and replaced with a unique code. This process is called Pseudonymisation.

This means that the people working with the data will only see the code and cannot see which patient the information relates to.

If the data shows that an unidentified individual might benefit from some additional care or support, we will receive a notification and will use the code to identify you and offer you relevant services.

Examples of how the information could be used for a number of healthcare related activities include;

- improving the quality and standards of care provided
- research into the development of new treatments
- preventing illness and diseases
- monitoring safety
- planning services

Who will my Personal Data be shared with?

We and other care providers will send the information they hold on their systems to the NHS South, Central and West (SCW) Commissioning Support Unit. SCW are part of NHS England. More information can be found here <https://www.scwcsu.nhs.uk>

SCW will link all the information together. We and other care providers will then review this information and make decisions about the whole population or particular patients that might need additional support.

SCW work in partnership with a company called Optum to help them with this work.

Both SCW and Optum are legally obliged to protect your information and maintain confidentiality in the same way that we are. More information about Optum can be found here www.optum.co.uk.

Is using my Personal Data in this way lawful?

Health and Social Care Providers are permitted by data protection law to use personal information where it is 'necessary for medical purposes'⁹. This includes caring for you directly as well as management of health services more generally.

Some of the work that happens at a national level with your personal information is enabled by other legislation. Sharing and using your information in this way helps to provide better health and care for you, your family and future generations. Confidential patient information about your health and care is **only used** like this where allowed by law and, in the majority of cases, anonymised data is used so that you cannot be identified.

You have a number of rights relating to how your personal information is used. See our main privacy policy for more information

<https://www.moredonmedicalcentre.nhs.uk/surgery-information/patient-information/data-protection-privacy-and-confidentiality>.

I have previously submitted a Type One opt-out, will my Personal Data be included in the Population Health Management programme?

No, If you have already submitted a Type One opt-out your personal data will not be included in the PHM programme.

Can I object to my Personal Data being used as part of the Population Health Management Programme?

You have a right to object to your personal information being used in this way. If you do choose to 'opt out' please contact us in the first instance and ask for a Type one opt-out. If you are happy for your personal information to be used as part of this programme, then you do not need to do anything further. Although you do have the right to change your mind at any time and object to the use of your data, once the data has been extracted for PHM and given a unique identifier, we will not be able to remove it from the information to be reviewed.

What will happen to my Personal Data when the Population Health Management programme is finished?

Once the PHM programme has completed all personal information processed by SCW as part of PHM and all personal data processed by Optum will be securely destroyed.

This will not affect any personal information held by us or other health or social care providers.

Who can I contact if I have more questions about Population Health Management?

If you have any questions or concerns about PHM and the use of your pseudonymised personal data, please contact us via gwh.info.gov@nhs.net.

If you still have concerns, you can also contact the Information Commissioner's Office directly at the following link <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>.