

Fair Processing Notice (Privacy Notice)

Your Personal Information – what you need to know

Fair processing notice for NHS Coastal West Sussex Clinical Commissioning Group

1 The Causeway, Goring-by-Sea, Worthing, West Sussex BN12 6BT

Phone: 01903 708400 email: contactus.coastal@nhs.net

What we do

NHS Coastal West Sussex CCG is the local NHS organisation that brings together local GPs and experienced health professionals to take on planning, buying and monitoring responsibilities (also known as commissioning) for local health services. The CCG is responsible for planning, buying and monitoring:

- the care and treatment you may need in hospital and community health services, including district nurses, physiotherapy and other therapies
- the medicines you may be prescribed
- mental health services
- and support and services for people living with learning disabilities.

We also have a role which includes managing patient feedback, including complaints, from our patients about services offered. This helps us to understand what is working well and what is causing problems for our patients.

[Further information about our work](#) is available online.

Using your information

We need to use information about you to enable us to commission services effectively, efficiently and safely.

Our CCG holds some information about you and this document outlines how that information is used, who we may share that information with and why, how we keep it secure (confidential) and what your rights are in relation to this.

What kind of information do we use?

As a Commissioner we do not routinely hold or have access to your medical records. However, we may need to hold some personal information about you, for example:

- Your name, address, your date of birth, your NHS number and contact details
- Details of your GP, what treatment you have received and where you received it
- Details of concerns or complaints you have raised about your health care provision and we need to investigate
- If you ask us for our help or involvement with your healthcare, or where we are required to fund specific specialised treatment for a particular condition that is not already covered in our contracts with organisations that provide NHS care
- If you ask us to keep you regularly informed and up-to-date about the work of the CCG, or if you are actively involved in our engagement and consultation activities or service user/Patient Participation Groups

Our records may include relevant information that you have told us, or information provided on your behalf by relatives or those who care for you and know you well, or from health professionals and other staff directly involved in your care and treatment. Our records may be held on paper or electronically in a computer system.

We use the following types of information/data:

- Personal – this is information containing details that identify individuals. The following are data items that are considered identifiable: name, address, NHS Number, full postcode, date of birth.
- Special Categories – personal data revealing: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, sex life or sexual orientation, and health, biometric or genetic data
- Confidential Information - this term describes information or data about identified or identifiable individuals, which should be kept private or secret and includes deceased as well as living people. 'Confidential' includes both information 'given in confidence' and 'that which is owed a duty of confidence'.
- Pseudonymised - this is data that has undergone a technical process that replaces your identifiable information such as NHS number, postcode, date of birth with a unique identifier, which obscures the 'real world' identity of the individual patient to those working with the data. When data has been pseudonymised it still retains a level of detail in the replaced data that should allow tracking back of the data to its original state.
- Anonymised – this is data in a form that does not identify individuals and where identification through its combination with other data is not likely to take place.
- Aggregated – this is statistical data about several individuals that has been combined to show general trends or values without identifying individuals within the data.

What do we use your Personal Confidential Data for?

The CCG is required by law to perform certain services that involve the processing of personal data. The areas where we regularly use personal data include:

- responding to your queries, compliments or concerns

- assessment and evaluation of safeguarding concerns
- assessments for continuing healthcare and appeals
- where there is a provision permitting the use of personal data under specific conditions, for example to:
 - o understand the local population needs and plan for future requirements, which is known as “Risk Stratification for commissioning”
 - o ensure that the CCG is billed accurately for the treatment of its patients, which is known as “invoice validation”

Personal data may also be used in the following cases:

- where necessary for your direct healthcare needs
- we need to respond to patients, carers or Member of Parliament communications
- you have freely given your informed agreement (consent) for us to use your data for a specific purpose
- there is an overriding public interest in using the data e.g. in order to safeguard an individual, or to prevent a serious crime
- there is a legal requirement that will allow us to use or provide data (e.g. a formal court order).

What do we use non-identifiable data for?

We use pseudonymised, anonymised and aggregated data to plan health care services. Specifically we use it to:

- check the quality and efficiency of the health services we commission
- prepare performance reports on the services we commission
- work out what illnesses people may have in the future, so we can plan and prioritise services and ensure these meet the needs of patients in the future
- review the care being provided to make sure it is of the highest standard

Do we share your information with other organisations?

We commission a number of organisations (both within and outside of the NHS) to provide healthcare services to you such as Western Sussex Hospitals NHS Trust and East Sussex Hospital NHS Trust. We may also share anonymised statistical information with them for the purpose of improving local services, research, audit and public health; for example understanding how health conditions spread across our local area compared against other areas. . We do not share information outside of the European Economic Area (EEA).

If you are receiving services from the NHS, we share information that does not identify you (anonymised) with other NHS and social care partner agencies for the purpose of improving local services, research, audit and public health.

We would not share information that identifies you unless we have a fair and lawful basis such as:

- You have given us permission;
- We need to act to protect children and vulnerable adults;
- When a formal court order has been served upon us;
- When we are lawfully required to report certain information to the appropriate authorities e.g. to prevent fraud or a serious crime;
- Emergency Planning reasons such as for protecting the health and safety of others;
- When permission is given by the Secretary of State or the Health Research Authority on the advice of the Confidentiality Advisory Group to process confidential information without the explicit consent of individuals

The law provides some NHS bodies, particularly NHS Digital, (formally the Health and Social Care Information Centre) ways of collecting and using patient data that cannot identify a person to help Commissioners to design and procure the combination of services that best suit the population they serve.

How we process information within the CCG

Data may be anonymised and linked with other data so that it can be used to improve health care and development and monitor NHS performance. Where data is used for these statistical purposes, stringent measures are taken to ensure individual patients cannot be identified.

When analysing current health services and proposals for developing future services it is sometimes necessary to link separate individual datasets to be able to produce a comprehensive evaluation. This may involve linking primary care data from your Doctor (GP) with other data such as hospital inpatient stays, outpatient appointments and A&E attendances; this type of data is called secondary uses service (SUS) data.

In some cases there may also be a need to link local datasets which could include a range of other hospital based services such as radiology, physiotherapy, audiology etc., as well as mental health and community-based clinics and services such as district nursing, podiatry etc. When carrying out this analysis, the linkage of these datasets is always done using a unique identifier (pseudonymised) that does not reveal a person's identity as the CCG does not have any access to identifiable data for these purposes.

We also contract with other organisations to process data on our behalf. These organisations are known as Data Processors and we ensure they are legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed.

A full list of details including the legal basis, any Data Processor involvement and the purposes for processing information can be found in Appendix A.

What safeguards are in place to ensure data that identifies you is secure?

We only use information that may identify you in accordance with Data Protection Legislation. The Data Protection Legislation requires us to process personal data only if there is a legitimate basis for doing so and that any processing must be fair and lawful.

Within the health sector, we also have to follow the common law duty of confidence, which means that where identifiable information about you has been given in confidence, it should be treated as confidential and only shared for the purpose of providing direct healthcare.

Everyone working for the NHS has a legal duty to keep information about you confidential. The NHS Care Record Guarantee and NHS Constitution provide a commitment that all NHS organisations and those providing care on behalf of the NHS will use records about you in ways that respect your rights and promote your health and wellbeing.

The [NHS Digital Code of Practice on Confidential Information](#) applies to all of our staff, and they are required to protect your information, inform you of how your information will be used, and allow you to decide if and how your information can be shared. All CCG staff are expected to make sure information is kept confidential and receive annual training on how to do this. This is monitored by the CCG and can be enforced through disciplinary procedures.

We also ensure the information we hold is kept in secure locations, restrict access to information to authorised personnel only, protect personal and confidential information held on equipment such as laptops with encryption (which masks data so that unauthorised users cannot see or make sense of it).

We ensure external data processors that support us are legally and contractually bound to operate and prove security arrangements are in place where data that could or does identify a person are processed.

The CCG has a senior member of staff responsible for protecting the confidentiality of patient information. This person is called the Caldicott Guardian. The contact details of our Caldicott Guardian are as follows:

Tej Bansil, Caldicott Guardian tej.bansil@nhs.net

They are supported by another senior member of staff who is responsible for information risk and information security, this person is called the Senior Information Risk Owner (SIRO). The contact details of our SIRO are as follows:

Dominic Wright – Managing Director dominicwright@nhs.net

The above two roles are also supported by our Data Protection Officer who assists the CCG to monitor internal compliance, inform and advise on our data protection obligations, provide advice regarding Data Protection Impact Assessments (DPIAs) and act as a contact point for data subjects and the supervisory authority.

Our Data Protection Officer is:

Umar Sabat, umar.sabat@ig-health.co.uk

How long do we hold information for?

All records held by the CCG will be kept for the duration specified by national guidance from NHS Digital, <http://systems.digital.nhs.uk/infogov/iga/rmcop16718.pdf>. Once information that we hold has been identified for destruction it will be disposed of in the most appropriate way for the type of information it is. Personal confidential and commercially sensitive information will be disposed of by approved and secure confidential waste procedures. We keep a record of retention schedules within our information asset registers, in line with the Records Management Code of Practice for Health and Social Care 2016.

Your right to opt out of data sharing and processing

The NHS Constitution states ‘You have a right to request that your personal confidential information is not used beyond your own care and treatment and to have your objections considered’. For further information please visit: <https://www.gov.uk/government/publications/the-nhs-constitution-for-england>

There are several forms of opt- outs available at different levels:

Type 1 opt-out. If you do not want personal confidential information that identifies you to be shared outside your GP practice you can register a ‘Type 1 opt-out’ with your GP practice. This prevents your personal confidential information from being used except for your direct health care needs and in particular circumstances required by law, such as a public health emergency like an outbreak of a pandemic disease. Patients are only able to register the opt-out at their GP practice and your records will be identified using a particular code that will stop your records from being shared outside of your GP Practice.

National data opt-out

The national data opt-out was introduced on 25 May 2018 and replaces the previous ‘type 2’ opt-out. NHS Digital collects information from a range of places where people receive care, such as hospitals and community services. The new programme provides a facility for individuals to opt-out from the use of their data for research or planning purposes. For anyone who had an existing type 2 opt-out, it will have been automatically converted to a national data opt-out from 25 May 2018 and will receive a letter giving them more information and a leaflet explaining the new national data opt-out. The national data opt-out choice can be viewed or changed at any time by using the online service at www.nhs.uk/your-nhs-data-matters “

NHS Digital takes the responsibility for looking after care information very seriously. Please follow the NHS Digital links on [how we look after information](#) for more detailed documentation.

NHS England recognises the importance of protecting personal and confidential information in all that we do, all we direct or commission, and takes care to meet its legal duties. Follow the links on the [How we use your information](#) page for more details.

Gaining access to the data we hold about you

The CCG holds limited records containing personal information, for example continuing healthcare applications; it does not hold personal healthcare records. If you wish to have sight of, or obtain

copies of your own personal health care records you will need to apply to your GP practice, the hospital or NHS organisation which provided your health care.

Where information from which you can be identified is held by the CCG, you have the right to ask to:

- View this or request copies of the records by making a Right of Access request under the General Data Protection Regulation
- request information is corrected/rectified
- have the information updated where it is no longer accurate
- where applicable, request information is erased
- where applicable, request for your data to be made portable
- where applicable, ask us to stop processing information about you where we are not required to do so by law
- request whether any decisions have been made about you by an automated decision

Everybody has the right to see, or have a copy, of data we hold that can identify you, with some exceptions. You do not need to give a reason to see your data. If you would like to access your data you must make the request in writing. Under special circumstances, some information may be withheld.

You can do this by writing to us or email us at:

- Post: NHS Coastal West Sussex CCG, 1 The Causeway, Goring-by-Sea, West Sussex, BN12 6BT
- Email: contactus.coastal@nhs.net

What is the right to know?

The Freedom of Information Act 2000 (FOIA) gives people a general right of access to information held by or on behalf of public authorities, promoting a culture of openness and accountability across the public sector. You can request any information that the CCG holds, that does not fall under an exemption. You may not ask for information that is covered by the Data Protection Legislation under FOIA. However you can request this under a Right of Access Request – see section above ‘Gaining access to the data we hold about you’.

Your request must be in writing and can be either posted or emailed to us at:

Post to:

The FOI Co-ordinator, Coastal West Sussex Clinical Commissioning Group
1 The Causeway, Goring-by-Sea West Sussex, BN12 6BT

Or email to: cwscg.cws-foi@nhs.net

Freedom of Information Requests are managed by a team at South Central and West Commissioning Support Unit).

Information Commissioners Office

The CCG is registered with the Information Commissioner's Office (ICO) as a data controller and collects data for a variety of purposes. For independent advice about data protection, privacy, data sharing issues and your rights you can contact:

Information Commissioner's Office
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

Telephone: 0303 123 1113 (local rate) or 01625 545 745

Email: casework@ico.org.uk or [Visit the ICO website.](#)

Complaints or questions

We try to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring concerns to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. Please contact:

- Telephone: 01903 708400
- Email: cwscg.complaints@nhs.net
- Write: Comments and Complaints Team, NHS Coastal West Sussex CCG, 1 The Causeway, Goring-by-Sea, West Sussex, BN12 6BT

Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

Changes to this privacy notice

We keep our privacy notice under regular review. This Fair Processing notice was last updated in May 2018.

Appendix A

Activity	Rationale
Complaints, Concerns and Enquiries	<p>Type of Data – Identifiable (Personal Confidential Information)</p> <p>Purpose – When we receive a complaint from a person we hold information about the complaint in our electronic files. This normally includes the identity of the complainant and any other individuals involved in the complaint. It may include sensitive personal data about individuals’ health care.</p> <p>We will only use the personal information we collect to process the complaint and to check on the level of service we provide.</p> <p>We usually have to disclose the complainant’s identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person’s record is in dispute. If a complainant doesn’t want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.</p> <p>Legal Basis - Before we proceed with handling a complaint we will obtain the explicit, written consent of the patient involved. We ensure they are aware of how and with whom their data may be shared by us, including if they have a representative they wish us to deal with on their behalf. You have the right to withdraw your consent at any time.</p> <p>Data Processor – We process this information ourselves</p>
Individual Funding Requests	<p>Type of Data – Identifiable (Personal Confidential Information)</p> <p>Purpose – If you (or your doctor on your behalf) make an Individual Funding Request (IFR) for a treatment not routinely commissioned, the CCG will use the information you provide and where needed request further information from care providers to identify eligibility for funding. If agreed, arrangements will be put in place to provide and pay for the agreed funding packages with appointed care providers.</p> <p>Legal Basis - The clinical professional who first identifies that you may need the treatment will explain to you the information that is needed to be collected and processed in order to assess your needs and commission your care; they will gain your consent to share this. Other legal basis is defined under the Direct Care Provision * (GDPR Art. 9(2)(h)) you have the right to withdraw your consent at any time.</p> <p>Data processor – We process this information ourselves</p>
Continuing Healthcare (CHC)	<p>Type of Data – Identifiable (Personal Confidential Information)</p> <p>Purpose – If you make an application for NHS Continuing Healthcare (CHC) funding, Coastal West Sussex CCG will use the information you provide and where needed request further information from care providers to identify eligibility for funding. If agreed, arrangements will</p>

	<p>be put in place to provide and pay for the agreed funding packages with appointed care providers.</p> <p>This process is nationally defined; we follow a standard process and use standard information collection tools when assessing eligibility for CHC applications.</p> <p>Legal Basis - The clinical professional who first sees you to discuss your needs will explain to you the information that they need to collect and process in order for your needs to be assessed and commission your care; they will gain your explicit consent to share this. Other legal basis is defined under the Direct Care Provision * (GDPR Art. 9(2)(h)) You have the right to withdraw your consent at any time.</p> <p>This includes care under the Mental Health Act 2005 which may be processed with a best interest decision.</p> <p>Data Processor – we process this information ourselves.</p>
Safeguarding Children and Adults	<p>Type of Data – Identifiable (Personal Confidential Information)</p> <p>Purpose – Advice and guidance is provided to care providers to ensure that adult and children's safeguarding matters are managed appropriately. Access to identifiable information will be shared in some limited circumstances where it's legally required for the safety of the individuals concerned. We will collect and process identifiable information where we need to assess and evaluate any safeguarding concerns.</p> <p>Legal Basis - Because of public Interest issues, e.g. to protect the safety and welfare of vulnerable children and/ or adults, we will rely on a statutory basis, defined under the Care Act 2012 rather than consent to process information for this use.</p> <p>Data Processor – we process this information ourselves</p>
Risk Stratification	<p>Type of Data – Pseudonymised/ Anonymised / Aggregate Data</p> <p>Purpose - Risk stratification is a process that uses de-identified personal data from health care services to determine which people are at risk of experiencing certain outcomes, such as unplanned hospital admissions.</p> <p>Data Processing activities for Risk Stratification Risk stratification tools are used by CCGs to analyse the overall health of a population using data which is anonymised in line with the Information Commissioner's Office (ICO) Anonymisation Code of Practice. The combined CCGs Secondary Use Service (SUS) data and GP data which contains an identifier (usually NHS number) is made available to clinicians with a legitimate relationship with their patients to enable them to identify which patients should be offered targeted preventative support to reduce those risks.</p>

	<p>The CCG has commissioned NHS South, Central and West Commissioning Support Unit (SCWCSU) to provide the risk stratification software solution on behalf of itself and its GP practices.</p> <p>This processing takes place under contract following the below steps:</p> <ul style="list-style-type: none">• NHS Digital has a legal obligation to obtain data from providers of NHS care such as the local hospital or community hospital. This data is then sent to the SCWCSU DSCRO and amended so that only your NHS number could identify you. The data is then provided to SCWCSU for processing in the risk stratification software. The CCG has signed a Data Sharing Contract with NHS Digital for the use of this data, called Secondary Use Services (SUS) data.• Your GP practice enables an organisation called Graphnet Healthcare, to extract data from your records which again, is only identifiable by your NHS Number. This data will only be extracted and provided to SCWCSU for those patients that have not objected to Risk Stratification or where no other type of objection to information sharing has been recorded on your record. The data, containing the same verified NHS numbers, are sent via secure transfer, directly to SCWCSU by Graphnet.• SCWCSU then link both sets of data using their risk stratification software. An algorithm is run on the data to generate a risk score for each Patient. The CCG is able to see data only after your NHS number has been removed and replaced by a pseudonymised reference. Your GP will be able to see the data with your NHS number in it so that it can identify if you require further support from them to manage your healthcare needs. <p>The risk scores are <i>only</i> made available to authorized users within the GP Practice where you are registered via a secure portal managed by SCWCSU.</p> <p>If you do not wish information about you to be included in the risk stratification programme please contact your GP Practice. They can add a code to your records that will stop your information from being used for this purpose.</p> <p>Further information about risk stratification is available from: https://www.england.nhs.uk/ourwork/tsd/ig/risk-stratification/</p> <p>Legal Basis</p>
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	<p>The use of identifiable data by CCGs and GPs for risk stratification has been approved by the Secretary of State, through the Confidentiality Advisory Group of the Health Research Authority and this approval has been extended to October 2018 which gives us a statutory legal basis under Section 251 of the NHS Act 2006 to process data for risk stratification purposes which sets aside the duty of confidentiality. We are committed to conducting risk stratification effectively, in ways that are consistent with the laws that protect your confidentiality. (GDPR Art. 6(1)(e) and 9(2)(h))</p> <p>Benefits</p> <p>CCGs and GPs use risk stratification tools as part of their local strategies for supporting patients with long-term conditions and to help and prevent avoidable admissions. Typically this is because patients have a long term condition such as Chronic Obstructive Pulmonary Disease. NHS England encourages CCGs and GPs to use risk stratification tools as part of their local strategies for supporting patients with long-term conditions and to help and prevent avoidable admissions.</p> <p>Knowledge of the risk profile of our population will help the CCG to commission appropriate preventative services and to promote quality improvement in collaboration with our GP practices.</p>
Invoice Processing	<p>Type of Data – Personal Confidential Information/ Pseudonymised/ Anonymised</p> <p>Purpose – This process ensures that those who provide you with care and treatment can be paid.</p> <p>There may be times where one healthcare organisation will need to invoice another for treatment given to a patient. This can occur, for example, when you need hospital treatment while away from home on holiday. The hospital at which you were seen may need to invoice us for the treatment you received.</p> <p>Before paying the invoice, we will need to be sure that we, and not another CCG, are responsible for your treatment costs as well as checking to ensure that the amount you are being billed for is correct. This process is known as invoice validation. For invoice validation to occur, a limited amount of information about you needs to be processed.</p> <p>As we complete continuing healthcare assessments; relevant members of the finance team may need to see some personal confidential data (such as a name and placement/provider) in order to process and validate invoices for funded healthcare. This is covered by consent.</p> <p>Once the invoice has been paid, the limited information held about you for this purpose is deleted, as it is no longer required. If the</p>

	<p>information is needed again, to respond to a question, it will be requested from the healthcare provider, the question answered and the information deleted again.</p> <p>Legal Basis - Section 251 NHS Act 2006, NHS Constitution (Health and Social Care Act 2012) (GDPR Art. 6(1)(e) and 9(2)(h))</p> <p>Data Processors - We process the majority of invoices ourselves. However NHS Shared Business Services (SBS) process all invoices on behalf of the CCG and should not receive any personal confidential data. NHS South, Central and West Commissioning Support Unit (CSU) validate personal confidential data (as detailed above) on behalf of the CCG. Coastal West Sussex CCG will validate and process data and invoices in relation to specialist placements.</p> <p>NHS England has published guidance on how invoices must be processed. For more information see: https://www.england.nhs.uk/ourwork/tsd/ig/in-val/invoice-validation-fags/</p>
Supporting medicines management and optimisation	<p>Type of Information – Identifiable (Personal Confidential Information)</p> <p>Purpose - CCG pharmacists work with GP practices to provide advice on medicines and prescribing queries, process repeat prescription requests and review prescribing of medicines to ensure that it is safe and cost-effective. This may require the use of identifiable information.</p> <p>In cases where identifiable data is required, this is done with practice agreement and in the case of repeat prescription processing with patient consent. No data is removed from the practice’s clinical system and no changes are made to patient's records without permission from the GP. Patient records may be viewed remotely via secure laptops from the CCG's premises and in care homes or patient homes.</p> <p>Where specialist support is required (e.g. to order a drug that comes in solid form in gas or liquid form) the CCG's medicines optimization pharmacists will order this on behalf of a GP to support your care. Identifiable data is used for this purpose.</p> <p>Identifiable data is also used by our pharmacists in order to review and authorise (if appropriate) requests for high cost drugs which are not routinely funded. In cases where identifiable data is required, this is done with the consent of the patients via the electronic high cost drug authorisation form.</p> <p>Legal Basis - Direct Care Provision (GDPR Art. 9(2)(h))* and/or explicit consent</p>
Patient and Public Involvement	<p>Type of Information – Identifiable (Unlikely to be Personal Confidential Information)</p> <p>Purpose – If you have asked us to keep you regularly informed and up</p>

	<p>to date about the work of the CCG or if you are actively involved in our engagement and consultation activities or patient participation groups (such as the CWS CCG ePanel), we will collect and process data which you have agreed to share with us.</p> <p>Legal Basis - We will rely on your explicit consent for this purpose.</p> <p>Data Processor – We process this information ourselves.</p> <p>Opting Out - You have the right to withdraw your consent at any time by contacting us, using our contact details on our website</p>
<p>Quality monitoring, concerns and serious incidents</p>	<p>Type of Information – Identifiable/ Personal Confidential Information/ Pseudonymised/ Anonymised</p> <p>Purpose – We need to ensure that the health services you receive are safe, effective and of excellent quality. Sometimes concerns are raised about the care provided or an incident has happened that we need to investigate. You may not have made a complaint to us directly but the health care professional looking after you may decide that we need to know in order to help make improvements.</p> <p>Legal Basis – The health care professional raising the concern or reporting the incident should make every attempt to talk to you about this and gain your consent to share information about you with us. Sometimes they can do this without telling us who you are. We have a statutory duty under the Health and Social Care Act 2012, Part 1, Section 26, in securing continuous improvement in the quality of services provided.</p> <p>Data processor – We process data given to us by GP’s and other health care professionals that may include details of the care you have received and any concerns about that care. In order to look into these concerns we may need to talk to other organisations such as NHS Improvement, the Care Quality Commission, NHS England as well as the Providers of your care.</p>
<p>Commissioning, planning and contract monitoring</p>	<p>Type of Information – Pseudonymised/ Anonymised</p> <p>Purpose – To collect NHS data about services we have commissioned to provide services to you. We also work with other local CCGs and often hold joint contracts and commission joint services to make best use of the money available to us.</p> <p>Legal Basis - GDPR Art. 6(1) (e) and Art.9 (2) (h). Our legal basis for collecting and processing information for this purpose is statutory. We set our reporting requirements as part of our contracts with NHS service providers and do not ask them to give us identifiable data about you.</p> <p>Data Processor – NHS Digital collect various data sets from NHS service providers that have been agreed locally. All identifying information about you is removed by NHS Digital before the information is made</p>

	<p>available for the CCG to monitor and manage its contracts. We also have signed a Data Sharing contract with NHS Digital and have been given approval to use a wide range of data to help us commission care services. This agreement makes sure that we only process data that does not identify you, that we keep the information secure and we do not share it without the agreement of NHS Digital. For more information about the types of data that NHS Digital collect please use this link http://digital.nhs.uk/datasets.</p>
Commissioning Support	<p>There are some activities that we ask the NHS South, Central and West Commissioning Support Unit (CSU) to undertake on our behalf. These include contracting, data analysis and information governance support, Human Resources. Some of the CCGs' information will be shared with the CSU in order for them to do this.</p>
National Registries	<p>National Registries (such as the Learning Disabilities Register) have statutory permission under Section 251 of the NHS Act 2006, to collect and hold service user identifiable information without the need to seek informed consent from each individual service user.</p>
Surveys and asking for your feedback	<p>Type of Information - Identifiable (Unlikely to be Personal Confidential Information)</p> <p>Purpose - Sometimes we may offer you the opportunity to take part in a survey that the CCG is running to ask specific questions about a service, a proposal or other aspect of the work of the CCG or the wider health service. We will not generally ask you to give us any personal confidential information as part of any survey.</p> <p>Legal Basis – you are under no obligation to take part and where you do, we consider your participation as explicit consent to hold and use the responses you give us.</p> <p>Data Processor - We use a company called SurveyMonkey to administer our surveys for us. We have entered into a formal Data Processing Agreement with them. Details of SurveyMonkey can be found here https://www.surveymonkey.co.uk/</p>
Research	<p>Type of Information - Identifiable (Unlikely to be Personal Confidential Information) / Anonymised</p> <p>Purpose - To support research oriented proposals and activities in our commissioning system</p> <p>Legal Basis - Your consent will be obtained by the organisation holding your records before identifiable information about you is disclosed for any research. If this is not possible then the organisation wishing to use your information will need to seek formal approval from the Data Access Advisory Group. This link will give you further details on this process http://content.digital.nhs.uk/IGARD</p>
Other organisations who provide support services for us	<p>Type of Information - Pseudonymised/ Anonymised</p> <p>Purpose - The CCG will use the services of additional organisations (other than those previously listed above), who will provide additional expertise to support the work of the CCG.</p>

	<p>Legal Basis - We have entered into contracts with other organisations to provide some services for us or on our behalf. These organisations may process or be in the vicinity of CCG data and could be identified as 'data processors'. Information that we may hold about you will not be shared or made available to any of these organisations. Below are their details and a brief description of the functions they carry out on our behalf:</p> <p>NHS South Central and West Commissioning Support Unit – risk stratification, commissioning intelligence analysis, finance, health & safety, human resources, contacting support, information governance support</p> <p>North East London Commissioning Support Unit - NHS Information Communication Technology Supplier</p> <p>TIAA – Provide internal audit services for the CCG</p> <p>Joint Commissioning Unit (with West Sussex County Council and Horsham and Mid-Sussex CCG) - children and families, and mental health commissioning</p> <p>East Sussex Hospitals NHS Trust - Provide staff payroll services</p> <p>PHS Limited and NHS Property Services - Archiving of CCG Records (archived by function/type – individuals not identified)</p> <p>NHS Property Services (subcontracted to SITA) - to securely dispose of confidential waste in a secure environment</p> <p>NHS Litigation Authority – Claims Management (we rely on your consent)</p> <p>Blueteq Limited – To help manage medicines</p> <p>CHS Healthcare Limited – Assessment of retrospective continuing healthcare claims, provision of Caretrack electronic system to record continuing healthcare applications and actions</p> <p>West Sussex County Council – management of safeguarding enquiries and as part of statutory local safeguarding children's and adult's boards</p> <p>Surface Impression – Provide the content management system of the internal website (will soon be moving to Wordpress as below).</p> <p>Wordpress – Provide the content Management system of the public website</p>
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