**Population Health Management Purposes**

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| **Purpose** | Only around 20% of good health is about access to health care. The remaining 80% is about the wider determinants such as social, economic and environmental factors that can have an impact on people’s health.  By identifying the wider determinants, we can support our local populations health and care needs and support commissioning activity, design services that are tailored around our population and provide evidence-based interventions that give the best possible outcomes for our local citizens.  [Population Health Management](https://notts.icb.nhs.uk/patient-records/) uses data, both healthcare data from clinical systems and non-healthcare data from sources including local authority and social services. The data from the non-healthcare providers can include information such as lifestyle, housing, and deprivation data. |
| **Type of Information** | Only de-identified information (NHS number removed) is accessible to the ICB. This privacy notice covers how the ICB uses the de-identified information.  Only GP Practices and clinicians within the ICB area have access to identifiable information (NHS Number) of their own patients in order to see who may benefit from additional help. For more information on how individual practices use identifiable data for this purpose, please refer to individual practice privacy notices, these are not managed by the ICB. |
| **How we will collect and use the Information** | PHM tools use a mix of historic information about patients such as age, gender, diagnoses and patterns of hospital attendance and admission as well as data collected in GP practices.  NHS Digital provides information, identifiable by your NHS Number only, about hospital attendances.  GP Practices provide information from GP records also identifiable by your NHS Number only along with Social and Community Services. All information is sent via secure transfer to the Population Health Management system where they are immediately pseudonymised and linked to each other.  Only de-identified information is made available to the ICB for the purposes of providing evidence-based care interventions. |
| **Who we will share the information with** | Only pseudonymised and aggregated information is shared outside of the ICB |
| **Legal Basis for Processing Personal Data** | 6(1)(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.  **Processing of Special Categories of Data**  9(2)(h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in [paragraph 3](https://gdpr-info.eu/art-9-gdpr/)  Schedule 1 part 1 (2) of DPA 2018 for ‘Health or Social Care Purposes’ |
| **Common Law Duty of Confidentiality** | A section 251 approval [(Reference Number:22/CAG/0101)](https://www.hra.nhs.uk/planning-and-improving-research/application-summaries/confidentiality-advisory-group-registers/) from the Secretary of State, through the Confidentiality Advisory Group 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. |
| **Data Processors** | * NHIS * Data Management Team (SAIU)   As data processors on behalf of provider organisations. |
| **Your Rights** | * To be informed about the processing of your information (this notice)   • Of access to information held about you  • Have the information corrected, in the event that it is inaccurate  • To restrict or stop processing  • Object to your information being processed or used  • Not to be subject to automated decision-making or profiling |
| **How long we will keep the information** | Your personal data will be deleted from our systems and files in line with the Records Management Code of Practice 2021.[Records Management Code of Practice - NHS Transformation Directorate (nhsx.nhs.uk)](https://www.nhsx.nhs.uk/information-governance/guidance/records-management-code/) |
| **Opt-Out** | You have the right to opt-out of your identifiable information being used for Population Health Management purposes. For information on how to opt-out, please visit our web-page titled [‘**Patient Records: how Nottingham and Nottinghamshire NHS use your personal information’**](https://notts.icb.nhs.uk/patient-records/) |