

## Trafford CCG Fair Processing Notice for patients registered with the Trafford Co-ordination Centre

This notice is to inform you how the Trafford Clinical Commissioning Group, as Data Controller<sup>1</sup>, processes and shares information about you as a patient in Trafford.

### The Trafford Co-ordination Centre

The Trafford Co-ordination Centre is managed and delivered by DXC Technology on behalf of Trafford CCG. DXC act as a data processor<sup>2</sup> for your personal information for the purpose of providing this service.

The TCC employs nurses (from Mastercall) and health care administrators who will perform duties such as managing your referrals from your GP and/or co-ordinating your care if you have been enrolled into the Care Co-ordination service.

The TCC creates a single medical record using information from their partners involved in your direct care.

The TCC partners are made up of the following Health and Social Care organisations for Trafford patients:

- Pennine Care NHS Foundation Trust
- Your Trafford GP Practice.
- Salford Royal NHS Foundation Trust
- Greater Manchester Mental Health NHS Foundation Trust
- Manchester University Hospitals NHS Foundation Trust
- The Christie NHS Foundation Trust.
- Trafford Council
- DXC Technology – NHS Business Partner/processor for the TCC
- Mastercall – Out of Hours Service

The above organisations have signed an Information Sharing Protocol which is an agreement that protects the way your data is used. Personal confidential information will be stored but only accessed by the TCC

---

<sup>1</sup> “**data controller**” means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be processed

<sup>2</sup> “**data processor**”, in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.



and/or Trafford partners under the following conditions:

- for your own care and welfare
- with explicit consent for other purposes
- to benefit a patient who lacks capacity to consent
- if required by law
- if in the public interest.

### **Other Agencies**

Everyone working for the NHS has a legal duty to keep information about you confidential.

You may be receiving care from other organisations as well as the NHS (such as Social Services). We may need to share some information about you so we can all work together on your behalf.

We will only ever use or pass on information about you if others involved in your care have a genuine need for it. We will not disclose your information to third parties without your knowledge or permission unless there are exceptional circumstances, such as when the health and safety of others is at risk or where the law requires information to be passed on.

Examples of 3<sup>rd</sup> party partner organisations are:

- housing departments
- education services
- voluntary community and social enterprise sector
- the police
- GM Fire and Rescue Service
- government departments
- care homes
- Ambulance and Transport Services.

### **What we use your information for**

We use your information to effectively deliver the TCC service and for purposes as listed below:

- to provide you with care/treatment and care plans, both now and in the future, ensuring that appropriate information is available to all those who treat you medically and care for you professionally
- to ensure your care is safe and effective (i.e. clinical audit)
- to support you in managing your own care and work with health and social care professionals
- to manage and plan the NHS and Council Services and highlight any gaps in service provision
- to allow us to improve patient access and experience
- investigate any complaints or legal claims.



Trafford CCG only uses **non-identifiable**<sup>3</sup> patient data for NHS business analysis, invoice validation and/or commissioning purposes.

### Details we process

The TCC health care professionals caring for you keep electronic records about your healthcare and services provided to you. These details are:

- personal details such as name, address, date of birth, equality and diversity information, NHS number and next of kin
- contacts and episodes of care e.g. hospital admissions, outpatient clinic appointments and home visits
- notes and reports by health and social care professionals about your health and welfare
- details and records about your treatment and care
- results of x-rays, laboratory tests, and any other tests
- housing information/care homes
- relevant information about people that care for you and know you well
- basic details about associated people e.g. children, partners, carers, relatives, etc
- any correspondence you send to us may also form part of your health record.

### Managing the Data

We need to be able to move electronic information from system to system, extracting the data, processing it and modifying it for the next system. Occasionally, tests will need to be made on the data to check that it has been transferred correctly. This will only be done under carefully controlled conditions and employees and contractors will be under strict confidential obligations to protect your confidentiality.

### How we keep your records secure and confidential

Each of the TCC partners has a responsibility under the Data Protection Act 1998 to protect every patient's personal information. Your records will be protected in the same way.

Staff working in Health and Social Care, have a legal duty to keep personal information, confidential and secure and only Health and Social Care registered professionals and supporting administrators involved in your care are allowed to look at your record for the purpose of **your** direct care. Where practicable you will be asked for your permission to view your record when you first come into contact (face to face or on the phone) with a registered health and social care professional or supporting administrator and

<sup>3</sup> Non-identifiable patient data is anonymous or pseudonymised data.



only the parts that are relevant and necessary will be accessed in accordance to their role.

Every time a record is accessed the identity of the reader is recorded. You can request details of all the people who have accessed your record. Staff can be asked to give a reason why they have viewed your record and the organisation's disciplinary policy will be applied if appropriate.

We keep paper and electronic records securely to prevent unauthorised access in line with the Data Protection Act 1998.

### **Risk Stratification<sup>4</sup>**

Trafford CCG (on behalf of GP practices) have bought an analytics software system from a company called Mede Analytics Ltd, who will also act as a data processor in respect of any personal data shared for the purpose of risk stratification, business commissioning and public health analysis, in accordance with the instructions of Trafford CCG and Trafford GP practice partners, who are the Data controllers. The software solution allows your personal data to be **pseudonymised<sup>5</sup>** and Mede Analytics will therefore not store or retain any identifiable data.

All patient data analysed is only re-identified for the purpose of direct care by Data Services for Commissioners Regional Office (DSCRO<sup>6</sup>) or a TCC clinician, only in agreement with and on behalf of your GP practice.

Trafford CCG and public health will only have access to non-identifiable data for invoice validation, commissioning or business analytics.

To ensure the most accurate risk score is calculated, information taken from GP clinical systems is linked with information relating to A&E attendances, hospital admissions and outpatient appointments (obtained from NHS Digital/DSCRO). Further information taken from social, community and mental health care may also be used, as appropriate and where available.

---

<sup>4</sup> **Risk Stratification** – is the process of combining GP and hospital data to identify patients who are at highest risk of re-admission to hospital and will benefit most from an early or immediate care intervention.

<sup>5</sup> **Pseudonymisation** - is a procedure by which the most identifying fields within a data record are replaced by one or more artificial identifiers, or pseudonyms. The purpose is to make the patient data record less identifying and therefore lower objections to its use. Data in this form is suitable for extensive analytics and processing.

<sup>6</sup> **DSCRO** <http://content.digital.nhs.uk/dataservicesforcommissioners>



**All personal information is pseudonymised before any risk stratification analysis is undertaken.**

### **Mobile Phone Number**

We record mobile telephone numbers to enable us to contact you if an appointment has to be rearranged. Some services also provide a text / voice reminder service so that you can be reminded of your appointment. If you prefer not to be contacted in this way, please tell us so we can remove your number from the system.

### **Your rights**

You can have a say in how the NHS uses information about you. If you do not wish your personal data to be used or shared in the way that is described in this leaflet, please discuss the matter with us. You have the right to request that your confidential information is not used beyond your own direct care and treatment and to have your confidential objections considered, and where your wishes cannot be followed, to be told the reasons including the legal basis.

The TCC centrally manage objections for your confidential information to be viewed or accessed. You can contact the TCC for further information on: 0161 976 2555 (text relay the prefix is 18001)

[Tcc.enquiries@nhs.net](mailto:Tcc.enquiries@nhs.net)

Trafford Co-ordination Centre  
Ground Floor, Crossgate House  
Sale  
M33 7FT

Your GP practice will also be able to manage your specific rights to object at practice level known as Type 1 and Type 2 objections explained below:

### **Type 1 objection**

Patients can object to information about them leaving a general practice in identifiable form for purposes **beyond** their direct care so confidential information about them will not be shared.

### **Type 2 objection**

Patients can object to information about them (from any health and social care setting) leaving NHS Digital (formerly known as HSCIC) in identifiable form for purposes **beyond** their direct care, so confidential information about them will not be sent to anyone by NHS Digital.



Please speak to your GP practice for more information or if you have any questions about objections.

### **Subject Access Requests**

You have a right to request access to and/or request copies of any personal information we hold about you on our records (whether paper or electronic records).

Your request must be made in writing to:

Subject Access Request

Trafford Clinical Commissioning Group

1st Floor, Crossgate House

Sale

M33 7FT

[jenna.lancaster@nhs.net](mailto:jenna.lancaster@nhs.net)

Points to note:

- you may be charged to be provided with a printed copy of the information held about you
- we are required to respond to your request within 40 calendar days
- you will need to provide adequate information (for example, full name, address, date of birth and clear instructions regarding the data you require) and proof of identification in order for your identity to be verified and to allow us to locate and retrieve the required information.

If you consider that any part of the information held in your record is inaccurate, you can apply to have this corrected. If we agree that the information is incorrect, the alteration will be made. If we are not satisfied that the information is incorrect, a note will be made of the information you consider is inaccurate.

You will be given a copy of either the correction or the note.

### **Freedom of Information Act 2000**

If you want to request any information about the organisation, which is not your own personal data, please refer to the Freedom of Information policy and procedure on the Trafford CCG website [www.traffordccg.nhs.uk/contact-us/freedom-of-information](http://www.traffordccg.nhs.uk/contact-us/freedom-of-information) or you can submit a Freedom of Information request to [TRCCG.FOI@nhs.net](mailto:TRCCG.FOI@nhs.net)

0161 873 9500

Information Governance Manager

NHS Trafford Clinical Commissioning Group

1st Floor, Crossgate House

Sale

M33 7FT



### Information Commissioners Office Notification

The Data Protection Act 1998 requires organisations to lodge a notification with the Information Commissioner to describe the purposes for which they process personal information.

This information is publicly available at the Information Commissioners Office at:

Wycliffe House

Water lane

Wilmslow

SK9 5AF

0303 123 1113

[accessicoinformation@ico.org.uk](mailto:accessicoinformation@ico.org.uk)

<https://ico.org.uk>

### Who is the Data Controller?

The Data Controller, responsible for keeping your information confidential is:

Trafford Clinical Commissioning Group

1<sup>st</sup> Floor, Crossgate House

Sale

M33 7FT

0161 873 9500

### Further Information

If you would like further information about how Trafford CCG process your personal information and or if you do not wish personal information to be used or shared in the way that is described in this leaflet, please contact:

Information Governance Manager

Trafford Clinical Commissioning Group

1<sup>st</sup> Floor, Crossgate House

Sale

M33 7FT

0161 873 9500

[carolyn.eadie@nhs.net](mailto:carolyn.eadie@nhs.net)

### Alternative formats

If you need help to understand this document or you require it in another format such as large print, braille or in a different language please contact the CCG Communications Team on 0161 873 9500.

