

NHS Wirral Clinical Commissioning Group  
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Our Ref: ID225

## Re: Freedom of Information Request

Thank you for your request for information made under the Freedom of Information Act 2000 which was received into this office on 30<sup>th</sup> June 2015.

### You Asked for:

Please could you provide me with the following information:

- Please could you tell me whether the presence of the 9Nu0/XaZ89 read code in the patient's GP record will prohibit extraction and uploading of their personal identifiable information under your risk stratification scheme?
- Please could you tell me whether the presence of the 9Ndo/XaXj6 read code in the patient's GP record will prohibit extraction and uploading of their personal identifiable information under your risk stratification scheme?
- Please could you tell me whether the presence of the 9Nd1/XaKll read code in the patient's GP record will prohibit extraction and uploading of their personal identifiable information under your risk stratification scheme?
- Please could you tell me whether the presence of the 93C1/XaQVo read code in the patient's GP record will prohibit extraction and uploading of their personal identifiable information under your risk stratification scheme?
- Please could you tell me of any other read codes which when present in the patient's GP record will prohibit extraction and uploading of their personal identifiable information under your risk stratification scheme?
- Please could you tell me if there as an alternative method to opting patients out (at their request) of your risk stratification scheme if adding a read code is not the mechanism of choice? (for example, in EMIS Web, the 93C1 code cannot be "added" as such but the "Patient does not wish to share the detailed record" flag can be set under EMIS Data sharing preferences)

## **Our Response:**

NHS Wirral Clinical Commissioning Group (CCG) have recently been added to the list of organisations approved by NHS England that can receive and process Person Confidential Data (PCD) for Risk Stratification purposes, the approval process applies to the use of primary care and secondary care data for Risk Stratification purposes only.

At present, no Wirral Wide risk stratification process has been undertaken nor data extracted / processed on a routine basis, however as part of the development of the Risk Stratification model the CCG has been working with a small number of GP Practice pilot sites in order to improve and develop the logic behind stratification model with an information sharing protocol agreed with parties as appropriate.

The CCG takes the relevant information governance issues very seriously and have included a number of measures to ensure not only the security of the data but also to ensure compliance with the legal basis for the data extracts from GP Practice Systems upon approval as a supplier:

### Security

- Strict restrictions have been applied to the data infrastructure within the CCG to ensure that processing of NHS Numbers (as the sole patient identifier extracted) is within a 'closed box' with strict role based access controls to ensure security of data at all times, the process aims to extract and process the data and only re-identify when required by a patients GP.
- Development of a web portal for the distribution of risk stratification outputs including related risk scores back to GP practices, this included strict role based access to ensure only those involved in the direct care of a patient can view the NHS Number.

### Information Governance Protocols in relation to Risk Stratification

- Wirral CCG has gained Information Governance Toolkit (IGT) Level 2 to provide assurance that the organisation has a strong focus on Information Governance and practice is embedded within the organisation. This level of assurance has been consistently achieved by the CCG.
- Wirral CCG has achieved Accredited Safe Haven (ASH) status in order to obtain the NHS Number as a sole patient identifier in national datasets. This allows the CCG to link secondary and primary care data for risk stratification purposes, the only patient identifier extracted from GP practice systems is NHS Number.
- Data sharing agreements have been prepared and will be distributed to each practice to allow them to make a decision on whether to participate in the scheme prior to commencement, if practices do not participate in the scheme no data will be extracted and the tool will not be available to them
- A Privacy Impact Assessment (PIA) has been under taken in accordance with the NHS England Assurance Statement to highlight any risks to the data flows.

### Next Steps and Communication

As part of its new models of care approach, the CCG are planning to roll-out a Risk Stratification Tool in accordance with criteria specified in the data protection act 1998 and the conditions of the NHS England assurance statement

Prior to commencement, there are a number of areas of engagement / communication planned with appropriate stakeholders including the development of a communications pack to ensure

patients are informed about the use of their data for risk stratification purposes and associated benefits and specifically highlighting the process for a patient to opt out of data sharing for Risk Stratification purposes.

- Data extracts are required to take into account any patients who have opted-out of data sharing (in accordance with read codes published by NHS England as part of the assurance statement), any patients opting-out are not extracted from the GP Practice system
- Data extracts will also exclude certain medical conditions (in accordance with read codes published by NHS England as part of the assurance statement).

For Clarity the presence of the following read codes in the patients GP record will prohibit extraction and uploading of their PID under the Wirral Risk Stratification scheme and this is the chosen information governance method and applied in accordance with the NHS England Assurance Process

- 9Nu0/XaZ89
- 9Ndo/XaXj6
- 9Nd1/XaKll
- 93C1/XaQVo
- 93C3
- 9Nu4

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