

## How we use your information

### NHS Bolton Clinical Commissioning Group Fair Processing / Privacy Notice

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## What is a Fair Processing or Privacy Notice?

The purpose of this notice is to inform you of the type of information including \*personal confidential data that Bolton CCG processes about you, how that information is used, who we may share that information with, and how we keep it secure and confidential.

Personal confidential data is a term used in the Caldicott Information Governance Review and describes personal information such as your name, address, date of birth; sensitive information such as health information which should be kept private or secret and includes information in respect to deceased as well as living people.

The review interpreted 'personal' as including the Data Protection Act definition of personal data, but included data relating to the deceased as well as living people, and 'confidential' includes both information 'given in confidence' and 'that which is owed a duty of confidence' and is adapted to include 'sensitive' information as defined in the Data Protection Act.

Bolton CCG has a duty to ensure this is kept confidential, secure and used appropriately.

## Who are we and what do we do?

Clinical Commissioning Groups (CCGs) were created following the Health and Social Care Act in 2012, and replaced Primary Care Trusts on 1 April 2013. Bolton CCG is therefore a commissioning organisation, our purpose is not to provide care and so we do not routinely hold or receive information about patients and service users in a format from which they can be identified.

Bolton CCG is responsible for buying (also known as commissioning) health services from healthcare providers such as Hospitals and GP Practices for our local population. Our role includes the following:

- Contracts are in place with local health service providers;
- routine and emergency NHS services are available to patients;
- those services provide high quality care and value for money;
- paying those services for the care and treatment they have provided; and
- performance monitoring of commissioned services.

More detail can be found on our website at:

<http://www.boltonccg.nhs.uk/about-us>

Accurate, timely and relevant information is essential for our work to help us to design and plan current and future health and care services, evidence and review our decisions and manage budgets.

The following information explains why we use information, who we share it with, how we protect your confidentiality and your legal rights and choices.

We are committed to protecting your rights to confidentiality

We want patients to understand:

- How the CCGs use and share information
- How GPs use and share your information
- Your health record, what it contains and how you can access it
- When you can choose to opt-out of your personal information being collected or shared and what this will mean to you

## Why we collect information about you

We are very careful when we need to use information about you to support the functions we perform as a CCG. The types of information we use are explained below:

### Secondary Uses Services Data (SUS)

We use information collected by hospitals, GPs, community services and NHS Digital. The type of information we use is called Secondary Uses Services data (SUS data). SUS data gives us information about the services we commission. It does not include your name or home address but may include information such as your NHS number, ethnicity and gender. It also contains coded information about hospital attendances and treatment.

We use the SUS data for a number of purposes:

- To understand the health needs of the population
- To plan, redesign and improve services
- To ensure providers are using resources effectively
- To pay services for the care they provide
- To audit NHS accounts and services.

We will use anonymised data (see Definitions section) that cannot be linked back to your identity (de-identified data) wherever possible. In order to ensure that the NHS continues to function lawfully and efficiently, the Secretary of State for Health has given permission for CCGs to use certain personal information from SUS without consent, but only when it is absolutely necessary for certain specified purposes. This approval is given upon the strict advice of the Health Research Authority's Confidentiality and Advisory Group (CAG) under conditions set out in section 251 of the NHS Act 2006. The specific terms and conditions that we are obliged to follow when using SUS data can be found on the NHS Digital website.

## Section 251 of the NHS Act 2006

The Secretary of State for Health gives limited permission for the CCG (and other NHS commissioners) to use certain confidential patient information when it is necessary for our work purposes other than direct care as explained below for example information from NHS Digital for commissioning, Risk Stratification and Invoice Validation.

This approval is given under Regulations made under Section 251 of the NHS Act 2006 and is based on the approval of the Health Research Authority's Confidentiality and Advisory Group.

This allows the Secretary of State for Health to make regulations to set aside the common law duty of confidentiality for defined medical purposes. Section 251 came about because it was recognised that there were essential activities of the NHS, and important medical research, that required the use of identifiable patient information – but, because patient consent had not been obtained to use people's personal and confidential information for these other purposes, there was no secure basis in law for these uses.

Section 251 was established to enable the common law duty of confidentiality to be overridden to enable disclosure of confidential patient information for medical purposes, where it was not possible to use anonymised information and where seeking consent was not practical, having regard to the cost and technology available.

To find out more about Section 251 and the work of the Health Research Authority (HAR), please visit: <http://www.hra.nhs.uk/about-the-hra/our-committees/section-251/what-is-section-251/#sthash.JL1s6ACl.dpuf>

## NHS Digital

We use information collected by NHS Digital from healthcare providers such as hospitals, community services and GP's, which includes information about the patients who have received care and treatment from the services that we fund.

The data we receive does not include patients' names or home addresses, but it may include information such as your NHS number, postcode, date of birth, ethnicity and gender as well as coded information about your visits to clinics, Emergency Department, hospital admissions and other NHS services.

In order to use this data, we have to meet strict conditions that we are legally required to follow, this includes making a written commitment to NHS Digital that we will not use information in any way that would reveal your identity. These terms and conditions can be found on the NHS Digital website.

If you do not want your personal information to be shared outside of NHS Digital, for purposes other than for your direct care you can register a “Type 2” opt-out with your GP practice.

For more information about NHS Digital please visit: <http://digital.nhs.uk/dataflowstransitionmanual>

## Risk Stratification (Pro-Active Care Management)

Risk stratification is a process GPs use to help them to identify and support patients with long-term conditions and to help prevent un-planned hospital admissions or reduce the risk of certain diseases developing such as type 2 diabetes. This is called risk stratification for case-finding.

The CCG also uses risk stratified data to understand the health needs of the local population in order to plan and commission the right services. This is called risk stratification for commissioning. This is called risk stratification for commissioning. The CCG does not have access to your personal data. The information is de-identified / pseudonymised.

NHS England (the national Commissioning Board) 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. 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.

Risk stratification tools use various combinations of historic information about patients, for example, age, gender, diagnoses and patterns of hospital attendance and admission (secondary care data) and primary care data collected in GP practice systems. The CCG will use anonymised information to understand the local population needs, whereas GPs will be able to identify which of their patients are at risk in order to offer a preventative service to them.

We are committed to conducting risk stratification effectively, in ways that are consistent with the laws that protect your confidentiality. The use of personal data by CCGs and GPs for risk stratification has been approved by the Confidentiality Advisory Group of the Health Research Authority (CAG) and it is reviewed by themselves yearly.

The CCG uses a Data Services for Commissioners Regional Offices (DSCRO's) specifically North West and Greater East Midlands DSCROs to assist in the process of Risk Stratification.

It allows records for the same patient from different sources to be linked to create a complete longitudinal record which is a comprehensive clinical summary of that patient's condition, history and care. To undertake this process to assist with risk stratification, the CCG uses DSCRO so that the CCG cannot identify patients.

## Who are DSCRO and What do they do?

NHS Digital's responsibilities as set out in the Health and Social Care Act 2012 include the collection, analysis and presentation of national health and social care data. The Act also gave NHS Digital the powers to act as a safe haven and collect, hold and process personal confidential data (PCD) for purposes beyond direct patient care.

Commissioners of healthcare services need to plan and commission healthcare services in their local area through analysis of actual and projected use of services across all parts of the care economy. This modelling requires access to information about care provided to patients, their hospital stays and patient journeys but without accessing personal confidential patient data. Care commissioners do not provide direct patient care, and therefore they have no legal basis on which to access personal confidential patient information.

Therefore commissioners require an intermediary service that specialises in processing, analysing and packaging patient information into a format they can legally use this is completed by Data Services for Commissioners Regional Offices (DSCROs)

DSCROs work with data from GP Practices and NHS Hospital Trusts in the regional processing centres. Staff follow strict rules on accessing, analysing and processing data. The powers granted to the organisation by the Health and Social Care Act 2012 which means that staff are operating within the approved legal framework.

The service allows clinical commissioning groups (CCGs), local authority public health teams and specialised commissioners to plan and commission those healthcare services in their local area and nationally using the services provided through the DSCROs.

Technical and organisational measures are in place to ensure the security and protection of personal confidential data. Robust access controls are in place to ensure only GPs are able to re-identify information about their individual patients with their consent when it is necessary for the provision of their care.

## Invoice Validation

Invoice validation is an important process which the CCG carries out. This involves using your NHS number to establish which CCG is responsible for paying for your treatment. The process also ensures that those who provide you with care are reimbursed correctly for the care and treatment they have provided.

Bolton CCG are registered as a Controlled Environment for Finance (CefF) under a Section 251 exemption, this enables us to process patient identifiable information

without consent for the purposes of invoice validation – CAG 7-07(a)(b)(c)/2013. In these cases we only use your NHS Number (no other identifiable information).

We can also use your NHS number to check whether your care has been funded through specialist commissioning, which NHS England will pay for. The process makes sure that the organisations providing your care are paid correctly.

Please be aware that this is the only time the CCG will use patient identifiable data (in this case NHS Numbers only), for the purposes of Invoice Validation.

## Personal Confidential Data

As a commissioning organisation we do not routinely hold medical records or patient confidential data. There are some specific areas, however, because of our assigned responsibilities where we do hold and use personal information. In order to process that information we will have met a legal requirement, in general this is where we have complied with one of the following:

- The information is necessary for direct healthcare for patients
- We have received consent from individuals to be able to use their information for a specific purpose
- There is an overriding public interest in using the information 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 information (e.g. a formal court order, statutory returns)

The areas where we use personal information are:

- Individual funding requests – a process where patients and their GPs can request special treatments not routinely funded by the NHS. This is carried out by Greater Manchester Shared Service Effective Use of Resources Team on behalf of the CCG.
- Assessments for Continuing Healthcare Assessments (a package of care for those with complex medical needs)
- Responding to your queries, concerns or complaints
- Assessment and evaluation of safeguarding concerns for individuals
- Medicines Optimisation Services
- If you are a member of our patient participation group, or have asked us to keep you up to date about our work and involved in our engagement and public consultations.

In circumstances where we information that may identify you (known as personal confidential data) we would only use in accordance with the:

- Data Protection Act 1998 - This Data Protection Act requires us to have a legal basis if we wish to process any personal information.
- General Data Protection Regulation (coming into force May 2018) - this will require us to have a legal basis to process any personal information.

- NHS Care Record Guarantee – sets out high level commitments for protecting and safeguarding your information, particularly in regard to your rights to access your information, how information will be shared, how decisions on sharing information will be made and investigating and managing inappropriate access (audit trails)
- NHS Constitution for England – this states that you have the right to privacy and confidentiality and to expect the NHS to keep your confidential information safe and secure

We also have to honour any duty of confidence attached to information and apply Common Law Duty of Confidentiality requirements. This will mean where a legal basis does not exist to use your personal or confidential information we will not do so.

We keep your information in written form and / or on a computer securely and confidentially.

The information held within these records depend on what is required in order to complete the process for which it is intended and will include basic personal details about you, such as your name and address. They may also contain more sensitive information about your health and also information such as outcomes of needs assessments.

Your information will not be sent outside of the United Kingdom where the laws do not protect your privacy to the same extent as the law in the UK. We will never sell information about you.

The CCG will use the services of the additional data processors, who will provide additional expertise to support the work of the CCG by adding value to the analyses of data that does not directly identify patients, as follows:

<b>Data Processors</b>	<b>Sharing Pseudonymised data with other CCGs for collaborative working</b>
<p><b>Data Processor 1</b></p> <p>NHS Arden and Greater East Midlands (GEM) Commissioning Support Unit (CSU) St John’s House, East Street, Leicester, LE1 1NB</p> <p>DSCRO hosted by NHS Arden GEM are processing data on behalf of the CCG for risk stratification purposes. See <b>Who are DSCRO and What do they do?</b></p> <p><b>Data Processor 2</b></p> <p>NHS Oldham CCG hosting: Greater Manchester Shared Services</p>	<p>None</p>

<b>Data Processors</b>	<b>Sharing Pseudonymised data with other CCGs for collaborative working</b>
<p>Ellen House, Waddington Street, Oldham, OL9 6EE for IT Services / Effective Use of Resources</p> <p>IT Services / Personal data for the purposes of the Effective Use of Resources process / Complaints / Information Governance / Invoice Validation (via the Controlled Environment for Finance)</p> <p><b>Data Processor 3</b></p> <p>Salford Royal NHS Foundation Trust hosting: Advancing Quality Alliance (AQuA), 3rd Floor, Gate House, Cross St, Sale, M33 7FT</p> <p>No personal data is transferred to this Data Processor or received.</p> <p><b>Data Processor 4</b></p> <p>Salford Royal NHS Foundation Trust hosting: Academic Health Sciences Network (Utilisation Management Team) Salford Royal NHS Foundation Trust Data Centre, Stott Lane, Salford, M6 8HD</p> <p>No personal data is transferred to this data processor or received</p> <p><b>Data Processor 5</b></p> <p>Xerox (UK) Ltd, Bridge House, Oxford Road, Uxbridge, UB5 1HS</p> <p>No personal data is transferred to this data processor or received</p> <p><b>Data Processor 6</b></p> <p>MCET Shredder Service &amp; Electrical Contractors, 8 Shire Ridge, Shire Oak, West Midlands, WS9 9RB</p> <p>No personal data is transferred to this data processor or received</p>	

## Sharing your information with other organisations

We share anonymised information 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 about you unless:

- you have asked us to and given us permission;
- we are lawfully required to report certain information to the appropriate authorities e.g. to prevent fraud or a serious crime;
- to protect children and vulnerable adults;
- when a formal court order has been served upon us; and/or
- the health and safety of others, for example to report an infectious disease like meningitis or measles

## Sharing and linking data

NHS patients and social care service users may receive care and treatment from a number of different places. It is necessary to link this information together to provide the full picture needed to support the activities listed above. In effect, sharing information enables the NHS to improve its understanding of the most important health needs and the quality of the treatment and care we provide to you

We have entered into contracts with other NHS organisations to provide some services to us, which includes processing data on our behalf, including patient information and to provide Human Resources services for our staff. In these instances, we ensure that our partner agencies have contracts which outline that your information is processed under strict conditions and in line with the law. These services are subject to the same legal rules and conditions for keeping personal information confidential and secure and the CCG is responsible for ensuring their staff are appropriately trained and that technical and operational procedures are in place to keep information secure and protect privacy.

## Disclosure of Information

We will not disclose your information to organisations/individuals that are not involved in your care, without your permission, unless there are exceptional circumstances or a legal obligation such as;

- there is a risk of harm to someone or the wider community,

- the prevention or detection of a serious crime,
- where we are required to do so by law,
- reporting some infectious diseases.

In the event that we are obligated to release information as described above, this will only be done with the approval of our \*Caldicott Guardian.

## Keeping information secure and confidential

All staff have contractual obligations of confidentiality, enforceable through disciplinary procedures. All staff will receive appropriate training on confidentiality of information and staff who have regular access to personal confidential data will have received additional specialist training.

We take relevant organisational and technical measures to ensure the information we hold is secure – such as holding information in secure locations, restricting access to information to authorised personnel, protecting personal and confidential information held on equipment such as laptops with encryption.

Unless required to do so by law, we will not share, sell or distribute any of the information you provide to us with any third party organisations/individuals without your explicit consent.

Each NHS organisation has a senior person responsible for protecting the confidentiality of patient information and enabling appropriate information sharing.

This person is called the Caldicott Guardian, in NHS Bolton CCG this is Dr Jane Bradford.

## Records Retention

The CCG will approach the management of its business records in line with the Records Management NHS Code of Practice for Health and Social Care 2016 which sets the required standards of practice in the management of records for those who work within or under contract to NHS organisations in England, based on current legal requirements and professional best practice.

The CCGs records shall not be retained indefinitely. At the end of the retention, records shall be disposed of. In most cases this will mean controlled destruction.

## Your right to withdraw consent for us processing your personal information

At any time, you have the right to refuse / withdraw consent from the CCG processing your information unless there is a law that enables us to do this such as safeguarding, a court order or it is in the public interest and therefore confidentiality is overridden in such cases.. The possible consequences of this will be fully explained to you and this could include delays in receiving care and / or treatment.

If you wish to withdraw consent from the CCG processing your information, please contact the relevant team via the contact details as detailed in the "Contacts" section of the leaflet.

## Are there any implications of withdrawing consent for care?

You are able to opt out of having your data shared with health and care professionals at any time. However, to provide the best possible care and treatment healthcare professionals need access to the most up to date information about you. This information can be from a range of services including hospital and your GP. Therefore sharing information securely between these services will allow the people that are supporting you to make better decisions and to work with you more effectively. We want to make sure that your care is as joined-up as possible, giving you the best possible outcome

## Opting Out of Data being Shared beyond care purposes

The NHS Constitution states "You have the right to request that your confidential information is not used beyond your own care and treatment and to have your objections considered".

There are several forms of opt- outs available at different levels. These include for example:

### **A. Information directly collected by the CCG:**

Your choices can be exercised by withdrawing your consent for the sharing of information that identifies you, unless there is an overriding legal obligation as detailed above.

### **B. Information not directly collected by the CCG, but collected by organisations that provide NHS services.**

## Type 1 opt-out

If you do not want personal confidential data information that identifies you to be shared outside your GP practice, for purposes beyond your direct care you can register a type 1 opt-out with your GP practice. This prevents your personal confidential information from being used other than 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.

Records for patients who have registered a type 1 opt-out will be identified using a particular code that will be applied to your medical records that will stop your records from being shared outside of your GP Practice.

## Type 2 opt – out

NHS Digital collects information from a range of places where people receive care, such as hospitals and community services.

To support those NHS constitutional rights, patients within England are able to opt out of their personal confidential data being shared by NHS Digital for purposes other than their own direct care, this is known as the 'Type 2 opt-out'

If you do not want your personal confidential information to be shared outside of NHS Digital, for purposes other than for your direct care you can register a type 2 opt-out with your GP practice.

For further information and support relating to opt-outs, please contact NHS Digital at:

- Email: [enquiries@hscic.gov.uk](mailto:enquiries@hscic.gov.uk) referencing '*Type 2 opt-outs - Data requests*' in the subject line;
- Telephone: 0300 303 5678
- Via the website: <http://digital.nhs.uk/article/7092/Information-on-type-2-opt-outs>

## How can you get access to information held about you at the CCG? (Subject Access Requests)

You have certain legal rights, including a right to have your information processed fairly and lawfully and a right to access any personal information we hold about you. You have the right to privacy and to expect the NHS to keep your information confidential and secure. You also have a right to request that your confidential information is not used beyond your own care and treatment and to have your objections considered. These are commitments set out in the NHS Constitution, for

further information please visit: <https://www.gov.uk/government/publications/the-nhs-constitution-for-england>

The current Data Protection Act 1998 and in future the GDPR gives you the right to request to view or have a copy of your records held by the CCG. You do not need to give a reason, but you may be charged a fee. This is called a subject access request. To make a request to any personal information we may hold you need to put the request in writing to the address provided below. For more information please refer to our Subject Access Requests Procedure which can be found at the following link: <http://www.boltonccg.nhs.uk/about-us/our-policies>. Please refer to the 'Contacts' section if you would like to make contact.

Additionally, the NHS Care Record Guarantee states that you can be provided audit trail information regarding those staff who have access your record.

As noted above, the CCG holds limited health information about you. This is only when it is held for direct care purposes. If you require access to GP or hospital records you will have to contact the NHS organisation(s) where you are being, or have been treated.

You should also be aware that in certain circumstances, your right to see some details in your health records may be limited in your own interest or for other reasons.

If you know that information which we hold about you is not correct, you may have a right to request that it is corrected, or to have a note added – please contact us.

## Data Protection Register / ICO Notification

The CCG is a Data Controller and under the terms of the Data Protection Act 1998 and are legally responsible for ensuring that all personal information we process is in compliance with the law. All data controllers must notify with the Information Commissioners Office (ICO) who is the UK's independent body set up to uphold information rights, of all personal information processing activities.

Bolton CCG has dutifully notified and our ICO Notification number is **ZA007073** you can access this notification via the ICO website at [www.ico.org.uk](http://www.ico.org.uk).

## Complaints

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. 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.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Please refer to the Contacts section for details on how to inform the CCG on any queries you may have regarding information held about yourself.

## Contacts

If you have any questions or concerns regarding the information we hold on you or the use of your information, please contact us at:

Diane Sankey  
Risk and Complaints Manager  
NHS Bolton Clinical Commissioning Group  
St Peter's House  
Silverwell Street  
Bolton  
BL1 1PP

Email: [dianesankey@nhs.net](mailto:dianesankey@nhs.net)

To contact Bolton CCG's Caldicott Guardian (Dr Colin Mercer), please contact us at: [bolccg.communications@nhs.net](mailto:bolccg.communications@nhs.net) (please note this email account is accessed by a number of personnel therefore consider the information provided when contacting and please state that the email is for the Caldicott Guardian of Bolton CCG).

Or you can use the "Contact Us" page on the Bolton CCG website at the link below:  
<http://www.boltonccg.nhs.uk/contact-us>

For independent advice about data protection, privacy and data-sharing issues, you can contact the Information Commissioners Office (ICO)

Information Commissioner Office (ICO)  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
[www.ico.org.uk](http://www.ico.org.uk)

## Definitions

<p>Personal Confidential Data</p>	<p>Personal confidential data is a term used in the Caldicott Information Governance Review and describes personal information about identified or identifiable individuals, which should be kept private or secret and includes dead as well as living people.</p> <p>The review interpreted 'personal' as including the Data Protection Act definition of personal data, but included data relating to the deceased as well as living people, and 'confidential' includes both information 'given in confidence' and 'that which is owed a duty of confidence' and is adapted to include 'sensitive' as defined in the Data Protection Act.</p>
<p>Anonymised Data</p>	<p>Anonymisation is the process of turning data into a form which does not identify individuals and where identification is not likely to take place. This allows for a much wider use of the information.</p>
<p>Pseudonymisation</p>	<p>Pseudonymisation is a technical process that replaces identifiable information such as a 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. It allows records for the same patient from different sources to be linked to create a complete longitudinal record of that patient's condition, history and care</p>
<p>Caldicott Guardian</p>	<p>Each NHS organisation has a senior person responsible for protecting the confidentiality of patient information and enabling appropriate information sharing. This person is called the Caldicott Guardian, who in Bolton CCG is Dr Colin Mercer. The Caldicott Guardian is the senior person in the CCG responsible for protecting the confidentiality of patient and service user information and enabling appropriate and lawful information-sharing. There are specific processes which are followed to ensure the continuing security and confidentiality</p>

	of the information and we are obliged to tell you that we have shared your information in all but very exceptional circumstances.
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## Useful resources and information

Information Commissioner's Office – <http://ico.org.uk/>

HRA – <http://www.hra.nhs.uk/>

NHS Digital – Guide to Confidentiality in Health and Social Care - <http://digital.nhs.uk/media/12822/Guide-to-confidentiality-in-health-and-social-care/pdf/HSCIC-guide-to-confidentiality.pdf>

Information Governance Alliance – <http://systems.digital.nhs.uk/infogov/iga>

NHS Care Record Guarantee - <http://systems.digital.nhs.uk/rasmartcards/documents/crg.pdf>

The NHS Constitution - <https://www.gov.uk/government/publications/the-nhs-constitution-for-england/the-nhs-constitution-for-england>

Records Management Code of Practice for Health and Social Care 2016 - <http://systems.digital.nhs.uk/infogov/iga/rmcop16718.pdf>