

Fair Processing Notice (Privacy Notice)

Your Personal Information – what you need to know

Who we are and what we do

NHS South Eastern Hampshire Clinical Commissioning Group (CCG) is responsible for securing, planning, designing and paying for your NHS services, including planned and emergency hospital care, as well as community and primary medical care (GP) services. We also have a performance monitoring role for these services, which includes ensuring that the highest quality of healthcare is provided and responding to any concerns from our patients on services offered. This is known as commissioning. For further information please refer to the 'About Us' page on our Website: <https://www.southeasternhampshireccg.nhs.uk/about-us/>

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 Data – means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- Special Categories of Personal Data – this term describes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.
- Confidential Patient Information – this term describes information or data relating to their health and other matters disclosed to another (e.g. patient to clinician) in circumstances where it is reasonable to expect that the information will be held in confidence. Including both information 'given in confidence' and 'that which is owed a duty of confidence'. As described in the Confidentiality: NHS code of Practice: Department of Health guidance on confidentiality 2003.

Pseudonymised - The process of distinguishing individuals in a dataset by using a unique identifier which does not reveal their 'real world' identity.

- Anonymised – 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 - 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?

There are some limited exceptions where we may hold and use personal confidential information about you. For example the CCG is required by law to perform certain services that involve the processing of personal confidential information.

The areas where we regularly use personal confidential information include:

- responding to your queries, compliments or concerns
- assessment and evaluation of safeguarding or safety concerns
- where there is a provision permitting the use of confidential personal information under specific conditions, for example to:
 - understand the local population needs and plan for future requirements, which is known as "Risk Stratification for commissioning"

Personal confidential information may also be used in the following cases:

- the information is 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 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).

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, see Appendix A) to provide healthcare services to you. We may 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)

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 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 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:

Julia Barton – Director of Quality and Nursing – sehccg.enquiries@nhs.net – 02392 282063

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:

Andrew Wood – Chief Finance Officer - sehccg.enquiries@nhs.net – 02392 282063

The above two roles are also supported by our Data Protection Officer. The Hampshire CCG Partnership has appointed a single Data Protection Officer (DPO) for Fareham and Gosport CCG, North East Hampshire and Farnham CCG, North Hampshire CCG, and South Eastern Hampshire CCG. They will be responsible for monitoring compliance with Data Protection legislations (GDPR & DPA 2018), Information Governance (IG) policies, providing advice and guidance, raising awareness, training and audits. The DPO acts as a contact point for the ICO, employees and the public. They cooperate with the ICO and will consult on any other matters relevant to Data Protection. The contact details of our DPO are as follows:

Tel: 01252 335154

Email: nehfccg.dpo.hampshire4@nhs.net

The CCG is registered with the Information Commissioner's Office (ICO) as a data controller and collects data for a variety of purposes. Our registration number is **Z3626799** and a copy of the registration is available through the [ICO website](#).

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>

You have the right to withdraw consent to us sharing your confidential and personal information if you do not wish us to process or share it.

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

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 does not directly provide health care services and therefore 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

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 want 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 at

NHS South Eastern Hampshire CCG
CommCen Building
Fort Southwick
James Callaghan Drive
Fareham
Hampshire
PO17 6AR

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: SEHCCG.FOI@nhs.net

Postal requests should be directed to:

Freedom of Information Team
South Eastern Hampshire CCG

CommCen Building
Fort Southwick
James Callaghan Drive
Fareham
Hampshire
PO17 6AR

<https://www.southeasternhampshireccg.nhs.uk/contact-us/freedom-of-information.htm>

Information Commissioners Office

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. South Eastern Hampshire Clinical Commissioning Group complaints contact details are found below;

SEHCCG.complaints@nhs.net

Phone: 023 9228 2081 (8:30am-4:30pm, Monday to Friday)

Complaints and Concerns
South Eastern Hampshire CCG
CommCen Building
Fort Southwick
James Callaghan Drive
Fareham
Hampshire
PO17 6AR

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 August 2018.

Appendix A

Activity	Rationale
Complaints, Concerns and Enquiries	<p>Purpose – To process your personal information if it relates to a complaint where you have asked for our help or involvement.</p> <p>Legal Basis - We will need to rely on your explicit consent to undertake such activities. 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>Purpose – We may need to process your personal information where we are required to fund specific treatment for you for a particular condition that is not already covered in our contracts.</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 explicit consent to share this. You have the right to withdraw your consent at any time</p> <p>Data processor – We ask NHS South, Central and West Commissioning Support Unit (CSU) to do this on our behalf.</p>
Safeguarding Adults	<p>Purpose – 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 adults, we will rely on a statutory basis rather than consent to process information for this use.</p> <p>Data Processor – we process this information ourselves</p>
Safeguarding Children	<p>Purpose – 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 Safeguarding we will rely on a statutory basis rather than consent to share information for this use.</p> <p>Data Processor – We ask West Hampshire Clinical Commissioning Group to participate in Multi Agency Safeguarding procedures on our behalf. They will process and hold information relating to children in</p>

	South Eastern Hampshire CCG
Risk Stratification	<p>Rationale</p> <p>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</p> <p>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

	<p>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> <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> <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.</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>
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<p>Invoice Processing</p>	<p>Purpose – This process ensures that those who provide you with care and treatment can be paid.</p> <p>Data Processors - NHS Shared Business Services (SBS) and NHS South, Central and West Commissioning Support Unit (CSU) process invoices on behalf of the CCG. They do not require and should not receive any patient confidential data to provide their services.</p> <p>NHS England has published guidance on how invoices must be processed. For more information see: https://www.england.nhs.uk/ourwork/tsd/jg/in-val/invoice-validation-faqs/</p>
<p>Patient and Public Involvement</p>	<p>Purpose – If you have asked 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 patient participation groups, we will collect and process data which you have agreed to share with us.</p> <p>Legal Basis - We will rely on your consent for this purpose. You have the right to withdraw your consent at any time.</p> <p>Data Processor – We process this information ourselves.</p>
<p>Quality monitoring, concerns and serious incidents</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 other local CCGs including NHS Fareham and Gosport and NHS Portsmouth as well as other Public bodies and Government agencies such as NHS Improvement, the Care Quality Commission, NHS England as well as</p>

	<p>the Providers of your care.</p> <p>System Support - QUASAR</p>
Commissioning, planning and contract monitoring	<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 - 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 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://content.digital.nhs.uk/datasets.</p>
Other CCGs	
Continuing Healthcare	<p>Purpose – We may need to process your identifiable information where you have asked for an assessment for Continuing Healthcare funding (a package of care for those with complex medical needs) and you need to have a particular care package commissioned for you.</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. 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 ask West Hampshire Clinical Commissioning Group to undertake assessments and commission your care on our behalf.</p>
Children’s Services	<p>Purpose – We may need to process anonymous information for purposes of commissioning, Quality and performance management services for children and maternity</p>

	<p>Legal Basis – 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 – we ask North East Hampshire and Farnham Clinical Commissioning Group to undertake this task on the CCGs behalf</p>
Commissioning Support	There are some activities that we ask the NHS South, Central and West Commissioning Support Unit (CSU) to undertake on our behalf. These include providing our IT equipment and IT network, 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.
National Registries	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.
Research	<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 Independent Group Advising on the Release of Data (IGARD) http://content.digital.nhs.uk/IGARD</p>
Surveys and asking for your feedback	<p>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 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>
Other organisations who provide support services for us	The CCG will use the services of additional organisations (other than those listed above), who will provide additional expertise to support the work of the CCG.

	<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>TIAA – Provide internal audit services for the CCG Shred it – Provide confidential waste destruction services</p>
Actuarial services	<p>Purpose – The CCG may ask third party organisations to conduct actuarial services on behalf of the CCG. Analysing aggregated anonymous data to assist the CCG in providing efficient and effective health care for the health economy. These are undertaken for a limited purpose and time period.</p> <p>Legal Basis – All data provided is Pseudonymised or aggregated with low numbers suppressed in line with NHS Digital guidelines. Type 1 Objections have been applied. No patient identifiable data is shared by the CCG for these purposes. Where anonymise data is shared it is in agreement with NHS Digital via the Data Sharing agreement process</p> <p>Data processors – Milliman LLP Deloitte LLP McKinseys & Company Inc. Uk Optum Health Solutions (UK) Ltd GE Finnamore RSM LLP (Baker Tilly Management) North East London CSU</p>