

# **Privacy Notice for Greater Manchester Cancer's Cancer Intelligence Service**

## **Who We Are and What we Do**

Greater Manchester Cancer is responsible for ensuring that the delivery of cancer services for the Greater Manchester and Eastern Cheshire population meet national standards and that all patients have equal access to care. Further information about us and what we do is available from the ["About Us"](#) section of our website.

Greater Manchester Cancer is hosted by The Christie NHS Foundation Trust.

## **NHS Data That We Receive and How We Use Them**

Greater Manchester Cancer's Cancer Intelligence Service will receive data from NHS Digital related to all patients who have been referred for a suspected cancer or referred for treatment for a confirmed cancer who live or are treated within the Greater Manchester and Eastern Cheshire region. The data will be in a format that does not directly identify you - pseudonymised information (see definition of pseudonymised below). The data will have originally been collected by organisations that provide NHS services.

The data received will include details of hospital attendances, age, gender and clinical details such as diagnoses and treatment received. It will not contain your NHS number, your name, address, postcode or date of birth. Your NHS number will have been replaced by a unique code that Greater Manchester Cancer's Cancer Intelligence Service will use to ensure that the data about your treatment is linked together, but we will not be able to convert it back to your NHS number or use in it any other way to identify you.

The data will be analysed by GMC's Cancer Intelligence Service and provided in anonymised format (see definition of anonymised below) to organisations that are responsible for planning and buying healthcare services (Clinical Commissioning Groups) and the Trusts that provide the care for you. They will use the information provided to assist in evaluating the services provided and the outcomes of that care. Any organisation that is not directly involved in your care will not have access to any information that identifies you.

We will provide information on good practice across the region. We will identify and compare areas of strengths and weakness within the present system supporting evidence based decision making. We will use the information to compare services delivered, the outcome of the services provided for patients and patient experience. This will help us highlight areas where changes are required.

NHS Digital collects health care information from organisations that provide NHS services. The Health and Social Care Act 2012 allows NHS Digital to provide organisations such as Greater Manchester Cancer Vanguard Innovation with information in a format that does not identify you, when it is to be used to benefit patients and lead to improvements in healthcare for everyone. Further details about the information collected by NHS Digital, how it is used and shared, are available directly from their [website](#).

Greater Manchester Cancer, through our host organisation (The Christie NHS Foundation Trust), will enter into a data sharing agreement with NHS Digital which will outline the terms and conditions on how the data will be used and protected. An example of the data sharing agreement is available [here](#) on the NHS Digital website.

## **Fair Processing – Data Protection**

Organisations that process personal data must comply with the General Data Protection Regulation (GDPR). The GDPR restricts how we can use an individual's data, and consists of six Data Protection

Principles that must be applied when processing data. Under current data protection law, organisations that process personal data, must also register as a 'Data Controller', and notify the Information Commissioner (ICO) why they need to process the data. The Christie NHS Foundation Trust is the Data Controller of personal information that is collected by the Trust to help them provide and manage healthcare to their patients. Principle one of the GDPR requires the Trust to ensure that all personal information held is processed fairly, lawfully and in a transparent manner. You can see the Trust's Privacy Notice by clicking [here](#). This explains how they use and manage the information they hold about their patients, including how they share it within the NHS and with non-NHS organisations, and how they maintain confidentiality. Full details of all the data processing purposes are listed at the ICO website (<http://www.ico.gov.uk/>).

Greater Manchester Cancer's Cancer Intelligence Service does not receive any NHS data directly from The Christie NHS Foundation Trust or from any of the other Trusts that provide cancer treatment. We receive pseudonymised data from NHS Digital, as explained above.

The Christie NHS Foundation Trust is also required to ensure that any organisation it hosts (e.g. Greater Manchester Cancer and its Cancer Intelligence Service) also complies with the GDPR. The Christie NHS Foundation Trust is registered with the Information Commissioner: registration number Z7091213.

### **What is personal data?**

Personal data is information that relates to a living individual who can be identified from that data.

### **What is pseudonymised data?**

Data about individuals but with identifying details (such as name or NHS number) replaced with a unique code.

### **What is anonymised data?**

Data about individuals but with all identifying details removed.

### **How do we keep your information confidential?**

Everyone working for the NHS is subject to the Common Law Duty of Confidence and staff of Greater Manchester Cancer's Cancer Intelligence Service comply with this requirement too. Our team is relatively small and we work within strict controls, in our own technical environment, and are not directly linked to our host, The Christie NHS Foundation Trust, or its data.

Even though Greater Manchester Cancer's Cancer Intelligence Service does not receive information about you that directly identifies you, we will ensure that only authorised staff will have access to all the pseudonymised data received from NHS Digital, we will only use the data as permitted by NHS Digital and we will ensure that it is fully anonymised when it is shared outside of GM Cancer with the Clinical Commissioning Groups and Trusts referred to above.

### **Sharing your information**

Greater Manchester Cancer's Cancer Intelligence Service will share anonymised data with NHS organisations that are responsible for providing cancer services in the region. Greater Manchester Cancer's Cancer Intelligence Service will not share data that could lead to your identity being revealed with any organisation that is not directly involved in your care.

Greater Manchester Cancer's Cancer Intelligence Service will be supported in their Business Intelligence (data analysis) work by NHS Arden and Greater East Midlands Commissioning Support Unit (AGEM CSU). They will prepare and make the data available to us which has initially been provided by NHS Digital in a format that does not identify individuals. AGEM CSU will be under contract with us as a data processor, and like us, they will comply with the security and confidentiality requirements laid out by NHS Digital in their data sharing agreement.

### **How Long Will We Retain Data?**

Greater Manchester Cancer's Cancer Intelligence Service will retain the pseudonymised data received from NHS Digital for a maximum period of 5 years, in accordance with our data sharing agreement with NHS Digital. If necessary, we can apply for an extension to retain the data for a longer period. Once the data is no longer required, it will be securely destroyed in accordance with NHS information security standards.

### **Your Choices about how your Personal Information is used by the NHS**

The NHS Constitution provides you with choices about how your personal information is used and shared. You can choose to withdraw consent (opt-out) from allowing information that identifies you being used or shared for any purpose beyond directly providing your care.

Even though the data that we receive does not identify you, we still wish to make you aware of your rights regarding your personal data and what to do if you wish to opt-out. This information has been obtained from the NHS Digital website:

#### **Type 1 opt-outs**

If you do not want 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.

#### **Type 2 opt-outs**

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

A [direction](#) from the Secretary of State sets out the Department of Health policy as to how type 2 opt-outs must be applied and instructed NHS Digital to apply type 2 opt-outs from 29 April 2016.

More information on how NHS Digital collects and uses opt-out information is available from their website - [Applying Type 2 Opt Outs](#)

You may also opt out of The Christie NHS Foundation Trust sharing or using confidential information that they have recorded about you. You should raise objections at the point you are asked on your treatment pathway with them. Should you change your mind and wish to raise objections later, you can do this. To help them support your wishes, you are asked to put in writing that you do not wish The Christie NHS Foundation to share your information, by contacting:

Information Governance Department  
The Christie NHS Foundation Trust  
Wilmslow Road  
Withington  
M20 4BX

Tel: 0161 446 8460

Email: [information.governance@christie.nhs.uk](mailto:information.governance@christie.nhs.uk)

Your decision will be discussed with you should there be any adverse consequence that you may not be fully aware of.

### **Can I see my information?**

Under the GDPR a person may request access to information (with some exemptions) that any organisation holds about them. This is known as the Right of Subject Access. Greater Manchester Cancer Vanguard does not hold any information that identifies you. If you wish to access your health records or any personal information about you, you need to directly contact the organisation that provided your NHS services.

If you require access to your health records held by The Christie NHS Foundation Trust, you must make a written request to:

Legal Secretary, Central Administration Department, The Christie NHS Foundation Trust,  
Wilmslow Road, Withington, M20 4BX

The Trust can only provide access to information it holds. For example to see the records held by your GP you have to contact your GP practice directly.

The Access to Health Records Act 1990 also allows access, in certain circumstances, to information that is held on deceased patients. Again, you need to contact the organisation that collected the information.

### **The NHS Care Record Guarantee**

The Care Record Guarantee is a commitment on how your health records are used in ways that respect your rights and promote your health and wellbeing. Copies of the full document can be obtained from:

CQC National Customer Service Centre, Citygate, Gallowgate, Newcastle upon Tyne, NE1 4PA

Or via <http://systems.digital.nhs.uk/rasmartcards/documents/crg.pdf>

### **Raising a concern**

If you have a concern about any aspect of how we use or manage data in the Greater Manchester Cancer's Cancer Intelligence Service, please contact:

Patient Advice & Liaison Service (PALS) The Christie NHS Foundation Trust  
Wilmslow Road, Withington, M20 4BX

Tel: 0161 446 8217 between the hours of 10am - 4pm. (Outside of these hours call 0161 446 3000 and ask staff to bleep the on-call manager)

Email: [pals@christie.nhs.uk](mailto:pals@christie.nhs.uk)

### **Further information**

If you require any further information on how we use or share the data we receive in Greater Manchester Cancer's Cancer Intelligence Service, please contact:

Information Governance Department  
The Christie NHS Foundation Trust  
Wilmslow Road  
Withington  
M20 4BX

Tel: 0161 446 8460

Email: [information.governance@christie.nhs.uk](mailto:information.governance@christie.nhs.uk)