



## North Staffordshire Combined Healthcare NHS Trust COVID-19 Privacy Notice

*(This Privacy Notice is to read in conjunction with our Trust Privacy Notice)*

Due to the unprecedented challenges that the NHS as a whole, and us, North Staffordshire Combined Healthcare NHS Trust (NSCHT), face due to the worldwide COVID-19 pandemic, there is a greater need for public bodies to require additional collection and sharing of personal data to protect against serious threats to public health.

In order to look after your healthcare needs in the most efficient NSCHT may need to share your personal information, including health records, with staff from other health organisations (i.e. Clinical Commissioning Groups, Commissioning Support Units, Local authorities etc.) and bodies engaged in disease surveillance for the purposes of research, protecting public health, providing healthcare services to the public and monitoring and managing the COVID-19 outbreak and incidents of exposure.

The Secretary of State has served notice under Regulation 3(4) of the **Health Service (Control of Patient Information) Regulations 2002 (COPI)** to require organisations to process confidential patient information in the manner set out below for purposes set out in Regulation 3(1) of COPI.

### **Purpose of this Notice**

The purpose of this Notice is to require organisations such as NSCHT to process confidential patient information for the purposes set out in Regulation 3(1) of COPI to support the Secretary of State's response to COVID-19 (COVID-19 Purpose). "Processing" for these purposes is defined in Regulation 3(2) and includes dissemination of confidential patient information to persons and organisations permitted to process confidential patient information under Regulation 3(3) of COPI. This Notice is necessary to require organisations such as NSCHT to lawfully and efficiently process confidential patient information as set out in Regulation 3(2) of COPI for purposes defined in regulation 3(1)

### **Requirement to Process Confidential Patient Information**

The Secretary of State has served notice to recipients under Regulation 3(4) that requires NSCHT to process confidential patient information, including disseminating to a person or organisation permitted to process confidential patient information under Regulation 3(3) of COPI.

NSCHT is only required to process such confidential patient information:

- where the confidential patient information to be processed is required for a COVID-19 Purpose and will be processed solely for that COVID-19 Purpose in accordance with Regulation 7 of COPI
- from March 20<sup>th</sup> 2020 until **30<sup>th</sup> June 2022**.

### **COVID-19 Purpose.**

A COVID-19 Purpose includes but is not limited to the following:

- understanding COVID-19 and risks to public health, trends in COVID-19 and such risks, and controlling and preventing the spread of COVID-19 and such risks
- identifying and understanding information about patients or potential patients with or at risk of COVID-19, information about incidents of patient exposure to COVID-19 and the management of patients with or at risk of COVID-19 including: locating, contacting, screening, flagging and monitoring such patients and collecting information about and



providing services in relation to testing, diagnosis, self-isolation, fitness to work, treatment, medical and social interventions and recovery from COVID-19

- understanding information about patient access to health services and adult social care services and the need for wider care of patients and vulnerable groups as a direct or indirect result of COVID-19 and the availability and capacity of those services or that care
- monitoring and managing the response to COVID-19 by health and social care bodies and the Government including providing information to the public about COVID-19 and its effectiveness and information about capacity, medicines, equipment, supplies, services and the workforce within the health services and adult social care services
- delivering services to patients, clinicians, the health services and adult social care services workforce and the public about and in connection with COVID-19, including the provision of information, fit notes and the provision of health care and adult social care services
- research and planning in relation to COVID-19.

### **Summary Care Records**

Summary Care Records (SCR) are an electronic record of important patient information, created from your GP health records. They can be seen and used by authorised staff who work in other areas of the health and care system who are involved in your direct care. Patients who have already consented to having additional information added to their SCR will have additional information shared, which will include Anticipatory Care Plans for vulnerable, frail or elderly patients, although particularly sensitive information will not be automatically included in the sharing. The SCR will help a wide variety of organisation in response to COVID-19, as detailed above.

### **Recording of processing**

A record will be kept by NSCHT of data processed under this Notice.

### **Sending Public Health Messages**

Data protection and electronic communication laws will not stop NSCHT from sending public health messages to you, either by phone, text or email as these messages are not direct marketing.

### **Digital Consultations**

It may also be necessary, where the latest technology allows NSCHT to do so, to use your information and health data to facilitate digital consultations and diagnoses and we will always do this with your security in mind.

### **Visitors to NSCHT Sites**

We have an obligation to protect our staff and employees' health, so it is reasonable for staff at any NSCHT run sites to ask any visitors to tell us if they have visited a particular country, or are experiencing COVID-19 symptoms. This must only be in pre-approved circumstances and we would also ask all patients to consider government advice on the NHS 111 website.

Where it is necessary for us to collect information and specific health data about visitors to our NSCHT sites, we will not collect more information than we need, and we will ensure that any information collected is treated with the appropriate safeguards.



**Review and Expiry of this Notice**

This Notice will be reviewed on or before 31<sup>st</sup> March 2022 and may be extended by The Secretary of State. If no further notice is sent to NSCHT by The Secretary of State this Notice will expire on **30<sup>th</sup> June 2022.**