Leicester, Leicestershire and Rutland
Integrated Care Board

NHS Leicester, Leicestershire and Rutland Integrated Care Board (LLR ICB)

Public Privacy Notice: how your information is used

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Document Author:	Senior Manager Information Governance (and Data Protection Officer) Information Governance Lead Officer
Director:	Chief Finance Officer (and Senior Information Risk Owner) and Chief Medical Officer (and Caldicott Guardian)

Version Control

Version number	Approval / Amendments made	Date (Month Year)
Version 1	The Public Privacy Notices for LLR CCGs have been updated to reflect the transition to Leicester, Leicestershire, and Rutland Integrated Care Board (LLR ICB) from 1 July 2022.	June 2022
	Document presented and approved by the Executive Management Team (EMT) on 27 June 2022.	27 June 2022
Version 2	NHS England Public Privacy Notice template adopted, and content updated to include Fit and Proper Person's Test requirements.	January 2024
Version 3	Review of Privacy Notice and update to National Fraud Initiative section	October 2024
Version 4	Review of the Privacy Notice making reference to: • The Privacy Notice in Easy Reading format • The Privacy Notice written for Children and Young People • Addition of the Sub licensing arrangements for organisations with whom the LLR ICB will be looking to share commissioning data received from NHS England. (Appendix L)	June 2025
Version 4.1	Appendix 1c Enquiries and Complaints updated with reference to sharing information with the Parliamentary Health Service Ombudsman (PHSO).	August 2025

Version 5	Reference made to the Data Use and Access Act (DUAA) 2025. Removal of Appendix K 'The Your Voice Platform'. The LLR ICB contract with Culture Shift Communications Ltd has ended. Appendix B 'Personalised healthcare commissioning' updated to reflect change in delivery of Continuing Healthcare for Adults (CHC), Continuing Care for Children and Young People (CCC) and Section 117 Mental Health and Learning Disabilities Aftercare services (S117).	February 2026
Version 6	Change in contact telephone number	August 2026
Version 7	Reviewed against updated NHS England Public Privacy Notice template and reference made to clustering arrangement between NHS Leicester, Leicestershire and Rutland Integrated Care Board (LLR ICB) and NHS Northamptonshire Integrated Care Board (NICB).	September 2026
Version 8	ICO contact details updated to reflect change in name and address	October 2026

All policies can be provided in large print or Braille formats upon request. An interpreting service, including sign language, is also available.

A version of this Privacy Notice is also available on the LLR ICB website in a format suitable for Children and Young People as well as in an Easy Read format.

What is a Privacy Notice?

This Privacy Notice is a statement that describes how the LLR ICB collects, uses, retains and discloses your personal information.

Different organisations sometimes use different terms, and it can be referred to as a privacy statement, a fair processing notice or a privacy policy.

To ensure that we process your personal information fairly and lawfully we are required to inform you:

- Why we need your data
- How it will be used
- Who it will be shared with
- How long it will be kept
- What rights you have to control how we use your personal information

LLR ICB 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 obligations.

LLR ICB ensures that it complies with the key Data Protection Legislation:

- UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Data Use and Access Act (DUAA) 2025
- The Human Rights Act 1998
- The Common Law Duty of Confidentiality
- Health and Social Care Act 2012 as amended by the Health and Social Care (Safety and Quality) Act 2015

Our contact details

Name: NHS Leicester, Leicestershire and Rutland Integrated Care Board (LLR ICB)

Address: Room G30, Pen Lloyd Building, County Hall, Glenfield, Leicester, LE3 8TB

Phone Number: 01604 476777

Email address: llricb-llr.informationgovernance@nhs.net

Website: https://leicesterleicestershireandrutland.icb.nhs.uk/

ICO registration number: ZB345877

We are the controller for your information. A controller decides on why and how information is used and shared.

Data Protection Officer contact details

Our Data Protection Officer is responsible for monitoring our compliance with data protection requirements. If you have any questions about the use of your personal data or this Privacy Notice, please contact us via the details below:

NHS Leicester, Leicestershire and Rutland Integrated Care Board
Room G30, Pen Lloyd Building, County Hall, Glenfield, Leicester, LE3 8TB.
Telephone: 01604 476777
Email: llricb-llr.informationgovernance@nhs.net

How do we get information and why do we have it?

The personal information we collect is provided directly from you, examples are provided below.

- You ask for our help or involvement with your healthcare.
- You have sought funding for continuing health care or personal health budget support.
- You have applied for a job with us or work for us.
- You are actively involved in our engagement and consultation activities or service user participation groups.
- You have raised an enquiry or a complaint about healthcare that you have received, and we need to investigate.

We also receive personal information about you indirectly from others, in the following scenarios:

- Other health and care organisations involved in your care, e.g. Care Homes may provide the ICB with information for the purpose of continuing healthcare funding.
- Family members or carers (if they raise a complaint, enquiry or request for information on your behalf).
- Members of Parliament (if they raise an enquiry or complaint on your behalf, with your consent).
- Parliamentary and Health Service Ombudsman.
- Organisations we commission to provide healthcare services, for example, GP Practices, University Hospitals of Leicester NHS Trust, Leicestershire Partnership NHS Trust (with your consent).
- Local Authorities (with your consent).
- NHS England (with your consent).

What information do we collect?

Personal information
We process personal information for several purposes such as continuing healthcare, workforce planning, complaints handling, processing of Subject Access Requests, litigation claims.

For the details of what personal information we collect and how we use it please refer to Appendix 1 of this Privacy Notice, further details are provided under the relevant service or function.

More sensitive information
We also process special category information which the Data Protection Act 2018 says is more sensitive and therefore needs more protection:

- Racial and ethnic origin
- Criminal or Suspected criminal offences
- Trade Union Membership
- Religious or philosophical beliefs
- Physical or mental health details
- Sexual orientation

Who do we share information with?

Cluster arrangements between the LLR ICB and NHS Northamptonshire ICB (NICB)
The LLR ICB is operating in a formal cluster arrangement with NHS Northamptonshire Integrated Care Board (NICB) in preparation for the creation of a single Integrated Care Board covering both areas from April 2027, subject to national approval.

During this transition period, as both the LLR ICB and NICB are working under a single structure, we may need to share limited and appropriate information with colleagues in NICB.

Any information shared will be handled in line with UK GDPR, the Data Protection Act 2018, and our existing information governance obligations. LLR ICB and NICB are joint data controllers for your personal information.

We may share information with the following:

- Internally within the LLR ICB and NICB between teams / functions, only where required.
- Provider organisations we commission to provide services e.g., University Hospitals of Leicester NHS Trust, Leicestershire Partnership NHS Trust, with your consent.
- Other NHS Trusts, GP surgeries and other care providers involved in your care and treatment.
- Third party data processors (such as IT systems suppliers or auditors), with your consent.

Where the LLR ICB commissions a third-party data processor to support the services we provide, they are legally and contractually bound to adhere to the same security arrangements as the LLR ICB to handle your personal information. The LLR ICB legally remain the data controllers of the personal information being processed.

In some circumstances we are legally obliged to share information. This includes:

- When required by NHS England to develop national IT and data services
- When reporting some infectious diseases
- When a court orders us to do so
- Where a public inquiry requires the information

We will also share information if the public good outweighs your right to confidentiality. This could include:

- Where a serious crime has been committed
- Where there are serious risks to the public or staff
- To protect children or vulnerable adults

The National Fraud Initiative
The LLR ICB is required by law to protect the public funds it administers. It may share information provided to it with other bodies responsible for auditing, or administering public funds, or where, undertaking a public function, in order to prevent and detect fraud.

The Cabinet Office is responsible for carrying out data matching exercises.

Data matching involves comparing computer records held by one body against other computer records held by the same or another body to see how far they match. This is usually personal information.

Computerised data matching allows potentially fraudulent claims and payments to be identified. Where a match is found it may indicate that there is an inconsistency which requires further investigation.

No assumption can be made as to whether there is fraud, error, or other explanation until an investigation is carried out.

The LLR ICB participate in the UK Government Cabinet Office's National Fraud Initiative : a data matching exercise to assist in the prevention and detection of fraud. We are required to provide particular sets of data to the Minister for the Cabinet Office for matching for each exercise.

The use of data by the Cabinet Office in a data matching exercise is carried out with statutory authority under Part 6 of the Local Audit and Accountability Act 2014.

Data matching by the Cabinet Office is subject to a Code of Practice. Should you wish to know more information on this, please see the Fair Processing Notice.

View further information on the Cabinet Office's legal powers and the reasons why it matches particular information.

For further information on data matching at Leicester, Leicestershire and Rutland ICB please contact: LLR ICB Chief Finance Officer - llricb-llr.enquiries@nhs.net.

What is our lawful basis for using information?

Personal information
Under the UK General Data Protection Regulations (UK GDPR), the LLR ICB processes personal data under the following lawful bases:

Article 6.1 (a) We have your consent - this must be freely given, specific, informed and unambiguous.

Article 6.1 (c) We have a legal obligation - the law requires us to do this, for example where NHS England or the courts use their powers to require the data.

Article 6.1 (e) We need it to perform a public task - a public body, such as an NHS organisation or Care Quality Commission (CQC) registered social care organisation, is required to undertake particular activities by law.

Article 6.1 (f) We have a legitimate interest - for example, a private care provider making attempts to resolve an outstanding debt for one of its service users.

More sensitive data
Under the UK General Data Protection Regulations (UK GDPR), the LLR ICB processes your special category data under the following lawful bases:

Article 9.2 (b) – processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law.

Article 9.2 (h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services.

Article 9.2 (g) – processing is necessary for reasons of substantial public interest.

Article 9.2 (f) – processing is necessary for the establishment, exercise or defence of legal claims

Data Use and Access Act (DUAA) 2025
The DUAA 2025 amends, but does not replace, the UK GDPR, DPA18 and the Privacy and Electronic Communications Regulations (PECR). The DUAA updates key aspects of existing legislation, making it easier for UK businesses / organisations to protect people's personal information while growing and innovating their products and services.

Common law duty of confidentiality
In our use of health and care information, we satisfy the common law duty of confidentiality because:

- You have provided us with your consent (we have taken it as implied to provide you with care, or you have given it explicitly for other uses)
- We have support from the Secretary of State for Health and Care following an application to the Confidentiality Advisory Group (CAG) who are satisfied that it isn't possible or practical to seek consent
- We have a legal requirement to collect, share and use the data
- For specific individual cases, we have assessed that the public interest to share the data overrides the public interest served by protecting the duty of confidentiality (for example sharing information with the police to support the detection or prevention of serious crime). This will always be considered on a case-by-case basis, with careful assessment of whether it is appropriate to share the particular information, balanced against the public interest in maintaining a confidential health service.

How do we store your personal information and how long do we keep it for?

Your information is securely stored for the time periods specified in the NHS Records Management Code of Practice. We will then dispose of the information as recommended by the Records Management Code for example:

- Paper records will be securely disposed via a contract which the LLR ICB hold with the Leicestershire County Council
- Electronic records are deleted by LLR ICB staff in line with the Information Governance policy and the NHS Records Management Code of Practice

What are your data protection rights?

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information (known as a subject access request).

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you. Please contact us if you wish to make a request:

NHS Leicester, Leicestershire and Rutland Integrated Care Board
Room G30, Pen Lloyd Building,
County Hall,
Glenfield, Leicester,
LE3 8TB

Telephone: 01604 476777
Email: llricb-llr.informationgovernance@nhs.net

Automated decision making
The LLR ICB does not make any decisions based solely on automated processing and therefore individual's rights in relation to personal data processed in this way are not applicable.

National data opt-out
The ICB has put procedures in place to review uses and disclosures of confidential patient information against the national data opt-out guidance. The ICB is compliant with the national data opt-out policy.

The information collected about you when you use health and care services can also be used and provided to other organisations for purposes beyond your individual care, for instance to help with:

- improving the quality and standards of care provided
- research into the development of new treatments
- preventing illness and diseases
- monitoring safety
- planning services

This may only take place when there is a clear lawful basis to use this information. All these uses help to provide better health and care for you, your family and future generations. Confidential health and care information is only used like this when allowed by law.

Whenever possible data used for research and planning is anonymised, so that you cannot be identified, and your confidential information is not accessed.

You have a choice about whether you want your confidential information to be used in this way. If you are happy with this use of information you do not need to do anything. If you do choose to opt out your confidential information will still be used to support your individual care.

To find out more or to register your choice to opt out, please visit www.nhs.uk/your- nhs-data-matters.

You can change your mind about your choice at any time.

Data being used or shared for purposes beyond individual care does not include your data being shared with insurance companies or used for marketing purposes and data would only be used in this way with your specific agreement.

How do I complain?

If you have any concerns about our use of your personal information, you can make a complaint to us via the Information Governance Team using one of the below contact methods.

- **Telephone:** 01604 476777

- **Post:** Information Governance Team, NHS Leicester, Leicestershire and Rutland Integrated Care Board, Leicestershire County Council, Room G30, Pen Lloyd Building, County Hall, Glenfield, Leicester, LE3 8TB

- **Email:** llricb-llr.informationgovernance@nhs.net

Following this, if you are still unhappy with how we have used your data, you can then complain to the Information Commission.

The Information Commission's address is:

Information Commission's Office
4th Floor, No. 3 Circle Square
5 Hawkshaw Street
Manchester
M1 7BL

Helpline number: 0303 123 1113
ICO Website: https://www.ico.org.uk

Date of last review
This Privacy Notice was last updated **October 2026** and will be updated as and when required and on at least an annual basis.

APPENDIX 1 A

Leicester, Leicestershire and Rutland

Legal Processes and Claims	
Why are we collecting your Personal Information.	In certain situations, due to its commissioning responsibilities, the LLR ICB is required to become involved in legal proceedings such as claims and litigations; Court of Protection cases; and Coroner's Inquests. It is therefore necessary for it to process personal and special category data for the purpose of, or in connection with, legal proceedings (including prospective legal proceedings), for the purpose of obtaining legal advice, or for the purpose of establishing, exercising or defending legal rights.
How we receive your Personal Information.	Most of the personal information we process is provided to us directly by the legal firm representing an individual complainant or claimant or it may be provided by: • The Courts • Legal representative of individuals • GPs or other healthcare provider organisations • Health and social care professionals involved in an individual's social care needs • NHS England or other regulatory body.
What types of Personal Information we do we collect.	The type of personal information we collect is as follows: • An individual's name, contact information and any other information relating to the situation, including information about the care and treatment provided to the individual. • Information about the representative of an individual • Information about the family and/or carers of an individual • Information about the health and social care professionals involved in an individual's care • Information about Court officials.

The lawful basis under which we may process your Personal Information.	Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is set out in Article 6(1)(c) UK GDPR. This is because it relates to the processing of personal data which is necessary for compliance with a legal obligation to which the controller is subject. Where we process special categories of personal data for these purposes, the legal basis for doing so is Article 9(2)(f) - processing is necessary for the establishment, exercise or defence of legal claims.
Who do we share your Personal Data with and why	We may share this information with the Courts, the legal representatives of the complainant or claimant, the legal representatives for the LLR ICB, the healthcare and care providers where they may be involved or will be involved in the individual's health and care needs previously, currently or prospectively. We may also share information with other parties to the legal proceedings where for instance the LLR ICB is instructed to do so by the Courts.
Who are the Data Processors of your Personal Information	NHS Leicester, Leicestershire and Rutland Integrated Care Board and the legal firms representing the LLR ICB.
How long we will store your Personal Information	Your information is securely stored. We retain and dispose of your information in accordance with our information governance policies and procedures and in line with the national Records Management Code of Practice.

APPENDIX 1 B

Leicester, Leicestershire and Rutland

Personalised healthcare commissioning (e.g. continuing healthcare)	
Why are we collecting your Personal Information.	The NHS Commissioning Board and the Clinical Commissioning Group (Integrated Care Board) (Responsibilities and Standing Rules) Regulations 2012, Part 6 places a duty on the LLR ICB in regard to the assessment and provision of NHS Continuing Healthcare also known as Personalised Healthcare Commissioning (PHC). The LLR ICB's Continuing Healthcare for Adults (CHC) (including Joint Funding arrangements) and Continuing Care for Children and Young People (CCC) are provided through LLR ICB and Northamptonshire ICB (NICB). Section 117 Mental Health and Learning Disabilities Aftercare services (S117) are provided through Leicestershire Partnership NHS Trust (LPT). An individual receiving care or their representative may apply for a review of a decision to decline funding by an Independent Review Panel. The independent review process is coordinated by the NHS Continuing Healthcare team in NHS England. The below links provide further information around the services under Personalised Healthcare Commissioning NHS Continuing Healthcare is explained by NHS Choices – https://www.nhs.uk/conditions/social-care-and-support-guide/money-work-and-benefits/nhs-continuing-healthcare/ S117 Mental Health Aftercare – https://www.nhs.uk/conditions/social-care-and-support-guide/care-after-a-hospital-stay/mental-health-aftercare/ This may also include individual funding requests.

How we receive your Personal Information.	The personal information we process will be provided to the LLR ICB by: • The individual who will be receiving CHC, CCC and S117 services. • Representatives of the individual who will be receiving CHC, CCC and S117 services e.g., family members, lawyers, Care Homes, GPs, Hospitals. • Providers that LLR ICB commissions personalisation healthcare services from. • Local Authority teams: such as Adult Social Care, Social Workers and brokerage teams, GP practices and / or hospital clinicians for individual funding requests.
What types of Personal Information do we collect.	The records that we obtain that relate to these areas may include • Care Home records • Health Records (for example GP, Hospital, Mental Health, District Nursing) • Education and Social Care Records. The type of personal information being processed falls under the following headings: • Behaviour • Cognition (understanding), • Communication • Psychological/emotional needs, mobility, nutrition (food and drink) • Continence, • Skin (including wounds and ulcers) • Nutrition and hydration • Mobility • Breathing symptom • Treatment and symptom control through prescribed drug therapies and medication • Altered states of consciousness and other significant needs.
The lawful basis under which we may process your Personal Information.	Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is set out in Article 6(1)(e) UK GDPR. This is because it relates to the processing of personal data which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Where we process special categories of personal data for these purposes, the legal basis for doing so is Article 9(2)(h) - processing is necessary for the provision of health or social care.
Who do we share your Personal Data with and why	We may share this information with Leicestershire Partnership NHS Trust (LPT), Northamptonshire ICB (NICB) and health and care providers (including Local Authorities e.g. Public Health Teams) where they are involved or will be involved in the individual's health and care needs previously, currently or prospectively. We may also share information with NHS England who is responsible for the review of cases (through the Independent Review Panel) where cases have been escalated to them. An independent review panel is made up of; an independent lay member chair, a representative nominated by the LLR ICB (not involved in the case), a representative nominated by a Local Authority (not involved in the case); and at times there is also a clinical advisor in attendance.

Who are the Data Processors of your Personal Information	NHS Leicester, Leicestershire and Rutland Integrated Care Board, NHS, Leicestershire Partnership NHS Trust (LPT), Northamptonshire ICB (NICB) and local authorities where applicable.
How long we will store your Personal Information	Your information is securely stored. We retain and dispose of your information in accordance with our information governance policies and procedures and in line with the national Records Management Code of Practice.

Leicester, Leicestershire and Rutland

APPENDIX 1 C

Enquiries and Complaints	
Why are we collecting your Personal Information.	Most NHS care and treatment goes well but sometimes things can go wrong. If patients or their carers are unhappy with the care or the service they have received, it is important to let us know so we can explore ways to improve systems and processes going forward. When an enquiry or complaint is received personal information will be required to enable the enquiry or complaint to be reviewed and investigated. The LLR ICB has a statutory duty under the *Local Authority Social Services and NHS Complaints [England] Regulations (2009)* to process personal data in relation to complaints. The LLR ICB will investigate the issue and aim to provide a local resolution to resolve the issue raised. From the 1 July 2023, LLR ICB is also responsible for the management of complaints regarding primary care services within Leicester, Leicestershire and Rutland. Primary care services include primary medical care services (i.e. services provided by GP Practices), pharmacy, ophthalmology and primary care dental services. LLR ICB may directly manage the enquiry/ concern or complaint regarding primary care services, or we may ask our hosted team, that is based in NHS Nottingham and Nottinghamshire ICB, to investigate the matter on behalf of LLR ICB. The statutory responsibility for the complaint response of the complaint will remain with the LLR ICB and therefore the response to the complaint will be approved by the LLR ICB however correspondence may be received from the hosted team in Nottingham. In order to process a complaint, the LLR ICB will collect the relevant information at the point of contact to enable the team to provide a sufficient response to the request.
How we receive your Personal Information.	The personal information we process will be provided to the LLR ICB by: • Patients and / or their relative / carer / representative • Members of Parliament on behalf of the member of the public or patient • Parliamentary and Health Service Ombudsman (PHSO) • Other ICBs (with the consent of the individual) • Provider organisations we commission (with the consent of the individual) • NHS England (with the consent of the individual)

What types of Personal Information do we collect.	The type of personal information the LLR ICB will be processing includes: • Name and contact details including address and telephone number • Details of the enquiry, concern or complaint • GP Surgery or other health and care provider information • NHS number • Date of birth • Special Category health information • Representatives name and contact details (if applicable)
The lawful basis under which we may process your Personal Information.	Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is set out in Article 6(1)(e) UK GDPR. This is because it relates to the processing of personal data which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Where we process special categories of personal data for these purposes, the legal basis for doing so is Article 9(2)(h) - processing is necessary for the provision of health or social care.
Who do we share your Personal Data with and why	We may share this information with • NHS Nottingham and Nottinghamshire ICB – Primary Care Complaints Management Team • Relevant providers (with the consent of the data subject) in order to fully investigate the complaint being made.
Who are the Data Processors of your Personal Information	NHS Leicester, Leicestershire and Rutland Integrated Care Board, NHS Nottingham and Nottinghamshire ICB, MPs, and relevant health and care providers.
How long we will store your Personal Information	Your information is securely stored. We retain and dispose of your information in accordance with our information governance policies and procedures and in line with the national Records Management Code of Practice.

The Parliamentary Health Service Ombudsman (PHSO) is an independent organisation setup by parliament to investigate complaints which cannot be locally resolved by the NHS, UK government departments and other public organisations.

Where a complaint has been investigated by the LLR ICB and the complainant remains dissatisfied with the complaint response, the complainant is able to contact the PHSO for an independent review and investigation.

During the investigation of a complaint, the PHSO may contact the LLR ICB for further personal and / or health care information pertaining to the complaint being investigated.

On occasion the PHSO may contact the LLR ICB requesting information, either personal and / or health care information where a complaint has not been made to the LLR ICB by the complainant but has been raised with the PHSO directly.

The PHSO have legal powers to obtain information relevant to their investigations into a complaint and therefore do not require a complainant / patients consent to share relevant information.

Leicester, Leicestershire and Rutland

APPENDIX 1 D

Population Health Management	
Why are we collecting your Personal Information.	Population Health Management (PHM) is aimed at improving the health of an entire population. It is being implemented all across the NHS and the LLR ICB participates in PHM programmes across the local system. PHM is about improving the physical and mental health outcomes and wellbeing of people and making sure that access to services is fair, timely and equitable. It helps to reduce the occurrence of ill-health and looks at all the wider factors that affect health and care. The PHM approach requires health care organisations to work together with communities and partner agencies, for example, GP practices, community service providers, hospitals and other health and social care providers. These organisations will share and combine information with each other to get a view of health and care services for the population in a particular area. This information sharing is subject to robust security arrangements. Examples of how the information could be used for a number of healthcare related activities include: • improving the quality and standards of care provided • research into the development of new treatments • preventing illness and diseases • monitoring safety • planning services • Understanding the different health problems in different areas/populations
How we receive your Personal Information.	The personal information we process will be provided to the LLR ICB by GP Practices / GPs, Local Authorities, and NHS England (commissioning data sets). Sources of the data may also include local data flows from NHS and Non-NHS providers.

What types of Personal Information do we collect.	The type of personal information the LLR ICB will be processing includes personal data about your health care. This information will be combined and anything that can identify you (such as your name or NHS Number) will be removed and replaced with a unique code. This means that the people working with the data will only see the code and cannot see which patient the information relates to. This keeps your identity private while allowing you to benefit from the insights gained from analysing large amounts of data. The data processed and analysed for the ICB will exclude patients who have expressed a wish not to share information. Your GP can provide more information about any population health management system they are using. Should you have any concerns about how your information is managed by your GP Practice please contact your GP Practice to discuss how the disclosure of your personal information can be limited.
The lawful basis under which we may process your Personal Information.	Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is set out in Article 6(1)(e) UK GDPR. This is because it relates to the processing of personal data which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Where we process special categories of personal data for these purposes, the legal basis for doing so is Article 9(2)(h) - processing is necessary for the provision of health or social care.
Who do we share your Personal Data with and why	We may share this information with an external organisation for the purposes of analysing your data. The external organisations would be acting on behalf of the LLR ICB to help improve healthcare for our population. Your data will not be provided in an identifiable format. Where analysis identifies groups of people who may benefit from an intervention, then this data may be provided to your GP Practice. Only your GP practice can identify the names and other details of these people – the ICB never can. Therefore, as a result of population health management, your GP may be able to offer you additional services.
Who are the Data Processors of your Personal Information	NHS Leicester, Leicestershire and Rutland Integrated Care Board, NHS Midlands and Lancashire (ML), relevant health and care providers, and external organisations who are commissioned to provide the LLR ICB with analytical and business intelligence support.
How long we will store your Personal Information	Your information is securely stored. We retain and dispose of your information in accordance with our information governance policies and procedures and in line with the national Records Management Code of Practice.

APPENDIX 1 E

Communications, stakeholder engagement and patient experience	
Why are we collecting your Personal Information.	It is a part of the legal duties of the LLR ICB to ensure that the public to whom services are being or may be provided, and their carers and representatives (if any), are involved (whether by being consulted or provided with information). The LLR ICB want to involve the public in the planning and development of commissioning arrangements, in the development and consideration of proposals by the LLR ICB for changes in the commissioning arrangements, and in the decisions of the LLR ICB affecting the operation of commissioning arrangements. We want to build strong and supportive communications, collecting patient experiences, involving people including stakeholders and developing strong relationships, so that we can work in partnership and use people's experiences and views to inform our work. LLR ICB offer various mechanisms to the public to receive information through robust communications. It also provides a variety of ways for people to get involved and share their experiences with us. These could be engaging with members of the public and professional colleagues regarding: • Contacting the LLR ICB through its contact forms online • The latest news and information from the LLR ICB • Providing engagement and consultation feedback opportunities on initiatives • Involvement through groups and forums including Patient Participation Group Network, Public and Patient • Involvement Assurance Group, Online Citizens' Panel and the ICB VCSE Alliance. • Invitations to online and offline events and activities • Surveys and polls • Messages through the Be involved mailbox - llricb-llr.beinvolved@nhs.net • Social media channels such as Facebook, Twitter. LLR ICB use Hootsuite to manage our social media platforms. We collect and store information that has been received directly from you when you have consented to this process. We will only share information with third party organisations with your explicit consent or when the law allows.

How we receive your Personal Information.	The personal information we process will be provided to the LLR ICB by: • The individual who has provided their information by contacting the LLR ICB • Provided by the individual through engagement and consultations • Provided by the individual through involvement in groups, forums or events/activities • Provided by the individual through completing health surveys or polls.
What types of Personal Information do we collect.	The type of personal information the LLR ICB will be processing includes: • an individual's name, address, e-mail address and other personal or health information. • Equality data (optional) if signing up to the Citizens' Panel or completing a survey.
The lawful basis under which we may process your Personal Information.	Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is set out in Article 6(1)(a) UK GDPR. Article 6(1)(a) "the data subject has given consent to the processing of his or her personal data for one or more specific purposes"
Who do we share your Personal Data with and why	We may share this information with an external organisation for the purposes of analysing your data. The external organisations would be acting on behalf of the LLR ICB to help ensure appropriate analysis is undertaken. Other recipients of the information include • Various teams across the LLR ICB Teams involved in events or during consultations • LLR ICB's website data processor • LLR ICB's mailing services data processor • LLR ICB's survey processing provider.
Who are the Data Processors of your Personal Information	NHS Leicester, Leicestershire and Rutland Integrated Care Board, relevant health and care providers, external organisations who are commissioned to provide the LLR ICB with analytical and business intelligence support, and Citizen's Panel.
How long we will store your Personal Information	Your information is securely stored. We retain and dispose of your information in accordance with our information governance policies and procedures and in line with the national Records Management Code of Practice.

APPENDIX 1 F

Fit and Proper Person's Test – Board Members	
Why are we collecting your Personal Information.	This notice relates to the information collected and processed in relation to the Fit and Proper Person's Test (FPPT). We use the information that you have given us to: • conclude whether or not you are fit and proper to carry out the role of board director • inform the regulators of our assessment outcome.
How we receive your Personal Information.	Most of the personal information we process is provided to us directly by you as part of your application form and recruitment to satisfy recruitment checks and the FPPT requirements. We may also receive personal information indirectly, from the following sources in the following scenarios: • References when we have made a conditional offer to you. • Publicly accessible registers and websites for our FPPT. • Professional bodies for FPPT to test registration and or any other 'fitness' matters shared between organisations. • Regulatory bodies, eg Care Quality Commission (CQC) and NHS England.

What types of Personal Information do we collect.	The type of personal information we collect is in relation to the FPPT for board members and is described below, much of which is already collected and processed for other purposes than the FPPT: 1. Name, position title (unless this changes). 2. Employment history – This would include detail of all job titles, organisation, departments, dates, and role descriptions. 3. References. 4. Job description and person specification in their previous role. 5. Date of medical clearance. 6. Qualifications. 7. Record of training and development in application/CV. 8. Training and development in the last year. 9. Appraisal incorporating the leadership competency framework has been completed. 10. Record of any upheld, ongoing or discontinued disciplinary, complaint, grievance, adverse employee behaviour or whistle-blow findings. 11. DBS status. 12. Registration/revalidation status where required. 13. Insolvency check. 14. Declaration of any settlement agreements. 15. A search of the Companies House register to ensure that no board member is disqualified as a director. 16. A search of the Charity Commission's register of removed trustees. 17. A check with the CQC, NHS England and relevant professional bodies where appropriate. 18. Social media check. 19. Employment tribunal judgement check. 20. Board member reference completed (where applicable). 21. Annual self-attestation signed, including confirmation (as appropriate) that there have been no changes.
The lawful basis under which we may process your Personal Information.	Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is the need to perform a public task. Processing of this data is necessary on the lawful basis set out in Article 6(1)(e) UK GDPR. This is because it relates to the processing of personal data which is necessary for the performance of the fit and proper person test which is carried out in the public interest and/or in the exercise of official authority vested in the controller.
Who do we share your Personal Data with and why	We may share this information with NHS England, CQC, future employers (particularly where they themselves are subject to the FPP requirements), and professional bodies.
Who are the Data Processors of your Personal Information	NHS Leicester, Leicestershire and Rutland Integrated Care Board and NHS England.
How long we will store your Personal Information	Your information is securely stored. We keep the Electronic Staff Record (ESR) FPPT information including the board member reference, for a career long period. We will then dispose of your information in accordance with our information governance policies and procedures and in line with the national Records Management Code of Practice.

APPENDIX 1 G

Leicester, Leicestershire and Rutland

Freedom to Speak Up and whistleblowing	
Why are we collecting your Personal Information.	All NHS organisations and others providing NHS healthcare services in primary and secondary care in England are required to adopt NHS England's national policy as a minimum standard to help normalise speaking up for the benefit of patients and workers. Its aim is to ensure all matters raised are captured and considered appropriately. Whistleblowing is the term used when a member of the public or an employee contact the LLR ICB to raise a concern about the organisation and the services the LLR ICB provide which is done in the public interest. The LLR ICB can investigate cases relating to service providers commissioned by LLR ICB with whom a contract is held. The LLR ICB's Freedom to Speak up guardians are the Chief Medical Officer and the Non-Executive member is the Renumeration Executive lead.
How we receive your Personal Information.	The personal information we process will be provided to the LLR ICB by: • The person contacting LLR ICB regarding themselves and those involved in the issues leading to the concerns raised • Those considered at risk • Providers we commission services from.
What types of Personal Information do we collect.	The type of personal information the LLR ICB will be processing includes details of the whistleblower depending on the nature in which the information is provided, where data is provided it would include: • Name • Contact details • Specific elements relating to the concerns may be collected, i.e., personal information regarding another employee, or those concerned to be at risk (name, contact information etc.).
The lawful basis under which we may process your Personal Information.	Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is set out in Article 6(1)(e) UK GDPR. This is because it relates to the processing of personal data which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Where we process special categories of personal data for these purposes, the legal basis for doing so is Article 9(2)(h) - processing is necessary for the provision of health or social care.

Who do we share your Personal Data with and why	We may share this information with an external organisation where appropriate for the purposes of an investigation, this may include: • Health and care providers. • Fraud and corruption – local body and NHS Counter Fraud Authority • Serious patient safety issues or issues relating to condition of registration – Care Quality Commission (CQC) • Allegations regarding a clinician's fitness to practice – relevant professional regulator or healthcare body (e.g. CQC, General Medical Council (GMC)) • Safeguarding - Issues will be dealt with in accordance with the LLR ICB safeguarding policies and with local authorities where appropriate.
Who are the Data Processors of your Personal Information	NHS Leicester, Leicestershire and Rutland Integrated Care Board, relevant health and care providers, external organisations who will be supporting the review / investigations.
How long we will store your Personal Information	Your information is securely stored. We retain and dispose of your information in accordance with our information governance policies and procedures and in line with the national Records Management Code of Practice.

APPENDIX 1 H

Leicester, Leicestershire and Rutland

Safeguarding	
Why are we collecting your Personal Information.	LLR ICB has a statutory responsibility to safeguard Children, Looked After Children and Adults who are at potential risk or where there is evidence of harm, abuse or neglect. The LLR ICB is dedicated to ensuring that the principles and duties of safeguarding adults and children are holistically, consistently and conscientiously applied with the wellbeing of all, at the heart of what it does. The data collected by the LLR ICB in the event of a safeguarding situation will be as much personal information as is necessary, or possible to obtain, in order to handle the situation. These may include basic demographics, contact details and special category information (such as health information).
How we receive your Personal Information.	The personal information we process will be provided to the LLR ICB by: • Information from the person contacting LLR ICB with safeguarding concerns • Members of Public • Representative of people at risk • The relevant Safeguarding Boards • Local Authorities • Police • Healthcare professionals (i.e., their GP or mental health team) • Providers we commission where relevant.
What types of Personal Information do we collect.	The type of personal information the LLR ICB may collect includes: • GP Practice Records • Serious Case Review reports • Domestic Homicide Review Reports • Individual Agency Summary Reports • Child Protection Plans • 72 Hour incident forms / Serious Incident forms • Individual Safeguarding reports • Overview reports • CHC Packages of Care • Performance report - GP Names and Professional Registration number

The lawful basis under which we may process your Personal Information.	Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is set out in Article 6(1)(e) UK GDPR. This is because it relates to the processing of personal data which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Where we process special categories of personal data for these purposes, the legal basis for doing so is Article 9(2)(h) - processing is necessary for the provision of health or social care.
Who do we share your Personal Data with and why	We may share this information (if safe to do so) with health and care providers where they are involved or will be involved in the individual's health and care needs previously, currently or prospectively. The information may also be shared with: • The relevant local Safeguarding Boards • Local Authorities • Police • Healthcare professionals (i.e., their GP or mental health team) Providers we commission where relevant.
Who are the Data Processors of your Personal Information	NHS Leicester, Leicestershire and Rutland Integrated Care Board and local authorities where applicable.
How long we will store your Personal Information	Your information is securely stored. We retain and dispose of your information in accordance with our information governance policies and procedures and in line with the national Records Management Code of Practice.

APPENDIX 1 I

Invoice validation	
Why are we collecting your Personal Information.	Invoice validation is an important process as it involves using your NHS number to check that the correct LLR ICB is responsible for paying for your treatment. ML CSU is an accredited Controlled Environment for Finance (CEfF) under a Section 251 exemption, which enables them to process patient identifiable information on behalf of LLR ICB without consent for the purposes of invoice validation – CAG 7-07(a)(c)/2013. We will 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.
How we receive your Personal Information.	The personal information we process will be provided to the LLR ICB by: • The sources of data are providers who submit invoices to NHS Shared Business Services for payment.
What types of Personal Information do we collect.	The type of personal information the LLR ICB may collect includes; NHS number, name, address, financial details.
The lawful basis under which we may process your Personal Information.	Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is set out in Article 6(1)(e) UK GDPR. This is because it relates to the processing of personal data which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Where we process special categories of personal data for these purposes, the legal basis for doing so is Article 9(2)(h) - processing is necessary for the provision of health or social care.
Who do we share your Personal Data with and why	NHS Midlands and Lancashire (ML) will receive personal data relating to invoice validation as an accredited Controlled Environment for Finance.

APPENDIX 1 J

Leicester, Leicestershire and Rutland

Risk Stratification	
Why are we collecting your Personal Information.	Risk stratification is a process GPs use to help them to identify and support patients with long-term conditions and to help prevent unplanned hospital admissions or reduce the risk of certain diseases developing such as type 2 diabetes. This process is used for case- finding and is a type of profiling as it is the automated processing of personal data to analyse or predict health needs. However, this is not a solely automated process as whilst cases are identified through an automated process, no decisions are made automatically; they are made by the GP. The LLR ICB also uses risk stratified data to understand the health needs of the local population in order to plan and commission the right services, which is called 'risk stratification for commissioning.' Risk stratification tools use historic information about patients, such as age, gender, diagnoses and patterns of hospital attendance and admission collected by NHS England from NHS hospitals and community care services. This is linked to data collected in GP practices and analysed to produce a risk score. GPs are able to identify individual patients from the risk stratified data when it is necessary to discuss the outcome and consider preventative care. However, the LLR ICB can never identify an individual from the risk stratified data that we see. Where the risk stratification process has linked GP data to health data obtained from other sources i.e. NHS England or other health care provider, the GP will ask for your permission to access the details of that information. NHS ML CSU is our data processor for risk stratification purposes.
How we receive your Personal Information.	Personal data is supplied by GPs and NHS England (Secondary Use Services Data).

What types of Personal Information do we collect.	Data from the GP Practice system will be obtained by using a "bulk data extract", uploaded directly by the risk stratification tool supplier from the practice system. Prior to the upload, the supplier will obtain permission from the practice to request the data from the practice system provider and the practice will notify their system providers that this permission has been granted. The data extract will EXCLUDE patients who have expressed a wish not to share information. Reports produced from the system including identifiable data are only provided back to your GP or member of your care team as data controller in an identifiable form. Your GP can provide more information about any risk stratification programme they are using. Should you have any concerns about how your information is managed at the surgery please contact the Practice Manager to discuss how the disclosure of your personal information can be limited. The Secondary Uses Service (SUS) is the single, comprehensive repository for healthcare data in England which enables a range of reporting and analyses to support the NHS in the delivery of healthcare services. Information on care provided for all patients by health care providers (both NHS and independent sector healthcare providers for NHS patients only) must be submitted to the Secondary Uses Service according to the Commissioning Data Set Mandated Data Flows guidelines.
The lawful basis under which we may process your Personal Information.	Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is set out in Article 6(1)(e) UK GDPR. This is because it relates to the processing of personal data which is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Where we process special categories of personal data for these purposes, the legal basis for doing so is Article 9(2)(h) - processing is necessary for the provision of health or social care.
Who do we share your Personal Data with and why	The LLR ICBs 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. The LLR ICB does not have access to identifiable information.
Who are the Data Processors of your Personal Information	NHS Leicester, Leicestershire and Rutland Integrated Care Board and NHS Midlands and Lancashire (ML).
How long we will store your Personal Information	Your information is securely stored. We retain and dispose of your information in accordance with our information governance policies and procedures and in line with the national Records Management Code of Practice.
Common Law Duty of Confidentiality	The LLR ICB has approval under Section 251 from the Secretary of State through the Confidentiality Advisory Group (CAG) of the Health Research Authority to allow pseudonymised information to be sent to the LLR ICB by NHS England in order to help and support the LLR ICB plan and commission appropriate health care services for the population of Leicester, Leicestershire and Rutland.
Opt-Out	You have the right to opt-out of your identifiable information being used for Risk Stratification purposes. Please contact your GP for further information around opting out and how this may affect the health care you receive.

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APPENDIX 1 K

Sub Licensing	
Why are we collecting your Personal Information.	LLR ICB receive de-identified or pseudonymised data from NHS England under a Data Sharing Agreement for the purposes of commissioning health and care services for the population of Leicester, Leicestershire and Rutland. Sub Licensing is a process through which the data shared by NHS England with ICB's can be onward shared with partner organisations within the Integrated Care System (ICS) to meet the needs of the population. The LLR ICB has the authority under the Data Sharing Agreement with NHS England to share the data received from NHS England with our partner organisations in the Leicester, Leicestershire and Rutland Integrated Care System (ICS) to support the commissioning of health and care services for the population following strict criteria and requirements as set by NHS England.
How we receive your Personal Information.	The data is received from NHS England under a Data Sharing Agreement with LLR ICB.
The lawful basis under which we may process your Personal Information.	Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information is set out in Article 6(1)(e) - processing is necessary for the performance of a task in the public interest or in the exercise of official authority vested in the controller. Article 9(2)(h) - processing is necessary for the provision of health or social care.

Who do we share your Personal Data with and why	NHS Midlands and Lancashire (ML) receive the data from NHS England as the data services provider for LLR ICB. The data will be shared with sub licensee organisations within the Integrated Care System (ICS) with whom a sub licensing agreement is in place for the purposes of collectively meeting the needs of the population. All sub licensing requests for data will be vetted and approved by the ICB Caldicott Guardian and Chief Clinical Information Officer. The onward sharing of data by the sub licensee is strictly prohibited. The Sub Licensing Register which lists all the partner organisations that the LLR ICB share your data with can be found on the LLR ICB Website.
Who are the Data Controllers & Processors of your Personal Information	NHS Leicester, Leicestershire and Rutland Integrated Care Board are the Data Controllers. Once a sub licensing agreement is in place between the LLR ICB and the sub licensee organisation, the sub licensee will also become a Data Controller of the data shared by the LLR ICB. The Sub Licensing Register which lists all the partner organisations that the LLR ICB share your data with can be found on the LLR ICB Website. NHS Midlands and Lancashire (ML) are the Data Processors.
How long we will store your Personal Information	Your information is securely stored. We retain and dispose of your information in accordance with our information governance policies and procedures and in line with the national Records Management Code of Practice. Data shared with sub licensee organisations within the ICS will be ceased on the termination or expiry of the sub licensing agreement between the LLR ICB and the sub licensee organisation. Under the agreement, the sub licensee organisation will destroy the data provided under the agreement and provide a data destruction certificate to the LLR ICB.