

National Clinical Audit of Psychosis Early Intervention in Psychosis audit 2020/2021 privacy notice

The Royal College of Psychiatrists (the College) hosts the National Clinical Audit of Psychosis (NCAP). The audit collects data on compliance with agreed standards and provides NHS Trusts, Health Boards in Wales, services in Ireland and organisations providing NHS-funded care (referred to as services in this privacy notice) with benchmarked reports on their performance.

The audit aims to improve the quality of care provided for service users (patients) with psychosis. In 2020/2021, the audit will be collecting patient identifiable information from services in England as part of the EIP audit. This is:

- to test the feasibility of using routine data for future rounds of the audit.

NCAP has Section 251 approval to collect patient identifiable data without consent (ref: 20/CAG/0105).

The College is the data processor for the information you provide to us as part of NCAP. The Healthcare Quality Improvement Partnership (HQIP), is the funder for the audit. HQIP is joint data controller with NHS England for the audit.

If you have any queries about the process or how we handle your information, please contact us at dataprotection@rcpsych.ac.uk

Sources of information used by NCAP: NCAP uses a range of sources to collect information on service user care. In 2020/2021, these will include services and NHS Digital.

For the EIP audit, patient identifiable data about service users' care will be collected directly from services in England, and pseudonymous data on service users' care will be collected from NHS Digital.

Services: submit information about service user care to NCAP via a secure web-based tool. Security and confidentiality are maintained using passwords and a registration process.

- Most information is collected from hospital records, although some may be collected specifically for the audit.
- NCAP also gathers registration information (e.g. audit lead contact details) directly from services to support the management of the audit.

NHS Digital: will provide information about service user care held in the Mental Health Services Data Set (MHSDS). NCAP will provide patient identifiers (NHS Number, date of birth, gender and postcode) to NHS Digital, to receive the MHSDS data for these patients.

What personal information will we process?

- Patient identifiable data (NHS number, date of birth and postcode);
- Demographic data including age, sex, ethnicity;
- Care data including interventions received (e.g. medication, psychological therapies), processes of care.

What will we do with your information?

NCAP publishes reports on the aggregated data at NHS Trust/Health Board/organisation, regional and national levels at specific points during the audit programme.

When contacting services, we will use the staff contact details provided to us at registration and in connection with any ongoing relationship with NCAP.

We will:

- Only use your information for the purpose of this audit or to fulfil business, legal or regulatory requirements, if necessary.
- Hold your data in secure data centres in the EU and US which comply with ISO 27001 security standards. Your data is also held securely by us and/or our data processors whether the information is in electronic or physical format.
- Ensure that only staff members working on the individual audit and data processors by approval have access your data. All data files are password-protected and stored in restricted areas.

We will not:

- share any information with any third parties for marketing purposes.

What information do we ask for, and why?

NCAP does not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to:

- maintain a record of and to contact services; or
- for the purpose of assessing compliance against the agreed audit standards and providing benchmarked reports on compliance and performance; or
- compare the data we collect with the data services in England submit directly to NHS Digital.

Use of data processors

Data processors are contracted third parties who process data for us. This means that they cannot do anything with the information unless we have instructed them to do it, nor can they share your data with any other organisation.

They will hold it securely and retain it for the period we instruct.

The data processors we use are:

- Software providers/hosts for databases which hold the data (Formic);
- Hosting partner which provides the secure virtual datacentre (Microsoft);
- External statisticians may be used for detailed analysis of anonymised sections of data.

How long is the information retained for?

Data that does not identify the individual is retained for the duration of the audit and for five years after it is completed.

Identifiable data may be held for the one-year period, granted by Section 251 approval. To hold data longer than this, a Section 251 extension must be applied for and granted.

Legal basis for processing

The national clinical audits process data under Article 6(1)(e) of the General Data Protection Regulation (GDPR) which allows for the processing of data where this is carried out in the public interest or in the exercise of official authority vested in our joint data controllers, HQIP and NHS England.

Confidentiality

All data submitted for the audit are treated as confidential. Once data are received by the College, access to patient identifiable information is restricted to the NCAP team and is logged and monitored.

NCAP has Section 251 approval to provide patient identifiers (NHS Number, date of birth, gender and postcode) to NHS Digital, in order to receive the data in MHSDS for these patients.

The audit team will not publish information that can enable individual service users, family, friends or carers, or staff to be identified. Any contracts with data processors include confidentiality clauses.

The confidentiality and security of information is maintained in the following ways:

- All reports include aggregated data at the relevant level (national, regional, NHS Trust/Health Board/organisation);
- In all audit publications, the statistical information is reviewed to ensure the risk of identification is minimised, and where necessary, small numbers are suppressed. This assessment follows guidelines issued by the Office for National Statistics - Review of the Dissemination of Health Statistics: Confidentiality Guidance.

Your rights

Under the Data Protection Act 2018 and General Data Protection Regulation (GDPR) you have rights as an individual which you can exercise in relation to the information, we hold about you.

What if I do not want my information used by the audit?

Service users can choose to opt-out of the EIP audit. Opting out of the audit will not affect the care a service user receives.

If you are in England and would like to opt-out of the case-note audit before 1st December 2020, please:

- Contact your local NHS Trust/organisation directly and request to opt-out from the audit. The Trust/organisation will be able to confirm whether you are included in the sample. If your data are due to be submitted to NCAP, they will notify the NCAP team of your request.

The NCAP team will acknowledge receipt of this to the Trust/organisation who will provide confirmation to you.

If you are in England and would like to opt-out of the case-note audit from 1st December 2020, you can follow one of the following procedures:

- 1) Contact the NCAP team by email (NCAP@rcpsych.ac.uk) and request to opt-out from the audit. The team will confirm your identity and check whether you are included in the sample. If you are included in the sample, the team will confirm this with you and the Trust/organisation. The team will then remove your data and email you and the Trust/organisation to provide confirmation of this.
- 2) Contact your local NHS Trust/organisation directly and request to opt-out from the audit. The Trust/organisation will be able to confirm whether you are included in the sample. If your data have been included, they will contact the NCAP team with your request. The NCAP team will delete the data and provide confirmation of this to the Trust/organisation. The Trust/organisation will provide confirmation to you.

Please note that once analysis is completed in March 2021 it may not be possible to remove your data from the sample.

National data opt-out

We confirm that the audit is currently compliant with the national data opt-out policy. To find out more or to register your choice to opt out, please visit www.nhs.uk/your-nhs-data-matters.

Complaints or queries

The College takes any personal data complaints very seriously.

We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate.

If you want to make a complaint about the way we have processed your personal information you can contact us using the details at the bottom of this notice.

You can also complain to the Information Commissioner's Office directly:

Wycliffe House Waterlane Wilmslow Cheshire SK9 5AF

Website: <http://www.ico.org.uk/>

Tel: 0303 123 1113

Changes to this privacy notice

We keep our privacy notice under regular review. This Privacy Notice was last updated in September 2020.

How to contact us

If you want to request information about our privacy policy you can email us at dataprotection@rcpsych.ac.uk or at the below address:

Data Protection Officer

Royal College of Psychiatrists

21 Prescott Street

London

E1 8BB

Please read our disclaimer.