

NHS Grampian

Privacy notice

Test of change – Care Manager access to health records systems

What is happening?

NHS Grampian and our local authority partners, Aberdeenshire Council, Aberdeen City Council and Moray Council, provide integrated health and social care services under the direction of the local Integration Joint Boards.

To support the prompt and appropriate discharge of patients, it is essential the correct packages of care are in place. Care packages are put in place by Local Authority Care Managers, but understanding the social care needs of any person relies on an understanding of their health conditions.

NHS Grampian and our local authority partners have committed to putting people at the heart of integrated, system-wide approaches to health and social care. Rather than maintain artificial boundaries between NHS Grampian and each Council that slow discharge planning, the Health Board has agreed Care Managers will have access to the health records system so that they can design the right approach to care packages to the benefit of our patients.

Care Managers have always had access to your health information for discharge and care planning. What has changed is that we (NHS Grampian) will provide direct access to the system storing your health information. This should speed up processes between NHS Grampian and the relevant local authority, and to help you get home with the right support as soon as possible.

This new access is being tested for six months to see what impact it has on improving discharge processes for our patients. Following the conclusion of this test, NHS Grampian will consider whether this is the right approach to sharing key information or whether other approaches might be more suitable.

Please be reassured this is not new access to information. It is providing direct access to the system. As a safeguard, NHS Grampian will implement a process to check no records are being accessed inappropriately. Care Managers are registered professionals and subject to professional duties of

confidentiality. They have also signed a personal confidentiality undertaking with NHS Grampian. Finally, the Health Board has signed formal agreements with each of the local authorities concerning Care Manager access to these systems.

Your health records will not be removed from NHS Grampian. This access is to data so your health and social care need can be better met at discharge through collaboration between NHS Grampian and your local authority.

Personal data and special categories of personal data

Care Managers will have access to your demographic data (name, address, date of birth, CHI number etc) and your health information so that they can plan effectively for your discharge from hospital.

Your health record may also include information on your ethnicity and other special categories of data such as your religion or other similar philosophical belief, your sex life or your sexual orientation where those matters have a bearing upon your health care.

They will also have access to data about other people in your health record such as the details of your key contacts, next of kin, welfare guardian etc. Anyone who fulfils such a role on behalf of one of our patients should understand that their demographic data (name, contact details etc) will be available to Care Managers.

Data controller

NHS Grampian is the data controller for your health data and your health records remain with the Health Board. Access will be provided to local authority Care Managers for the purposes of managing your health and social care needs upon discharge. The Board has signed an agreement with each local authority governing this access. Access is only for the purposes of discharge/care planning. Care Managers may not access your health information for any other purpose, such as ongoing social care management. Care Manager access to your health record is limited to a maximum of four weeks after your date of discharge. Where information appears in your social care plan, the controller for that information will be the relevant local authority providing services to you, as it always was.

There is no change to the retention of your data by the Health Board or the relevant local authority; this change is about facilitated access to health data for the purposes of discharge planning.

Lawful processing

The processing of your data is further to the official authority of the Health Board and a task in the public interest (i.e. the provision of your care). Concerning your health records and other special categories of personal data, processing is lawful for the purposes of the provision of health or social care and the management of the health and social care system.

Your rights

If you wish to update, access, erase, or limit or complain about the use of your personal data please let our Data Protection Officer know contacting Information Governance - gram.infogovernance@nhs.scot - or 01224 551549. You may also wish to contact the Information Commissioner's Office - <https://ico.org.uk/your-data-matters/raising-concerns/> or seek to enforce your rights through judicial remedy.