

Privacy Notice – Start Well public consultation

North Central London Integrated Care Board (NCL ICB) is undertaking a public consultation for proposed changes to maternity, neonatal and paediatric surgical services.

In order to do this, we will be collecting personal data of those that give their feedback. This includes data collected through online or written questionnaire responses, at face to face or online meetings and written and verbal feedback.

This data will include the following special categories of data:

- Racial/ethnic origin
- Religious or philosophical beliefs
- Sexual life
- Disability status
- Details of employment status
- Details of applicant carer status.

This data will be used to inform and improve the proposals set out in the public consultation. This includes understanding differences in views on and impact of proposals based on the characteristics of those that participate in the consultation. This data will support NCL ICB as the responsible commissioner to meaningfully consider responses to the consultation and ensure that the proposals are informed by feedback. This is an important part of meeting the ICB's duties under the Equality Act 2010.

To support the consultation, we are working with an independent organisation, Opinion Research Services (ORS), that is processing data on behalf of the ICB. NCL ICB remains controller of this data and any rights to object to the processing of this data can be directed to NCL ICB.

ORS will produce a full report of the consultation in which the views of individual members of the public acting in a personal capacity will be anonymous. However, where feedback is from representatives of organisations or someone acting in an official capacity, it may be attributed.

ORS have their own privacy notice which outlines how they manage data collected during consultation. This can be found here: https://online.ors.org.uk/privacy_notice

NCL ICB will also collate data as part of its engagement activities related to this consultation, this data will be transferred to ORS to be used as part of the overall analysis and inclusion in the final report.

1) Controller contact details	NHS NCL Integrated Care Board (ICB) 2nd Floor Laycock PDC Laycock Street London Greater London N1 1TH
2) Data Protection Officer contact details	Tony Haworth Data Protection Officer nclicb.dpo@nhs.net

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<p>3) Purpose of the processing</p>	<p>Fulfilment of a Public Task –</p> <p>Undertaking of a public consultation to inform potential significant changes to NHS maternity, neonatal and paediatric surgical services in North Central London. The proposals included in the consultation have the purpose of improving care.</p>
<p>4) Lawful basis for processing or sharing</p>	<p>The lawful justifications for the processing and possible sharing of this data are;-</p> <p>The Data Protection Act 2018 (DPA) section 8(c) – “the exercise of a function conferred on a person by an enactment or rule of law”, specifically the NHS Act 2006 and the Health and Social Care Act 2012, allowing use of UK General Data Protection Regulations (UK GDPR) Article 6(1)(e) ‘...for the performance of a task carried out in the public interest or in the exercise of official authority...’</p> <p>And</p> <p>DPA Section 10(1)(d) “public health”, satisfying Section 3 of DPA Schedule 1 Part 1, allowing us use of UK GDPR Article 9(2)(i) “processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices...”</p> <p>And</p> <p>The National Health Service Act 2006 (as amended by the Health and Social Care Act 2012 and 2022)</p> <ul style="list-style-type: none"> • Section 242, requires the NHS to make arrangements to involve patients and the public in planning services, developing, and considering proposals for changes in the way services are provided and decisions to be made that affect how those services operate <p>And</p> <p>The Equality Act 2010</p>
<p>5) Recipient or categories of recipients of the shared data</p>	<p>The independent organisation that is processing anonymous data on behalf of the ICB is Opinion Research Services (ORS) www.ors.org.uk</p> <p>Data used as part of this project will not be shared with anyone other than ORS or NCL ICB.</p>
<p>6) Rights to object</p>	<p>You have the right under Article 21 of the UK GDPR to object to your personal data being processed. Please contact the ICB if you wish to object to the processing of your data.</p>
<p>7) Right to access and correct</p>	<p>You have the right to access any identifiable data that is being shared and have any inaccuracies corrected.</p>
<p>8) Retention period</p>	<p>The data will be held by ORS for no more than one year after any decisions around possible changes to services have been finalised. Any data held by the ICB will be held in line with the NHS Records Management Code of Practice.</p>

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9) Right to Complain.

You have the right to complain to the Information Commissioner’s Office, you can use this link <https://ico.org.uk/global/contact-us> or call their helpline Tel: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

There are National Offices for Scotland, Northern Ireland and Wales, (see ICO website)