

# NHS Federated Data Platform

## Privacy Notices

### Local Analytical Hub (LAH) - FDP Product Privacy Notice

#### Product Description

Integrated Care Boards (ICBs) are NHS organisations responsible for planning health services for their local population.

The Integrated Care Boards (ICBs) use this product to support and improve the way they manage health and care services for their local population, to provide the required care and services for the area's population.

The Local Analytical Hub (LAH) enables ICB analysts across the area where you live to work together to understand the health and care issues across the area to help identify the actions they can take to improve your local health and care services.

Information about you is treated to make sure you cannot be identified. De-identified information is used in order to create the product.

#### What are the purposes for processing my personal data?

The data within the workspaces allows analysts in the Integrated Care Board (ICB) to understand the use of health and care services, identify where there are problems with delivery of care and highlight differences in care provided across communities.

#### What personal data about me is processed in this Product?

Personal data which has been de-identified (we call this de-identified data) will be processed by the ICB for the purposes above. De-identified data that is processed to create the Product and allow analysis to be completed may include data about:

- Age
- Sex
- *Date of Birth*
- Gender
- Postcode
- *General Identifier – NHS Number*
- *Race or ethnicity*
- *Medical conditions, diagnosis and treatment*

#### Who is my personal data shared with?

De-identified data is securely analysed by a small number of data analysts in the ICB for the purpose of understanding how services are working and identify health services that are required across your area.

## UK General Data Protection Regulation (UK GDPR) Information

### Controllers of your personal data

Under data protection law, the ICB using the Local Analytical Hub, are the controller of your de-identified personal data. The specific ICBs using the Local Analytical Hub are listed on the [Product Description page of the NHS England website](#).

### Legal grounds for processing your personal data

The processing of de-identified personal data by ICBs for the purposes explained above is permitted under the following legal grounds under data protection law (this is UK GDPR and the Data Protection Act 2018 (DPA2018)):

- **Public Task** - Article 6(1)(e) of UK GDPR 'necessary for the performance of a task carried out in the public interest or in the exercise of official authority...'
- **Health Care** - Article 9(2)(h) of UK GDPR 'necessary for the purposes of preventative 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..." In addition, the legal grounds under paragraph 2 of Part 1 of the DPA 2018 apply (health care purposes).

*Under Schedule 6 of the National Provider Contracts, the commissioning datasets within the Strategic Commissioning Tool (SCT) can be linked to datasets surfaced by ICBs locally under the Local Analytical Hub (LAH). This would also permit the data to move between the SCT product and LAH product within the ICB's local FDP tenant.*

### Common Law Duty of Confidentiality:

- **Legal Obligations** – The data used and linked within this product from the Strategic Commissioning Tool (SCT), NHSE is required by law to process confidential patient data it collects, pseudonymises and anonymises to create the pseudonymised and anonymised data input and output to be shared with the ICB. This is required under legal direction referred to above and issued by the secretary of state for health and social care to NHSE under section 254 of the Health and Social Care Act 2012.
- The de-identified personal data processed about patients by the ICB for the purposes stated above are also confidential data. As the ICB is processing your confidential data to complete analysis to enable planning health services for their local population, it is either relying on your explicit consent to do this, as you have provided this to the ICB or NHS organisation who has collected your data at point of care or the ICB has achieved a section 251, meaning it allows the ICB to collect this confidential data for the purposes above. The ICB will keep your de-identified personal data confidential and

only use and share it with other members of the ICB analysts to provide the local population with health and care services and subject to strict confidentiality controls to ensure your information remains confidential.

### **Processor acting on behalf of ICBs**

**Palantir Technologies UK LTD:** The data platform contractor, Palantir Technologies UK LTD is a processor acting on behalf of the ICB who are using this Product. They provide the data platform and the technology that the Product uses and only act on the instructions of the ICB.

**IQVIA:** will act as a data processor via the NHS PET national tool in relation to 'treating data' so that a person can no longer be identified. IQVIA teams will not have access to the identifiable data processed.

### **Your rights under UK GDPR**

You have the following rights under UK GDPR in relation to the processing of your personal data by the ICB for the purposes above:

- Right to be informed
- Right of access
- Right to rectify
- Right to object

Further information about these rights is in the NHS Federated Data Platform Privacy Notice [here](#). The ICB will also have a Privacy Notice on its own website which will explain more about how the ICB processes your personal data, your rights and how to exercise them.

### **Does the National Data Opt Out or any other opt out apply to this Product?**

Where the National Data Opt Out and Type 1 Opt Outs apply to the processing of your personal data by the organisations providing data to the ICB, the opt out will have been applied before the data is processed by the ICB.

### **More information**

For more information about how personal data is processed within the Federated Data Platform please see the [NHS Federated Data Platform Privacy Notice here](#).

## **Strategic Commissioning Tool (SCT) - FDP Product Privacy Notice**

### **Product Description**

Your Integrated Care Board (ICB) is responsible for planning the delivery of NHS services in its area including deciding how resources are allocated. They use this Product to help decide what services to commission and to improve the NHS services provided to you. The Product enables care organisations to assess the effectiveness of their services, supporting them to plan and deliver care.

### **What are the purposes for processing my personal data in this Product?**

The Product enables the ICB to better understand how NHS organisations in your area are providing care. It is a tool to: improve population health; enhance the patient experience; reduce unfairness in health outcomes, and support staff well-being.

### **What personal data about me is processed in this Product?**

Personal data which has been de-identified (we call this de-identified data) will be processed by ICB in your area for the purposes above. De-identified data that is processed to create the Product and to create anonymous data in the dashboards may include data about a patient's:

- Postcode
- Date of birth and age
- Sex
- Living habits
- Professional Training / Awards / Education
- General Identifier e.g NHS Number
- Physical / Mental Health or Condition, Diagnosis / Treatment
- Racial or ethnic origin

This data is used to create dashboard where the information is 'aggregate (grouped together) so that no individuals are identifiable.

### **Who is my personal data shared with?**

De-identified data is securely analysed by a small number of data analysts in the ICB for the purposes of creating anonymous aggregated data to display in dashboards. This is data that doesn't identify you. It is therefore not personal data. Your personal data will not be shared with any other organisation as part of this Product.

### **UK General Data Protection Regulation (UK GDPR)**

Information Controllers of your personal data Under data protection law the ICB is using the Product are the legal controllers of your personal data under data protection laws. The

specific ICBs using the Product are listed on the [Product Description page of the NHS England website.](#)

## Legal grounds for processing your personal data.

### Legal basis under UK GDPR & Data Protection Act 2018 (DPA 2018):

#### Article 6 – Personal Data

- **Public Task** - Article 6 (1) (e) Processing 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 by virtue of the statutory functions referred to above. Statutory authority for the ICB to process the data in this product is: Application of the functions of an ICB as set out in the Health & Care Act 2022 (sections 21 – 25) and it's modification of the NHS Act 2006. In particular the duties with regards to:
  - Effectiveness and efficiency
  - Improvement in the quality of services
  - Reducing inequalities
  - Promote integration

#### Article 9 – Special Category Personal Data

- **Health Care** - Article 9 (2) (h) processing is necessary for medical diagnosis, the provision of health care, or the treatment or via of health care services and system (Health Care) plus Schedule 1, Part 1, Paragraph 2 '*Health or social care purposes*' of DPA 2018.

## Common Law Duty of Confidentiality

**Not applicable** - The Data processed using the SCT is pseudonymised via the NHS PET national tool and any data disclosed is Anonymous Aggregated Data or Operational Data and is not Confidential Patient Data. In phase 1 there is no GP data and the national pseudo key is used.

The FDP Benefit Metrics Data shared with NHSE is Anonymous Aggregated or Operational Data and is not Confidential Patient Data.

## Processor acting on behalf of care organisations and the ICB

**Palantir Technologies UK LTD:** The data platform contractor, Palantir Technologies UK LTD is a processor acting on behalf of the NHS England who are using this Product. They provide the data platform and the technology that the Product uses and only act on the instructions of the NHS England and the ICB. Accenture support Palantir Technologies UK LTD in their role as processor for the above purposes.

**IQVIA:** will act as a data processor via the NHS PET national tool in relation to 'treating data' so that a person can no longer be identified. IQVIA teams will not have access to the identifiable data processed.

## Your rights under UK GDPR

You have the following rights under UK GDPR in relation to the processing of your personal data by the ICB for the purposes above:

- Right to be informed
- Right of access

- Right to rectify
- Right to object

Further information about these rights is in the [NHS Federated Data Platform Privacy Notice](#). The NHS Bristol, North Somerset and South Gloucestershire Integrated Care Board privacy notice is available on the [ICB website](#) and includes more information about how the ICB processes your personal data, your rights and how to exercise them, as well as contact details for data protection officers.

### **Does the National Data Opt Out or any other opt out apply to this Product?**

The National Data Opt Out policy does not apply to this Product as the data shared with the ICB to create the Product has been collected and shared under a legal obligation (the Legal Direction) and therefore the National Data Opt out does not apply. More information is available on the [NHS website](#).

Type 1 Opt Outs do not apply to this Product because the Datasets used to create the Product does not contain Confidential Patient Information that has been collected by the ICB from GP Practices.

### **More information**

For more information about how personal data is processed within the Federated Data Platform please see the [NHS Federated Data Platform Privacy Notice](#).

Last updated date – 30 Sep 2025