

London SDE London Analytics Platform

Privacy Notice

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1. Important Information about the London Analytics Platform

This document is aimed to provide both professionals and patients alike with detailed, yet concise, transparency materials about the London Analytics Platform, including how it works, what information about you is being used, what it is being used for, what your rights are and how you can exercise them.

The Sub-national Secure Data Environment (“**SNSDE**”) is a programme of work nationally funded by NHS England which involves the creation of 11 NHS-led SNSDEs covering the whole of England, including London. The **London Secure Data Environment (“London SDE”)** is under development as part of the wider SNSDE programme.

The London Analytics Platform is an integral part of the London SDE. SDEs are platforms that uphold the highest standards of privacy, security and confidentiality, providing NHS organisations, and in limited circumstances, to approved third parties, access to patient level data, without allowing the data to be extracted from the environment.

The London SDE is formed by two important components:

- the London Data Service, and
- the London Analytics Platform.

We have a separate Privacy Notice for the London Data Service. If you wish to have more information about that, please follow this [link](#).

1.1 What is the London Analytics Platform, how does it work and what data does it collect?

For care to be truly built around individuals, there is a need for their health and care professional to view selected information about that individual’s health and care packages and – crucially – that individual’s personal goals and aspirations.

This is best achieved through integrated care. Integrated care means the various care teams work together to provide care that is focused on individual people and their needs. Bringing together all the different parts of the health and care system, for both adults and children, will provide better communication and sharing information resulting in less confusion for individuals, carers and staff. This will mean one set of goals agreed by the individual, supported by one team, one approach.

But for health and care professionals to be able to work together to provide care in an integrated way, it is important that they will have access to all necessary information about the patients. The issue is that, even to this day, the data collected by the majority of NHS organisations about their patients is kept in their internal systems (called electronic patient records, or EPR), with limited data being shared among those organisations.

That’s where the London SDE comes in.

As a component of the London SDE, the London Data Service brings together patient records from different health and care organisations in London. The records linked by the London

Data Service are then made available in the London Analytics Platform, which provides clinicians and health and care professionals with a holistic overview of a patient's healthcare record. The database in the London Analytics Platform is made up of patient healthcare records from various sources, including information from both adults and children's health and care, including:

- GP practices;
- Hospitals;
- Adults and children's social care services;
- Mental health services;
- Community care services;
- Local authorities.

The shared data held on the London Analytics Platform allows these clinicians and healthcare professionals to prescribe better treatment and provide better care in general as they have the full picture of a patient's health and care conditions.

The London Analytics Platform helps health and care professionals to provide integrated care to patients. They will have secure and confidential access to information about patients not only from their own records but also from the records of other care providers who also hold information about those patients, including both adults and children, to ensure that there is safer and better treatment, based on more accurate information.

As a result, patients will not have to repeatedly explain their medical history to different people or to remember specific details about medications, treatments and medical history each time they see a new health or care professional. It also allows patients to be more involved and have more knowledge about their own health and well-being.

By using the London Analytics Platform, health and care professionals from the different health and care organisations involved in patients' care will be able to access identifiable information about those patients, including their full name, contact details, date of birth, NHS number as well as details about their health and care and treatment. Here is an example:

Patient Name	Sam Lentil
NHS Number	8453211567
Date of birth	20/05/1945
Phone number	01234 567890
Residential postcode	E1 111
GP and hospital records	A&E visit 13/06/1973
Health conditions	Diabetes
Medication and allergies	M&M, 3 x daily for 2 weeks
Appointments, treatment and care	Geriatrician, Imperial College Healthcare NHS Trust – 01/04/1982
Social or mental health information relevant to care	Mental health user
Test results	Blood pressure 120/80mmHg

The London Analytics Platform will not collect all personal data related to a person. Where a particular code is 'legally restricted' (previously known as 'sensitive data'), where it would display sensitive treatments or status about a person, this personal confidential data will not

flow into the London Analytics Platform unless there is a statutory or legal duty mandating sharing (e.g. infections, contaminations and diseases for the purposes of controlling epidemics). Examples of the categories of data that will not be collected or made available in the London Analytics Platform are:

- Information related to abuse;
- Complaints about care;
- Conviction and Imprisonment;
- Gender reassignment;
- HIV and AIDS;
- IVF Treatment;
- Infertility Management and Treatment;
- Marital Status;
- Sexually Transmitted diseases;
- Termination/abortion;

A full list of the coded restricted information which will not be ingested into the London Analytics Platform can be found in the following [link](#).

1.2 What is the London Analytics Platform’s pseudonymised database?

The London Analytics Platform also contains a completely separate version of the database in pseudonymised form. To create this version of the database, the personal data held in the core database mentioned above goes through a process called pseudonymisation. This means that information that identifies patients will be replaced, removed, or transformed. For example, one or more identifiers relating to a patient (such as the NHS number) are replaced with a pseudonym (such as a reference number), and a separate logbook is kept to allow the pseudonym to be tied back to the patients. Only those who have access to the logbook would be able to re-identify the patients. But the logbook will be kept secure under robust access controls by those managing the database and will only be accessible by them in very limited circumstances. This means that approved users who are given access to the pseudonymised database will not have access to the logbook and consequently, will not be able to re-identify patients within the database.

An example of the data within the pseudonymised database can be seen below:

Data Items	Data within the London Analytics Platform’s identifiable database	Pseudonymisation method	Data within the London Analytics Platform’s pseudonymised database
Patient First Name	Sam	Removed	N/A
Patient Surname	Lentil	Pseudonymised	xxxxxxxxxx
NHS Number	NHS: 8453211567	Pseudonymised to 10 digit key	1234567890
Date of birth	20/05/1945	Replaced to age value	77
Phone number	01234 567890	Removed	N/A

Residential postcode	E1 111	Partial data removal – outbound postcode only	E1
GP and hospital records	A&E visit 13/09/1973	Included (save for any local identifiers such as hospital or patient numbers)	A&E visit 13/09/1973
Health and wellbeing information relevant to their care	Diabetes	Included	Diabetes
Medication and allergies	M&M, 3 x daily for 2 weeks	Included	M&M, 3 x daily for 2 weeks
Appointments, treatment and care	Geriatrician, Imperial College Healthcare NHS Trust – 01/09/1982	Included (save for any local identifiers such as hospital or patient numbers)	Geriatrician, Imperial College Healthcare NHS Trust – 01/09/1982
Social or mental health information relevant to care	Mental health user	Included	Mental health user
Test results	Blood pressure 120/80mmHg	Included	Blood pressure 120/80mmHg

The pseudonymised database contained in the London Analytics Platform may only be used by authorised users in the public interest for purposes that may include:

- **Supporting the provision of proactive health and care**, which includes the prevention, investigation and treatment of illness and the alleviation of suffering of individuals, as well as a wide array of population health management programmes.
- **Commissioning and planning of health and care services**, which is understood as the continual process of planning, agreeing, and monitoring and evaluating of health care services.
- **Assessing and improving of health and care services**, including service evaluations, developments and audits which all serve the purposes of evaluating current services and identifying areas of improvements and providing insights for decision-makers to consider when establishing or changing services.
- **Health research**, understood as any project undertaken by organisations that contribute data to London Analytics Platform, health and care academic teams or industry partners that attempts to lawfully derive new knowledge to answer or refine relevant questions.

The pseudonymised database may enable research and service evaluation opportunities that would otherwise be intrusive and/or prohibitive due to cost, time and privacy. For example, academic researchers may request access to the pseudonymised database to conduct research projects focused in developing new treatments or medicines. Where previously analysts and researchers would have had to try and link data on a case-by-case basis, taking months of effort, they can now achieve the same output in less time across a greater cohort of participants. Allowing research to take place is something which is in the NHS Constitution – research helps society by better understanding the causes of illness and helps to produce innovative ways to provide better care for patients.

Before gaining access to the pseudonymised database in the London Analytics Platform, users must go through a strict process. The user (for example, an analyst or a researcher) will need to complete an application form explaining their project and obtain the approval of a Committee made up of representatives of the health and care organisations across London that shared the data as well as patient representatives. After receiving approval of the Committee, the user will only be able to access the pseudonymised data using state-of-the-art technology that prevents the user from ingesting more information or, more importantly, from copying or removing information from the environment. If, after analysing the data, the user wants to extract the result of their analysis from the environment, they will need to follow a strict process that ensures that the information is completely anonymised (aggregated) before being extracted.

As a result of the pseudonymisation process and the additional controls adopted to protect the data, researchers and analysts who access pseudonymised data for the purposes mentioned above will only be able to analyse information that is pseudonymised in this context. This is because they do not have the reasonable means to re-identify the patients included in the database.

You can find out more about pseudonymised data and how data is used in the NHS at: <https://understandingpatientdata.org.uk>.

1.3 Which organisations are involved in the London Analytics Platform?

The London Analytics Platform itself is not a legal entity and does not hold a legal standing. It is a secure platform established by the health and care organisations that operate across the five geographic areas that comprise London (North Central, North East, North West, South East and South West), including:

- Organisations, registered with the Care Quality Commission (CQC) that provide health and care services to the population in London, including General Practices (GP), hospitals, mental health and community providers, and social services;
- Local authorities in London;
- Organisations in London that commission health and care services from providers, including the North Central London Integrated Care Board (NCL ICB), the North East London Integrated Care Board (NEL ICB), the North West London Integrated Care Board (NWL ICB), the South East London Integrated Care Board (SEL ICB), and the South West London Integrated Care Board (SWL ICB).

These health and care organisations have collectively decided to contribute data for the creation of the two databases contained in the London Analytics Platform. These organisations are responsible for making all the key decisions about how and why the data in the London Analytics Platform may be used, and because of that they are regarded as data controllers under data protection legislation. The practical operation of the London Analytics Platform is carried out by the North West London Integrated Care Board (NWL ICB) on behalf of all the other organisations in the region.

You can contact the Data Protection Officer for each Data Controller involved by going on their respective website and looking at their Privacy Policy.

1.4 Is my data sold in the London Analytics Platform?

We **never** sell personal data. Neither the identifiable nor the pseudonymised data contained in the London Analytics Platform is ever sold to third party organisations or individuals.

Whilst the data is never sold, the London Analytics Platform operates on a cost-recovery basis. This means we charge individuals who request access to the pseudonymised database not for the data itself, but for the cost of allowing safe access to the data and keeping the data in a safe and secure environment. The charge depends on the type of application and the amount of work that is required in order to allow safe access, and is discounted for NHS and academic access.

2. What are our lawful bases?

Each organisation who is responsible for providing patients, both adults and children, with health and care also has responsibilities under the Data Protection Act (DPA) 2018, the UK General Data Protection Regulation (UK GDPR), the Human Rights Act 1998, and the Common Law Duty of Confidentiality to maintain your privacy and keep your data safe.

Under the DPA 2018 and the UK GDPR specifically, these organisations need to have a legal basis to process your data.

When processing your personal data in the context of the London Analytics Platform, the health and care organisations acting as data controllers rely on Article 6(1)(e) of the UK GDPR. This means that they have considered the processing of the data to be “*necessary for the performance of a task carried out in the public interest or in the exercise of official authority*”.

When processing personal data considered to be of special category (personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation), the health and care organisations rely on the following legal bases under Article 9 of the UK GDPR:

- **Article 9(2)(h)**: the processing is “*necessary for the provision of health and/or social care, including preventative or occupational medicine*”;
- **Article 9(2)(i)**: the processing is “*necessary for reasons of public interest in the area of public health*”; or
- **Article 9(2)(j)**: the processing is “*necessary for archiving purposes in the public interest, scientific or historical research purposes*”.

2.1 Common law duty of confidentiality

In addition to the applicable legal bases under the UK GDPR, in February 2025, the London SDE programme received support under Section 251 of the NHS Act 2006 and its current Regulations, the Health Service (Control of Patient Information Regulations 2002), following advice from the Confidentiality Advisory Group (“**CAG**”). This approval allows the London SDE to lawfully receive **confidential** patient-level information from health and care providers in

London and from NHS England, and to use this information for various purposes in the public interest, as outlined above in **section 1.2** of this Privacy Notice.

3. Other information about the London Analytics Platform

3.1 How do we collect your data?

If you have been to a GP, a hospital, a social care provider or another NHS organisation in London that is part of the London SDE programme, then your data will have been automatically extracted from their local records and processed in the London Analytics Platform to create an 'integrated record'. You don't need to do anything for this to happen. This is because your health and/or care organisation have legal responsibilities to share information where this will facilitate care for an individual.

The transfer and processing of data that is required to get the data from the local records to the integrated record will be carried out through the London Data Service, which combined with the London Analytics Platform, form the London SDE. We have a separate Privacy Notice for the London Data Service. If you wish to have more information about the London Data Service, please follow this [link](#).

3.2 How long is my data retained?

Your data will be retained in line with the [NHS Records Management Code of Practice](#) which sets out what people working with, or within, NHS organisations in England need to do to manage records correctly. It's based on current legal requirements and professional codes of best practice. Appendix 2 of the Code contains a detailed retention schedule and sets out how long records should be kept, either due to their ongoing administrative value or as a result of a statutory requirement. For more information, please see the code of practice, which sets out which data types are kept by your healthcare provider for which amount of time.

3.3 Where is my data stored?

Your data is securely processed and stored on Microsoft Azure and Snowflake servers located in the United Kingdom. Microsoft and Snowflake were chosen to provide secure, state-of-the-art data centre facilities and technical infrastructure for the secure storage of data. While the identifiable and pseudonymised databases are both kept on Microsoft Azure servers, they are stored in entirely separate instances on Snowflake, meaning they are kept completely separate from each other to manage and mitigate potential risks.

3.4 Is my data transferred to other countries?

Your personal data is not transferred to any other country outside of the UK.

4. What are your rights?

Under data protection law, you have various rights afforded to you as a data subject. These rights are listed in detail in **Appendix A**.

You can find out more about your rights by visiting the Information Commissioner’s Office’s website: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/>

We regularly update and review this Privacy Notice and we will bring any new uses of personal data to your attention before processing it.

You are not required to pay any charge for exercising your rights. If you make a request, unless it is considered to be manifestly unfounded or excessive, we have one month to respond to you. We may ask for verification of you as an individual when considering your request.

You can exercise your rights either verbally or in writing. Please contact us using the details below:

Email:	NELondonicb.oneLondon.opt-out@nhs.net
Address:	OneLondon Service Desk NHS North East London 9 th Floor 20 Churchill Place London E14 5HJ
Phone number:	020 3182 2900 A voicemail service operates 24 hours a day 7 days a week. Please leave a message providing us with your contact name, telephone number and the nature of your request. We will contact you to process your request within office hours (Monday – Friday 09:00 – 17:00)

4.1 What happens after you submit your request?

You will receive communication from us acknowledging the receipt of your request. We will try our best to process your request without undue delay and within one month of receipt. Where we are unable to get back to you within that timeframe, we may extend it by another two months where we are legally allowed to do so. If that is the case, we will inform you as soon as possible about the delay

4.2 Verifying your Identity

We will require you to provide us with additional information so that we can verify your identity. This is solely for us to ensure that we do not disclose your data to the wrong person or to someone who is pretending to be you. Please note that the additional information you provide us will constitute further processing of your personal data.

4.3 Our right to refuse to comply with your request or charge a fee

Usually, we will be happy to comply with your requests without undue delay and free of charge. However, there are certain circumstances where we are legally allowed to refuse to comply or charge a reasonable fee. This will be the case where your request is manifestly unfounded or excessive. If we decide to refuse to comply or charge you a reasonable fee, we will inform you about our decision.

4.4 Can you opt-out?

If you do not wish for your personal information to be used for the purposes of the London Analytics Platform, you can opt out. Opting out means that you inform us that you do not want to participate, and we will take measures to ensure that your personal information is not used.

We offer two different systems for opting out, each tailored to the specific purpose you wish to opt out of.

If you do not want for your personal data to be pseudonymised and then used for **research, planning and service improvement purposes**, you can opt out by:

Online	An Opt-Out Portal is currently under development and the link to this will be published here when it is live
writing to us via email	NELondonicb.oneLondon.opt-out@nhs.net Please use the subject line “Opting-Out for Secondary Purposes” so that we can correctly identify your request.
writing to us via post	OneLondon Service Desk NHS North East London 9 th Floor 20 Churchill Place London E14 5HJ Please title your letter <i>Opting-out for secondary purposes</i> include your name, NHS number, date of birth, address and contact details.
calling us	020 3182 2900 A voicemail service operates 24 hours a day 7 days a week. Please leave a message providing us with your contact name, telephone number and the fact that you would like to opt-out of your data being used for secondary purposes. We will contact you to process your request within office hours (Monday – Friday 09:00 – 17:00)

You can also ask that your data not be shared with services for the individual care that is provided to you. This is likely to have an impact on the information available to NHS services and our partners who are providing your healthcare and should be given careful consideration. If you do not want your personal data to be used for your **individual care, as well as research, planning and service improvement purposes**, you can inform us by the same methods listed above but please clearly label your request for Dissent so we can route your request accordingly.

If you have previously submitted an opt-out form directly to your GP practice so that your personal data is not used for **research, planning and service improvement purposes** (this is called a **Type 1 Opt-Out**) or registered a [National Data Opt Out](#), your data will not be pseudonymised and used for the public interest purposes listed on page 5. However, your personal data may still be used for the purposes of individual care in the London Data Service and the London Analytics Platform. For more information on the exercise of Type 1 Opt-Out, please visit the NHS website: <https://www.nhs.uk/using-the-nhs/about-the-nhs/opt-out-of-sharing-your-health-records/>

If you are experiencing any issues with opting out, please contact us NELondonicb.oneLondon.opt-out@nhs.net and we will be happy to support you.

5. Making a complaint or raising a concern

If you have any concerns, or are unhappy about how your data is being used please get in touch through any of the contact methods below:

Postal Address	OneLondon Service Desk NHS North East London 9 th Floor 20 Churchill Place London E14 5HJ
Phone number	020 3182 2900
Email	NELondonicb.oneLondon.opt-out@nhs.net Please use the subject line "Complaint" so that we can correctly identify your request.

Alternatively, you can raise a concern with the Information Commissioner's Office (ICO) who are the UK data protection regulator who will investigate your complaint. Please see the Information Commissioner's website for more details: <https://ico.org.uk/concerns/>

The contact details for the ICO are as follows:

Postal Address	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
Helpline number	0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.
Online	You can also make a complaint or raise a concern via the ICO's website .

Appendix A

Your rights include:

Individual Right	Information about your rights
Right to object	For the purposes of your data in the London Analytics Platform, you have the right to object to the processing of your data.
Right to be informed	<p>As a data subject, you have the right to be informed about how your data is collected and used. This Privacy Notice serves as our transparency material for data subjects as to how your personal data is used, informing you of our uses.</p> <p>The health and care organisations taking part in the London Analytics Platform have made efforts to ensure sharing is reasonably expected by the public (there should be notices in your GP practice, NHS hospitals or community providers) and with the appropriate technical and organisational controls in place to secure your information.</p> <p>This Privacy Notice aims to provide you with information in a concise, transparent, intelligible manner which is easily accessible and uses a clear and plain language.</p>
Right of access	<p>As a data subject, you have the right to access and receive a copy of the personal data we hold about you. You can make a subject access request to us for this information. We will provide the information in an accessible, concise and intelligible format, and it will be disclosed in a secure way.</p> <p>We have the right to refuse such a request where there is a relevant restriction, or where the request is manifestly unfounded or excessive.</p>

<p>Right of rectification</p>	<p>As a data subject, you have the right to rectify inaccurate personal data which we hold about you.</p>
<p>Right of erasure</p>	<p>In certain circumstances, as a data subject, you have the right to request verbally or in writing that we erase the personal data we hold about you. You can only request the personal data is erased where:</p> <ul style="list-style-type: none"> • it is no longer necessary for the purposes we collected it, • if you provided the information by consent and you withdraw your consent, • we have processed the information unlawfully, • or the erasure is in line with a legal obligation.
<p>Right of restricting processing</p>	<p>In certain circumstances, as a data subject, you have the right to request verbally or in writing that we restrict the processing of your data for a period of time.</p> <p>You can only request the processing of personal data is restricted where:</p> <ul style="list-style-type: none"> • you are contesting the accuracy of the personal data and it is being verified, • the data has been unlawfully processed, • or we no longer need the personal data but you require us to keep it in order to establish, exercise or defend a claim.
<p>Right of data portability</p>	<p>You have the right of data portability, meaning you have the right to receive a copy of your personal data in a structured, commonly used and machine readable format.</p> <p>However, the right of data portability does not apply to the London Analytics Platform, as this right only applies when the data is collected via consent (Article 6(1)(a) UK GDPR) or for the performance of a contract (Article 6(1)(b) UK GDPR). Your health and social care providers do not rely on either of these lawful bases to process your personal data for these purposes.</p>
<p>Rights related to automated decision making including profiling</p>	<p>We do not make any automated decisions or automated profiling about any data subjects without any human involvement.</p>