

Regional Health and Social Care Information Sharing Agreement

Information Governance Steering Group 14th June 2022

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Policy – Normal Place of Residence Ambiguity

This policy applies to processing within the Connected Care solution and to data forwarded from the Connected Care solution for processing in other systems.

It is recognised that from time to time, the place at which a data subject is treated as normally resident may vary according to the reference data source being used at the time. For example:

1. a data subject may be registered with a general practitioner in one locale
2. but registered with a local authority in a separate locale.

As a consequence, normal place of residence could be seen as ambiguous from the perspective of the data subjects integrated care record as well as in any processes reliant on the care record.

While this is not perceived to create a disadvantage for data subjects interacting with a single data controller organisation at the point of care, there is a concern that this ambiguity can create disadvantage in any processes that involve working with a cohort of data subjects or selection of a data subject from a cohort where the normal place of residence has a bearing on whether or not a data subject can be included in the cohort.

As a consequence and in order to avoid creating disadvantage for data subjects where there is ambiguity in their data the policy for addressing ambiguity in normal place of residence is for the subject's data to be available for processing in all of the cohorts creating the ambiguity. So, for example:

1. Healthcare providers and commissioners may choose to rely on general practitioner registration to determine locale¹;
2. Local authorities and social care providers and commissioners may choose residential address²; and
3. Providers of urgent care services may find it necessary to include the data subject in both cohorts.

This policy takes effect from 14th June 2022 and expires on the 30th April 2028.

Version 1 (final).

¹ Please note, for the avoidance of doubt, the use of this example statement is not intended in any way to restrict healthcare providers and commissioners to relying on general practitioner registration when determining locale.

² Please note, for the avoidance of doubt, the use of this example statement is not intended in any way to restrict local authorities and social care providers and commissioners to the use of residential address when determining locale.