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10 August 2021

Ms Rachel Winch
Royal College of Paediatrics and Child Health
5-11 Theobalds Road
London
WC1X 8SH

Dear Ms Winch,

Application title: National Neonatal Audit Programme (NNAP) data flow
CAG reference:

This amendment sought support to clarify that BadgerNet ID is also being collected for the purposes of this audit, and will be held and processed by the RCPCH in addition to the key identifiers listed in the original application.

This amendment also sought support for a new flow of data from RCPCH back to the individual Trusts. This flow will contain mainly non-identifiable information, with the only identifiable data item being the BadgerNet ID. These patient episode lists are for the purposes of data quality and completeness checks, and will relate to patients cared for by that Trust only. The applicants reason that this amendment will improve the quality and completeness of the data reported by the NNAP by enabling NHS Trusts to act on any inaccuracies before the final analysis is conducted. It also will provide NHS Trusts to implement quality improvement in a more timely manner.

Confidentiality Advisory Group advice

The amendment requested was considered by Chair's Action. The Chair was content to recommend support for this amendment, and commented that support was required for the flow back to Trusts, as BadgerNet ID could be considered a direct identifier.

Confidentiality Advisory Group conclusion

In line with the considerations above, the CAG agreed that the minimum criteria under the Regulations appeared to have been met for this amendment, and therefore advised recommending support to the Secretary of State for Health and Social Care.

Specific conditions of support

1. Confirmation provided from the IG Delivery Team at NHS Digital to the CAG that the relevant Data Security and Protection Toolkit (DSPT) submission(s) has achieved the 'Standards Met' threshold: **Confirmed: Royal College of Paediatrics and Child Health and CleverMed Ltd have DSPT 2019/20 (by check of the NHS Digital DSPT tracker on 06 August 2021)**

Reviewed documents

<i>Document</i>	<i>Version</i>	<i>Date</i>
HQIP letter of support RCPCH Amendment		14 July 2021
CAG amendment form		14 July 2021
Appendix 1 NNAP Data Flow Diagram July 2021		July 2021

Please do not hesitate to contact me if you have any queries following this letter. I would be grateful if you could quote the above reference number in all future correspondence.

Yours sincerely

Caroline Watchurst
Confidentiality Advisor

On behalf of the Secretary of State for Health and Social Care

Email: cag@hra.nhs.uk

Enclosures: Standard conditions of support

Standard conditions of support

Support to process confidential patient information without consent, given by the Secretary of State for Health and Social Care, is subject to the following standard conditions of support.

The applicant and those processing the information will ensure that:

1. The specified confidential patient information is only used for the purpose(s) set out in the application.
2. Confidentiality is preserved and there are no disclosures of information in aggregate or patient level form that may inferentially identify a person, nor will any attempt be made to identify individuals, households or organisations in the data.
3. Requirements of the Statistics and Registration Services Act 2007 are adhered to regarding publication when relevant, in addition to other national guidance.
4. All staff with access to confidential patient information have contractual obligations of confidentiality, enforceable through disciplinary procedures.
5. All staff with access to confidential patient information have received appropriate ongoing training to ensure they are aware of their responsibilities.
6. Activities remain consistent with the G