

Epact2 Privacy Impact Assessment Summary

The privacy risks to patients from the ePACT2 system have been managed as summarised in the table below. Therefore the Information Asset Owner and Caldicott Guardian have approved this system for go-live for NHS customers.

Privacy Risk	Managed by
Measures taken against individuals as a result of collecting information about them might be seen as intrusive.	All patient identifiers have been removed apart from NHS Number. NHS Number is only visible to a single team within NHSBSA. The NHS Number is only used by that team as agreed with the NHSBSA Caldicott Guardian.
If a retention period is not established information might be used for longer than necessary.	The information will be deleted at the end of the agreed retention period. Currently this is 60 months.
Data is not stored securely	The stored information is encrypted to the NHS Standard. ePACT2 will be regularly penetration tested to ensure unauthorised access is prevented. Access will be restricted to the user's assigned role.
The context in which information is used or disclosed can change over time, leading to it being used for different purposes without people's knowledge.	NHSBA will only use and share the information for supporting more effective planning of NHS services and to share it with those with a legal power of access to the information. Wider NHS Staff are bound by the terms of the ePACT2 user agreement to only use the information in compliance with those terms. Access to the data will be removed for any breach of the terms.
Collecting information and linking identifiers might mean that an organisation is no longer using information which is safely anonymised.	The Caldicott Guardian of each NHS organisation will authorise who manages user access to ePACT2 for their NHS organisation. The ePACT user agreement re-enforces the duty of confidence relating to this information. This prohibits sharing of data that risks patients being identified.