Request

I am requesting information relating to the use of NHS numbers within a pilot or initiative operated by Wigan Council in safeguarding contexts. Please provide:

1. The final, approved Data Protection Impact Assessment (DPIA) carried out by, or on behalf of, Wigan Council in relation to:
    - the use of NHS numbers sourced from NHS systems (including, where applicable, the Personal Demographics Service) to facilitate the identification of children involved in multi-agency safeguarding processes for joint working across health and children's services, and
    - any associated data matching, linking, or sharing.
2. If more than one DPIA exists, please provide those DPIA(s) most directly relevant to the above processing.

For clarity:

- *This request is limited to DPIA documentation only (including embedded risk assessments or summaries where they form part of the DPIA), and excludes emails, drafts, or general correspondence.*
- *I am not requesting any operational detail that would identify specific individuals, cases, or investigative techniques.*
- *Where necessary, I am content for personal data (e.g. names, contact details) and sensitive operational detail to be redacted in accordance with the Act.*

Response

Please note a DPIA screener *(attached)* was completed for the purposes of the pilot which was approved – a full DPIA was not deemed to be required.

DATA PROTECTION IMPACT ASSESSMENT (DPIA) - screener

IG Civica Ref:- (to be completed by IG Team) **165488**

SECTION 1: SCREENING QUESTIONS

Project Lead (person completing this DPIA screener)

Name
Job Title Transformation and Performance Service Lead Children's Services
E-mail
Phone number

Project Name: Supporting Families Data Integration project

Please use this box to provide an explanation of what your project will involve:-

The Department for Education (DfE) have partnered with Wigan Council to test some of the principles of introducing the NHS number as a Single Unique Identifier (SUI) for children whom the local authority has a statutory duty to safeguard and promote the welfare as per the Children's Act 1989 and Children's Act 2004.

The purpose of the pilot is test the feasibility of the proposed introduction of a Single Unique Identifier in the forthcoming Children's Schools and Wellbeing Bill which is currently going through parliament.

The SUI is a proposed **consistent identifier** that would be used across various children's services (e.g. health, education, social care) to:

1. Improve information sharing about children
2. Enhance safeguarding responses
3. Support early intervention and better co-ordination of services

The project named Pilot Phase 1 by the DfE involves Wigan Council working with the DfE and NHSE to test the technology, ICT infrastructure and steps required by the local authority to connect to the NHS Personal Demographic System securely and bring the child's NHS number into a secure test environment. This will be done by matching basic demographic data the local authority already holds for the subject matter by sending a CSV file to the NHS system which then completes a matching process to retrieve the related NHS number. For the purposes of this pilot we will only be solely focused on retrieving the child's NHS number.

The pilot also involves evaluating if this different way of sourcing the NHS number provides a better matching rate than the current way of bringing across NHS numbers via the current NHS batch tracing system which is what is currently used nationally to support Child Protection Information System.

A partnership agreement has been signed off by the DFE Director General and the Director for Children's Services to enable the work to be taken forward at pace as part of an urgent national pilot, originally planned between October 24 and March 25, but this timeline has slipped.

The following questions will now assist you to decide whether a full DPIA is necessary. **Answering 'yes' or 'Unsure' to any of the questions is an indication that a DPIA may be required; this will be discussed with the IG Team**

The screening questions below highlight key areas which have the potential to cause privacy risks. Answers to these questions will highlight any particular privacy risks/issues that can assist you to populate risk assessments.

Potential Privacy Risk		Yes	No	Unsure	Comments
a)	Does the new system / process / initiative rely on automated processing without human intervention to make a decision?	☐	☒	☐	There are no automated decision making processes in children's services as this would be unlawful. The new process being tested for the purposes of this pilot and does not involve any real life use of the data to inform any decision making other than to decide whether this technology is a better way of retrieving the NHS number.
b)	Does the new system / process / initiative involve large scale processing of special categories of data (such as health and genetic data)?	☐	☒	☐	No the only data that is being tested is the NHS number
c)	Does the processing involve systematic monitoring of a public area on a large scale (e.g. CCTV)?	☐	☒	☐	Click here to enter text.
d)	Is the information about individuals likely to raise privacy concerns or expectations e.g. using health records, criminal records or other information people would consider particularly private?	☐	☒	☐	No there is no further access to any further detail beyond the NHS number for the purposes of the pilot.
e)	Will the initiative involve the collection of new information about individuals?	☐	☒	☐	Click here to enter text.
f)	Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	☐	☒	☐	Click here to enter text.
g)	Will the initiative require you to contact individuals in ways which they may find intrusive?	☐	☒	☐	Click here to enter text.
h)	Will the information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	☐	☒	☐	
i)	Does the initiative involve you using new technology which might be perceived as being intrusive? e.g. biometrics or facial recognition	☐	☒	☐	Click here to enter text.
j)	Will the initiative result in you making decisions or taking action against individuals in ways which can have a significant impact on them?	☐	☒	☐	Click here to enter text.

Potential Privacy Risk		Yes	No	Unsure	Comments
k)	Will the initiative compel individuals to provide information about themselves?	☐	☒	☐	Click here to enter text.
l)	Will it involve tracking individuals' location or behaviour?	☐	☒	☐	Click here to enter text.
m)	Will it involve processing data that might endanger the individual's physical health or safety in the event of a security breach?	☐	☒	☐	Click here to enter text.
n)	Will it use profiling or special category data to decide on access to services?	☐	☒	☐	Click here to enter text.

Additional Comments:

The DFE have commissioned the team to support the LA to pilot this work and Digital Services are involved in the projects oversight through the JAG processes and directly in providing access to appropriate systems and tools to complete the work.

SECTION 2: DATA ITEMS

Please tick the boxes regarding the data items you will be processing for this initiative, system, project.

Personal Details *Information that identifies the individual and their personal characteristics* ☒ Forename(s) ☒ Surname ☒ Address ☒ Postcode ☒ Date of Birth ☒ Age ☒ Gender ☐ Physical Description ☐ Home Tel Number ☐ Mobile Tel Number ☐ Other Contact No. ☐ Email Address ☐ GP Details ☐ Legal Representative (Next of Kin) ☒ NHS Number ☐ NI Number ☐ Photographs/Pictures ☐ Other, list below	**Physical or Mental Health or condition** ☐ Yes ☒ No **Sexual Identity and life** ☐ Yes ☒ No **Trade Union Membership** ☐ Yes ☒ No **Family lifestyle & social circumstances** *Information relating to the family of the individual and their social circumstances* ☐ Marital / partnership status ☐ Carer / relatives ☐ Children / Dependents ☐ Social status e.g. housing **Education & Training** ☐ Education / Training ☐ Qualifications ☐ Professional Training ☒ This section is not applicable	**Employment Details** ☐ Employment Status ☐ Career Details ☒ This section is not applicable **Financial Details** ☐ Income ☐ Salary ☐ Benefits ☒ This section is not applicable **Religious or other beliefs of a similar nature** ☐ Yes ☒ No **Offences including alleged offences** *Information relating to any offences committed or alleged to have been committed by the individual* ☐ Yes ☒ No **Race or ethnicity** ☐ Yes ☒ No

You must confirm that the data items you have ticked above are relevant and necessary for this initiative and there is a justified reason for their use. Tick the box below to confirm this:

☒ **Confirm**

SECTION 3: DATA FLOW

Data flow – It is essential that each flow of data is identified, documented and specifies the security measures in place. <u>Please complete this section only when personal data is being shared internally or externally.</u>					
Flow description	**Going from**	**Going to**	**Method of access/transfer and control**	**Specify the security control(s) in place for the flow**	**Where will the data be stored after access/transfer ?**
NHS Number identifier retrieval via NHS Personal Demographics Service (PDS)	Liquid Logic and EHM into the Wigan Data Warehouse	NHS Demographic matching service	A client tool collects a file containing records that need to be matched with NHS data. It checks each record one by one by securely sending it to a matching service. This service validates the data, retrieves secure credentials, and uses them to access the NHS Personal Demographics Service (PDS). After sending the data to PDS, it receives a response indicating whether there's a match, multiple matches, or none. The result is returned to the client tool, which saves any matched NHS numbers in a results file, along with a separate file containing details about the process for auditing purposes.	All data transfers are securely managed and monitored. The entire process takes place within a protected cloud environment using Microsoft Azure, where access is restricted through private networks (VNets), authentication secrets are stored in Azure Key Vault, and internet traffic is filtered through Azure Firewall. No data is stored permanently outside of secure, access-controlled systems, ensuring compliance with data protection standards. The solution sits within Wigan Councils Microsoft Azure environment that is protected by our Zero Trust security model. Data moving between the Wigan environment and the Tooling service will be encrypted in two ways. SSL to send the files to Blob storage. On top of that all files will be asymmetrically encrypted before being sent. No data is stored permanently outside of secure, access-controlled systems, ensuring compliance with data protection standards. All security aspects have been scrutinised and approved at JAG and have been approved by NHSE.	For the purposes of the pilot only a secure test area in Wigan Azure platform.

SECTION 4: PROCESSING ACTIVITY DETAILS

What is the key purpose for the processing of personal data?
Purpose is to provide an improved way of retrieving NHS numbers against than the current demographic batch service.

Please confirm the legal basis under UK GDPR for the processing

Article 6 lawful basis for processing personal data	**Article 9 – <u>additional condition only for processing special categories of data</u>**
☐ Article 6 (1)(a) - Consent	☐ Article 9(2)(a) - Explicit Consent
☐ Article 6 (1)(b) - Contractual Necessity	☐ Article 9(2)(b) - Employment
☐ Article 6(1)(c) - Compliance with legal obligations	☐ Article 9(2)(c) - Vital Interests
☐ Article 6(1)(d) - Vital Interests	☐ Article 9(2)(d) - Charity or not for profit bodies
☒ Article 6(1)(e) – Task in the public interest or in exercise of official authority	☐ Article 9(2)(e) - Manifestly made public by data subject
☐Article 6(1)(f) - Legitimate Interests	☐ Article 9(2)(f) - Legal Claims
	☐ Article 9(2)(g) - Substantial public interest
	☐ Article 9(2)(h) - Health and Social Care
	☐ Article 9(2)(i) - Public Health
	☐ Article 9(2)(j) - Historical, statistical or scientific purposes

If article 6(1)(c) or 6(1)(e) is selected above, please specify below the relevant legislation that sets out the task or obligation

Children Act 2004

Sections 10 and 11 of the Children Act 2004 place obligations upon agencies including local authorities, police, clinical commissioning groups and NHS England to co-operate with other partners in promoting the welfare of children and ensuring that they act safeguard and promote the welfare of children in need as define by the Children's Act 1989 in their area.

NHSE and DfE have established that pursuant to 16E or 16F of the Children Act 2004 safeguarding partners and relevant agencies have a duty to make arrangements to work together in exercising functions for the purpose of "safeguarding and promoting the welfare of children in the area", **and** identifying and responding to the needs of children in the area and to identify **and** review serious child safeguarding cases.

Pursuant to s16H of the Children Act 2004 safeguarding partners have a power to request that NHS England provides the information to enable or assist the performance of the functions conferred by sections 16E and 16F. NHS England therefore has a legal obligation basis under UK GDPR article 6(1)(c) and in respect of the common law duty of confidentiality to allow Wigan Council to onboard to and use PDS to access NHS numbers for children who have been identified as a potential child in need.

Sections 16E, 16F and 16H of the Children Act 2004 are appended to this letter. [Children Act 2004 / Children Act 2004 / Children Act 2004]

SECTION 5: SIGNATURES AND APPROVAL PROCESS

Please now return this form to legalinformationgovernance@wigan.gov.uk

One of the IG Team will contact you to discuss whether a full DPIA is likely to be required. In addition to the questions asked on this form, the following areas are likely to be discussed prior to a final recommendation being made:-

- Have you spoken to IT about information security and related matters?
- Have you spoken to Contracts & Procurement, if appropriate?
- Have you considered any Data Sharing or Processing Agreements, if appropriate?
- Have you determined a retention period for the personal data?
- Is this processing included in your Privacy Notice?
- Is the personal data being processed likely to be used for other purposes in the future?

Information Asset Owner

After speaking to Information Governance, the Information Asset Owner (normally Assistant Director or above) must make the recommendation below.

Based on the above information and discussion with the Project Lead I confirm that the above answers accurately reflect the process involved in the project and it is recommended that

☐ a full DPIA is required
☒ a full DPIA is not required.

Name Sandie Hayes
Job Title Practice Director
Email
Signed 
Date 25/7/2025

Once the Information Asset Owner has signed, please return this questionnaire to legalinformationgovernance@wigan.gov.uk

Recommendation to Data Protection Officer by IG Manager (or nominee)

Name
Job Title Information Governance Manager
Email
Date 21.07.2025

Based on the above information and discussion with the Project Lead I confirm it is recommended that

☐ a full DPIA is required
☒ a full DPIA is not required.

Decision of the Data Protection Officer

☐ a full DPIA is required
☒ a full DPIA is not required.

Name

Job Title Strategic Lawyer - Corporate
Email [redacted]
Date 21/7/25

Version control

Version	Author	Review Notes	Sign off	Date
0.1	[redacted]	First draft for IG review	SH	
2.1	[redacted]	Added amends based on GD IG comments to create 2.1	SH	
2.2	[redacted]	Added legal basis legislation named in NHSE discussions and new proposal agreed for technical solution by CTO - JAG	SH	
2.3	[redacted]	Added simple descriptions detail for the flow, added technical details to an appendix.	SH	

Appendix – technical steps / flow of data

1. The client tool will pull the file with records ready to be matched from file storage or wherever that file is output to.
   2.The client tool then loops through each record in the file and makes a http request against the matching service API.
   3.This request is made to a private endpoint on the client tools vnet.
2. 4.The SUI service takes the JSON payload from the client and ensures the data is valid and in the correct format.
3. 5.The SUI service gets secret material from Azure KeyVault to authenticate against the NHS PDS service.
4. 6.It stores the subsequent auth token securely in a memory cache.
5. 7.Once the data has been validated it makes one or more requests outbound (over the internet) to the NHS PDS FHIR API to match that record against PDS.
6. 8.Access outbound is controlled by Azure Firewall.
7. 9.PDS will return either a single match, a response indicating there are many matches or no match.
8. 10.With the response from the NHS API the SUI service returns that to the client tool.
9. 11.The Client tool outputs to the CSV the NHS number if one was returned. 12.Additionally, a metadata file (CSV) is output with more information about the process.

