Population Health Management (PHM) Privacy Notice

Optum Pathfinder and One London Re-ID Portal

The Jubilee Street Practice Ltd | November 2026

Under data protection law, we must explain how we use your personal information, including when we share it with other organisations and why. Our main practice privacy notice is available at https://jubileestreetpractice.nhs.uk/privacy-policy-2/. This additional notice explains our participation in Population Health Management (PHM) in North East London and how information may be re-identified for your individual care.

What is Population Health Management (PHM)?

PHM aims to improve the physical and mental health and wellbeing of local populations, support fair and timely access to services, prevent illness and reduce health inequalities. It also helps health and care services understand factors that affect people's health and plan support around population needs.

The Jubilee Street Practice participates in PHM with other health and care organisations in North East London, including GP practices, hospitals, community services and local authorities. Relevant information may be combined and analysed in a de-identified, generally pseudonymised form through the Optum Pathfinder platform. Organisations involved must maintain appropriate confidentiality, security and governance safeguards.

How will my information be used?

Information about your health and social care may be used in pseudonymised form. This means direct identifiers, such as your name and NHS number, are replaced by a unique code. Pseudonymised information is still protected under data protection law; it is not the same as fully anonymised data.

PHM activities may include:

- Identifying groups of patients who might benefit from additional care or preventative interventions
- Improving the quality and standards of care
- Supporting appropriately authorised research into treatments
- Preventing illness and disease
- Monitoring safety and service quality
- Planning and improving health and care services

Who may share or receive information?

Depending on the purpose and applicable arrangements, information may be provided by or shared between The Jubilee Street Practice, other relevant health and care providers, local authorities in North East London and NHS North East London Integrated Care Board. The organisations involved must handle information lawfully and securely and protect patient confidentiality.

When can information be re-identified?

Most PHM analysis is carried out using pseudonymised information, so people conducting that analysis cannot directly identify individual patients.

Sometimes PHM may identify patients who could benefit from a review, preventative intervention, improved support or another health or care service. Where necessary for an individual's care, appropriately authorised professionals involved in that person's direct care, such as their GP or treating

clinician, may use the One London Re-ID Portal to re-identify relevant patients and offer assessment, treatment, support or follow-up.

This is restricted to authorised professionals with a legitimate direct-care relationship. Access is controlled and audited, and must be necessary for the provision of direct care.

What is the legal basis for using my data?

Health and care organisations may process personal information where necessary to perform their health and care functions. PHM analysis is undertaken using pseudonymised information wherever possible, while re-identification may be necessary for individual direct care. Relevant legal bases include:

- UK GDPR Article 6(1)(e): processing necessary for a task carried out in the public interest or in the exercise of official authority.
- UK GDPR Article 9(2)(h): processing necessary for preventative medicine, diagnosis, provision of health or social care or treatment, or management of health or social care systems and services.

For confidential patient information used for direct care, the common law duty of confidentiality may be satisfied by implied consent when information is appropriately shared among professionals involved in your care. Other PHM uses must meet their own applicable legal and confidentiality requirements.

Can I opt out or object?

There are different rules for using information for individual direct care and for research and planning. Your choices about research and planning do not prevent health and care professionals using relevant information for your individual care.

Type 1 opt-out: You can ask your GP practice to record a Type 1 opt-out to limit the sharing of confidential patient information from your GP record for purposes beyond your individual care, subject to the applicable rules and exemptions.

National Data Opt-out: You can choose whether your confidential patient information is used for research and planning where this opt-out applies. You can manage your choice at https://www.nhs.uk/your-nhs-data-matters/ or telephone 0300 303 5678. The National Data Opt-out does not apply to the use of information for your individual direct care.

The effect of either opt-out on a particular PHM data flow depends on its purpose and the applicable rules. If you have concerns about this programme or want to exercise your data protection rights, please contact the practice using the details in our main privacy notice.

Further information

Main practice privacy notice: https://jubileestreetpractice.nhs.uk/privacy-policy-2/

NHS information about data choices: https://www.nhs.uk/your-nhs-data-matters/