ENABLE Privacy Notice

ENABLE Fit Note Reform Pilot | Morecambe Bay Primary Care Collaborative CIC (MBPCC)

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Processing basis	Consent only for ENABLE access and processing
Document	ENABLE Privacy Notice
Organisation	Morecambe Bay Primary Care Collaborative CIC (MBPCC)
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Why we are giving you this notice

This notice explains how MBPCC accesses, uses, stores and shares your personal information when you choose to take part in ENABLE. It tells you what you are consenting to, how you can withdraw consent and what rights you have.

Who is responsible for your information?

MBPCC is the data controller for information it accesses and uses to deliver ENABLE and for disclosures it makes for the pilot. Your GP practice remains the controller of your GP record. The Department for Work and Pensions (DWP) is a separate controller of information it receives for the approved pilot evaluation and monitoring.

MBPCC: Morecambe Bay Primary Care Collaborative CIC, 1st Floor, Wellington Court, Kirkby Lonsdale, Carnforth, LA6 2HQ. ENABLE telephone: 015242 35505. Email: mbpcc.enable@nhs.net. You can request contact with MBPCC's Data Protection Officer (DPO) through these details.

What is ENABLE?

ENABLE is a fit note reform pilot for eligible patients at participating GP practices. It provides fit note assessment and, where appropriate, a Workability Assessment and Workability Plan. ENABLE clinicians record relevant clinical decisions and outcomes in the GP practice's EMIS record. Workability Plans are managed within the approved service record arrangements.

Our lawful basis: your consent

Consent is the sole UK GDPR lawful basis that MBPCC relies on to access and use your personal information for ENABLE. MBPCC relies on Article 6(1)(a) of the UK GDPR (consent), and, for health or other special-category information, Article 9(2)(a) (explicit consent). ENABLE staff will only access the relevant information in your GP record after your consent has been obtained and recorded.

Consent to ENABLE accessing and using your information for your assessment and care is separate from consent to share your identifiable or pseudonymised information with DWP for pilot monitoring and evaluation. You can decline DWP sharing and still receive a fit note assessment through ENABLE. Under the agreed pilot pathway, however, a Workability Assessment and Workability Plan are only offered where you also consent to the required DWP information sharing.

You can withdraw either consent at any time. See "Your choices and rights" below for what happens if you withdraw consent and how to do so.

What information do we use, and where do we obtain it?

- Your identity and contact details, such as name, date of birth, NHS number, address, telephone number and email address where needed.
- Relevant information from your GP record, including health information needed for a safe fit note or workability assessment.
- Information you tell us during referral, booking, consultations and follow-up, including health, disability, employment and workability information.
- Information provided through the ENABLE Florey questionnaire, appointment and service outcome records, and information needed for agreed pilot reporting.
- Where included in the agreed dataset, equality-monitoring information and identifiers needed to match approved evaluation records.

- Relevant information from a family member, carer, advocate, employer or support service only where appropriate and with your permission.

We receive information from you, participating GP practices, ENABLE staff and, with your permission, other people or services involved in your care or support. We only access information needed for the purpose to which you have consented.

Why do we use your information?

With your consent, we use your information to arrange appointments, assess fit note needs, discuss barriers to work where relevant, document clinical decisions, prepare and follow up Workability Plans where offered, and manage the safe delivery of ENABLE. With your separate evaluation consent, we also prepare and disclose the minimum agreed information needed for pilot monitoring, reporting and evaluation.

Who do we share information with?

- Authorised ENABLE clinicians and staff, and your participating GP practice, as necessary for the service you have agreed to receive.
- Approved contracted service providers that support clinical records (including EMIS), appointment messaging and Florey questionnaires (including Accurx), telephony, secure IT, storage or interpreting. These providers process information only under the controller's instructions and agreed safeguards.
- DWP, only where you have separately consented to the agreed pilot information sharing and only for the approved monitoring and evaluation purposes.
- An employer, onward support organisation or evaluation researcher only where you have given any separate consent required for that activity.

DWP does not receive unrestricted access to EMIS or your full GP record. Unrelated consultation notes are not included in routine pilot reporting. ENABLE data is not shared under this pilot for DWP benefit entitlement, compliance, fraud investigation or enforcement decisions. MBPCC does not sell your information or use it for marketing.

DWP monitoring and evaluation

If you give separate explicit consent, MBPCC may share the approved participant-level or appointment-level information needed to understand how the pilot operates and whether it helps people remain in or return to work. This may include agreed identifiers, referral and appointment information, whether fit notes or Workability Plans were provided, service outcomes and agreed equality-monitoring fields. Only data fields in the approved reporting arrangements will be shared; published findings will not identify you.

We will ask for separate consent before any optional evaluation interview, survey, case study or research contact. DWP is responsible for its own use and retention of information it receives. You can read more in the DWP Personal Information Charter on GOV.UK.

How long do we keep your information?

Clinical entries made in EMIS are retained in accordance with applicable NHS records retention requirements. The ENABLE pilot retention plan currently provides for MBPCC management, reporting and evaluation datasets to be held up to October 2027, followed by secure deletion or effective anonymisation unless retention is required for longer. Working extracts are removed when no longer needed. DWP determines retention of information that it receives as a separate controller.

How is information protected and is it sent overseas?

Only authorised staff can access information relevant to their roles. Approved systems, access controls, secure storage and transfer arrangements are used. We do not transfer ENABLE personal information outside the UK under the current service arrangements. If these arrangements change, we will explain any applicable safeguards and update this notice.

Optional technology and automated decisions

If an appointment offers ambient voice technology to help draft a clinical note, the clinician will explain it and ask for your separate explicit consent before it is used. You can decline without affecting your care. A clinician reviews any draft before it is added to a clinical record. ENABLE does not use solely automated decisions with legal or similarly significant effects on you.

Your choices and rights

You may withdraw your consent to ENABLE access and use of your information, or your separate consent to DWP evaluation sharing, at any time by calling 015242 35505 or emailing mbpcc.enable@nhs.net. We will stop future access, use or sharing that depends on the withdrawn consent. Withdrawal does not undo processing already carried out while consent was valid, and does not automatically delete clinical records that must be retained. Information already lawfully shared with DWP remains under DWP's control.

If you decline or withdraw consent for DWP sharing, you can still receive an ENABLE fit note assessment, but you will not be offered the pilot Workability Assessment and Workability Plan. If you decline or withdraw consent for ENABLE itself to access and use your GP information, staff will explain how this affects delivery of the ENABLE service and the options available to you for a fit note assessment.

Subject to the conditions in data protection law, you can request access to your information, correction of inaccurate information, deletion, restriction of processing and data portability. You have the right to withdraw consent. You can request a copy of information held by MBPCC through the contact details above; for your full GP record, contact your GP practice; for information held by DWP, contact DWP directly.

Questions, complaints and updates

For privacy queries or to exercise your rights, contact MBPCC using the details above and ask for its Data Protection Officer. You can complain to the Information Commissioner's Office (ICO) at ico.org.uk/make-a-complaint or on 0303 123 1113. We will review this notice if the pilot pathway, information sharing, technology or retention arrangements change materially.