

**Reference:** FOI.ICB-2324/001

**Subject:** Working Together Agreements

*I can confirm that the ICB does hold some of the information requested; please see responses below:*

| QUESTION  | RESPONSE  |
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| <p>In addition, from the information you have supplied for my original request, I am requesting further data on the number of patients and family carers who have signed WTAs which the ICB and/or Sirona have also signed WTAs since 2018, but where independent providers were not involved. Please give the specific years when patients/family carers signed. Further, the data requested is about non-profit bodies (providers, the ICB and Sirona) caring for individuals with a particular disability or medical condition. The request is one with a substantial public interest.</p> | <p>The ICB can confirm that less than 10 WTAs have been signed between the ICB and people in receipt of Continuing Healthcare. WTAs are considered the personal information of the individuals to which they concern. The ICB must consider Data Protection Principles when responses contain individual's health data as well as consider whether disclosure of information may allow members of the public to identify individuals.</p> <p>The ICB has considered whether disclosure of the information would contravene principle (a): personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject(s).</p> <p>In this case the data requested constitutes health related records which is considered special category data. The conditions for disclosing this type of data are: Explicit consent and whether the data is already in the public. In this case, the ICB does not have consent to disclose the information and this information is not in the public</p> |

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|  | <p>domain. Therefore, disclosure would contravene principle (a) and the ICB has not disclosed the information.</p> <p>The ICB Freedom of Information policy outlines the requirement for the ICB to consider whether disclosure of low numbers, particularly relating to health data, could make individuals identifiable. In this case, the ICB has considered that by the very nature of being CHC eligible, packages are highly complex and usually for individuals who are well known within the health and social care system. FOI responses are made publicly available and ICB must consider whether an individual could be identified through other data available, whether this is on a wider public or individual basis.</p> <p>The ICB also has an obligation to consider the reasonable expectations of the individuals involved. In this case, the ICB believes that the individuals would expect that any details relating to their WTAs would be confidential and not disclosable to the public.</p> <p>The ICB does not hold records of WTA's signed between patients and Sirona.</p> |
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***The information provided in this response is accurate as of 17 May 2023 and has been approved for release by Denise Moorhouse, Deputy Chief Nursing Officer for NHS Bristol, North Somerset and South Gloucestershire ICB.***