

- How did this happen?

The Freedom of Information Act 2000 provides the public access to information held by public authorities. The Trust (a public body) received a request asking for maternity information between 2016 and 2019. The Trust's response included an Excel spreadsheet which contained hidden data that was accessible using a pivot table also included within the spreadsheet.

- What information was included?

For all lines of data, the personal information included was date of birth, NHS number, UHS hospital number and home post code (as at the date of the appointment). For 112 lines of data, the individual's surname was also included.

Other, non-personal information was hidden in the spreadsheet but accessible using a pivot table:

- 'CCG code' – The NHS Clinical Commissioning Group (CCG) for the area where the individual lives.
- 'HRG code' – Health Resource Group, a code used by the Trust to charge the CCG for the cost of the appointment. The HRG codes in question were:
  - Non-delivery antenatal phase (intensive)
  - Non-delivery antenatal phase (intermediate)
  - Non-delivery antenatal phase (standard)
  - Non-delivery postnatal phase (intensive)
  - Non-delivery postnatal phase (intermediate)
  - Non-delivery postnatal phase (standard)
- 'GP practice code' – a code used in the NHS to identify a particular GP practice
- 'SPEC CODE' – a speciality code recorded for the appointment. The code on all lines of data was '560 Midwifery'.
- 'Admission Date' - date of appointment

- How many individual patient details were included?

21,818 unique patient details were included within the 42,000 lines of data, i.e. most individuals had more than one appointment. Of the 21,818 there were 112 which included surnames.

- Where can I find the details of the original FOI to which this breach relates?

Details of the original request and response are available at the following website <https://www.whatdotheyknow.com/>. The original response is no longer available and was removed from the website on 31 October 2023, and UHS was notified on 1 November. WDTK is a website where individuals can submit FOI requests to any public authority in the UK.

- What is a pivot table?

A pivot table is a tool within an Excel spreadsheet which can be used to extract and summarise a large set of data. A pivot table enables the user to select certain fields within the data and aggregate that information, for instance individuals whose name begins with 'M', born after a certain date.

- Do we know how many times the spreadsheet was accessed and by whom?

We have been unable to confirm how many times the spreadsheet was accessed on the WDTK website, as this is not information retained by WDTK. The spreadsheet was available on the What Do They Know website between November 2020 and 31 October 2023. A search has been conducted and there is no evidence of the document existing elsewhere.

- Have all affected patients been informed?

To deal with this as quickly as possible – bearing in mind the numbers involved and time-lapsed since the appointments occurred - we have taken the decision to be proactive in alerting our community to this data breach. To support anyone who's concerned that their details may have been included, we have a dedicated Data Enquiries team who can be contacted on: 023 8120 5444 and email: [dataenquiry@uhs.nhs.uk](mailto:dataenquiry@uhs.nhs.uk). This service will be manned Monday to Friday, between the hours of 9am to 5pm.

- Will you also be individually contacting those directly affected by this data breach?

We are aware there may be issues of sensitivity and safety to consider, so have made the decision not to contact those individuals directly.

- What is the UHS FOI process and how is it managed/governed?

The governance around the FOI team is currently under review with a revised policy and a standard operating procedure being introduced imminently. The new procedure will provide clarity and consistency across the Trust on the handling of FOI requests and implement additional controls in terms of what information is released and in what format.

- How has this data breach been investigated internally, and what has been the outcome of that?

This data breach has been assessed to establish the risk to the individuals affected, and the Trust. The assessment follows NHS guidance, and we use an NHS risk matrix to assess the impact of the breach. The Information Commissioner's Office was notified of the breach on 1 November 2023.

The outcome confirms that there has been a breach and lists the various actions and lessons learned. The ICO is currently investigating this breach and we are fully cooperating.

- What measures have been put in place to prevent this type of data breach happening in the future?

In September 2023, the Information Commissioner issued an advice notice to all public authorities regarding the use of spreadsheets. This advice has been included in our new standard operating procedure and includes a requirement that spreadsheets must not contain pivot tables and must be double-checked prior to publication.

- How do I request a copy of my health records?

No detailed medical or clinical information about patients was disclosed as part of this breach.

However, if you would like to request copies of your health record, details of how to do so can be found on the Trust's privacy notice under '[Right of Access](#)'. Alternatively, please email [Disclosures@uhs.nhs.uk](mailto:Disclosures@uhs.nhs.uk) for advice on how to request this information.

If you wish to complain about how your personal data has been handled by the Trust, please contact our Patient Advice Service: [patientsupportservices@uhs.nhs.uk](mailto:patientsupportservices@uhs.nhs.uk)