

Data Protection Impact Assessment Summary: PPSN – Expanded Use



Purpose of the Project

The Health Service Executive (HSE) is expanding its use of the Personal Public Service (PPS) number by collecting and recording it during all health and social care interactions. This will enhance the safe and accurate verification of patient identity, supporting improved quality, safety, and efficiency across healthcare services.

A Data Protection Impact Assessment (DPIA) was conducted on this expanded use, and this document provides a summary of its key findings.

Why does the HSE need to expand the use of the PPSN?:



1 Enhance Identity Verification

- **Accurate Verification:** The PPS number will support accurate verification of patient identity, reducing the risk of misidentification and improving the ability to link individuals to their correct medical records.
- **Streamline Records Management:** Accurate patient identification helps maintain medical and administrative records, which can reduce duplicate records and fragmented data. This supports more efficient coordination of services across health and social care providers.

2 Improve IHI Match Rates

- **Unique Identification:** The Individual Health Identifier (IHI) enables unique identification of patients across healthcare services. To maximise the IHI's benefits in quality, safety, and efficiency, the IHI match rate needs to be as close to 100% as possible.
- **Enhanced IHI Matching:** The availability of the PPSN on a patient's record during the IHI matching process significantly improves the chances of an accurate IHI match. The PPSN, being a unique and inflexible personal data item, is a powerful data point for IHI matching.



Benefits

- **For Patients:** Improved accuracy in identifying patients, helping to link them to the correct healthcare records and supporting the delivery of appropriate care based on their medical history.
- **For Healthcare Providers:** Enhanced coordination and communication among healthcare teams, which can lead to more efficient and effective care delivery.
- **For the HSE:** Better data accuracy and higher IHI match rates which will assist in enabling digital healthcare technologies thus contributing to the overall improvement of healthcare services in Ireland.

Data Collection and Usage

Term	Explanation
Collection	The PPSN will be requested from patients and recorded during all interactions with health and social care services. This is a new processing operation.
Accessibility	Patients who cannot provide their PPSN, or who do not have a PPSN will still have access to health and social care services. It will never be used as a barrier to accessing healthcare.
Purpose	The PPS number will be used to support the verification of patient identity and contribute to more efficient healthcare service processes. This is an additional purpose to existing processing purposes of the PPSN.

Legal Basis

The HSE and Voluntary Hospitals have a lawful basis for collecting PPS numbers under the Social Welfare Consolidation Act 2005 as a “specified bodies”.

This legal basis also supports the sharing of the PPSN with voluntary health and social care services, services funded by the HSE, private hospitals and private healthcare facilities for patient identity verification where this is necessary for patients and service users.

Data sharing will comply with statutory obligations and in line with protocols, policies and standards.



Is this processing necessary and proportionate?

The widespread collection and recording of the PPSN by the HSE has been considered by the HSE's National Data Protection Office and the Data Protection Commission, the Department of Social Protection and the Department of Health.

All have noted that they consider the use of the PPSN in this manner to be necessary and proportionate and not excessive.

What Organisational and Technical Security Measures are in place?

1 Data Security

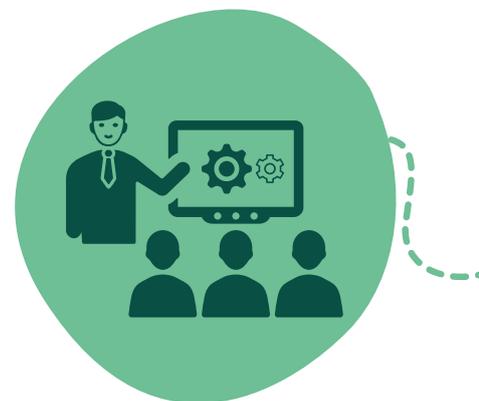
- Strict policies and procedures are in place to protect the PPSN and other personal data from unauthorised access or breaches. Measures include robust data security policies, staff training, and adherence to GDPR guidelines and system security configurations.

2 Transparency

- Patients will be informed about the use of their PPSN through privacy notices and other communication channels. These will include how data subjects can exercise their rights under the GDPR.

3 Staff Education

- Educational materials on the collection and recording of patient demographic data, including the PPSN, for identity verification purposes, are available to staff. These materials remind staff of their responsibilities to protect this information as they would any other personally identifiable information under the HSE's Data Protection Policy, Data Protection Act 2018 and GDPR.



4

Maintaining Data Accuracy

- Regular technical system updates, along with staff collecting or confirming the PPS number with patients during health and social care interactions, help ensure that data remains accurate and up to date.



5



Ensuring Public Awareness

- There is information on [hse.ie](https://www.hse.ie) explaining the purpose and benefits of using the PPSN in the health service. All communication will be developed with HSE Communications and ensure they meet the accessibility guidelines.

Want to know more?

**Email:
PPSNID@hse.ie**

For more information on PPSNs and how the HSE processes personal data please visit:

<https://www.hse.ie/ppsn>

<https://www.hse.ie/eng/gdpr/>

