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Duncan Selbie, CEO
Public Health England
Wellington House
133-155 Waterloo Road
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26 March 2018

Dear Mr Selbie,

Re: Data-sharing MOU between the Home Office and NHS Digital consultation

Thank you for the opportunity to contribute to this important review of potential impact that the memorandum of understanding between the Home Office and NHS Digital might have on the health and healthcare seeking behavior of migrants.

The Royal College of Physicians fully supports a review into the affect this MOU may have on public health, following concerns raised in 2016. Further concerns include:

- the impact on individual and public health of a tracing service which may deter some migrants from healthcare
- the compatibility of this tracing service with the law, data protection regulation and human rights
- the compatibility of this tracing service with clinicians' confidentiality responsibilities, and
- how in practice officials will apply the public interest test to every individual tracing request.

Anecdotally the Royal College of Physicians is aware that individuals may be deterred from seeking medical attention however evidence has been otherwise difficult to obtain.

"a case I saw a few years ago when somebody who was dropped off at a service station ... was arrested. He clearly had pulmonary TB. The immigration services refused to take him, so he was released into the community and presumably then kept well away from health services to avoid detection." (Anonymous Physician)

The Royal College of Physicians eagerly awaits the findings of this inquiry and subsequent recommendations in relation to the memorandum.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Goddard', with a horizontal line extending to the right.

Dr Andrew Goddard,

Registrar, Royal College of Physicians