

## Information Governing Group

**Thursday 1 February 2018 (09.00–13.00)**

British Dental Association, 64 Wimpole Street, London W1G 8YS

### 1. Welcomes and introductions

#### Attendees

Bill Sturman	NWL Collaboration of CCGs	Director of Informatics	BS
Christine Dunne	NWL Collaboration of CCGs	Deputy Director, Primary Care Systems	CD
David Stone	Kaleidoscope Consultants	Managing Consultant / IG Adviser to the GG	DS
Elle Baldry	Kaleidoscope Consultants	Project Manager	ED
Ernest Norman-Williams	BHH CCG	IG Manager	EN-W
Ian Riley	NWL Collaboration of CCGs	Director of BI	IR
Jan Boucher	Tri Borough	IG Manager	JB
Jo Andrews	London North West Healthcare Trust	Head of IG	JA
John Norton	Lay Partners Advisory Panel	Lay Partner	JN
Katie Stone (Notes)		IG Support Officer	KSt
Kavitha Saravanakumar	NWL Collaboration of CCGs	Deputy Director, BI	KSa
Laurie Slater	CWHHE/NWL	IG Clinical Lead	LS
Lynn Young	Kaleidoscope Consultants	Senior IG Consultant	LY
Mike Davis	NWL Collaboration of CCGs	Local Digital Roadmap Lead	MD
Muhitul Haque	NWL Collaboration of CCGs	DCC trainer	MH
Philip Robinson	ICHT	Data Protection Officer	PR
Rachel Meadows	NWL Collaboration of CCGs	Head of Development, WSIC	RM
Richard Baxter	Hounslow	IG Clinical Lead	RB
Ritu Sharma	Hillingdon Hospitals Foundation Trust	IG Manager	RS
Sanjay Gautama (Chair)	ICHT	Caldicott Guardian and CCIO	SG
Steve Janering	ICHT	Project Manager	SJ
Xavier Yibowei	NWL Collaboration of CCGs	Programme Manager	XY

Tony Willis (NWL Collaboration of CCGs, Clinical Lead for Diabetes) and David Newton (Senior IG Consultant, Kaleidoscope Consultants) attended for Item 9.

### 2. Welcomes and introductions

Apologies were received from: Jane Wilmot and Raj Seedher.

### 3. Confirm that the meeting is quorate

It was agreed that this meeting was quorate and others not in attendance would be informed of proceedings through the published minutes which can be found at:

<http://integration.healthiernorthwestlondon.nhs.uk/informatics/governance-group>

However, there were concerns raised over the lack of representation both the Governing Group and the Dataflows, Security and Access Sub Group were now experiencing with non-quorate meetings becoming more frequent. This was a particular worry because of the importance of the ISA-rewrite work currently underway.

#### **ACTION**

SG to contact organisations with patchy attendance particularly acute MH to encourage greater engagement. Other GG members encouraged to do the same.

#### **ACTION**

ISA project team to consider terms of reference of future governing group and consider mechanisms for using available technology to allow for more efficient and robust ways of communicating with a wider group of signatories.

### 4. Declare conflicts of interests

David Stone declared that he was a private consultant. He also informed the group that Amy Ford who was currently chairing the DCC project meetings was leaving her NHS role to join Kaleidoscope from mid-April 2018. Katie Stone who was the IG Support Officer and carried out the Secretariat function for the Governing Group is also supplied by Kaleidoscope.

### 5. Minutes of the Governing Group meeting held on 07 December 2017

The minutes of the Governing Group meeting held on 7 December 2017 were approved as a correct record of the meeting and would now be published on the web site.

### 6. Minutes of the Governing group meeting held on 18 January 2018

The minutes of the Governing Group meeting held on 18 January 2018 were approved as a correct record of the meeting and would now be published on the web site.

## **7. Review of Actions Log and validation of recommendations made on 18 January 2018 non-quorate meeting**

Papers has been recirculated to support validation of recommendations made at the non-quorate meeting on 18 January. The recirculated papers were community data feed, referrals data feed and the discover project papers (slides and detailed procedures guide).

All actions are updated in the Actions Log below.

## **8. Review of NWL Information Sharing Agreement**

DS had explained previously on general shape of the ISA as an overarching agreement with two main schedules as a starting point. Every schedule would need a supporting Data Protection Impact Assessment (DPIA). The Governing Group's role would be to 'police' compliance with the schedules (including any additional schedules added). Responsibility and liability for compliance with the schedule would rest with the parties to each schedule. Overall, in most areas there was not going to be significant changes to current well-established practice. It was indicative that the ICO was not re-issuing guidance in some areas as current guidance.

The ISA was not yet ready to circulate because it was the subject of a series of engagement events which were currently being advertised and would take place during February and March. It is essential that feedback from these events is incorporated into the draft.

DS raised four issues that the project team were grappling with.

### **a) Structure for Data Controller and Data Processor**

The best way to structure the relationship between data controllers (DCs) and the data processor (DP). In NWL there are multiple DCs contracting with one DP and through them with their sub-processors. Currently the Governing Group is the mechanism through which the DCs come together to provide the DP (namely Brent) with an instruction as they require clear written authority. Under DPA 2018/GDPR a DP will gain statutory duties and associated liabilities. They are also liable for their sub-processors.

The options for the GG to consider are:

Keeping the current arrangement. This would require a conversation with Brent to ensure they fully understood the liabilities. Brent must be able to control their sub-processors to make their liabilities work. SG commented that it may not make sense for Brent to carry the extra risk for any sub-processors if they were only working with a limited number of Data Controllers. In these cases the DCs should contract direct with the organisation as a DP and supervise their operations accordingly. DS confirmed that this would require each schedule to have a clear host DC (or multiple). It would require a duty to actively manage the

operation of the contract provisions.

An alternative model DS put forward was that the DCs could form an LLP. The new legal entity could enter into a contract and would jointly take on the duties and liabilities. The issue with this model was the lack of joint resource to actively manage the contract with the DP so the GG would need to be assured that there was adequate support being offered. The only way of reducing liabilities for a DP's failures would be to prove that the contract was actively managed and measures had been fully cascaded and properly managed.

With either model the DCs still need to be able to ratify any decisions made centrally as you cannot delegate your DC duties (nor avoid them with a legal construct). The ISA project team were considering electronic tools for this activity.

**ACTION**

DS to request a legal briefing for the GG's next meeting on the relevant benefits and risks of the LLP model for data processors from Data Protection specialist lawyers. BS to confirm which lawyers to use.

b) Research – commercialisation of research data

The clause in the current ISA prohibiting any commercial gain or reward from use of any information contained in the WSIC De-identified Dataset will be removed. By proposing this, the project team were seeking to be sufficiently open to allow for uses such as the Discover programme and their activities which seek to encourage investment in the health of the NW London population.

DS asked the GG whether they felt the ISA needed to distinguish between NHS, academic and commercial research as well as private sector vs. third sector/charity activity.

The GG emphasised that public understanding of the commercial model would be essential to avoid negative reactions to something that might be considered beneficial if better explained.

c) Status of CCGs

DS reminded the GG that CCGs had a different status in the ISA as they were not full signatories as they were not involved in delivery of direct care. However, with the definition expanded to 'that which is allowed in law', should any organisation that meets the lawful basis to process data be a full signatory?

DS stated that although CCGs would still not view any identified data and only have access to dashboards, NHS England have said that this should still be defined as personal data and the

controls should be 'as though' the data remained personal data. The justification is that CCGs need access to inform discussions and policy making on whole populations. The benefit would be that we remove a layer of complexity as there would be no special cases.

The GG said they thought CCGs should be included, but that there must be clear eligibility rules for any organisation becoming a signatory and better controls over how to terminate and remove an organisation from the contract and data set (on both sides).

d) Engagement – third sector / voluntary

DS said that engagement activity would be carried out via CCGs management directors who would be asked to forward to third sector partners as necessary.

The revised ISA will incorporate lesson learned from Grenville concerning data sharing during and following a major incident.

JN asked that particular attention was given to helping lay members to understand so they could help influence others. He asked for a simple leaflet that explained the benefits (and risks). DS said they were waiting for national guidance and would then use this to avoid any inconsistencies.

## 9. Diabetes Marketing Automation

Tony Willis (NWL Collaboration of CCGs, Clinical Lead for Diabetes) and David Newton (Senior IG Consultant, Kaleidoscope Consultant) attended for this item. TW explained that he was here to discuss the information governance aspects of his work and reminded the group about the work of his project.

DN then took the GG through the slides which showed the data flows. He explained that they were using explicit consent as the legal basis for processing.

The GG expressed concern of this approach and suggested that the project should seek to work under a healthcare need rather than consent. It was suggested that the model used by this Diabetes project was likely to be popular with other programmes and it would be laborious for individual data subjects to be asked for multiple consents across different services.

DN agreed that they would be able to do this through the quality of their fair processing materials at least for the two pilot sites, after which time the decision could be reviewed. PR said that the FPN must be highly visible at point of access and at the point of signing up. There needed to be efforts made to ensure that people had read and understood the notice. JN agreed this could be done by using simple understandable materials.

The GG was in agreement that the approach needed all the characteristics of consent (freely given, specific, informed, easy to opt-out), but without the signature itself ('clear affirmative

action'). Using this service was by self-referral and self-registration. It was entirely voluntary and therefore individual data subjects would be aware that they were starting to use a new service by expressing their own preference.

LS –asked who would be contacting the patient at the start of the process. He felt it needed to be someone who already knew about their condition (ie 'no surprises').

It was agreed that phase one work was business as usual and should be considered by the CCGs IG Group. When the project was ready for Phase 2 there would expect to once review that all IG considerations were appropriately considered. SG emphasised that these processes could carry on in parallel and need not hold back process. It had been previously stated in a GG meeting that TW needed to fund the IG support from his project budget.

## 10. WSIC Programme

### i. General update

The GG noted the slide presentation from KSa which updated them on the programme.

The GG suggested that the programme create a quick reference factsheet with a mix of headline data and good news stories which could be used to brief CEOs in the hope that they would repeat them in their wider circles to 'get the word out'. The programme could usefully develop a list of stakeholder groups that would be a good audience for WSIC programme updates and work out how best to access them (for example, SG suggested the ICHT Board).

### ii. PEN test update

The GG were asked to note the updated PEN test report and that all actions were now complete.

### iii. Proposed changes to setting up accounts update

RM explained that the DSA Sub Group had agreed to the recommendation that the accounts set up process could be amended to reduce the pressure on the service desk and the senior managers who were required to check every new request.

The team were rolling out training to more people and improving the depth of training. At the same time there were reducing the checking from 100% to just spot checks.

RM reassured the group that there was a double check because the list of new access requests was returned to the Data Controller so they could ensure that the right person had been given access for their practice or organisation

Currently the lead time is one week and the team were under Significant pressures to reduce

this.

The GG asked how the WSIC team verify that the form is from a legitimate source. They were keen to gain assurance that there was a due diligence process on the identity of the signatory. It was considered satisfactory that if the form was sent from the address of the Caldicott Guardian that was sufficient.

It was suggested that the team send the Caldicott Guardian a full list of current users when implementing the new process to remind them of their duties and current accounts.

**ACTION**

WSIC programme to implement the new training and spot checks and will amend the form to ensure the signatory is the Caldicott Guardian.

**ACTION**

WSIC programme will send all Caldicott Guardians a list of people who have access from their organisation for verification and will let them know about the newly designed form.

## 11. CIE programme update

Stephen Janering from ICHT attended and presented some update slides to the group.

He set out two current pieces of development around interfaces with SystemOne GP data and a CIE 'viewer' to allow access to the individual patient dashboard in WSIC .

SJ explained that CIE would be a data processor under the new ISA. DS commented that if CIE were determining their own purpose and manner of processing then they would be considered a data controller and would not gain protection from a data processor contract. They would have to be acting entirely under the instruction of one or more data controllers under contract for the processor construct to work. If they were seeking to demonstrate they were a processor then a Caldicott Guardian from the data controller must fully scrutinise and sign off the DPIA.

EN-W said he had concerns about the claim that sensitive personal data was not included in the sample as sometimes it had been in error. This had been reported to Brent. DS alerted the group to the seriousness of this and reminded them that all breaches must be reported to the Governing Group. Breaches should be logged, investigated and published. It is a provision of the processor contract that they report breaches to the data controller.

SJ reported that CIE was working on click through from CIE to WSIC. He wanted to check with the GG that there were no objections to this approach.

- There were still some issues to resolve:
- Where will patients be directed if they have concerns?
- What is the most appropriate patient view?
- How can CIE avoid additional issues coming to GPs?
- How can CIE ensure they are respecting patient preferences and honour dissent to share?
- How can CIE validate that a call is valid?

The GG asked that SJ return to a meeting setting out the controls for increased access.

**ACTION**

EN-W to bring a report on any breaches to the Governing Group and report on actions taken to ensure there are systems in place so this happens in future.

**ACTION**

SJ to return to the GG with a report on the programme in primary care and giving access to patients.

**12. Report from National Audit Office on the Investigation and Lessons learnt as a result of the recent Cyber Attack**

It was noted that this had been brought forward on more than one occasion. Abhilash Abraham was not in the meeting and the item was cut from the agenda because of lack of time. It was requested that AA consider if it needed discussing at the GG and if so to resubmit it for a future agenda with a cover note setting out the issues to be considered.

**ACTION**

KS to inform AA of this approach.

**13. North West London (NWL) Cyber Security Maturity Model and Cyber Security Toolkit**

It was noted that this had been brought forward on more than one occasion. Abhilash Abraham was not in the meeting and the item was cut from the agenda because of lack of time. It was requested that AA consider if it needed discussing at the GG and if so to resubmit it for a future agenda with a cover note setting out the issues to be considered.

**ACTION**

KS to inform AA of this approach.

#### 14. IG Toolkit and Cyber Security Recommendation

It was noted that this had been brought forward on more than one occasion. Raj Seedher was not in the meeting and the item was cut from the agenda because of lack of time. It was requested that AA consider if it needed discussing at the GG and if so to resubmit it for a future agenda with a cover note setting out the issues to be considered.

#### **ACTION**

KS to inform RS of this approach.

#### 15. IG Support Tracker

KSt reminded the group that the tracker was a record of all IG work commissioned directly by the group. It was being extended to include spend against agreed budget. The work on the tracker and introducing the IG request form had highlighted the trend that IG was often an afterthought for projects who had not included time or money for IG work in their plans. It meant that requests were often late and urgent which made it difficult to gain competitive quotes and advise in detail about scope.

The Governing Group were informed that BS was setting up a new NWL IG Group. This group would consider IG that involved local projects that only one or a few organisations were involved in and were funded by them. The Information Governing Group would be informed of their activity and have knowledge of the IG advice and activity across NWL, but would not be involved in scrutiny or funding of this more BAU work. This left the GG to focus on IG that impacted all of NWL and came directly from the ISA. The Chairs of the GG would retain a discretionary fund to ensure that IG was funded for projects that needed it and legitimately had no localised funding.

KS reported that she had sent a request to join a preferred supplier list to a few consultancies and was preparing a rates card so that NWL could advise projects on a range of suppliers to approach. There had been an issue owing to her own conflict of interest and it was agreed that the WSIC Programme would hold the commercially sensitive information and rates would not be discussed in any forum that included representatives of private consultancies.

#### **ACTION**

KS to handover the tracker to the WSIC Programme and inform the consultancies that they should approach them direct with their rates cards.

It was noted that funding for the current support arrangements would run out at end February 2018. BS was asked about the future of support for the Governing Group and its activities including the sub groups. BS confirmed that there would be administrative support in place from April 2018 and that John Keating was progressing with this by devising a role profile. DS asked if

it would be helpful to supply some information on the activities in the role as it currently stands. BS confirmed that this would be helpful.

**ACTION**

KS to send information to BS about the IG Support Officer activities.

**ACTION**

BS and IR to confirm arrangements from February 2018 until the new resources were in place.

**16. Update on progress with GP support (partnership)**

DS reiterated that he had been seeking a solution with a commercial company as it might be a lot cheaper for NWL and if it was near to completion would be quicker to implement.

The GG confirmed that they wanted a proposal setting out a scope for a possible service.

**ACTION**

DS to complete a draft scope for a GP support service for discussion at the next meeting (1 March 2018).

**17. MOU combining with Governing Group**

KS had prepared a comparison of the terms of reference between the MOU and the GG. It had demonstrated that they were not fundamentally different and it should be possible for the governance arrangements for the new ISA to incorporate the requirements of the MOU.

**ACTION**

ISA team to ensure that they fully considered the needs of the MOU in their work, including the governance arrangements.

**18. Update on activities from the Dataflows, Security and Access Sub Group**

Raj Seedher was not at the meeting. KS explained that the DSA Sub Group had not been quorate on 21 December 2017 and the GG had not been Quorate on 18 January and therefore their recommendations still needed to be validated by the Governing Group. The decisions were set out in the Action Log and outcomes reported there.

## 19. Risk Register – discussion on best way to review and bring up to date

KS reported that the risk register was out of date and it needed bringing up to date before the GG could properly review it. It was suggested that a meeting be set up between the Chairs, WSIC programme, someone from the ISA project and KS to look at the risks in depth and then bring it to the April meeting with enough time for the GG to discuss.

### **ACTION**

KS to set up a risk register review meeting with the Chairs, WSIC programme, ISA project and update the risk register for the 5 April meeting.

## 20. Any other business

### PRIVACY POLICY UPDATE (PKB)

PKB had some feedback on the Privacy Policy they completed with NWL Lay Partners last year. The feedback concerns the improvement of clarity around encrypted data transfer to PKB. The recommendation was for the inclusion of one sentence. The recommendation originated from a PKB customer (NHS Greater Glasgow).

Suggestion: PKB circulate this sentence to NWL Lay Partners directly for review/approval and if the Lay Partners agree they update their Privacy Policy.

The GG said that PKB were the data controller and managed their own privacy policy. They would like to see the revised wording with the change highlighted as a courtesy, but did not consider it their decision.

### **ACTION**

PKB (DG) to circulate the privacy policy as a 'below the line' paper to a future meeting with the change to PN highlighted.

**Dates of the next meeting:** Thursday 1 March 2018 (09.30am, BDA).

- The deadline for agenda items: 19 February.
- The deadline for papers: 22 February
- Papers circulated: 23 February

Note: All dates for papers are now published on the web site –  
<http://integration.healthiorthwestlondon.nhs.uk/informatics/governance-group>



North West London Collaboration of  
Clinical Commissioning Groups





#	Date opened	Action	Who	Update	Date due	Open/closed
019	05/10/2017	SJ suggested that a WSIC update to be provided to the Portfolio Board	BS	<p><b>01/02/2018.</b> WSIC update would be sent to the Portfolio Board. BS would put WSIC on the agenda.</p> <p><b>07/12/2017:</b> WSIC Programme had not yet been invited to present at the Portfolio Board, but would be happy to attend and provide a demonstration. Bill Sturman agreed to organise an invitation.</p>		<b>Open</b>
035	07/12/2017	<p><b>De-identified contract</b></p> <p>AL [IR] agreed to contact DACBeachcrofts for them to validate that all their concerns had been addressed and the version circulated was the final version as agreed by them</p>	AL/IR	<p><b>01/02/2018:</b> IR confirmed that they had a meeting with Beechcroft. It had been clarified that comments were on the form and not the contract itself. Those comments had not been fully reflected and would now be processed. The issue was how long access was granted form. Recommendation was six months before a return to the group to show continued need. IR would be preparing a final iteration and then come to the GG to sign off contract AND access form.</p>	5/04/2018	<b>Open</b>
036	07/12/2017	<p><b>London North West</b></p> <p>AL [IR] agreed to seek advice from DACBeachcrofts over any risks from past</p>	AL/IR	<p><b>01/02/2018:</b> IR met Sonia Patel and DACBeachcrofts. LNW need assurance about what was happening August 17 and six months before. Assumed to be</p>	05/04/2018	<b>Open</b>



#	Date opened	Action	Who	Update	Date due	Open/closed
		data sharing.		minimal risk, but action was agreed to write to people about what was held. There may be no one impacted and if they were it is likely to be a signatory.		
037	07/12/2017	<b>London North West</b>  AL [IR] agreed to seek greater clarification over the 'low risk' assessment.	AL/IR	<b>01/02/2018:</b> Sonia Patel had asked for greater assurance on the low risk rating in the paper from David Newton that data could not be reidentified. IR agreed to speak with Sonia Patel again about this issue to confirm nothing more was required.	05/04/2018	<b>Open</b>
038	07/12/2017	<b>London North West</b>  AL [IR] agreed to update the project tracker and post it on the web site.	AL/IR		Immediate	<b>Open</b>
041	07/12/2017	<b>London North West</b>  IR agreed to write to SP to confirm her preferred treatment of active and newly trained users.	IR	<b>01/02/2018:</b> The process of involving CG had been reviewed and new arrangements were on the agenda.  IR would confirm with Sonia Patel the current status of her termination for LNW from the ISA. Were we in a 'stop the clock' period while things were considered. Or was she satisfied with progress and withdrawing her termination?  If termination was to go ahead then discussions needed to start about exit and withdrawal of data held.	01/03/2018	<b>Open</b>



#	Date opened	Action	Who	Update	Date due	Open/closed
048	07/12/2017	<b>TPP – validation list</b> LS to bring validation list to a future meeting	LS		05/04/2018	<b>Open</b>
049	07/12/2017	<b>TPP – principles to stop sharing</b> LS to suggest some principles and a process for making a decision to stop TPP sharing.	LS		05/04/2018	<b>Open</b>
053	18/01/2018	<b>DCC</b> <u>Request</u> to the DCC project team  DCC team to consider producing a set of short ‘marketing’ documents explaining the DCC, its purpose, how it fits with other pan-London initiatives, and its benefits (linked to each sector). Include development plans (in brief), timescales, how it is costed (now and in future), plans for demonstrating the DCC at work, expectations are from the project team (support, etc.) and from the organisation itself in terms of set up.	DCC	<b>01/02/2019:</b> DCC project team invited to the 1 March 2018 meeting and reminded of these items.	1 March 2018	<b>Open</b>
057	18/01/2018	ISA team to log that research issues are more fully addressed in the new ISA.	ISA project team		1 February 2018	<b>Open</b>
058	18/01/2018	<b>DISCOVER:</b> ICHP to explore the additional risks to data	Discover / AL		01/03/2018	<b>Open</b>



#	Date opened	Action	Who	Update	Date due	Open/closed
		controllers as a result of Discover and consider whether ICHP could indemnify data controllers to mitigate any residual risk				
059	18/01/2018	<b>DISCOVER:</b> ICHP to work on the terms of reference for the Access Sub-group to include membership and responsibilities as defined in the proposed Data Research Access Group (DRAG)	Discover/AL		01/03/2018	<b>Open</b>
062	18/01/2018	<b>DATA CLEANSE:</b> KS to undertake an initial review of what data sets are available and general evaluation of their accuracy and usefulness taking no more than one day at the rate quoted (£600). Subject to the outcome, Bill Sturman would need to be approached to approve any further work/funding.	KS	01/02/2018: Needs to use information collected during the consultation and will then build from there.	04/04/2018	<b>Open</b>
067	01/02/2018	<b>QUORACY</b> SG to contact organisations with patchy attendance particularly acute MH to encourage greater engagement. Other GG members encouraged to do the same.	SG and all GG		01/03/2018	<b>Open</b>
068	01/02/2018	<b>QUORACY</b> ISA project team to consider terms of	ISA Project team		05/04/2018	<b>Open</b>



#	Date opened	Action	Who	Update	Date due	Open/closed
		reference of future governing group and consider mechanisms for using available technology to allow for more efficient and robust ways of communicating with a wider group of signatories.				
069	01/02/2018	<b>NEW ISA</b> DS to request a legal briefing for the GG's next meeting on the relevant benefits and risks of the LLP model for data processors from Data Protection specialist lawyers. BS to confirm which lawyers to use.	DS		01/03/2018	<b>Open</b>
070	01/02/2018	<b>APPROVING ACCOUNTS</b> WSIC programme to implement the new training and spot checks and will amend the form to ensure the signatory is the Caldicott Guardian.	WSIC programme		01/03/2018	<b>Open</b>
071	01/02/2018	<b>ACCOUNT VALIDATION BY CGs</b> WSIC programme will send all Caldicott Guardians a list of people who have access from their organisation for verification and will let them know about the newly designed form.	WSIC programme		01/03/2018	<b>Open</b>
072	01/02/2018	<b>BREACHES</b> EN-W to bring a report on any breaches to the Governing Group and report on	EN-W		01/03/2018	<b>Open</b>



#	Date opened	Action	Who	Update	Date due	Open/closed
		actions taken to ensure there are systems in place so this happens in future.				
073	01/02/2018	<b>CIE PROGRAMME</b> SJ to return to the GG with a report on the programme in primary care and giving access to patients.	SJ		05/04/2018	<b>Open</b>
079	01/02/2018	<b>ADMIN SUPPORT: FEB TO APRIL</b> BS and IR to confirm arrangements from February 2018 until the new resources were in place.	BS/IR		01/03/2018	<b>Open</b>
080	01/02/2018	<b>GP SUPPORT IDEAS</b> DS to complete a draft scope for a GP support service for discussion at the next meeting (1 March 2018).	DS		01/03/2018	<b>Open</b>
081	01/02/2018	<b>MOU AND NEW ISA</b> ISA team to ensure that they fully considered the needs of the MOU in their work, including the governance arrangements.	ISA project team		04/04/2018	<b>Open</b>
082	01/02/2018	<b>RISK REGISTER</b> KS to set up a risk register review meeting with the Chairs, WSIC programme, ISA project and update the risk register for the	KS		05/04/2018	<b>Open</b>



North West London Collaboration of  
Clinical Commissioning Groups



#	Date opened	Action	Who	Update	Date due	Open/closed
		5 April meeting.				
083	01/02/2018	<b>PKB PRIVACY NOTICE</b> PKB (DG) to circulate the privacy policy as a 'below the line' paper to a future meeting with the change to PN highlighted.	DG		05/04/2018	<b>Open</b>

Please address all queries and change to: [nwl@infogovernance.nhs.net](mailto:nwl@infogovernance.nhs.net)



## ALL ITEMS CLOSED AT OR SINCE THE MEETING

#	Date opened	Action	Who	Update	Date due	Open/closed
047	07/12/2017	<b>Communications sub group</b>  KS to review the terms of reference of the previous group and bring a draft to the next GG.	KS	<b>01/02/2018:</b> This was discussed on 18 January 2018 and the revision of the ToR would be a task for the new sub group. Priority is setting up the group.	18 January 2018	<b>Closed</b>
051	07/12/2017	<b>Meetings</b>  KS to inform PMO to cancel January and set up 18 January meeting as agreed.	KS	The meeting request was adapted and re-circulated	Immediate	<b>Closed</b>
052	18/01/2018	<b>Meetings</b>  KS to ask PMO to extend the times of the Governing Group meeting on 1 February 2018 to 9am to 1pm. All outstanding agenda items should be moved to the new agenda (and will not be shown as individual action points).	KS	The meeting request was adapted and re-circulated.  All outstanding agenda items were repeated on the agenda for 1 February 2018.	Immediate	<b>Closed</b>
056	18/01/2018	<b>DISCOVER – DECISION:</b>  The meeting agreed the programme move forwards (using the DSA Sub-Group for Access Requests with an extended audience). The recommendation needs to be ratified by a quorate meeting.  SG requested that all GG attendees read the papers provided ahead of a short validation	GG	The quorate meeting on 1 February agreed that the Discover programme would use the DSA sub group and new terms of reference would be agreed to cover their needs. Members with knowledge of research should be increased.  The Information Governing Group approved the launch, but thought that	1 February 2018	<b>Closed</b>



		discussion at 1 February Information GG meeting.		there may need to be further assurances from Brent and a review of the FPNs being used to ensure it covered everything.  Item would be closed, but Discover would return to a future meeting and report on progress. The regular DSA Sub Group update would cover the extension of the meeting's remit.		
060	18/01/2018	<b>ISA:</b>  <b>DS to share project plan for ISA with GG.</b>	DS	01/02/2018: Now a regular agenda item and will be handled during meeting.	1 February 2018	<b>Closed</b>
060	18/01/2018	<b>AMBULATORY REFERRAL:</b>  <b>It was agreed that there needed to be a meeting with ICHT and other stakeholders before the project could progress. This meeting should include project and ICHT. LS and Christine Gunn should be copied in so they were aware of progress.</b>	Andrew Harrison	01/02/2018: Item closed and will be reopened when the meeting has occurred and there is a report to the Information Governing Group.	01/02/2018	<b>Closed</b>
064	18/01/2018	<b>COMMUNICATIONS SUB GROUP:</b>  <b>KS to draft invitation for SG to issue to Amy Darlington inviting her to Chair a communications sub group and set up initial discussion about the work with DS and the project team.</b>	KS	01/02/2018: Letter was issued to Amy Darlington from SG. Item is closed, but Communications Sub Group to be added to main agenda.	01/02/2018	<b>Closed</b>
065	18/01/2018	<b>DATA FEEDS (Community) – DECISION:</b>  <b>The GG are asked to confirm that the</b>	GG	01/02/2018: Agreed with the recommendation of the DSA sub group that this should be agreed.	1 February 2018	<b>Closed</b>



		<b>community groups could send data to WSIC with appropriate due diligence taking place on their legal basis for processing and communication with patients.</b>				
066	18/01/2018	<b>DATA FEEDS (referrals) – DECISION:</b>  The GG are asked to confirm that they agreed that the request for referrals data should be rejected until such time as the new ISA was agreed.	GG	01/02/2018: Agreed with the recommendation of the DSA sub group that this should be rejected at this time, but should be considered again.	1 February 2018	<b>Closed</b>
074	01/02/2018	<b>NAO LESSONS LEARNT</b>	KS	AA informed that it had been noted and if decisions were needed it needed to be resubmitted to correct committee with a cover note.	01/03/2018	<b>Closed</b>
075	01/02/2018	<b>NORTH WEST LONDON (NWL) CYBER SECURITY MATURITY MODEL AND CYBER SECURITY TOOLKIT</b>	KS	AA informed that it had been noted and if decisions were needed it needed to be resubmitted to correct committee with a cover note.	01/03/2018	<b>Closed</b>
076	01/02/2018	<b>IG TOOLKIT AND CYBER SECURITY RECOMMENDATION</b>	KS	RS informed that it had been noted and if decisions were needed it needed to be resubmitted to correct committee with a cover note.	01/03/2018	<b>Closed</b>
077	01/02/2018	<b>CONSULTANCY RATE CARD</b>  KS to handover the tracker to the WSIC Programme and inform the consultancies that they should approach them direct with their rates cards.	KS	Tracker sent to KSa with all current submissions. Concerned suppliers informed of new arrangements which would ensure commercial sensitive information was not shared.	01/03/2018	<b>Closed</b>



North West London Collaboration of  
Clinical Commissioning Groups



078	01/02/2018	<b>IG SUPPORT OFFICER ROLE</b>  KS to send information to BS about the IG Support Officer activities.	KS	Activity list sent to BS with approx number of hours per item.	01/03/2018	<b>Closed</b>
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Please address all queries and change to: [nwl@infogovernance.nhs.net](mailto:nwl@infogovernance.nhs.net)