

**North West London Whole Systems  
 ISA Governing Group Meeting  
 3<sup>rd</sup> March 2016  
 Time: 9.30am – 11.30am**

**Venue: Royal Society of Medicine,  
 1 Wimpole St, London, W1G 0AE**

**ATTENDEES**

<b>Name</b>	<b>Role</b>	<b>Organisation</b>	<b>Attendance</b>	<b>IN.</b>
Sanjay Gautama (Chair)	Caldicott Guardian	Imperial NHS Hospital Trust	Yes	<b>SG</b>
Alan Meakin	IT project manager	Harrow Council	Yes	<b>AM</b>
Alina Gritsenko	WSIC PMO	NWL Collaboration of CCGs	Yes	<b>AGr</b>
Amanda Lucas	WSIC Dashboards & DW Programme Manager	NWL Collaboration of CCGs	Yes	<b>AL</b>
Angeleca Silverside	Lay Partner	West London	Yes	<b>AS</b>
Anne Crofts	Partner	DAC Beechcrofts	Yes	<b>AC</b>
Araripe Garboggini	IG Manager	CNWL	Yes	<b>AG</b>
Caroline Law	IG Manager	Chelsea and Westminster Hospital	Yes	<b>CL</b>
Dr Mohammed Al Ubaydli	CEO	Patients Know Best	Yes	<b>MU<b>b</b></b>
Janice Boucher	Borough Information Governance and Caldicott Support Manager	Triborough	Yes	<b>JB</b>
Jason Clarke	IG Manager	BHH- Brent Host	Yes	<b>JC</b>
Kate Glass	Network Manager	Kilburn GP Network	Yes	<b>KG</b>
Katrina Smith	IG Manager	West London Mental Health NHS Trust	Yes	<b>KS</b>
Muhammad Ali	IG Manager	Hounslow and Richmond Healthcare Trust	Yes	<b>MA</b>

Raj Seedher	IG Manager	Brent Local Authority	Yes	<b>RS</b>
Samantha Gautama	IG Officer	Imperial College Healthcare NHS Trust	Yes	<b>SGa</b>
Selin Barnett	WSIC Project Manager	NWL Collaboration of CCGs	Yes	<b>SB</b>
Sheri Ekladios	IG Manager	CLCH	Yes	<b>SE</b>
Simon Howarth	Deputy SIRO	London North West Healthcare NHS Trust	Yes	<b>SHo</b>
Sonia Patel	NWL Informatics Lead	NWL Collaboration of CCGs	Yes	<b>SP</b>
Varsha Dodhia	Lay Partner (Deputy)	Harrow	Yes	<b>VD</b>
Cyndee Massa	Deputy IG Manager	CLCH – Deputy	No	CM
Gary Wilsher	IG Manager	Hounslow Council	No	GW
Graham Trainor	IG Manager	West Middlesex University Hospital	No	GT
Ian Riley	Director of Business Intelligence	NWL Collaboration of CCGs	No	IR
Jahan Mahmood	GP	Wembley GP network (brent)	No	JM
John Norton	Lay Partner	Central London	No	JN
Kuldhir Johal	CCG GP IT Lead	Hillingdon CCG	No	KJ
Laurie Slater	GP representative	Hammersmith & Fulham	No	LS
Mary Umrigar	IG Manager	Ealing Council	No	MU
Michael Davies	IT Lead	Hillingdon CCG	No	MD
Phillip Robinson	IG Manager	Imperial NHS Hospital Trust	No	PR
Reena Parmar	IG Manager	Harrow Council	No	RP
Richard Baxter	GP representative	Hounslow	No	RB
Ritu Sharma	IG Manager	The Hillingdon Hospital NHS FT	No	RSh
Rory Hill	IG Officer	CHWHHE	No	RH
Stephen Murphy	IT Commissioning and Information Governance	Triborough	No	SM

	Specialist, Adults Social Care Shared Services			
Vijay Patel	IG Representative	Harness GP Network	No	VP

## PART ONE: Provider Partners

### 1. Welcome and Introductions – Sanjay Guatama

- Welcomed HRCH as new members to the Governance Group

### 2. Minutes and Actions – Sonia Patel

- The minutes of the 4<sup>th</sup> February 2016 meeting were reviewed and agreed.

### ACTION UPDATE

Action No.	Date	Action	Assigned to	Status/Update	Status
52	04.05.2015	Process and procedures documents need to be updated and signed off by governance group	AL	On-going, more work needed by Data Processors  AL to bring back document to sign off.	Paused
68	04.06.2015	ISA Governance Group to send letters to the CCGs to ask for them to encourage the GPs that have not passed the IGT in March but have signed the ISA letters, to ask them to be compliant and confirm.	JC RH	Paused however it will be picked up again by JC who will provide an update to governing group. To hold off until April.  JC attended meetings with Harrow, Brent and Hillingdon CCGs giving them an update on the GP toolkits. JC will be attending Practice Manager forums and engaging with the Practice Managers to ensure that the compliance for the 8 CCGs is exactly where it's meant to be.  <u>To be included in April agenda.</u>	Open
89	07.06.2015	Social Care Partners to provide agreed minimum dataset for the WSIC Data Warehouse	All	Harrow - sent data. Brent - sent data. Triborough transferring soon. Still need Ealing, Hounslow, Hillingdon Councils to send list.	Open
92	04.08.2015	Circulate National Partners Summary of WSIC Programme once available	SP	First draft was circulated for comment, waiting for LGA to write up case study.	Paused

				DS met with WELC who do not believe that IGA understand what we are doing nor do they think that they will publish material. SB to circulate link to recent publication.  National work paused.	
<b>100</b>	08.09.2015	RACIE of the proposed Programme to be shared with the Governance Group	<b>JH</b>	Paused until 2016.	<b>Paused</b>
<b>101</b>	08.09.2015	Imperial Healthcare Partners to come back to the Governance group to answer questions on data flows, IAO, Clarification of hand-off of liability (roles and responsibilities), patient complaints procedure and demonstration or proposal of look up tool.	<b>JH</b>	Paused until 2016.	<b>Paused</b>
<b>102</b>	08.09.2015	Legal review of changes of WSIC ISA and associated risks of adopting CIE to be brought back to Governance Group	<b>JH</b>	Provider Partners have expressed concern. AC presented risk and issue table at meeting.	<b>Closed</b>
<b>103</b>	08.09.2015	C2C team need to come back to Governance Group with feasibility data request	<b>JH</b>	Provider Partners have expressed concern.	<b>Paused</b>
<b>106</b>	06.10.2015	The Governance Group agreed to ask Dr Ben Lucas to chair a group to finish the work on the definition of risk stratification.	<b>ALL</b>	Awaiting for Calidcott 3 review	<b>Closed</b>
<b>126</b>	03.12.2015	JC to get DPA's with TPP,	<b>JC</b>	Following up, will be in place by March 2016.	<b>Paused</b>

		System One.		Ongoing	
137	03.12.2015	AL to bring demo dashboards to next meeting.	AL	March agenda	Closed
146	07.01.2016	JC to circulate BHH report to the Governance group.	JC	Comes back in April – review of IG toolkits.	Open
147	07.01.2016	SB to publish all DPAs online and circulate link to website location.	SB	SB is waiting for all DPAs to be done. SP requested for online upload.	Closed
151	07.01.2016	SB to have the GP data requests signed off by a GP representative.	SB	<p>Queries from Philip, no further feedback, Sam to chase. Close update – 10 Feb</p> <p>SP Ref no to the data requests. No idea what's requested. A tracker to be designed specifically for this group.</p> <p>Next meeting to have provide an update on the visibility of the above</p>	Closed
152	07.01.2016	RS to make recommendations and draft a brief conclusion report about the incident presenting it to the Governance group in April.	RS	<p>Ongoing</p> <p>To be presented back to the group in march</p>	Closed
155	07.01.2016	AL to work with RS to ensure that there are plans in place prior to mitigation ahead of the next Governance group meeting in relation to the CSU and Mckinsey response that are due on the 19 <sup>th</sup> of January.	AL/RS	<p>Ongoing</p> <p>March agenda</p>	Closed
164	04.02.2016	SB/SP to explore and understand the requirement for Royal Free to be part of Provider partners (paused till April)	AL	Further clarification around Royal Free is required. Consult with Anne Crofts.	Open

<b>165</b>	04.02.2016	AS to write up the point made on whether the patient information will be classed as a medical record or otherwise, and share it with the CIE programme team	AS	Patient information is considered as a medical record.	<b>Closed</b>
<b>166</b>	04.02.2016	DS to share with the group paper on legal requirements to patient verification and citizen identity as discussed in the meeting with SG on 1 February	DS	Nothing has been submitted	<b>Open</b>
<b>167</b>	04.02.2016	SB/Beachcroft to hold a discussion with PKB on the current user agreement and present their findings to the group at March meeting	SB		<b>Closed</b>
<b>168</b>	04.02.2016	All to comment on the re-drafted ISA and return to SB by 17 February	ALL		<b>Closed</b>
<b>169</b>	04.02.2016	CIE adoption carried over to March Agenda	SB		<b>Closed</b>
<b>170</b>	04.02.2016	AL present dashboard demo in March	AL		<b>Closed</b>
<b>171</b>	04.02.2016	SB to follow up on the provider partners' process comments	SB		<b>Closed</b>
<b>172</b>	04.02.2016	AL requested further clarification as to the process for sign off of data items	AL	See action #173	<b>Closed</b>
<b>173</b>	04.02.2016	SP to bring back to the group mapping of the process for data requests sign off	SP	April meeting	<b>Open</b>
<b>174</b>	04.02.2016	RS to hold conversations with South East CSU and feed back to the group	RS		<b>Closed</b>
<b>175</b>	04.02.2016	JC to feedback to the group next month on Brent CCG Exec group meeting	JC		<b>Closed</b>
<b>176</b>	04.02.2016	AL promised to follow up on the new process implemented by SE CSU and provide assurance to group	AL		<b>Closed</b>

<b>177</b>	04.02.2016	SB and DS to work on audit templates	SB	April meeting	Open
<b>178</b>	04.02.2016	DS to test the audit templates with PR/RS/SH	DS	April meeting	Open
<b>179</b>	04.02.2016	RB to help SB with CWHHE fair processing	RB	April meeting	Open
<b>180</b>	04.02.2016	SG to provide an update on media channels to Imperial for the WSIC and CIE programmes	SG	Selin to add the full breakdown into the document repository	Closed
<b>181</b>	04.02.2016	All provider partners to provide update on fair processing	ALL	Ongoing Update in April	Open
<b>182</b>	04.02.2016	AG/JC/SB to scope what will be appropriately to audit for partner providers and bring it March meeting	AG/JC/SB	April agenda. Risk register to provide overview which providers need support and where are the gaps	Open
<b>183</b>	04.02.2016	ICO audit to start in May	ALL (tbc)	Pre-ICO audit has been suggested to see where the gaps are	Open
<b>184</b>	04.02.2016	Working group to scope what is needed from provider partners to help with ICO audit	LS/AG/SB/JC		Closed
<b>185</b>	04.02.2016	AL to provide procurement update for GP data	AL		Closed
<b>186</b>	03.03.2016	SB to bring back IGA's concerns with the data flows following conversations with Phil Walker	AL		Open
<b>187</b>	03.03.2016	SB to send doodle poll to members to gauge the participation for the review panel	SB		Open
<b>188</b>	03.03.2016	RS to share with the Group review panel's decision on assurance processes, mitigation activities and action plan	RS		Open
<b>189</b>	03.03.2016	MUb /AS/VD to review Privacy policy documents currently available on PKB's website and convert these into patient-friendly language	MUb/AS/VD		Open



<b>190</b>	03.03.2016	AL to denote mechanisms to manage data flows into WSIC Dashboards, to be tabled for May agenda	AL		<b>Open</b>
<b>191</b>	03.03.2016	CIE programme to bring back mechanisms in CIE consent engines as May item	CIE programme		<b>Open</b>
<b>192</b>	03.03.2016	MUb to expand and clarify on the data deletions outlined within patient's privacy policy	MUb		<b>Open</b>
<b>193</b>	03.03.2016	SB to respond to SE's concerns regarding consent mechanisms assurances	SB		<b>Open</b>
<b>194</b>	03.03.2016	AS to provide feedback on the data control and assurances to the Lay Partners Advisory Group	AS		<b>Open</b>
<b>195</b>	03.03.2016	ALL to comment back on new ToR for sign off at the next meeting	ALL		<b>Open</b>
<b>196</b>	03.03.2016	AL to bring back Role Based Access to Governance group for sign off	AL		<b>Open</b>
<b>197</b>	03.03.2016	AL to update the user manual with role-based access section and Terms and Conditions	AL		<b>Open</b>
<b>198</b>	03.03.2016	SB ensure the Group is aware of the Change Academy and any other data sharing and access training opportunities	SB		<b>Open</b>

### 3. Update Provider Partner Sign Up – Selin Barnett

- **SB** updated that all of the large providers in NWL have now been signed up. This accounts to around 60% (240 GP practices).
- **SP** added that Ealing area requires more work to be done. Central London have indicated that they would like to pause with this agreement because they want to conclude with System 1 sharing. There is an understanding that for each CCG there may be a proportion of practices not signed up which at this stage have to be accepted and influenced over time.

### 4. Update on HSCIC Engagement; WSIC Data Flows – Sonia Patel

- **SP** feedback on the field visit to the leading QC was positive. The draft guidance since been shared with Information Governance Alliance (IGA) led by Phil Walker. The following up approach will be to share the information with other pioneers and vanguards. Phil will provide further guidance on taking this forward from the subsequent conversations which are to be had beginning of March.
- **SG** stated that the current approach is to work with IGA to create a process to be shared with other pioneers.
- **SB** stated that Phil Walker currently has certain concerns with the data flows which he is yet to share.
- **SP** updated that Local Government Association are keen with on the work being undertaken with the QCs.

#### ACTIONS

- **SB** to bring back IGA's concerns with the data flows following conversations with Phil Walker

### 5. Security Review Panel – Raj Seedhar

- **RS** updated that preliminary findings have now been circulated which will help to shape a view on the action plan coming out of that.
- **SG** stated that as a Group we need to be clear on how to handle any other issues with fault and certain assurance and mechanisms need to be in place as a result.
- **SP** review panel is convened and comes back to the Group.
- **AS** pointed out there is a need for the communications section to be included within the action plan.
- **SB** set up a doodle poll to gauge the participation for the review panel and urged anyone that wanted to be part of the review to book on.
- **SHo** highlighted the importance of understanding the accountability and where it lies.
- **MU** asked for the heads up on any media communications prior to them going out as Patients Know Best (PKB) will be the data controller in the new agreement.

#### ACTIONS

- **SB** to send doodle poll to members to gauge the participation for the review panel
- **RS** to share with the Group review panel's decision on assurance processes, mitigation activities and action plan

### 6. NWL Digital Information Sharing Agreement – Anne Crofts

- Update of ISA
- Patient Access Records & Data Contollership
- Provider Partner Risks
- Fair Processing/Comms

- **SG** stated that there is a need for a more non-specific information sharing agreement that is not system-specific so that the ISA can support the wider community; the agreement now outlines the principles to support the wider interoperability agenda and bring any system required.
- **AC** updated that ISA has been re-named to North West London Digital Information Governance Agreement to suit its new role. This is yet to be finalised. Part B has been re-drafted from specific arrangement with PKB to being more generic which now says that if provider partners wish to use or add other sub-data processors and programmes with other parties, no data sharing will happen unless the host of the commercial contract for that 'tool' agreed to take on the liability for every partner and assure the other provider partners that the transfer of data is safe and secure, transparent, robust and lawful. It also outlines that a separate agreement will be entered into between the party that is contracting to the service provider and the service provider to the benefit to all of the parties to the ISA. If required an indemnity will be given by the provider partner to indemnify all other parties against loss and damages if anything goes wrong. Additionally, **AC** shared with the Group the first such agreement called Assurance Requirements and Indemnity drawn up between Imperial NHS and PKB for the Care Information Exchange (CIE) programme.
- **RS** asked on whom the asset owners will be and the liability element that comes in with that.
- **SG** agreed that there needs to be absolute clarity on where the liability and indemnification lies within this Group. It needs to be understood that the asset is PKB and the asset owner is Imperial.
- **AC** added that PKB's creation of the shared record is governed under a separate data processing arrangement.
- **VD** asked where the responsibility lies for data sharing on various platforms, e.g. mobile devices. **MUB** clarified that the user will have to give consent for the data sharing access outside of the care professional directly treating the person.
- **AC** stated that there are two levels to controlling the data: provider partners who feed information from their systems into the platform and patients who decide what goes on their records, we have looked into whether patients can be the data controller of their own information however it has been agreed between both legal parties that due to the liability in this agreement, PKB will remain data controllers on their behalf. The important message to carry out is a clear articulation of the service privacy policy and user documentation to the patients who will see this as NHS promoted service. It needs to be established what the patients are being told and what they expect, and how it links back to the data.
- **SB** suggested to PKB that their privacy policy documents and the like are rewritten in a user-friendly patient language as the current wording is confusing.
- **MUB** agreed to look into it with the help of AS and VD. This patient group will also be used to look into the authorising of the third party applications access.
- **AS** asked what channels of communications are being used if the patient decides to opt-out of PKB and WSIC Dashboards. **SG** highlighted that the relevant mechanisms with the appropriate consent modelling will be in place for the CIE, would need to work with the dashboards team for WSIC.
- **AL** confirmed they were looking into this.
- **AC** updated on the risks with amber RAG rating starting with the division of ISA into Parts A and B. Further articulation on the agreements is required from PKB.
- **SG** asked if these can be included into the DPA with **AC** responding that these have not yet been finalised to be used elsewhere.
- **AC** mentioned that it is unclear from the user agreement how the deletion process works: what is being deleted, when and by whom. **MUB** answered that during the initial 12 months

the patient must revoke their consent for the data sharing, otherwise the data becomes a medical record which must be maintained for audit trails and will not be deleted.

- **SP** asked for the Group to sign off the re-drafted ISA for it to be shared with data controllers giving them a window of 2 weeks to comment; Assurance and Indemnity process – 1 week to comment; and user terms and privacy which has 2 weeks deadline to work with the lay partners (AS is a nominated lay partner lead on this). AC will not be a part of a working group but will give a final paper sign-off. The group has agreed to the proposed approach.

#### **ACTIONS**

- **MUb /AS/VD** to review all of the documents currently available on PKB's website and convert these into patient-friendly language if appropriate
- **AL** to denote mechanisms to manage data flows into WSIC Dashboards, to be tabled for May agenda
- **CIE programme** to bring back mechanisms in CIE consent engines as May item
- **MUb** to expand and clarify on the data deletions outlined within patient's privacy policy
- **SB** to respond to SE's concerns regarding consent mechanisms assurances
- **AS** to provide feedback on the data control and assurances to the Lay Partners Advisory Group

#### **7. Terms of Reference & Review of Membership Update – Anne Crofts** **Proposed New Governance Structure – Sonia Patel**

- **SP** asked the Group to review the papers and come back with any comments.
- **SG** proposed to send out ToR together with the ISA to the data controllers for the sign off

#### **ACTIONS**

- **ALL** to comment back on new ToR for sign off at the next meeting

#### **PART TWO: WSIC Update**

##### **8. WSIC Dashboards Programme Update – Amanda Lucas**

-Programme Update

-GP Data Update: Procurement and Proposed New Data Processor

- **AL** updated on the progress with test Apollo medical extract with successful data validation and GP data extraction service and procurement board to appoint a permanent sub-data processor for GP data; 2 companies submitted bids and Apollo was appointed. The next step is to formally adopt Apollo medical within the ISA. The next Brent exec Group is on the 23<sup>rd</sup> March so will aim to achieve sign off. The dashboard roll-out plan is currently being identified. At scale organisations are being targeted for these purposes.
- **SG** asked when the providers will be given access to the pilot dashboards to which **AL** responded that, firstly, early adopter partners need to be identified. Then the right level of access must be devised for different providers.
- **SB** mentioned that dashboard Role Based Access has sign-off has to come from within the Group.
- **SG** pointed out the need of a clear roadmap for the dashboard roll-out and all possible outcomes.
- **AS** highlighted the issue of personalised budgets inclusion within the dashboards with **SB** adding that this information is part of the direct care and further talks around this issue are required.

- **RJ** asked if there are any usage policies available with **AS** confirming that there are some guidelines around granting user access. More input around who governs and manages the access locally is required.
- **SG** stated that dashboard will drive the direct care and should be classed as an addition to the patient medical record and it must be decided how it is managed.
- **RJ** suggested a need for a clear definition of roles-based access with **SB** confirming that this will be added to the user manual currently in draft form which, once finalised, will set out terms and conditions.
- **SG** said that the general principles of data sensitivity and sharing will apply.
- **SB** mentioned the NWL Change Academy to be launched soon which will provide relevant training for sharing information across care setting and between health and social care professionals. Change Academy roll-out has been delayed but will link governance group in once launched.
- **AS** asked if the decisions made on the basis of the dashboard information are to be archived with **SG** saying it is unlikely that these will be collected and archived but the date stamp of who accessed the dashboard and when should cover it.

#### **ACTIONS**

- **AL** to bring back Role Based Access to Governance group for sign off
- **AL** to update the user manual with role-based access section and Terms and Conditions
- **SB** ensure the Group is aware of the Change Academy and any other data sharing and access training opportunities

#### **9. AOB**

- **JC** raised a concern from patient advisory group on the compliancy of WSIC data collection. Group joint response to these concerns will be welcomed.
- **SG** agreed that such comments and concerns should be brought to the Group for a joint response to be decided on, articulated and fed back.