



North West London Digital
Security & Access Sub Group
Tuesday 18th July 2017

Time: 12:00 – 14:00

Venue: 5th Floor Board Room, British Dental Association
64 Wimpole Street, W1G 8YS

Minutes

ATTENDEES

Name	Role	Organisation	IN.
Rajesh Seedher	Information Governance Manager and Chair	Brent Council	AG
David Grange	IG Manager	Patient Knows Best	DG
Jacqui Sinclair	IG Manager	BHH	JS
Lisa Francis	Project Support Officer	NW London CCG's	LF
Mohammad Ali	IG & Information Security for North West London	HRCH	MA
Stephen Murphy	IT Commissioning & Information Governance Specialist	Tri-borough Council	SM
Sophie Gomez	Assistant Data protection Officer	Imperial	SG

Apologies

Emma Cooper



**ACTION UPDATE
OPEN/CLOSED**

Data Access Briefing					
001	20/06/2017	Joint Controllers to request that the solicitors drafting the Data Access Contract reference measurable standards so that compliance with contracts can be effectively measured.	JC		Open
002	20/06/2017	EC to double check that the most recent version of s251 criteria was used to develop the identified control.	EC	<i>Emma to provide feedback at August meeting</i>	Open
003	20/06/2017	Since the IGA Code of Practice is still in draft, the contract should have an element of change control so that it can be effectively amended to reflect any deviations from current form.	EC	<i>Emma to provide feedback at August meeting</i>	Open
004	20/06/2017	It was noted that NHSD are limiting use of their data flows to substantive staff only. Contracts with recipient organisations are being amended to reflect this. Agreed to review the information once DS has forwarded. For WSIC, this would impact Brent who holds the contract with NHSD for this data.	DS		Open
005	20/06/2017	Group agreed that to bridge the gap between the contract being drafted by the solicitors, EC should draft some additional terms to supplement the data access form which limit the use appropriately and serve to provide some interim assurance.	EC	<i>Emma to provide feedback at August meeting</i>	Open
Brent Council Data Access Request					
009	20/06/2017	EC to draft a briefing to GPs indicating the types of requests we are now receiving and providing assurances around the ways we are limiting use. Open the conversation so we can understand any sensitivities that GPs might have. Consider engagement methods.	EC		Open
010	20/06/2017	EC to add limitations to use including no performance management to Data Access Request Form prior to approval of Brent Request. It should include questions around how they will limit scope creep and access to the data – separation of concerns.	EC	<i>Emma to provide feedback at August meeting</i>	Open
Hillingdon Pilot CSV Upload					
013	20/06/2017	Group agreed that a decision on this could not be made until a risk assessment had been made that compared the security of both approaches so that an informed decision could be made. This is also in light of the high-risk nature of the data sets and the inability to control data once removed. AL to undertake.	ALL	<i>Risk Assessment Report to be circulated asap</i>	Pending
GDPR Workshop					
014	20/06/2017	EC to alter GDPR work plan so that it is driven by risks and potential impacts so that STP can	EC	<i>Emma to provide feedback at August meeting</i>	Open





		see the value of resource allocation.			
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AOB

015	20/06/2017	EC to merge TOR and present to next group for discussion.	EC	Emma to present at the next meeting.	Open
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Decisions log

Data Access Requests – Public Health, Hounslow Council and Central London CCG

Approved by Group subject to

There needs to be some clarification from AL as to whether the two data access requests are anonymised or pseudonymous data. The group agreed to approve if the requests are anonymised.

A: AL to clarify whether Hounslow require anonymised or de-identified data

A: AL to amend the data request form for Hounslow to ISA rather than DSA to avoid confusion

A: Organise an independent review on the data extraction process despite the incident being classified as a near miss

CLOSED

#	Date	Action	Who	Update	Status
006	20/06/2017	Group agreed that delays waiting to gain approval from main group could cause issues and that the decision to proceed would be circulated with an opportunity to object.	ALL		Closed
007	20/06/2017	Group agreed that there is a need to identify a clear roadmap in light of GDPR and that resource are required to execute. STP will be approached to query how to drive forward	ALL		Closed
008	20/06/2017	RB to have conversation with Alan Selwyn (Brent GP IT Lead) re the sensitivities around data that identifies activity per GP.	RB		Closed
011	20/06/2017	Group agreed that there needs to be clarity as to whether the Sub Group has the power to make decisions or merely recommendations given the delay this can cause and also the burden it places on Digital IG and Cyber Security Group. At present there are no quoracy rules so that would need to be amended. Consideration needs to be made of the fact that the de-identified data set has now been identified as high risk.	ALL		Closed
012	20/06/2017	Group agreed that Change Requests and Data Access Requests should be clearly differentiated in the agenda to avoid confusion. AL to action.	ALL		Closed





PART ONE: Governance

1. Welcome and Introductions –

Welcomed every member to the meeting

2. Minutes and Actions from IG Information Governance and Cyber Security Steering Group

These minutes will be reviews and signed off at the next meeting

3. Minutes and Actions

These minutes were agreed as approved. All actions are accurately reflected as closed or open.

4. LMC Frame Work

This will be carried as an agenda item to next meeting in August 2017.

5. GDPR Workshop

Group discussed the GDPR Workshop and agreed that the work plan should be refined to identify specific work streams and a project plan. Since each signatory has their own responsibilities, a WSIC based approach is recommended with a view to how resources can be allocated. It is a full-time role and will require specific PMO oversight. STP to be approached.

Emma to give progress up date in the August meeting.

6. De-identified access request form:

Public Health, Hounslow Council
Central London CCG

There needs to be some clarification from Amanda Lucas as to whether the two data access requests are anonymised or pseudonymous data. The group agreed to approve if the requests are anonymised.

A: AL to clarify whether Hounslow require anonymised or de-identified data

A: AL to amend the data request form for Hounslow to ISA rather than DSA to avoid confusion

A: Organise an independent review on the data extraction process despite the incident being classified as a near miss.

We also agreed for Emma to follow up with resources as per her request.

DPIA – we acknowledged that this is a critical dependency for the GDPR work stream, therefore we would like the draft presented at the next meeting. If it is not ready, the group wishes to consider writing a new version.

Regarding the security incident we discussed the near miss and requested that an independent review is carried out on the extraction process because of similar incidents and the high associated risks.

8. AOB

The timings of the meeting is an issue – we think 9.30 to 11.30 is better and more likely to be attended. Having the meeting during lunch period is disruptive to people's day plan – they have to go to work, come to meeting than go back, whereas it could be more convenient to come in the morning straight and go to work for the afternoon.

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North West London Collaboration of
Clinical Commissioning Groups

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