

WSIC ISA Governance Group

3rd March 2015

Attendees	Initials
Dr Aumran Tahir (chair)	AR
Kuldhir Johal	KK
Bryan Johnson	BR
Alyson Hope	AH
Raj Seedher	RS
Alistair Robertson	AR
Sonia Patel	SP
Selin Barnett	SB
John Norton	JN
Lawrence Wahlund	LW
Katrina Smith	KS

Apologise	Initials
Alastair Gilchrist	AG
Simon Howarth	SH
Andrew Steedon	AS
Ursula Gallagher	UG
Alyson Hope	AH
Angeleca Silverside	AS
Mary Umrigar	MU

Part One: Governance & Updates

1. Welcome & Introductions

- It was noted by the group that there was a lack of representations from partners at the meeting, will need to assess representatives commitment to the group;
- It was agreed by the group that the Chair would write to areas who have poor attendance
- Action- AT to write to West London CCG, Brent CCG, Central London CCG about commitment to the group
- JN, requested a list of attendees to be circulated to all before meeting so all are aware of who is supposed to attend
- Action- List of attendees to be added when circulating papers at next meeting

2. Update of ISA Signatories

- SP updated group and noted that Ealing Council and Hillingdon Hospital are new partners, KS was welcomed by the group
- It was noted that Brent and Harrow GP have started sign up
- Group discussion around aligning WSIC IG and CIS IG with Imperial

- CNWL meeting 5th March to discuss the templates
- Harrow Council are looking to progress sent letter last week, awaiting for a formal response
- Triborough are currently putting a PIA through and are looking to sign soon
- KK informed the group that Hillingdon Local Authority is also looking to sign so they can share and emphasised that North West London are all looking to aligning all 8 CCGs in the integrations board and providers it is high priority for all
- RS, enquired if there could be an interim agreement with larger providers like ChelWest & Imperial so they commit to a shared understanding of a need to share and to inform partners. We don't want others to stop people engaging with the programme as they aren't engaging if they don't have anything signed as it is a legal agreement, takes along time to get sign of.
- KK, can use the NWL ISP to be signed before the ISA if needed
- SP stated that this was a valid point, where they haven't got the ISA signed yet they might be able to sign a non-legal agreement to bring them round the table
- AR warned of a risk of duplication of administration
- AT, might be too far along will need to see how they fit together
- Action SP to think about how it could help to bring other large providers around the table

3. Section 251 & Section 255

- SP updated, Ealing and Hammersmith & Fulham CCG might be the only areas that want to use Integrated care record for indirect use. Personalised communications were a big push for the CAG so we are looking at 4 months to get s251. Due to PERDA and the time taken to go out the s251, cost effective, CAG have agreed that it could be not be proportionate for the time taken to use it. Going back to CAG in March to discuss further.
- JN asked for clarity on s251 and CAG, group discussion around what the s251 is and the CAG and what is sensible to be used for commissioning care.
- KK, encouraged the signing of the ISAs, as it will be really useful to clinicians to track full journey, how can we quality assure a journey if we cant see the whole journey, at this point in time you have to do it at each point of contact.
- AT, programme team would like a steer as to what would be reasonable to patients
- JN stated that websites, older patients that do use the internet, access through libraries, surgeries, spending half a million on a letter to everyone might not be as cost affective as it can do.
- RS, will confuse the patients if we write out to all, need to strike the right balance, concerned, might need to pilot comms on patients
- JN, this will seriously affect the patients giving consent to patients giving consent to sharing information for direct care with their care givers
- LW enquired about the scope for the 3rd sector organisations, are some concerns when we stretch from providers.
- SP, it's on the road map however there are other hurdles that they need to do before accessing, sharing and feeding into the ICR. This group will be the pathway to this and it will up the governance group.
- Group discussion around the consent flow and model and proper uses of the data sharing for direct and indirect share purposes.

- Action- share the diagram of sharing to the group for comment
- Action- section 255 on next agenda as not enough time to cover now

4. Incident reporting – RAJ

- RS shared system were data controllers in their own right, response to the last meeting as there was some concern about how breaches locally are reported.
- BJ, we need to make sure that incidents are proportionate, needs to define what a trigger is, if it is a serious incident or if there are common themes.
- SP, support having an incident reporting for integrity, there needs to be some more work on what the incidences are, shouldn't hard code it at this incident we will learn as this is group grows.
- AR stated that the limiting the amount of information for the group should be the additional role as the information security officer.
- AT need to think about how we give this out the GPs and other professionals, need think about this as future meetings.
- Action- for next meeting, how do we report incidents?
- AR, this document will need to align with the WSIC ISA.
- Action-Adopt protocol, name SIRO and Security Officer align with ISA and put up on website
- SIRO, nominated for the group, Aumran Tahir or Sonia Patel
- Security Officer- 6 months rotating seat- Raj Seedher

5. Conflicts of interest

- AT opened to the group and stated due to the crossover of the WSHYE and the WSIC platforms due to the Operational Set Up Working Group
- Group support of conflicts and suggests a register and statement to protect the Ops Group. Also suggested a confidentiality agreement
- RS wanted to also include gifts and hospitality also include into it.
- Action- AT to instigate register of conflict of interest at the Ops Set Up group and report back to Gov Group at next meeting
- Action- look into confidentiality agreement with gifts included for sub-processors

Part Two, Communication

6. Log in Area for WSIC Website

- SB confirmed the area is now set up and log in and how to guide for all the voting members of the GG
- Action- log in and how to guide for all the voting members of the GG

7. Communication Plan for NWL/WSIC/S251

- SP, welcome feedback to the easy read version, so we can refine for fit for purpose.
- KK, list isn't that affective, can we do a mind map instead?
- Group noted that work needed to be done on Page 14 and page 13, page 17 to be changed
- Action- feedback from the partners on the easy read document to be sent to Selin
- IG booklet was also looked at by the Governance group, it was agreed that a legal review would be needed before being printed

- Action- legal and equality review of both documents

Part Three, WSIC data warehouse Ops Set Up Update

8. Data Protection Agreement

- AT request the support of the governance group for a Data Processing Agreement for a one off extract of his practise data to be used in de-identified format by McKinsey & Concentra to develop the WS data warehouse and WSIC Dashboards
- Group agreed to support DPA
- BJ, group would like to see the output of the test data
- Action- AT to bring report back to governing group
- RS, suggested that if dealing with 3rd party, there is a cloud good practise guidance that will help underpin agreements, can email to SP, cloud security principles, we've converted into criteria that can be inserted.
- Action- RS to share cloud principles
- Action- Look at how this relates to the ISA and bring back to the next Governance Group
- KK, we also need to give assurances with processors as we scale up
- Action- Supplier chain diagram to be discussed at the next Governance Group
- BJ, UAT testing and penetration testing needs to be included for assurance; IG toolkit penetration testing will suffice.
- RS, this is also mentioned in the cloud security principles for service suppliers
- SP, would be good to suppliers to sign up to principles
- Action- Cloud principles and how it strengthens the ISA/data processor agreements to be discussed at next meeting

9. Data Templates

- SB opened discussion to the group, and explained the update of the WSIC data templates
- JN lay partners will not be able to comment as they do not have expertise on data.
- SP, NWL team have reviewed and provide assurances that this is correct and fit for purpose
- SB explained that sensitive codes like Ethnicity DOB Gender will be collected but will only be collected at GP level it will not be collected across the care setting for de-duplications
- Actions- Add a page about the assumptions around what has been taken out and also a listing who has been involved in the creating of the data templates
- Action- to be discussed at the next meeting in March

10. Review System Diagram

- KK, need to identify who has what part of the processing, is it McKinsey or SE CSU
- AT, need to add point at which the agreements are in place before data is transferred.
- KK, GPs and Jo public think that McKinsey think they are going to be accessing the data, need to provide assurances that this is not the case. Supply chain is very important to integrity.
- Action- update data flows to reflect comments for next meeting

11. Dashboards Demonstration

- SP, welcome a Lay partners voice on the dashboards would be really useful
- RS, would like for the log in to be in line with the GPG43 authentication and registration/assurance national standards for log in details
- Action- paper on log in security to be brought back to next group
- Group discussion around future proofing the data for the care act, would like to keep in mind the changes to 'care' scope for future developments, would be part of the remit of the governance group to increase scope as and when needed to incorporate the changes.
- AR, is there a risk that GPs look at the spend data and prescribe based on cost?
- AT, cost is a new way for GPs to look at how patients are treated, for example, you can tell there was a serious stay at hospital based on a large spend history. GPs have a duty of care to provide the best cost and the best outcome for a patient, having spend will enhance the GPs understanding of the patients care pathway and should not affect the treatment they receive.
- RS, for social care for the future we are looking at Linkages, family relationships, household linkages as the dashboards evolve, it would be good to group them.
- Group agreed that this was in scope for the future
- BJ, would be good to keep a record of the opportunities that may present themselves, address data would be an easy way to group families.
- Action- Add to register future developments. Add to risk register, as opportunities.
- Group discussion around the role of a social care worker to make sure that patients can have access to the medication
- BJ stated that this raises a good point for mental care, this will benefit mental health care professionals, need to look into how social care can use the medication list in ICR more affectively.

12. Risks & Issues

- Group agreement that there ran out of time
- Action- SB to update and add to next agenda with future developments register

13. AOB

- Discussion around data controllers in common, its important that everyone is present at the meetings so everyone can make a collective decision, suggested a formal letter form AT to senior leadership
- Agreement that the Gov Group meetings should be monthly meetings till the end of the year and extended to 3 hours
- KS, requested to book for next 6 months in advance
- Action- SB to extend meeting hours and add more dates

Actions

Action No.	Date	Action	Assigned to	Status/Update	Status
1	03.03.2015	AT to write to West London CCG, Brent CCG, Central London CCG about commitment to the group	AT		
2	03.03.2015	List of attendees to be added when circulating papers at next meeting	SB		
3	03.03.2015	SP to think about how it could help to bring other large providers around the table	SP		
4	03.03.2015	share the diagram of sharing to the group for comment	SP		
5	03.03.2015	section 255 on next agenda as not enough time to cover now	SB		
6	03.03.2015	For next meeting, how do we report incidents	SB		
7	03.03.2015	Adopt protocol, make changes to nominated security officer and SIRO, align with ISA and put up on website	SB		
8	03.03.2015	look into confidentiality agreement with gifts included for sub-processors	SP		
9	03.03.2015	AT to instigate register of conflict of interest at the Ops Set Up group and report back to Gov Group at next meeting	AT		
10	03.03.2015	log in and how to guide for all the voting members of the GG	SB		
11	03.03.2015	Feedback from the partners on the easy read document to be sent to Selin	All/SB		
12	03.03.2015	Legal and equality review of both documents	AR		
13	03.03.2015	AT to bring report of uses of his data via the DPA to governing group next month	AT		

14	03.03.2015	Supplier chain diagram to be discussed at the next Governance Group	SB		
15	03.03.2015	Cloud principles and how it strengthens the ISA/data processor agreements to be discussed at next meeting	SB		
16	03.03.2015	Add a page about the assumptions around what has been taken out and also a listing who has been involved in the creating of the data templates	SB		
17	03.03.2015	Update data flows diagram to reflect comments for next meeting	SP		
18	03.03.2015	Paper on log in security to be brought back to next group	SP		
19	03.03.2015	Add to register future developments. Add to risk register, as opportunities	SB		
20	03.03.2015	SB to update and add to next agenda with future developments register	SB		
21	03.03.2015	SB to extend meeting hours and add more dates	SB		