

WSIC ISA Governance Group: 4th August 2015

Name	WSIC Informatics Lead	Organisation	Attendance
Dr Aumran Tahir (chair)	Clinical Director WSIC Programme West London GP Representative	NWL Collaboration of CCGs	Yes
Kuldhir Johal	CCG GP IT Lead	Hillingdon CCG	Yes
Simon Howarth	Deputy SIRO	London North West Healthcare NHS Trust	No
Katrina Smith	IG Manager	West London Mental Health NHS Trust	No
Raj Seedher	IG Manager	Brent Local Authority	Yes
Alistair Robertson	Solicitor	DAC Beechcrofts	Yes
David Stone	IG Consultant	Kaledoscope	Yes
Sonia Patel	WSIC Informatics Lead	NWL Collaboration of CCGs	Yes
Selin Barnett	PM IG & Ops Set Up	NWL Collaboration of CCGs	Yes
Angeleca Silverside	Lay Partner	West London	Yes
John Norton	Lay Partner	Central London	Yes
Mary Umrigar	IG Manager	Ealing Council	No
Caroline Kerby	GP representative	NHS Brent CCG/ Brent Harness Network	Deputise
Ritu Sharma	IG Manager	The Hillingdon Hospital NHS FT	Yes
Caroline Law	IG Manager	Chelsea and Westminster Hospital	Yes
Gary Wilsher	IG Manager	Hounslow Council	Deputised
Sanjay Gautama	Caldicott Guardian	Imperial Hospital NHS FT	No
Graham Trainor	IG Manager	West Middlesex University Hospital	No
Reena Parmar	IG Manager	Harrow Council	No
Phillip Robinson	IG Manager	Imperial Hospital	No
Jason Clarke	IG Manager	BHH- Brent Host	No
Rory Hill	IG Officer	CHWHHE	Yes
Janice Boucher	Borough Information Governance and Caldicott Support Manager	Triborough	Yes

Kate Glass	Project Manager	Kilburn GP Network	Yes
Vijay Patel	IG Representative	Harness GP Network	Yes
Simon Haines	Analyst	Hounslow Council	Yes
Sheri Ekladios	IG Manager	CLCH	No

Part One: Governance

1. Update on new signatures to ISA

- AT- noted that CNWL and Hillingdon Council were provided official response letters on behalf of the Governance Group however they have both as yet still hadn't signed the ISA
- SB updated the group that the programme team had started to engage with Hounslow GPs

2. Minutes & Actions

- July minutes, approved by the governance group. To be published on Website.

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	Person identified from Central London however unable to attend on behalf of GPs as person does not represent data controllers, still open	Open
31	14.04.2015	DS and AR define assets that are being shared across partners and which sit with SIRO	ADS/AR	Addressed in PIA review	Closed
52	04.05.2015	Process and procedures documents need to be updated and signed off by governance group	SB	On-going, more work needed by Data Processors	Open
55	04.05.2015	ISA updated stating that data controllers we will respond to subject access requests as part of the information that they have access to.	AR	Updated in August version of ISA, to be circulated before September meeting	Closed
60	04.06.2015	Need clarification with data controllers on voting rights of members	AR	To Be added to the updated Terms of Reference - On agenda	Closed

61	04.06.2015	Post updated terms of reference on Governance Group area on WSIC website	SB	Added to August Agenda	Closed
64	04.06.2015	AR to define risk stratification in the PIA	AR	Risk stratification focus group to work through definition set up end of September	Open
67	04.06.2015	Invite PIA author to next working group to discuss direct care and sharing datasets	SB	On agenda	Closed
68	04.06.2015	ISA Governance Group to send letters to the CCGs to ask for them to encourage the GPs that have no passed the IGT in March but have signed the ISA letters, to ask them to be compliant and confirm.	JC	Paused	Paused
69	04.06.2015	Governance Group members review and feed into the Communication & Engagement Strategy by July Governance Group.	All	Working Group set up and will bring back to group in September	Open
70	04.06.2015	Explore Tier, for an independent reviews of security arrangements and provide feedback to the governance group.	SP	SP to bring back to group in October after Data Warehouse is operational	Open
73	04.06.2015	JN and AS to ask their LPAG colleagues to support a joint letter to Simon Stevens to improve TPP system for the benefit of the patients	JN/AS	Update at meeting in July	Paused
75	04.06.2015	SG to bring back formal briefing in July to group on CIE and how the Information Governance would fit together	SG		Open
76	04.06.2015	SP to brief Governance Group on Brent Executive Committee response to accepting Imperial as a Data Processor	SP	On agenda	Closed

77	04.06.2015	AR to update to reflect date review of ISA after 3 years in next update of WSIC ISA	All	Updated in August version of ISA, to be circulated before September meeting	Closed
78	07.06.2015	Send Letter to Gary Collier from Hillingdon council to inform them of the acceptance of the WSIC ISA Governance Group	AR	Letter send, awaiting response	Closed
79	07.06.2015	Once confirmed by Hillingdon Council, amend in next version of WSIC ISA	SB/SP	Updated in August version of ISA, to be circulated before September meeting	Closed
80	07.06.2015	Set up task and finish focus group to define Risk stratification and case finding for North West London partners, chaired by Dr Ben Lucas.	SB	Group to meet on 27th September	Closed
81	07.06.2015	SP to report back about the Brent Governing Body decision to Provider Partners in September meeting	SP	On agenda	Closed
82	07.06.2015	Report back to group on letter to SE CSU from WSIC Partners	SP	On agenda	Closed
83	07.06.2015	Update Governance Group on LLMC meeting about data sharing	SP/SB	Meeting with LLMC 25th August. SP to report back at September meeting	Open
84	07.06.2015	Bring Data Processing Agreement back to Governance Group in August	SB	Concentra DPA shared at meeting. Will bring back other 3 DPA's in September	Open
85	07.06.2015	Post User Guides on WSIC website	SB	Complete	Closed

86	07.06.2015	Change title of form and post on Governance Group area on WSIC website	SB	complete and uploaded on website	Closed
87	07.06.2015	Governance Group would like a youtube video to be circulated to the governance group to show full capabilities of PKB platform	SB		Open
88	07.06.2015	Governance Group to shorten to 2 hour meeting	SB	Complete	Closed
89	07.06.2015	Social Care Partners to provide agreed minimum dataset for the WSIC Data Warehouse	All	On-going request: Harrow due to transfer data via Brent's N3 connection	Open

Action 73

- RS- is this a change request or do we need to highlight an issue to NHS England?
- SP- GP SOC new requirements are coming through soon which means that EMIS and TPP will have similar offerings, it's important that they both have the functionality to filter before extraction
- RS- need to put ourselves in their world, they will want to be paid for the development of filtering if not mandated
- AS- if I was sitting working for them, this would require a lot of resource, we would have the charge you to make the change to the system
- DS- they have committed to publishing open API's and there was commitment to solve several issues, however we need to check when they are coming out with that?
- AT- It's important that we highlight the need to stop the perpetual relationship and behaviour; it's for the good of primary care
- KJ- Big risk that this will be whole systems and also unplanned care

Action 84

- SP- Tony Grewel, LLMC Medical Director attended the Lay Partners Advisory Group (LPAG) meeting at the end of July, and stated that they had 3 specific requirements before they could endorse any Information sharing agreement. We have organised a follow up meeting to address their requirements.

3. Communication and Engagement working group- John Norton

- JN- Making good progress with the work we are doing, we are hoping to bring everything back to the governance group in September with the strategy and the communication material.
- KG- is this going to affect the posters and leaflets already in circulation?
- JN- the new material will be building on the previous versions with support from national team
- SB- we will be able to bring back the final material to the governance group in September

Action- Bring back Communication material in September

4. Terms of Reference- Alistair Robertson

- AR-updated the paper and circulated to the partners, however as there is no representation from Imperial who requested the change, we should put on hold for next month as awaiting further response.

Action- Bring back Terms of Reference in September

5. Update on National Pioneer IG Task Force – Feedback from Deep-dive – Sonia Patel

- SP- Waiting to get a draft of the national conclusion of what the local partners and conversations are then will share at next meeting

Action- Circulate National Partners Summary of WSIC Programme once available

6. WSIC ISA Version 4 confirmation for release in September – Alistair Robertson

Updated Clauses in WSIC ISA	Proposed amendment	Rationale
6.5	Confirmation that no data subject should pay more than once for an SAR, and that SAR disclosure must be signed off by an appropriate professional.	Included in response to the PIA.
8.1	Remove provision for retaining data in hidden form for six months after a patient opts out. Instead, data to be purged as soon as is reasonably possible	Included in response to the PIA.
8.2	Clarified reference to the specific relevant section for audit trails, of the NHS Records Management Standard.	Included in response to the PIA.

16.1	Termination date of 29 June 2018, unless extended	Adds certainty.
Appendix 6, para 4	"All parties acknowledge and agree that information shared by London Borough of Hillingdon will not be included in the De-identified Dataset, unless such inclusion is expressly approved in advance by London Borough of Hillingdon. London Borough of Hillingdon confirms that this arrangement will be reviewed within six months of London Borough of Hillingdon acceding to this agreement.	Included at request of LB Hillingdon.
Appendix 6, para 5	New reference to the case finding review, to be chaired by Dr. Ben Lucas	Included at request of Central and North West London Foundation Trust.

Clause 16.1 - need to extend before the end otherwise you will need to

- SP- CNWL asked for the risk stratification for case finding purposes,
- AR- held back due to as the focus group
- SP- we need to still add wording around the evaluation process, second purpose the case finding to make sure that they. 'The governing group will conduct an evaluation of the case finding purposes'
- DS- we need to put a more general statement in, saying that they will commission evaluation programme where they see fit
- SP- we have Nuffield evaluation already but CNWL would like to further define case finding for the direct benefit of the patients. To not slow things down, we will share virtually before being added to the ISA?
- **Group agreement**
- AR- one other change came up in PIA, about adult data, in accordance with the NHS code of conduct. Recommendation page 17 PIA, 4.12.3 would like to add 8.2 will now have this statement
- **Group agreement**

Part Two: Assurance & Security

7. Updated Data Processing Agreement (DPA) - Selin Barnett

- SB- we are currently going through a review of the original DPA's, the one presented is the first of 4 new DPA's the others will be EMIS, TPP, PKB, South East CSU. Once Brent Governing Body have signed them off, we will present to the ISA Governance Group

- RS- annual self-assessment for the Data Processor and regular penetration testing, we need to add this all of the Data Processing Agreements
- DS- the PIA picks up the need for an regular assessment of all data processors, there is a new good process checklist for the development of DPA's that is being developed centrally which can help to check against the
- SP- Please could you share the self-assessment checklist, we will make sure that we check the new DPA's against it
- DS- Yes, will send on, need to bear in mind that the checklist will also a requirement for the IGT Toolkit level 2 in the next edition.
- SB- We will give the governance group a week to further comment back on DPA, will collate and incorporate into final edition

Action: Bring back all DPA's once Brent Governing Body have signed them

8. Privacy Impact Assessment (PIA) Quarterly Update - Debbie Terry

- DT- Quarterly review of the PIA, to bring up to date as the programme has progressed since last version and also reflect the changing landscape

R 1.17 –Communication to Population

DT need to make sure that you are testing it, so you can make sure that you are reaching heard to reach patients/service user groups

- SB- Have been developing new material with a sub group of the governance group, will then go through a period of testing before being published.
- JN- we are hoping to bring this back to the governance group next month (September). I am still concerned about the implied consent of the population. New Update to the Health & Social Care Act comes in from October, consent, do they assume that without the patients consent?
- DT- its emphasise Dame Caldicott's intention for implied consent, guidance for implementation
- JN- could have an impact on the wording on our leaflets
- AR- helpful statement of intent, won't add anything to the original, but will help clarify sharing for direct care for care staff
- DT- what we haven't got is the Department of Health's (DH's) interpretation of it, but working on it at the moment, NHS England are reluctant to put anything in the guidance without steer for DH. Need to add a health warning on it so we can future proof this.
- DS- published some guidance yesterday on it, they are developing their understanding on the law and consulting on it more widely

R1.22- Registering Patient consent

- DT- Objections management held on GP system, has to go through this at the moment, other provider partners will need to start thinking about who needs to opt and how they are going to do it

- DS- framework and other social care systems might not support it, start an internal discussion, as this is not just for this system, it will have an effect on other systems. Once Care Information Exchange (CIE) is up and running, then this will not be a problem.
- KG- when we talk to our partners, we need to make sure that they don't then the others are putting pressure on the GPs to be the central registry of consent for everything and everyone
- SP- Care models are in line with the way we record objections as well, we need to do this collaboratively. Need a consent and choices workshop, need to add to the agenda so we all understand the various systems opt patients/service users out. might need to do it as an incremental approach
- SB- Consent workshop will be added to the next agenda
- KG- our providers are working this through, be good to get it back,
- KJ- Hillingdon have done some work on this, we have asked for explicit consent at first point of contact aligned it to the read code for ICP

Action: Consent workshop to be added to the next agenda in September

R1.21- Risk Stratification

- DT- There is a paper from Geraint Lewis at NHS England about Risk stratification that sets out the challenges
- It was noted by the group that there was a focus group chaired by Dr Ben Lucas from CNWL, that was looking at the local perspective on risk stratification on the 25th September
- DT- Can keep on as a recommendation but there is a definition of this now centrally that we can use

R1.22- Proportionality

- DT- proportionality was picked this up as part of the Information Governance Alliance deep dive,
- SP- will evolve over time, led by the providers will be picked up by a working group
- DS- need to understand that there will be discrepancies in the record and we will need to make sure that the partners are aware that the quality will improve over time. Need to make sure that there is a way of changing discrepancies in the records
- KJ- also raises the fact of how we work with EMIS and TPP

R2.23- Data Quality

- KJ- big risk that they wont use the data if it isn't good data quality
- AS- once get patient access you will have a lot more queries
- SP- there will be a change management process in place

Risk and Issues

- AT- we held off on the joint letter from the provider partners because, we felt that the letter would damage the relationship more, we need to reset as they were in a state of transition and flux, now we are supporting them a bit more with resources to make it happen.

- SP- The Programme have invested in some more resource to make sure that the Data Warehouse gets operational, New PM will build a relationship with SE CSU which is the biggest risk at the moment
- SP- we will provide a full report on progress of the data warehouse at the next meeting.

Open Actions

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		provide feedback to the governance group.		operational	
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89	07.06.2015	Social Care Partners to provide agreed minimum dataset for the WSIC Data Warehouse	All		Open
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91	04.08.2015	Bring back Terms of Reference in September	AR		Open
92	04.08.2015	Circulate National Partners Summary of WSIC Programme once available	SP		Open
93	04.08.2015	Bring back all DPA's once Brent Governing Body have signed them	SB		Open
94	04.08.2015	Consent workshop to be added to the next	SB		Open

		agenda in September			
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