

Digital North West London:  
Information Governing Group Minutes

Thursday 2 November 2017

British Dental Association (09:00-12.00)

**Minutes**

**NOTE: By agreeing to these minutes, you are providing formal approval of the decisions therein in your capacity as a signatory of the Digital ISA and a Data Controller (please refer to Decision Log).**

**ATTENDEES**

Name	Role	Organisation	IN.
Abhilash Abraham			AA
Allan Meachim			AM
Amanda Lucas	WSIC Dashboards Programme Manager	NWL Collaboration of CCGs	AL
David Grange	IG Manager	Patient Knows Best	DG
David Stone	IG Consultant	Kaleidoscope Ltd	DS
Ernest Norman-Williams	Information Governance Manager	BHH CCG's	EN-W
Gilbert George			GG
Ian Riley	Director of Business Intelligence	NWL CCGs	IR
Jane Wilmot	Lay Member		JW
Jan Boucher	IG Manager	Tri Borough	JB
Jo Andrews			JA
John Norton	Lay Member		JN
Dr Laurie Slater (Chair from item 11)	IG Lead Clinical CWHHE	CWHEE/NWL	LS
Raj Seedher (Chair for items 1-10)	IG Manager	Brent	RSe
Ritu Sharma			RSh
Xavier Yibowei	Programme Manager	NWL CCG	XY
Stephen Janering	Project Manager	Imperial	SJ
<b>In attendance</b>			
Lisa Francis	PMO Project Support Officer	NWL Collaboration of CCGs	LF
Linda Williamson	PMO Manager	NWL Collaboration of CCGs	LW
Katie Stone	Minutes	NWL IG Support	KS

**Apologies if this list is incorrect. Please email [nwl.infogovernance@nhs.net](mailto:nwl.infogovernance@nhs.net) with any corrections.**

## **1. Apologies for absence**

Dr Sanjay Gautama (SG) had sent apologies for this meeting and Dr Laurie Slater (LS) had agreed to Chair, but was unexpectedly delayed. Raj Seedher (RSe) was nominated as chair in LS's absence and started the meeting.

## **2. Conflicts of interest / declaration of interests**

No one declared an overall conflict, but DS was asked to leave during relevant item.

## **3. Welcome and introductions**

Everyone present and on the phone introduced themselves. RSe confirmed that there were four data controllers in the room and the meeting was quorate.

## **4. Minutes of the meeting held on 5 October 2017**

The minutes of the meeting held on 5 October 2017 were confirmed as an accurate record of the meeting.

## **5. Actions log**

Updates were given and noted on the action log below.

## **6. Risk register**

The risk register was not discussed at this meeting in the absence of Dr Sanjay Gautama and Dr Laurie Slater.

## **7. Incident management**

No ongoing incidents were reported to the Governing Group.

## **8. Data Controller Console (DCC)**

XY led the discussion on this item. He reminded the Governing Group that the Data Controller Console (DCC) being developed by Healthy London Partnership was a tool to help ensure that all data sharing agreements are kept electronically in one place. The tool could be used as a mechanism for processing requests to join an agreement. He was seeking confirmation that the Governing Group were content with how the project was progressing (with a possible staged approach to implementation with just limited functionality to start with). Deployment would be an IT-led project (rather than IG) because it was considered a better fit for configuration, training and communications. XY confirmed that all the large providers are live on DCC and it is already being used to some degree. There are no General Practices signed up yet, but project team were almost ready to approach GP practices to start the process.

JB informed the Governing Group that the Tri-borough CCGs have been engaging with the project from a Local Authority perspective and have agreed to register and upload Adult Social Care Protocols. They will review its added-value when they start being charged for their involvement.

JB also commented that the DCC issues were coming to the Governing Group, but no one was attending the DCC project meetings to put forward the NWL Collaboration's concerns and ensure that the project met their needs. XY confirmed that Emma Cooper had been the super user representative, but no one had attended since she left and they were looking for someone to attend in December and on an ongoing basis for the NWL Collaboration.

Points raised in discussion:

- The group were reminded that Philip Robinson had raised concerns because there was not sufficient information on the potential costs after an initial 'free' period.
- Concerns were expressed over cost in the future, but also the cost of possible exit if tempted by early free entry without full information.
- DCC might be useful as a change management tool for helping collect signatories for the new updated ISA (will need a consistent line when signing up over 370 practices to the new ISA).
- Could be possible to meet the GDPR requirement that Data Controllers are open and transparent. But there needed to be assurance that the DCC would actually help with GDPR compliance (particularly part of Article 12 and Article 14 around transparency and providing information to the Data Subject).
- Need to see if all GDPR benefits are exploited, eg Article 30 (records of processing activity) otherwise there is a risk of duplication.
- Balance needs to be struck – wait for perfection or move forwards to make things a bit better and then develop as we go.
- May not know the full cost of the system, but can it afford to wait? Brent, Harrow and Hillington (BHH) CCGs need mechanisms to speed up sharing between parties.
- It doesn't help organisations navigate their own internal budget processes if they do not have financial information.
- Positive to have one repository that gives control for updating and reviewing.

It was proposed that the DCC project team should be invited to present more fully at the next Governing Group meeting. The item should cover: funding and costs and how well the DCC meets GDPR requirements, and does it align with the WSIC objectives and wider digital programme objectives. If they cannot attend in December, the possibility of a separate meeting was considered.

**ACTION (By December 2017)**

DS agreed to raise DCC at his meeting with Mike Part and others on 13 November 2017 to discuss pan-London approach to IG and GDPR. The group would like to see the DCC in the context of a strategic view of sharing.

**ACTION (By December 2017)**

KS to arrange for the DCC to attend the meeting on 7 December and alert them to topics for discussion.

**9. WSIC programme update**

AL talked through the headlines in the slides that had been circulated before the meeting, 'Introduction to the WSIC Dashboards Collaboration of NWL CCGs'.

- The objective is to have all GPs involved and AL confirmed that 354 GPs practices had signed the ISA (from 372).

- The data covered 1,840,200 patients (representing 78% of the NWL patient population).
- The data warehouse was seeing an increase in new and returning users and they had observed that the data was increasingly used by care communities.
- The next dashboards being planned for release is the multi-mobility tool, stroke management and Serious Mental Illness which could lead to better co-ordinated care.
- The disease specific dashboards for asthma and diabetes were starting to pick up.
- ICHP helping to fund dashboards, eg patients on the wrong drugs.

AL was asked about formal evaluation on effectiveness. The focus currently is more on recruitment and awareness as the local incentive schemes for practices (in place for six out of eight CCGs) only started in August 2017. AL did confirm that they were starting to consider this. West London 'MyCare, MyWay' were doing some evaluation work. Nuffields did evaluate ICP and the outcome was there was not sufficient data to judge effectiveness. Diabetes dashboard has only been running for three months, and asthma was just starting. It was agreed that it was worth thinking about planning for evaluation early on to ensure that the right data was collected to allow for successful analysis and AL agreed to take this back to the group.

JW asked if they could help by getting patient participation groups involved in ensuring their practices are using it. It was agreed that the WSIC group would meet with patient partner groups to explain their work and start to consider how they might help ensure more active patient engagement.

AL explained that they were preparing to have two organisations sign up to the new data access contract for non-signatories (ICHP and H&F GP Federation). JA asked about progress with a response to their concerns over the new terms and conditions for non-ISA signatories (T&Cs) which had been drafted by Beechcrofts. It became clear to the group that the consultation on the T&Cs had not been fully distributed by the group secretariat function and therefore the consultation was invalid. It was agreed that a full response would be prepared to address concerns, and the T&Cs had to be re-distributed to all signatories of the ISA as they were formally the decision-makers.

**ACTION (Immediate)**

- i) Group secretariat to draft response to Sonia Patel at London North West Healthcare NHS Trust addressing the concerns she had raised about the new contract;
- ii) KS send the contract to all the signatories to the ISA asking for their views in a new two-week period.

**ACTION (When ready)**

AL to report to the Governing Group about evaluation plans.

**ACTION (January 2018 for progress report)**

AL to arrange for WSIC programme team to meet with identified patient partner groups to explain the programme and seek support for greater use by their local practices.

## 10. GDPR update

DS presented took the Governing Group through the fundamentals of the new General Data Protection Regulation (GDPR) using a set of slides.

He explained that for NWL, there were issues to explore around the risks to Brent as the contractual host (ie the Data Processor). Under the DPA 1998 all risk sat with the Data Controller who was entirely responsible for compliance with the data protection principles. Under GDPR, Data Processors will have their own statutory obligations to meet the Data Protection Principles and will be legally liable for the first time for the failures of a sub-processor. Brent CCG must understand what it means. For the whole group, there are issues around moving from Data Controllers 'in common' to joint Data Controllers – this changes to risk share. The GDPR also adds in an obligation to consult with lay groups.

### Comments

- Brexit would have an impact as it would mean that the UK needed its own assessment of adequacy to transfer data to and from Europe and this might take time.
- The need for support for GPs in implementing GDPR and the new Data Protection Act.
- Concerns of DCC compatibility mentioned elsewhere in the meeting.
- It is not a WSIC programme project, but it involves all the same organisations.
- The Governing Group may wish to consider whether a coordinated approach would be beneficial for the future of their digital programme. It was agreed that this was a SIRO decision and should therefore be referred to Dr Sanjay Gautama for his consideration.

#### **ACTION (Immediate)**

KS to circulate the GDPR slides with the minutes to the meeting.

#### **ACTION (Immediate)**

KS to discuss with SG whether to add GDPR to December agenda for further discussion about a possible co-ordinated approach.

**[Dr Laurie Salter arrived at the meeting during item 11 and commenced his role as Chair.]**

## 11. Governance of IG and work requests

DS introduced his tabled paper on governance of IG and work requests. He explained that there was very little time on the existing contract and so a change was needed. Bill Sturman was currently funding the administrative arrangements, but in future he may be looking for a contribution from each organisation if we can prove that the process is good value for money and worthwhile.

The aim of this proposal was to separate the project management and admin role from the specialist IG advice. By managing requests for IG support (through the form at Annex A of the paper), the Governing Group would gain greater insight into the cost of IG advice and the range of requests that were being sent through. Although it would be a more formal approach, there would always be an element of flexibility by allowing the Chair to agree smaller or more urgent requests and report this back to the Governing Group at their next meeting.

The Governing Group were asked to decide if decisions about support could be made only in the Governing Group or whether they wanted to delegate any decision-making to the sub-groups.

It was agreed that because the paper was tabled, the group would be given two weeks from the meeting date to comment.

LS agreed that because of a gap in the support, the arrangements could start immediately, but that did not negate any comments that the Governing Group wished to submit as the details could be changed.

Comments made in the meeting:

- Low-value / quick responses – could that be agreed by the Chair, or general limits set?
- Then more robust, to bank of suppliers. Get approval first.
- Could there be a database of previous advice so that information built up over time and the group avoided duplication.
- How does it sit with CCG IG managers and could better use be made of internal resources?
- Should there be a group of IG managers from across the CCGs to ensure there were not skills and knowledge gaps and that advice was managed in a coordinated way?

**[David Stone was asked to leave the meeting]**

The Governing Group discussed:

- Whether they needed to use consultants at all; and if so, should it be Kaleidoscope Consultants.
- They acknowledged that there was considerable work to be undertaken and the knowledge that Kaleidoscope had meant that they could work quickly and with a deeper knowledge of the issues at hand.
- 2017/8, rewriting the ISA and the Schedules, etc. Would be under threat if the group did not act quickly.
- There was concern over the volume of critical work currently underway: GDPR/Data Protection Act There should be more robust decisions based on knowledge of the cost and time involved – and who is paying?
- Some members agreed that Kaleidoscope was the best option by some margin; and that if there was a decision to drop Kaleidoscope (or competitively tender) this would create significant delays and it was not clear that there was an alternative resource with the grasp of the issues.
- Need to better understand the budget arrangements and any internal procurement issues for each CCG.
- Longer term commissioning must be cleaned up, but for now it may be better to consider an agreement on critical work and a single tender action to cover that list.
- Any original procurement exercise and contract has since run out, but it did exist originally.
- Outcome after discussion with LS of proposed work to be taken on by Kaleidoscope. Because of the restricted timeframe, the good history we have with them, their understanding of our needs and ability to provide the required solution and the current lack of availability of this degree of expertise as UK organisations start to address GDPR issues, Kaleidoscope should be asked to continue developing work on:
  - Privacy Impact Assessment
  - Development of up-to-date FPN (Caldicott3, GDPR, news TPP EDSM)
  - Redrafting and sign of MASH ISA

Scoping and costing of this work should be drafted and taken back to the group for a final decision.

**ACTION (Immediate)**

KS to recirculate the paper with the minutes and request comments to the shared mailbox.

**ACTION (Immediate)**

KS to publish IG Request Form on the web site and use for all requests for support.

**ACTION (December 2017)**

DS to draw up proposal and costings for essential work outlined to be discussed at 7 December meeting.

**[David Stone was invited to return to the meeting]**

**[It was agreed that the meeting could continue after 12pm, although some people left the room.]**

**12. EDSM Model for TPP**

LS took the Governing Group through the slides from TPP. He explained that TPP have developed a new Enhanced Data Sharing Model with input from ICO, NHS England, NHS Digital and BMA, which is being piloted in Wakefield.

LS presented primary care orientated documentation to the group, which is about to be published by TPP. IG leads should be mindful of this information, but should not act on it until formally published. There will be further documentation for organisations outside of primary care.

There needs to be a workgroup to established the local configuration across NWL and agree the organisations:

- Who we share with
- Who we share no data with
- Who requires a verification process

There will need to be an educational package rolled out to primary care to establish the required process for verification. The new EDSM will need to be incorporated into FPNs across the board (work has started on this).

**13. New IG Toolkit and cyber security recommendations**

RSe had left the meeting and so this item was held over to next meeting.

**ACTION (December 2017)**

KS to add item to December meeting.

**14. Any other business**

Review of Public Facing Materials

AL tabled a paper summarising the outcomes of work into Public Facing Materials. The report had only just been issued and needed digesting so will be on the agenda again in December. The

discussion then might consider if this is an opportune time to reconstitute the Communications Sub Group and discuss membership.

Immediate outcomes show that although it might be possible to improve messages, the main issue is that existing communications are not being displayed or made available. The request to the Governing Group is that they ask their communications teams to better promote the existing materials and take steps to help the public find the FPN. The minimum agreed was that notices should be made available on the webs site, but it is thought that it should really now be expanded.

**ACTION (December 2017)**

KS to circulate the paper to the Group and put PFM paper and Communications sub group on the agenda for December meeting.

**ACTION (Immediate)**

The Group to talk to their organisations about publicising existing notices for more prominent display.

Memorandum of Understanding Group

LS raised the issue of the MOU Group (which is now mainly a direct care / BAU process). He noted that they cover many of the same issues and have similar membership to the Governing Group.

His proposal was a possible combining of the two groups. As preparatory work he suggests a comparison of the terms of reference of the groups and a comparison of the MOU to the ISA and when this is ready return to the group with a specific request to combine their work if this still looks sensible.

**Action (December 2017)**

LS to use the new IG Request Form to commission work to compare the MOU and Governing Group work.

**15. Date of the next meeting**

The next meeting is scheduled for Thursday 7 December from 09.30 to 12.30. This should be the new regular new start time.

**ACTION (Immediate):**

KS to inform PMO of new start time for all Governing Group meetings.

**ACTION LOG: OPEN ITEMS**

(Note: closed items will be removed only after they have been reviewed at a formal meeting)

#	Date opened	Action	Who	Update	Date due	Date closed
001	06/07/2017	A considerable effort needs to be made to strengthen the lay partner representation at this meeting from other eight Boroughs	JN	<b>02/11/2017:</b> There were new members and the group agreed that this was sufficient for time being. It was agreed that additional effort would be made to engage as part of the work on the new ISA. GDPR Article 36 – will need to evidence public consultation and the patient groups will be valuable in helping design those consultations.	Sep 2017	<b>CLOSED</b> <b>02/11/2017</b>
002	06/07/2017	Need to develop the Cyber Security tool kit, and look at scoping for back up abilities. The Patching status needs to be brought up to speed.	[AA] DS	[Mike Part to attend the next Governing Group to ensure visibility and gain clarity on what is being decided for cyber security within NWL] <b>02/11/2017:</b> DS was attending meeting with Mike Part on 13 November 2017 and would report back to next Governing Group meeting on whether he still needed to attend. Some question over whether a toolkit was needed as	Sep 2017	

#	Date opened	Action	Who	Update	Date due	Date closed
				could be considerable overlap with plans for a new CQC standard.		
003	06/07/2017	AA to provide a report which has been scoped out to the providers about lessons learnt and actions taken as a result of recent cyber attack	AA	<b>02/11/2017:</b> It was explained that there is no specific standard for GPs as they do not have the power to determine their own IT. It was agreed thought could be given to security standards in the new ISA.  Item stays open for an update on lessons learnt when ready.	Sep 2017	
004	06/07/2017	Integrated Hospital Discharge MOU ISA – to be reworded to so as to allow for schedules to be brought in. Philip to provide a Template version of the ISA for other users benefit	PR	In progress. The MOU will become a schedule following the re write of the ISA. The MOU will be signed as is to allow for a working document	Sep 2017	
005	06/07/2017	Conversation to be had with Bill and Kevin in terms of taking this ISA forward and this needs to be funded.	SG	Meeting set up between Sanjay, Bill and Kevin to understand funding requirements. This funding will include re writing the ISA and completion of a DPIA for NWL to ensure GDPR compliance. Idea to create an umbrella ISA attached with an umbrella DPIA. Each schedule under this will have a DPIA attached to it.	Sep 2017	
006	06/07/2017	Amanda to bring action paper from Sub group to the next IG meeting in September	AL	Closed	Sep 2017	06/10/17

#	Date opened	Action	Who	Update	Date due	Date closed
007	07/09/17	Action to send out the contract for 2 week consultation period prior to Group approval.	ST	<b>02/11/2017:</b> This was discussed under item 9 and it was agreed that the consultation must be reopened to all ISA signatories and a detailed response prepared to concerns. This item is closed, but the issue will appear on the agenda in December.		<b>CLOSED 02/11/2017</b>
008	07/09/17	Original action: Action for ST to draft a letter to Brent for the Group to review.  27/09/2017: The draft letter reviewed as a paper. Decided that a working group needs to be set up to ensure a consistent and robust mechanism in line with GDPR. This group will consist of Raj Seeder, Ernest Normal-Williams and David Stone.	RSe	<b>02/11/2017:</b> This item relates to a consistent approach to Subject Action Requests. RSe has proposal for how to progress. Considering purchase of a system that once configured forces ready-made standards and procedures, templates and processes. ISA will need to specifically set out common understanding and approach before system can be commissioned – need to know our spec. New system must take account of new law.  Reopening item as the original issue regarding letter to Brent appears unresolved.		
009	07/09/17	Action to discuss the Data Controller Console issues with Bill Sturman.	XY	<b>02/11/2017:</b> Phillip Robinson (PR) has raised some concerns, but was unable to attend this meeting. RSe suggests carrying this item forward and arrange a discussion with PR involved. One core issue is the cost		

#	Date opened	Action	Who	Update	Date due	Date closed
				after the initial funded period. Additional discussion under DCC agenda item.		
010	05/10/2017	Mike Part to be invited to the next Governing Group meeting to ensure clarity and visibility around cyber security and governance within NWL	DS	<b>02/11/2017:</b> DS reported that there was a meeting set up with Mike Part and others on 13 November 2017 to discuss pan-London approach to IG and GDPR. The Visibility of cyber security and governance in NWL would be raised at that meeting and reported back to the December meeting.		
011	05/10/2017	Action to ask for a representative from the LLMC to attend the Governing Group.	LS	<b>02/11/2017:</b> The group agreed it was still important to issue this invitation and desirable to have an LLMC representative attend the Governing Group.		
012	05/10/2017	Action to contact Bill Sturman regarding the issue with continuity of IG support within the programme	SG	<b>02/11/2017:</b> It was agreed that this action could be closed as discussions had taken place. There was a paper presented at the November meeting with a new approach to IG support.		<b>CLOSED 02/11/2017</b>
013	05/10/2017	Action taken to set up a working group to understand the SAR mechanism and align to GDPR	RS	<b>02/11/2017:</b> It was agreed to close this item as the alignment of SAR approach would be picked up by work on a new ISA.		<b>CLOSED 02/11/2017</b>
014	05/10/2017	Action for the group to articulate feedback on the DCC which could be presented back to Bill Sturman	Group	<b>02/11/2017:</b> Agreed to close the action item as new actions would emerge from DCC discussion on the main agenda.		<b>CLOSED 02/11/2017</b>

#	Date opened	Action	Who	Update	Date due	Date closed
015	05/10/2017	Working group to be set up to include David Stone, Laurie Slater and Phillip Robinson to generate a checklist in plain English for GDPR compliance	DS	<b>02/11/2017:</b> Agreed to close this separate item and ensure that work on new ISA incorporates GDPR. Consider – as part of ISA work – whether a checklist will be of benefit to signatories.		<b>CLOSED 02/11/2017</b>
016	05/10/2017	David Stone and Philip Robinson to share slide presentations on GDPR with the group	KS	<b>02/11/2017:</b> Some members had not seen this presentation. It was agreed to re-issue it with the minutes.		
017	05/10/2017	WSIC programme team to purchase the Manula licence for access to the Operating Manual	AL	<b>02/11/2017:</b> WSIC team are now looking at different solutions that might provide a free-option.		
018	05/10/2017	Action to develop a paper reviewing options for sharing patient level WSIC record with the CIE	AL/SJ	<b>02/11/2017:</b> Discussions were underway. It was agreed that a paper with current thinking would be an item on the next Governing Group agenda.		
019	05/10/2017	SJ suggested that a WSIC update to be provided to the Portfolio Board	IR/AL	[No update given at November meeting]		
020	02/11/2017	<b>DCC:</b> DS agreed to raise DCC at his meeting with Mike Part and others on 13 November 2017 to discuss pan-London approach to IG and GDPR. The group would like to see the DCC in the context of a strategic view of sharing.	DS		7 December 2017	
021	02/11/2017	<b>DCC:</b> KS to arrange for the DCC to attend the meeting on 7 December and alert them to topics for discussion.	KS	Invitation issued on 20/11/2017.	7 December 2017	

#	Date opened	Action	Who	Update	Date due	Date closed
022	02/11/2017	<b>WSIC PROGRAMME – DEIDENTIFIED DATA ACCESS CONTRACT:</b> i) Group secretariat to draft response to Sonia Patel at London North West Healthcare NHS Trust addressing the concerns she had raised about the new contract; ii) KS send the contract to all the signatories to the ISA asking for their views in a new two-week period.	i) Group ii) KS	Email sent to Sonia Patel on 09/11/2017.  Consultation sent to all signatories of ISA on 09/11/2017.	November 2017	<b>CLOSED</b> <b>09/11/2017</b>
023	02/11/2017	<b>WSIC PROGRAMME:</b> AL to report to the Governing Group about evaluation plans.	AL		When ready	
024	02/11/2017	<b>WSIC PROGRAMME:</b> AL to arrange for WSIC programme team to meet with identified patient partner groups to explain the programme and seek support for greater use by their local practices.	AL		Progress update 4 January 2018	
025	02/11/2017	<b>GDPR UPDATE:</b> KS to circulate the GDPR slides with the minutes to the meeting; and KS to discuss with SG whether to add GDPR to December agenda for further discussion about a possible co-ordinated approach.	KS	Slides circulated with the draft minutes to the Governing Group mailing list (20/11/2017).  Item on draft agenda for consideration by Chair.	November 2017	<b>CLOSED</b> <b>20/11/2017</b>
026	02/11/2017	<b>IG SUPPORT:</b> KS to recirculate the paper with the minutes and request comments to the shared mailbox.	KS	Paper was circulated with minutes with new version of form and a flow diagram developed by PMO.	November 2017	<b>CLOSED</b> <b>20/11/2017</b>

#	Date opened	Action	Who	Update	Date due	Date closed
027	02/11/2017	<b>IG SUPPORT:</b> KS to publish IG Request Form on the web site and use for all requests for support.	KS	Form is published at <a href="http://HealthierNWL/informatics/governance-group">Healthier NWL/informatics/governance-group</a>	November 2017	<b>CLOSED 20/11/2017</b>
028	02/11/2017	<b>IG SUPPORT:</b> DS to draw up proposal and costings for essential work outlined to be discussed at 7 December meeting.	DS		29 November 2017	
029	02/11/2017	<b>NEW IG TOOLKIT AND CYBER SECURITY RECOMMENDATIONS:</b> KS to include on agenda for 7 December.	KS		7 December 2017	
30	02/11/2017	<b>PUBLIC FACING MATERIALS:</b> KS to circulate the paper to the Group and put PFM paper and Communications sub group on the agenda for December meeting.	KS		November 2017	<b>CLOSED 20/11/2017</b>
31	02/11/2017	<b>PUBLIC FACING MATERIALS:</b> The Group to talk to their organisations about publicising existing notices for more prominent display.	Group		7 December 2017	
32	02/11/2017	<b>MOU</b> LS to use the new IG Request Form to commission work to compare the MOU and Governing Group work.	LS		November 2017	
33	02/11/2017	<b>MEETING TIME</b> KS to confirm with PMO that the Governing Group should be 9.30 to 12.30 as standard.	KS		Immediate	<b>CLOSED 17/11/2017</b>



North West London Collaboration of  
Clinical Commissioning Groups



### DECISION LOG

#	Date	Decision
001	03.11.16	Group agreed that it is a good tool to group together all the ISA's in once place however some concerns raised when HLP stated patients would be able to tweak documents and have access to.
002	03.11.16	Recommendation to switch off those consent/contact options until further discussions had, unless PKB can provide assurances that have been worked through .
003	03.11.16	Continuing with face to face model for on boarding of patients which works well for CIE for patients using the dashboard.
004	03.11.16	Create a standard arrangement for staff verification which is the RA model
005	03.11.16	To disable those options which CIE are currently being used. To switch off those options until further discussions had, unless PKB can provide assurances that have been worked through.
006	03.11.16	Provider Partners are happy to add in NCRAS consent item to CIE record for NWL
007	03.11.16	Agreed by group to have scrambled NHS number, post code plus three. Need to resubmit form to group once changes have taken place
008	01.12.16	Every new provider who wants to sign into the ISA, should present at the IG Group once they have satisfied all requirements.
009	01.12.16	IG group to oversee the fair processing and all related change management.
010	01.12.16	Standing item on IG Group agenda should include Sub Group update.
011	01.12.16	Risk register to be linked to actions.
012	04.05.17	Request from Royal Brompton & Harefield NHS Trust to become a signatory to the ISA was approved.
013	07.09.17	The Group agreed that data access requests would be via the Sub-Group which would provide a brief synopsis of the request and a recommendation.

014	05.10.17	Data access contract to be circulated following no objections by the 06/10/2017. RSe confirmed he had reviewed the document and was happy with it.
015	05.10.17	To review the SAR process through setting up a working group
016	05.10.17	CIE to proceed on Mass Registration using which ever method the customer chooses
017	05.10.17	NHS 111 to sign an ISA in order to flow data
018	05.10.17	All de identified access requests recommended for approval by the security and access sub group were approved
019	05.10.17	Approval for the WSIC team to implement a cloud based solution to host the WSIC de identified data set
020	05.10.17	Following no comments on the WSIC PEN test specification submitted to the security and access sub group in September, approval for the WSIC team to commence with the PEN test

**ACTION UPDATE**

**PAUSED**

#	Date	Action	Who	Update	Status
259	07.07.2016	SJ to email SP asking what the patient opt out process should be	SJ/SP	Once C3 signed off, bring to December.	<b>Paused</b>
230	07.07.2016	Adoption and sign off of the ISA needs to be reviewed in relation to Caldicott 3	SB	ISA adopted, to be taken back to legal advisors. Caldicott 3 not signed from DoH yet.	<b>Paused</b>
347	02.02.2017	PR to liaise with LS to see how MOU has been amended.	PR/LS	MOU is on hold for the moment whilst solutions relating to TPP are considered. EC and LS will continue to discuss with LMC.	<b>Paused</b>
343	02.02.2017	EC to look at what Imperial has in place with regards to a programme which captures all risks and allows for sharing with data controllers.	PR	Superseded by GDPR.	<b>Pause</b>

**OPEN/IN PROGRESS**

#	Date	Action	Who	Update	Status
291	06.10.2016	RSe to liaise with SB and provide ideas / methodologies used around PIA (item amalgamated with 295)	RSe	PIA to be reviewed this year for the whole project. Operational Sub group to review overall PIA. Kaleidoscope in process of reviewing NHSE PIA; consider collaborative approach.	<b>In Progress</b>
304	06.10.2016	CMC to be invited to Future IG Group to understand the processes and design principles adopted by the IG Group. (LS) Invite to January Meeting.	Digital	EC advised that CMC becomes the equivalent of TPP (processor), there has been no progress over time. This has now been superseded by another initiative and ISA is in place. Mike Part is working on this.	<b>Close this?</b>
327	01.12.2016	More information requested on the costing on the DCC to be circulated as well as the user guides.	CM	Presentation on DCC delivered to Group. Funding is not there, may not be viable for NWL. This is currently on the risk register. Action and feedback to be provided by SP	<b>Open</b>
330	01.12.2016	RS to think about TOR for new suggested operational group/ what to call it.	RS	TOR was reviewed and concluded that the Operational Sub Group and Data Access Sub Group should be amalgamated into a two part meeting. Updated TOR to be brought to next meeting.	<b>In Progress</b>
345	02.02.2017	LS to have discussion with the Clinical Group looking at proportionality. EC to form part of that.	LS/EC	EC suggested providing group with guidelines for data minimisation. Group felt that clinical representatives were well versed in this area and support was not required. Recommend close action.	<b>Open</b>
346	02.02.2017	LMC: EC to draft letter to show Imperial and CCG support for the LMC progression. To include Chair's signatures, Champion SROs and lay partners. Ensure the letter draws out the key bit about patient safety being an issue. Suggested to add a deadline to the letter	TBA	EC advised that there was a HLP meeting end of September. She suggested that NWL should be invited to their meetings and HLP representatives should be invited to IG Group meetings. Also recommended that LMC was approached. No decision recorded.	<b>Open</b>

351	02.02.2017	Suggestion to review who has attended the IG group over last six months.	ST	An attempt was made to establish interest in the Group; this work may need to be re-visited as the response was limited. A new list is being worked on. A report has been given to Bill Sturman to review resource and to support the mapping of where different issues need to be directed.	In Progress
355	02.02.2017	Issue letter relating to Easy - Read Children's data – to go through 2 week process.	TBA	Objections logged. RB to speak with Brent/Harrow/Hounslow, where the 3 rejections came from to move things forward. <b>Sanjay and Richard to circulate clinical draft letter to the 3 practices who raised objections to flow of children's data.</b> No response received. 3 practices in Safe Haven (adult only), other practices going ahead. Kaleidoscope working on Fair Processing Notice project.	In Progress
356	02.02.2017	NWL Pathology ISA to be brought under the ISP – discussion point to be brought back to March agenda.	PR	Still some work to be done on this. If the ISA is revised it will alleviate the problem, if the ISA is not revised it will mean working at risk.	In Progress
357	04.05.2017	MASH ISA to be brought under ISP	LS	LS to continue to consider how S1 issues will impact on access under MASH ISA. Review of MASH ISA to continue until agreed. <b>Still waiting for a response from Tri-borough team.</b> MASH agreed to re-write ISA to be fit for purpose. The Vanguard Group were receptive to advice from LS and EC to run the ISA past the group when it is finished.	In Progress

**CLOSED**

#	Date	Action	Who	Update	Status
279	07.09.2016	One pager on Digital NWL Programme as standing item on agenda	SP	Still working with comms team to develop what this will look like. (SP did not have time to give a update – remains in progress)	<b>Close</b>
295	06.10.2016	SG and SP to discuss further the question around funding of PIA as there are 2 hosts of 2 systems on the same ISA. This item has been combined with 291.	SG/SP	Speak to David to get Multiple Quotes	<b>Closed</b>
309	03.11.16	SJ to keep Register of Privacy Officers but share with Gov. Group	SJ	Added to the decision log – Digital team to collect this.	<b>Closed</b>
331	01.12.16	IG Group TOR to be reviewed by all, comments to be provided to team.	All	Completed	<b>Closed</b>
333	01.12.16	Invite Dawn from NHSE to future meeting.		Invited. Waiting for confirmation	<b>Closed</b>
210	05.05.2016	Bring back assurance agreement, privacy policy and user acceptance agreement to this Group, for noting, in June	SJ MA	BKP Agreed to remove liability limit and include statement around backing up of data for users.	<b>Closed</b>
335	12.01.17	Incident Management Protocol – agreed by group, to be published.	EC	Complete	<b>Closed</b>
336	12.01.17	DG to produce the Incident protocol letter on letter headed paper, send to EC for records.	DG,EC	Completed	<b>Closed</b>
337	12.01.17	JN to work with DG to go over the revisions of the user agreements.	JN/DG	Discussed on agenda	<b>Closed</b>
338	12.01.17	DG to note that the definitions in agreement need to be pulled out and clear for patients to see and understand.	DG	Complete	<b>Closed</b>

339	12.01.17	Social care data set request by CAG– to be reviewed within 2 week time frame.	AL	Agreed by Group. 2 week approval window saw no objections.	<b>Closed</b>
340	12.01.17	Recommendation: Review Fair processing to help align with AL’s work. Also FP to include children.	All	Taken up by comms sub group. To be circulated for 2 week approval.	<b>Closed</b>
341	02.02.17	Risk register: Any additional new risks that are identified to be sent to EC.	All		<b>Closed</b>
342	02.02.17	Risk register: EC to include risk mitigation score	EC	Completed	<b>Closed</b>
344	02.02.17	Risk register: to add in, which part of programme the risk relates to, as well as who the risk owner is.	SP/EC	Completed.	<b>Closed</b>
348	02.02.17	Risk register: to add in regarding dependency on central flows/ data flows when ACP comes in.??	EC	Added to risk register.	<b>Closed</b>
349	02.02.17	AS and JN to have meeting – Privacy and user agreement to be finalised for March meeting.	AS/JN	Completed	<b>Closed</b>
352	02.02.17	CIE recommendations from this meeting to go through 2 week process.	All	Approved.	<b>Closed</b>
353	02.02.17	Add to risk register: LMC approval delay, GP Practices currently waiting.	EC	Completed.	<b>Closed</b>
354	02.02.17	Develop the existing Comms Sub Group which JN chaired in past.	EC	Completed.	<b>Closed</b>
100	08.09.2015	RACIE of the proposed Programme to be shared with the Governance Group	JH	Paused until 2016.	<b>Closed</b>
277	01.09.2016	joint letter with LLMC to GP’s end of October	SJ/SP	Finalising revisions to comments from LLMC on Digital ISA before proceeding	<b>Closed</b>
251	07.07.2016	Align version 2 of WISC communication documents to CWHEE MOU and CIE	AL	As part of sub-group	<b>Closed</b>

350	02.02.2017	To add in decision from December meeting regarding the medical exclusions.	SA	Added to Decision log. Completed. Recommended closed.	<b>Closed</b>
298	05.10.2016	Set up a Controls Table identifying what the controls are for WSIC Dashboard- RSe.	RSe	To be picked up at the Sub Group on the 16 <sup>th</sup> May 2017	<b>Closed</b>