

North West London Digital: Security and Data Access Sub Group

Tuesday 7 November 2017 (12.30–13:00)
Telephone conference (or Room 5.1 at MBR)

MINUTES

ATTENDEES

Name	Role	Organisation	IN.
Rajesh Seedher (Chair)	Information Governance Manager	Brent Council	AG
Andi Orłowski		ICHP	AO
Amanda Lucas	WSIC Dashboards Programme Manager	NWL Collaboration of CCGs	AL
Ian Riley	Director of Business Intelligence	NWL Collaboration of CCGs	IR
Katie Stone (Minutes)	IG Support	Working on behalf of NWL Collaboration of CCGs	KS
Stephen Murphy	IT Commissioning & Information Governance Specialist	Tri-borough Council	SM

Apologies if any of these names are wrong or you have been missed off the list. It is hard to capture names over the phone. If there is a correction to be made, please email nwl@infogovernance.nhs.net

1. INTRODUCTIONS

All participants were on the phone and introduced themselves.

2. PURPOSE OF THE MEETING

Due to the cancellation of October sub group, the Chair, Raj Seedher, requested an extraordinary meeting to review a request from Imperial Health Trust. The request which was circulated with the meeting request, was for ICHP and West London CCG evaluation team to conduct a strategic evaluation on the impact of 'My Care, My Way' in West London using the WSIC de-identified data set. This evaluation has critical deadlines and hence the call for an extraordinary meeting.

3. SECONDARY USES REQUEST:

Evaluation of Whole Systems Older Adult Pioneer Model of Care called My Care, My Way

Referring to the phrase: 'MCMW patients will be identified in the existing WSIC de-identified dataset' under Data Flow, concern was raised over the use of the word 'identified' which implied that the personal data would be identifiable. It was explained that the process would be to use the de-identified data to classify the cohort wanted through the use of temporary flags which would then be removed from the data.

It was agreed that a different term would be used (for example: cohort analysis) and with this amendment – and assurance that the work would be subject to the terms and conditions in the relevant contract – the group agreed that the proposal could proceed.

ACTION: Amend the paper and resubmit to the Sub-Group for information

4. DATE OF THE NEXT MEETING

Raj Seedher confirmed that the meeting scheduled for Tuesday 23 November (BDA, 09.30-11.30) would go ahead as planned. He requested that the meeting scheduled for 21 December 2017 at 09.30am was re-created as a 30 minute phone conference to capture any urgent items and keep momentum going with this group.

ACTION: KS to ask PMO to change the arrangements for the meeting on 21 December.

**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	EC	<i>Emma to provide feedback at August meeting</i>	Open

		limit scope creep and access to the data – separation of concerns.			
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	Risk Assessment Report to be circulated asap	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 see the value of resource allocation.	EC	Emma to provide feedback at August meeting	Open
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
Decisions log					
<u>Data Access Requests – Public Health, Hounslow Council and Central London CCG</u>					
Approved by Group subject to					
<p>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.</p> <p>A: AL to clarify whether Hounslow require anonymised or de-identified data</p> <p>A: AL to amend the data request form for Hounslow to ISA rather than DSA to avoid confusion</p> <p>A: Organise an independent review on the data extraction process despite the incident being classified as a near miss</p>					



North West London Collaboration of
Clinical Commissioning Groups



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