



**Digital North West London
Information Governance Group Minutes
Thursday 06th July 2017
Time: 9:30-12.00**

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

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).

Where written endorsement or objection is not obtained by 28th July 2017, the absence of response will be recorded as an approval.

ATTENDEES

Name	Role	Organisation	IN.
Amanda Lucas	WSIC Dashboards Programme Manager	NWL Collaboration of CCGs	AL
Jo Andrews	Head of IG	LNWH	JA
John Norton	Lay Partner	CL CCG	JN
Abhilash Abraham	IT Security Lead	NWL CCG	AA
Philip Roberson	IT Data protection Officer	Imperial	PR
David Granger	IG Manager	Patient Knows Best	DG
Emma Cooper	Digital IG Lead	NWL Collaboration of CCGs	EC
Steve Murphy	IT Commissioning IG Specialist	LBHF, WCC,& RBKL	SM
Mohamed Ali	IG & Information Security for North West London	HRCH	MA
Lisa Francis	Project Administrator	NWL Collaboration of CCGs	LF
Laurie Slater	GP IT Lead	Hammersmith and Fulham CCG	LS
Raj Seedher	IG Manager	Brent	RS
Richard Baxter	GP IT Lead / Chair	Hounslow CCG	RB
Nicola Willis	IBC Lead	NHS Digital	NW
Dr Sanjay Gautama	Clinical Director/ Chair/Caldicott Guardian	Imperial	SG
A Garboggini	Head of IG	CNWL	AG
Ian Riley	Director of Business Intelligence	NWL CCG's	IR

Please forgive me if I have missed anyone out, if I have please email Lisa.francis@nw.london.nhs.uk and I will add you to the attendance register. I was unable to catch the name of the person who dialled in to the meeting.

PART ONE: Governance

1. Welcome and Introductions

- Welcomed every member to the meeting

2. Minutes and Actions – Emma Cooper

- The minutes of 5th June 2017 meeting were reviewed and agreed.



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.	Paused
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.	Paused
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.	Paused

OPEN/IN PROGRESS

#	Date	Action	Who	Update	Status
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	Open
279	01.09.2016	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)	In Progress
291	06.10.2016	RS to liaise with SB and provide ideas / methodologies used around PIA	RS	PIA to be reviewed this year for the whole project. Operational Sub group to review overall PIA. Outstanding PIA for Care Management, the Sub Group on the 16 th May to drive this forward	In Progress
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.	SG/SP	Speak to David to get Multiple Quotes	In Progress
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 to have a discussion with BS to see where the CMC fit in. Invite CMC to these meeting going forwards, to help understand how CMC fits into the wider strategy. Emma to provide feedback at the September IG Meeting (Have we invited CMC?)	Open
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.	In Progress



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.	EC / PR	This remains open and EC to drive forward.	Open
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.	Open
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	EC	Requires progression to arrange this meeting. To coordinate with the meeting relating to DCC also. Emma to provide update at the September IG Meeting	Open
351	02.02.2017	Suggestion to review who has attended the IG group over last six months.	SA	Resources needed to commit to this group. Agenda needs to be slimmed down. Mapping of where different issues need to be directed. Review to be completed.	In Progress
355	02.02.2017	Issue letter relating to Easy - Read Children's data – to go through 2 week process.	EC	Objections logged. RB to speak with Brent/Harrow/Hounslow, where the 3 rejections came from to move things forward. Sanjay and Richard to circulate clinical draft letter to the 3 practices who raised objections to flow of children's data	In Progress
356	02.02.2017	NWL Pathology ISA to be brought under the ISP – discussion point to be brought back to March agenda.	EC	Philip to bring to next IG Meeting in September as agenda item	In Progress
357	04.05.2017	MASH ISA to be brought under ISP	LS / EC	LS to continue to consider how S1 issues will impact on access under MASH ISA. Review of MASH ISA to continue until agreed. Still waiting for a response from Tri-borough team	In Progress

CLOSED

#	Date	Action	Who	Update	Status
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.	Closed
331	01.12.16	IG Group TOR to be reviewed by all, comments to be provided to team.	All	Completed	Closed
333	01.12.16	Invite Dawn from NHSE to future meeting.		Invited. Waiting for confirmation	Closed
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.	Closed



335	12.01.17	Incident Management Protocol – agreed by group, to be published.	EC	Complete	Closed
336	12.01.17	DG to produce the Incident protocol letter on letter headed paper, send to EC for records.	DG,EC	Completed	Closed
337	12.01.17	JN to work with DG to go over the revisions of the user agreements.	JN/DG	Discussed on agenda	Closed
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	Closed
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.	Closed
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.	Closed
341	02.02.17	Risk register: Any additional new risks that are identified to be sent to EC.	All		Closed
342	02.02.17	Risk register: EC to include risk mitigation score	EC	Completed	Closed
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.	Closed
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.	Closed
349	02.02.17	AS and JN to have meeting – Privacy and user agreement to be finalised for March meeting.	AS/JN	Completed	Closed
352	02.02.17	CIE recommendations from this meeting to go through 2 week process.	All	Approved.	Closed
353	02.02.17	Add to risk register: LMC approval delay, GP Practices currently waiting.	EC	Completed.	Closed
354	02.02.17	Develop the existing Comms Sub Group which JN chaired in past.	EC	Completed.	Closed
100	08.09.2015	RACIE of the proposed Programme to be shared with the Governance Group	JH	Paused until 2016.	Closed
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	Closed
251	07.07.2016	Align version 2 of WISC communication documents to CWHEE MOU and CIE	AL	As part of sub-group	Closed
350	02.02.2017	To add in decision from December meeting regarding the medical exclusions.	SA	Added to Decision log. Completed. Recommended closed.	Closed
298	06.10.2016	Set up a Controls Table identifying what the controls are for WSIC Dashboard- RS.	RS	To be picked up at the Sub Group on the 16 th May 2017	Closed



MINUTES

- EC took the group through the minutes and actions of last month's IG meeting (June 2017).
- The group went through the risk register; all agreed changes have been made on Aspyre.
- **GDPR** – EC to bring up date to September meeting, what GDPR is going to mean materially, and whether resources have been found to move this forward. EC wants to go to STP for funding.
- **Data Access Requests** – Need Assurance that we are de-identifying at the level of scrutiny that we have articulated. Work is still being done with the SCU to update standards, these needs to be included in the PIA. Work with CSU to tighten and automate the processors.
- **Children's Data** – Original Coms are sufficient for all audiences, fair processing has been issued.
- A considerable effort needs to be made to strengthen the lay partner representation at the meeting.
- **Incident Management**, in the absence of EC this will be brought to the next IG meeting.
- **LMC Update**, in the absence of EC this will be brought to the next IG meeting.
- **Discover** to share LMC feedback on Discover at next IG Meeting.
- Update ISA with research as a purpose, in talks with Brent to get the ISA adopted.
- Discover is undergoing ethical approval, which is still under way.
- **Cyber Security Update** – only 8 out of 400 GP practices were impacted by the cyber-attack on the 12th June 2017.
- There was a risk surrounding patch management and processors which were not followed. As a result a business case was implemented to procure some patch management technologies.
- The assurance level for cyber security is rather limited because of procurement issues which needs scoping and implemented in a far more robust way in order for the assurance level to be satisfactory.
- Medical devices, providers are unable to tell us if they are patch filed or need patching and this has been a significant problem recently. Impact on patients where greater because of necessary precautions that had to take place during the Cyber-attack.
- AA will feedback all decisions made from the task force group back to IG as appropriate.
- For the reporting purposes in to the IG group – there needs to be understanding and assurance in term of processors that represent the wider sector.
- **Integrated Hospital Discharge MOU** – been written to support integrated discharge and to allow social workers to access Cerner which is part of a step plan to provide physical access to systems to reduce discharge times.
- There is work to do around how we manage this digital ISA as an umbrella and re-align it to include schedules.
- Sanjay to have a conversation with Bill and Kevin to move this ISA forward and also obtain funding for the ISA.
- **Feedback from the Data Access and Security Sub Group** - Sub Group to raise concerns with IG Group about the blurred lines in terms of requests of data for non-care purposes by commercial organisations.
- Sub Group recommended that the Data Request form includes clearer restrictions on linkage and onward use of the data including sharing with third parties outside of controlled environment.
- Data requests were approved subject to written confirmation around restrictions to linkage and identification of specific individuals
- Sub group to bring their recommendations back to the IG Group for ratification.
- **WSIC Use/Purpose Proportionality**
Amanda Lucas took the group through the presentation slide deck.
Amanda to liaise with EC regarding the Beeachcroft contract.
- **Data Controller Console**
- Selin took the group through the Data Controller Console Slide deck providing a update on progress.
- Selin will send out next workshop invitations
- **End of life Care Planning** – this will be brought to the next meeting
- **AOB**- there was no other business discussed



ACTION

OPEN

#	Date Opened	Action	Who	Update	Date Closed	Date Due
001	06/07/2017	A considerable effort needs to be made to strengthen the lay partner representation at this meeting from other 8 Boroughs	JN	JN to speak to the Lay Partner Group (so we can invite people who have a IG interest to the meeting)		Sep 2017
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	Mike part is chairing the cyber security task force group that was set up in the wake of the cyber threat of recent		Sep 2017
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	In progress		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		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	In progress		Sep 2017
006	06/07/2017	Amanda to bring action paper from Sub group to the next IG meeting in September	AL	In progress		Sep 2017

INCIDENT LOG

Internal Reference No	Date	Summary	Who	Update	Status
COM0657222	14.02.2017	PCD not redacted from transferred data between analysts.	AM / JS	Incident briefing presented. Further investigation completed. Graded as 'near miss'. Lessons learned and mitigations implemented.	Closed



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.