Digital North West London
Information Governance Group
Thursday 7th April
Time: 9.30-11.30

Venue: Upper Mews, British Dental Association,
64 Wimpole Street, W1G 8YS

Minutes

ATTENDEES

Name	Role	Organisation	IN.
Sanjay Gautama (Chair)	Caldicott Guardian	Imperial NHS Hospital Trust	**SG**
Alina Gritsenko	WSIC PMO	NWL Collaboration of CCGs	**AGr**
Amanda Lucas	WSIC Dashboards & DW Programme Manager	NWL Collaboration of CCGs	**AL**
Angeleca Silverside	Lay Partner	West London	**AS**
Anne Crofts	Partner	DAC Beechcrofts	**AC**
Araripe Garboggini	IG Manager	CNWL	**AG**
David Stone	IG Consultant	Kaleidoscope	**DS**
Gary Wilsher	IG Manager	Hounslow Council	**GW**
Graham Trainor	IG Manager	West Middlesex University Hospital	**GT**
Ian Riley	Director of Business Intelligence	NWL Collaboration of CCGs	**IR**
Janice Boucher	Borough Information Governance and Caldicott Support Manager	Triborough	**JB**
Jason Clarke	IG Manager	BHH- Brent Host	**JC**
John Norton	Lay Partner	Central London	**JN**
Matthew Kay	IG Manager	Hounslow	**MK**
Phillip Robinson	IG Manager	Imperial NHS Hospital Trust	**PR**
Raj Seedher	IG Manager	Brent Local Authority	**RS**
Richard Baxter	GP representative	Hounslow	**RB**
Selin Barnett	WSIC Project Manager	NWL Collaboration of CCGs	**SB**
Sheri Ekladios	IG Manager	CLCH	**SE**
Stephen Janering	Project manager- CIE	Imperial NHS trust	**SJ**
Vijay Patel	IG Representative	Harness GP Network	**VP**

PART ONE: Provider Partners

1. Welcome and Introductions – Sanjay Guatama

- Welcomed new member Matthew Kay, IG Manager from Hounslow Council to the Governance Group

2. Minutes and Actions – Selin Barnett

- **PR** noted that the actions in March needed some work as there were some queries
- **SB** noted that we would address mistakes with PMO
- The minutes of the 3rd March 2016 meeting were reviewed and corrections to the minutes agreed.

ACTIONS

- **SJ** to ensure CIE consent engine demo is brought to May meeting (follow up from action #191)
- **PMO** to review actions and amend as suggested

ACTION UPDATE

#	Date	Action	Who	Update	Status
52	04.05.2015	Process and procedures documents need to be updated and signed off by governance group	**AL**	On-going, more work needed by Data Processors AL to bring back document to sign off.	**Paused**
68	04.06.2015	ISA Governance Group to send letters to the CCGs to ask for them to encourage the GPs that have not passed the IGT in March but have signed the ISA letters, to ask them to be compliant and confirm.	JC RH	Paused however it will be picked up again by JC who will provide an update to governing group. To hold off until April. JC attended meetings with Harrow, Brent and Hillingdon CCGs giving them an update on the GP toolkits. JC will be attending Practice Manager forums and engaging with the Practice Managers to ensure that the compliance for the 8 CCGs is exactly where it's meant to be. To be included in April agenda.	Closed

89	07.06.2015	Social Care Partners to provide agreed minimum dataset for the WSIC Data Warehouse	All	Harrow - sent data. Brent - sent data. Triborough transferring soon. Still need Ealing, Hounslow, Hillingdon Councils to send list.	Open
92	04.08.2015	Circulate National Partners Summary of WSIC Programme once available	SP	First draft was circulated for comment, waiting for LGA to write up case study. DS met with WELC who do not believe that IGA understand what we are doing nor do they think that they will publish material. SB to circulate link to recent publication. National work paused.	Paused
100	08.09.2015	RACIE of the proposed Programme to be shared with the Governance Group	JH	Paused until 2016.	Paused
101	08.09.2015	Imperial Healthcare Partners to come back to the Governance group to answer questions on data flows, IAO, Clarification of hand-off of liability (roles and responsibilities), patient complaints procedure and demonstration or proposal of look up tool.	JH	Paused until 2016.	Paused
102	08.09.2015	Legal review of changes of WSIC ISA and associated risks of adopting CIE to be brought back to Governance Group	JH	Provider Partners have expressed concern. AC presented risk and issue table at meeting.	Closed
103	08.09.2015	C2C team need to come back to Governance Group with feasibility data request	JH	Provider Partners have expressed concern.	Paused
106	06.10.2015	The Governance Group agreed to ask Dr Ben Lucas to chair a group to finish the work on the definition of risk stratification.	ALL	Awaiting for Calidcott 3 review	Closed
126	03.12.2015	JC to get DPA's with TPP, System One.	JC	Following up, will be in place by March 2016. Ongoing	Paused
146	07.01.2016	JC to circulate BHH report to the Governance group.	JC	Comes back in April – review of IG toolkits.	Closed
164	04.02.2016	SB/SP to explore and understand the requirement for Royal Free to be part of Provider partners (paused till April)	AL	Further clarification around Royal Free is required. Consult with Anne Crofts.	Open
166	04.02.2016	DS to share with the group paper on legal requirements to patient verification and	DS	Nothing has been submitted. Awaiting final approval. Bring to	Open

		citizen identity as discussed in the meeting with SG on 1 February		May meeting	
173	04.02.2016	SP to bring back to the group mapping of the process for data requests sign off	SP	April meeting. May now	**Open**
177	04.02.2016	SB and DS to work on audit templates	SB	April meeting. May now	**Open**
178	04.02.2016	DS to test the audit templates with PR/RS/SH	DS	April meeting. May now. Selin to check w/ Caroline Morison	**Open**
179	04.02.2016	RB to help SB with CWHHE fair processing	RB	April meeting. Rolling out together w/ the programme	**Closed**
181	04.02.2016	All provider partners to provide update on fair processing	ALL	Ongoing Update in April. To become a standing agenda item, every 3 months	**Closed**
182	04.02.2016	AG/JC/SB to scope what will be appropriately to audit for partner providers and bring it March meeting	JC	April agenda. Risk register to provide overview which providers need support and where are the gaps. Bring back at May meeting	**Open**
183	04.02.2016	ICO audit to start in June/July	ALL (tbc)	Pre-ICO audit has been suggested to see where the gaps are.	**Closed**
186	03.03.2016	SB to bring back IGA's concerns with the data flows following conversations with Phil Walker	AL		**Closed**
187	03.03.2016	SB to send doodle poll to members to gauge the participation for the review panel	SB		**Closed**
188	03.03.2016	RS to share with the Group review panel's decision on assurance processes, mitigation activities and action plan	RS		**Closed**
189	03.03.2016	MUb /AS/VD to review Privacy policy documents currently available on PKB's website and convert these into patient-friendly language	MUb /AS/ VD		**Closed**
190	03.03.2016	AL to denote mechanisms to manage data flows into WSIC Dashboards, to be tabled for May agenda	AL		**Closed**
191	03.03.2016	CIE programme to bring back mechanisms in CIE consent engines as May item	CIE progr amm e		**Closed**
192	03.03.2016	MUb to expand and clarify on the data deletions outlined within patient's privacy policy	MUb		**Closed**
193	03.03.2016	SB to respond to SE's concerns regarding consent mechanisms assurances	SB		**Closed**
194	03.03.2016	AS to provide feedback on the data control and assurances to the Lay Partners Advisory Group	AS		**Closed**

195	03.03.2016	ALL to comment back on new ToR for sign off at the next meeting	ALL		**Closed**
196	03.03.2016	AL to bring back Role Based Access to Governance group for sign off	AL		**Closed**
197	03.03.2016	AL to update the user manual with role-based access section and Terms and Conditions	AL		**Closed**
198	03.03.2016	SB ensure the Group is aware of the Change Academy and any other data sharing and access training opportunities	SB		**Paused**
199	07.04.2016	SB to ensure CIE consent engine demo is brought to May meeting (follow up from action #191)	SB		**Open**
200	07.04.2016	PMO to review actions and amend as suggested	PMO		**Open**
201	07.04.2016	JC/RH to provide report on GPs in NWL that have and haven't passed IGToolkit	JC/ RH		**Open**
202	07.04.2016	JC to draft a response with RH reminding the practices that only practices with satisfactory and satisfactory with a plan for this year will have their data fed into dashboards. Share with SB for wider circulation once ready	JC		**Open**
203	07.04.2016	ALL to send comments to SB to incorporate into next ToR to be published	ALL		**Open**
204	07.04.2016	SB to send out doodle poll to the Group to see availability of all for the future meetings	SB		**Open**
205	07.04.2016	JC to clarify recommendation 7.2. from Incident Working Group action plan to RB	JC		**Open**
206	07.04.2016	AL to keep Governance Group updated with progress of HSCIC data flows	AL		**Open**
207	07.04.2016	AC to update ISA to reflect newly appointed Apollo Medical as sub-data processor for GP data	AC		**Open**
208	07.04.2016	SJ to bring demo on the latest CIE programme progress to May meeting	SJ		**Open**
209	07.04.2016	AS/JN/SJ to set up a meeting to discuss how the patients are recruited within the programme	AS/ JN/SJ		**Open**

3. IG Toolkit Scores – All

- **SG** noted that all provider partners had submitted their IG Toolkits by the end of March, one of the criteria within the ISA was that data controllers in common had to pass this as a minimum requirement
- Members of the governance group present confirmed that they had passed. **SG** then asked if there was a report for the GPs
- **JC** reported overall the score of 83% and mentioned that it would be safe to focus on those practices that have submitted either unsatisfactory return or did not submit return at all; **JC** also noted that Rory (CWHHE IG Rep) was on annual leave, would work with him to produce a report at next governance group in May
- **AL** confirmed that the data feed can be given/removed from the individual practices and individuals within any practice given, suggest that a letter is sent to those that have not passed their IG Toolkit
- There was a group discussion about what was the gateway criteria for sharing of information within the data controllers in common, would the group be happy with a case by case basis. Group agreement that this was best course of action
- **SG** urged the Group to agree that is it fair to assume if the practice hits satisfactory or satisfactory with a plan, they will be given access to shared patient information
- **IR** asked if this discussion needs to be reflected in an operational delivery plan
- **PR** confirmed that the IG Toolkit was also a necessary gateway for the CIE programme

ACTIONS

- **JC/RH** to provide report on GPs in NWL that have and haven't passed IGToolkit
- **JC** to draft a response with RH reminding the practices that only practices with satisfactory and satisfactory with a plan for this year will have their data fed into dashboards. Share with **SB** for wider circulation once ready

4. Information Sharing Agreement - Anne Crofts
- PKB

- **AC** updated that a detailed commentary on the ISA, and data processing agreement, and assurance requirements (part B) were received from PKB last week. As a result there will be some re-drafting of some of those documents
- **AC** said that the cap on Imperial liability is set at £5m which covers all types of loss
- **AC** mentioned privacy policy and terms of use – PKB acknowledged that an approach needs to be decided for NWL
- **SG** emphasised his support to the adoption process and offered his support if needed going forward

5. Terms of Reference - Anne Crofts

- **AC** said that the section on proposed changes to patient access services need to be brought to the governing group and if there will be any changes to the ISA, those will need to be reflected accordingly
- **SG** noted that this was an important step for the development of the governance group as the most representative IG Group in NWL
- **SB** asked the Group for any comments on ToR to which **SG** replied with a suggested shorter name for the Group and emphasised that any potential clashes with CWHHE Governance Group need to be avoided
- **PR** advised to revise Group's membership with the requirement of being a data controller and be registered with CQC

- **SG** noted that would also be the right time to update the co-chair role and would like to acknowledge Richard Baxter as his co-chair. Group agreed.
- **SG** and **RB** noted that there was a clash with the CWHHE MOU Group which was happening at the same time, would be advisable to the see run meetings after one another. Request to send out doodle poll to group to see if there are any other days which would be better for all
- **DS** noted that there was an outstanding action for a review of governance processes however was unclear when the deadline was
- **SB** noted that after the adoption of PKB into the ISA would be better to go back and review where this sits

ACTIONS

- **ALL** to send comments to SB to incorporate into next ToR to be published
- **SB** to send out doodle poll to the Group to see availability of all for the future meetings

PART TWO: Brent Host

6. Incident Working Group: Actions & Follow Up - Raj Seedhar/Jason Clarke

- **RJ** said that the security review panel met in March, was a productive meeting and a lot of the outstanding queries have now been addressed with a number of recommendations have been put forward via an action plan, providing reasonable level of insurance around the Hubs of south-east CSU. It was noted that there was now confidence in steps will be taken.
- **JC** added that costing around wifi and wireless networks will be worked out to ensure there are consistencies about technical specifications
- **JC** highlighted one of the recommendations which is to re-test a month after to check on all of the vulnerabilities
- **SG** mentioned that the Group needs visibility and any concerns to be raised by **RS/JC;** annual continuity of assurance needs to be considered
- **RB** drew attention to point 7.2. as it is not clear on the exact financial implications and to whom, would like **JC** to clarify

ACTION

- **JC** to clarify recommendation 7.2. from Incident Working Group action plan to RB

PART THREE: WSIC

7. Update on HSCIC Engagement; WSIC Data flows - Amanda Lucas

- **AL** updated on the latest communications with DAC Beechcrofts on HSCIC data processing issue, would be carrying on with the engagement
- **AC** was hopeful to have a resolution after the Caldicott 3 review
- **AL** emphasised that the dashboard deployment will continue as planned

ACTION

- **AL** to keep Governance Group updated with progress of HSCIC data flows

8. WSIC Dashboards Programme Update - Amanda Lucas

- Data Requests
- Programme Update

- GP Data Update: Apollo Sub-Data Processor

- **AL** updated that Apollo Medical was fully adopted by Brent executive; the team is currently mobilising a series of networks to deploy the dashboard. There are 2 versions of dashboards: with/out the costs attributed to the individual patients. Care professional chooses which one they use
- **DS** adds that careful consideration needs to be given that these are indicative of prices and not costs
- **SG** summarised that this is the conversation for the care professional to have with its patient, but we are currently not in a position to disseminate this information to the patient. The first dashboard will be non-priced dashboard

ACTION

- **AC** to update ISA to reflect newly appointed Apollo Medical as sub-data processor for GP data

9. Role Based Access - Amanda Lucas

- **AL** updated that through deployment they have access to the; the challenge is at practice-level data, i.e. how is the list of names being obtained and then determining what level of access the individual requires
- **SG** volunteered to work with AL from a provider point of view

10. Dissenting Patients - Amanda Lucas

- **AL** those patients who decided to opt-out of their data being shared, have been extracted at source; highlighted the issue of how to deal with these patients once their data has been taken into data warehouse and those patients who then choose to dissent and then opt-in. The solution is deleting the patient data
- **SG** disagreed on the basis that if the record that is incomplete and the patient changes their mind, the data is irrevocably deleted
- **DS** advised to de- activate the account rather than delete the data
- **PR** said that there is currently no selectivity factor

PART FOUR: CIE

11. Programme Update - Stephen Janering

- **SJ** updated that Imperial have switched on to PKB, and the patient sign up can commence soon; Hillingdon and London North-West are closely followed
- **SG** confirmed that the verifications processes are now done in-house

ACTIONS

- **SJ** to bring demo on the latest CIE programme progress to May meeting
- **AS/JN/SJ** to set up a meeting to discuss how the patients are recruited within the programme