

WSIC ISA Governance Group Minutes

14th April 2015

Attendees	Initials
Dr Aumran Tahir (chair)	AT
Sonia Patel	SP
Mary Umrigar	MU
Simon Howarth	SH
Raj Seedher	RS
Alistair Robertson	AR
Joanne Howard	JH
Selin Barnett	SB
John Norton	JN
Lawrence Wahlund	LW
David Stone	DS
Riordan Hill	RH
Jason Clark	JC
Vijay Patel (deputy)	VP
Mike Davies (deputy)	MD
David Knight (deputy)	DK
Max Kenny (presenting)	MK
Emma Hollings (presenting)	EH

Apologise	Initials
Caroline Kerby	CK
Kuldhir Johal	KJ
Ursula Gallagher	UG
Alyson Hope	AH
Angeleca Silverside	AS
Meena Thakur	MT
Paul Wratten	PW
Stephen Murphy	SM

Part One: Governance & Updates

1. Welcome & Introductions

- AT opened the meeting by welcoming new members to the group and thanked deputies for attending in place of the data controllers.
- Good attendance to the meeting was noted, however it was felt that there was more to do to commit all data controllers to attend the group. It was noted that Central London and West London GP's are not formally represented.

2. Minutes & Actions

- It was agreed by all partner providers would formally sign off previous minutes would be signed off at the beginning of every meeting
- A request by the group was made to have minutes be made public on the website. SB/SP agreed to take the request back to Comms team, so they can develop the website to accommodate.
- **Action- SP/SB Look into building area on WSIC website to hold formal Governance Group minutes.**

Actions update below

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	<p>Caroline Kerby now attends on behalf of Brent.</p> <p>West London representative was sent formal letter by Governance Group</p> <p>Alyson Hope left Central London, so need to identify new representative</p>	Open
2	03.03.2015	List of attendees to be added when circulating papers at next meeting	SB	In minutes going forward	Closed
3	03.03.2015	SP to think about how it could help to bring other large providers around the table	SP	WSIC ISA IG Summit taking place on 16 th April	Closed
4	03.03.2015	share the diagram of sharing to the group for comment	SP	Circulation needed, will be part of IG booklet being put together by central team	Open
5	03.03.2015	section 255 on next agenda as not enough time to cover now	SB	David Stone attended to update group	Closed
6	03.03.2015	For next meeting, how do we report incidents	SB	Incident reporting document has been circulated	Closed
7	03.03.2015	Adopt protocol, make changes to nominated security officer and SIRO, align with ISA and put up on	SB	RS- Officer appointed AT/SP- SIRO	Closed

		website			
8	03.03.2015	look into confidentiality agreement with gifts included for sub-processors	SP	On agenda on 14 th April	Closed
9	03.03.2015	AT to instigate register of conflict of interest at the Ops Set Up group and report back to Gov Group at next meeting	AT	On agenda 14 th April, agreed that this was going to change to a register of interest	Closed
10	03.03.2015	log in and how to guide for all the voting members of the GG	SB	Log in were provided for all. Work still needs to be done on other	Open
11	03.03.2015	Feedback from the partners on the easy read document to be sent to Selin	All/SB	Published on Website for all	Closed
12	03.03.2015	Legal and equality review of both documents	AR	Published on Website for all	Closed
13	03.03.2015	AT to bring report of uses of his data via the DPA to governing group next month	AT	No S1 data has moved into Data Warehouse yet.	Open
14	03.03.2015	Supplier chain diagram to be discussed at the next Governance Group	SB	On agenda 14 th April	Closed
15	03.03.2015	Cloud principles and how it strengthens the ISA/data processor agreements to be discussed at next meeting	SB	On agenda 14 th April	Closed
16	03.03.2015	Add a page about the assumptions around what has been taken out and also a listing who has been involved in the creating of the data templates	SB	Published on Website for all	Closed
17	03.03.2015	Update data flows diagram to reflect comments for next meeting	SP	Published on Website for all	Closed
18	03.03.2015	Paper on log in security to be brought back to next group	SP	Cloud principles discussed at meeting, Operational Set Up	Open

				group will start work on paper	
19	03.03.2015	Add to register future developments. Add to risk register, as opportunities	SB	New Risk and Issue register will be send to all Gov Group before May meeting	Closed
20	03.03.2015	SB to update and add to next agenda with future developments register	SB	New Risk and Issue register will be send to all Gov Group before May meeting	Closed
21	03.03.2015	SB to extend meeting hours and add more dates	SB	Meetings set up till October	Closed

3. Update on Signatories

- SP – For those partners to WSIC Programme that have not signed the ISA there is a planned workshop on the 16th April to work through their issues.
- Imperial, ChelWest, CNWL, CLCH and CLH have all been invited.
- **Action- SP to report back to group at next meeting**

4. Update on Chairs Actions

- AT updated group on actions he has accepted on behalf of the group, subject to the agreement at this meeting.
- Brent GPs have requested an update to the ISA, that was part of discussions with central programme team and SIRO Thirza Sawtell. It has been agreed that the ISA would be updated to include Appendix 10 which commits the NWL CCGs to help all partner providers with any legal costs if there is a data breach that was not caused by actions of the data controller.
- Will be included in the other changes passed through the governance group.

5. Requests from provider Partners- CNWL

- AR explained to the Governing Group that two amendments to the ISA were proposed in response to comments made by CNWL:
- Clause 2(F) would be amended to clarify that the ISA is not intended to overlap with risk stratification conducted in accordance with CAG approval 7-04(a)/2013;
- Clause 8.2 would be amended to clarify that data generated within the Integrated Care Record should always be retained in accordance with the NHS Records Management Code of Practice
- AR explained that a draft amended version of the ISA would be circulated after the meeting, which would include those two changes plus all other changes proposed in response to comments on the ISA received since it was signed in October 2014 (and which had been discussed previously by the Governing Group). The draft amended version would be circulated to all members of the Governing Group, all signatories of the ISA, and (as a courtesy) to those providers who have not yet signed the ISA but who are expected to sign soon.

6. Letter of changes to Partner Providers and Data Controllers

- AR updated the group on the process of passing all requested changes since beginning of the governance group in January.
- AR confirmed the preparation of a letter to inform all about the update of WSIC ISA for all data controllers. This will be sent out for comment from the central mailbox and the data controllers will be given by the 5th May for them to come back with any changes they would like to challenge.
- **Action- An update will be provided back to the Governance Group in May informing them of any challenges**

7. Update on s255

- DS opened to the group and explained the current work going on at National Level: working with HSCIC they are looking to put together to nationally mandate the HSCIC to collect social care data in patient identifiable format. The benefit of this would be a national structure and improve data quality to help integrate health and social care on a national level.
- SP expanded on this and informed the group that there is going to be a national team which focused on North West London as one of four pioneer sites which we getting extra support from HSCIC, NHS England and Department of Health.

8. Update on IG toolkit for all partner providers

- There was a group discussion around the baseline compliance of current provider partners and future partners. It was pointed out that the WSIC ISA compels all signatories to pass IG Toolkit Level 2.
- **GP's:**
JC confirmed that he will report to compliance for BHH and CCGs and will share the results with the group, on whole the practises were compliant and they were working to support those that did not pass the first time around.
- Joanna has already sent through to SB, and will share at the next meeting. Only one H&F, Hounslow nearly all were compliant, central and west weren't compliant.
- AR- Group can authorise to continue anyway without the Level 2 pass as it is at the discretion of the group, suggested they continue working with those that have failed with a view that Local IG teams will work with GPs to pass second submission.
- **Action- report back to group IG compliance of GPs at next meeting in May**
- **Providers:**
 - Brent LA- Passed
 - Ealing LA- Passed, MU suggested that she also provide a port on NHS number quality?
 - Group agreed, SP noted that there might not be a match yield when the practicality.
 - **Action- MU share Data Quality report with Group**
 - DS- offered to help the local authority partners by introducing them to HSCIC on NHS number so they can ask for support on completeness of service user to NHS number.
 - Group agreed
 - MD- also suggested that the meeting be feedback to be part as NWL interoperability ashe has gathered that there is a lot of variability many are between 60-94%. Some of the Local

Authorities have asked if we can get this together and compare notes? So would welcome this for the group. Would also like to include 2 main software suppliers to be involved in this, 2 main suppliers are Frameworki and liquid logic are 2 main in NWL.

- **Action- DS to set up meeting between Social care partners, software suppliers and HSCIC**
- RS- Brent has gone live with mosaic earlier than other local authorities and would be willing to share lessons learnt with partners.
- London North West Healthcare- Passed. SH- their score was lower than previous years, as new organisation we could only get 2's across the
- The Hillingdon Hospital- Passed
- VP-Harness will be part of BHH submission

Part Two: Assurance & Security

9. Privacy Impact Assessment

- DS, opened to the group and confirmed that the PIA was done by an independent consultant with Kaldeoscope
- RS- through the conclusion is there an action plan to address as group needs to monitor?
- DS- Pull out recommendations in a table and then we can put what are the actions, how we are in progressing them against.
- AT- Actions need to be agreed through this group. How do we do this?
- DS- some need to be discussed and some will come out in the report
- SP- need to make sure that the group has an action plans and milestones which will be reviewed continuously.
- **Action: Pull out recommendations in a table and then we can put what are the actions**
- SH- need to make sure that the PIA needs to be highlighted that this is a living document, it is to inform and this will continue through lifespan of programme into business as usual.
- JN- There are new and difficult questions on patient consent, which will need to be addressed, but this isn't the document. However it does highlight that there are legal impacts to the group not addressing these concerns. Need to be mindful that we are addressing and obtaining correct implied consent, would like another session to explore this.
- SP- Consent model as part of the next meeting, need to put together a document with this.
- AT- we need to have social care in a North West London consent workshop
- **Action- Add consent model to next agenda to plan for consent workshop for NWL**
- **Actions- Legal review of PIA**
- SP need to be adopted by Brent CCG, what are the next steps?
- JC- take through the BHH IT Subcommittee and will publish publically.
- Questions around SIRO and who are the right people? Because Brent is the host?
- SP- need a legal entity so does need to sit with Brent CCG, in document it sets out across the 8 CCGs
- DS- Asset ownership sits across all data controllers, as they all own the risk. The Data Processors cannot have a risk as they can only do a certain amount as depicted by the data controllers. Not all the risk can be delegated, needs to be the SIRO of the Group
- RS- need to know what assets are being shared as it will be dependent on who owns all the risk.

- **Action-DS and AR define assets that are being shared across partners and which sit with SIRO**
- JC- this will also needs to go to the Brent Governing Body
- Group asked for the branding on the document to be changed and send to all for their organisations.
- **Action- change branding on PIA and send out to the partners with caveat that this is a living document that will change over time**
- It was noted that The Hillingdon Hospital (THH) is a foundation trust not NHS trust, please change
- **Action- change name of THH to foundation trust and not NHS Trust**

10. Cloud Principles – Raj Seedhar

- RS opened to the group by explaining the standards of principle based security: How we share, how do we separate consumers, how we govern the security model, how do we deal with security measurements, how we set up new ID's, how we develop changes, how we manage identify and access shared information, 3rd party providers, how we deal with consumers.
- RS- Suggest that we follow up on these statements, gap analysis, then make recommendations. 2nd process- Decision making process, risk appetite, need to make sure how we think our governance should be, what's the impact and loss of data, linked to PIA. Based on these we need to do a security process, what are the profiles, should it just be log or passwords.
- SP- question posed can be part of a self-assessment, which could be discharged on the Operational Set Up Group
- AT- would the Ops Group be able to do the work on both to present to group?
- SP- need to be wary that there are commercial sensitivities as more than one system supplier involved
- DS- could ask them to adopt a recognised clinical system standard, might be a benefit to having this as we are operating across all.
- AT- suppliers might push back due to feasibility and cost, might ask them.
- **Action- Operation Set Up group to start self-assessment of cloud principles and report back to Governance Group**

11. Confidentiality agreement

- SB updated group and presented them with proposed agreement
- RS- need to put an appendix for Social care as they are different to health care
- **Action- SB to send to RS for input on Social care**
- Agreed by group once updated, to be sent out and signed by group members.
- **Action- send out to group once updated**

12. RBAC

- SP went through the 5 levels of the RBAC controls mentioned in the paper
- LW asked the group a scenario around care of a patient in an acute setting
- DS- need to make sure that we don't use consent as a barrier to things rather than a blocker.

- AT- main use of the data will be proactive care, the PKB interoperability will be more about the active care will address scenario given.
- Group discussion around social care and acutes sharing data and national developments
- RS- need to have effective scenarios that can be used to explain how to use the WSIC Dashboards and what kind of information that they contain
- SP- Still working out where the function for the SISS admin will sit and RA function, need to work with you as local providers and need to make sure the processes is smooth.
- JC- smart card availability for 3,4,5 roles, need to know the level of workload and the resource needed on Brent's side as Host Organisation
- **Action- Discussions with SP and JS around work load will be BHH & CWHHE for RA cards verification**
- **Action- Pass on matching up existing RA groups with ours to Op Group**
- **Action- Add to next agenda for Update**

13. Risk and Issues

- There was a group discussion around minutes and other documents that have been signed off by the governance group will be published as would like them to be in public forums.
- **Action- Set up page for minutes and signed off documents on website**
- SB Updated group on Current Issues. Updates from the group are recorded in the below table

Updated Issues List

Category	Group	Risk	Consequence	Scoring			Mitigation	Update	Owner	Actions	Open/Closed
Data	Operational Set Up WG WSIC ISA Governance Group	GP leads in some CCGs are cautious of Concentra Warehouse as an interim measure, there is a risk that they decide not to share their data.	GP Leads decision not to share their data will affect area and sign up of ISA, local GPs will loose confidence in WSIC and choose not to share data.	2	3	5	Extensive comms and engagement of senior stakeholders to support ISA discussions Independent legal and IG advise from outside parties available to help with concerns	14/04- Joint roll out of WHYSE and WSIC Dashboards communications and training to emphasise the long term intentions to move WSIC datasets across once stable	Sonia Patel	Transfer	Open
Information Governance	WSIC ISA Governance Group	The Governance Group is not representative of partner providers that have signed up to the ISA	Reputational damage for the Governance Group, could breach confidence of local care community, which could lead to withdrawal from ISA.	3	3	6	AT to write to partner providers to inform them of their duties at the Governance Group	14/04- AT will represent West London CCG Sending request to Central London CCG to ask for GP representative	Aumran Tahir (Chair WSIC IG Governance Group)	Manage	Open
Data	Operational Set Up WG WSIC ISA Governance Group Informatics Workstream	Issues with the capability of SystemOne to filter discented data is widely known in CWHHE GP Community	GPs start to discent from their ISA, no data is collected and the Early Adopter cannot launch in April	4	5	9	Farid has eculated to TPP directly Communication to GPs needed	14/04 - Working with S1 and SE CSU team to provide assurances to GP partners. Data will be landing into a secure area that, that will be purged on landing without human interaction. Letter from TPP confirming system capability. Senior NWL IT Leads are providing feedback to TPP about short comings and requesting that the ability to filter data	Aumran Tahir (Chair WSIC IG Governance Group)	Escalate	Open

- **Action- Update and separate risk and issue register and send to group**

14. Supply Chain

- SP presented diagram to the group.
- AT- is it worth adding Concentra will be passing over the Hitachi?
- SP- can put a provision, but it needs to be a decision for the group.

15. Opt outs and purging data (Emma Hollings & Max Kenney)

- RS- when patients want to opt out, there are also personal information that is also searched for in other people's records?
- DS- this is not free text so there will only be coded information
- SP- once complete purge process, what audit process in place?
- MK- selection of checks, check for read codes in Concentra as a double check, as part of process. Secondary part, we are receiving this file with every load we (Concentra) get, so we will not hold list of NHS numbers what have opted out, so every load this will be send from SE CSU and will be checked.
- EH- confirmation email will be sent to SE CSU saying that data has been purged from people that have opted out.
- Group discussion around if SE CSU can provide a total of patients that have descended
- **Action- Emma to provide feedback to group on what security checks for opt out codes SE CSU do to the group**
- Vijay, asked about frequency of data
- SP- monthly but will be incremental
- Group suggested that principles of purging need to be added to the document.
- Group agreement to signed off opt out and purge process document once principles of purging have been added
- **Action- Add principles of purging need to be added to the document.**

AOB

1. National Picture

- SP shared an update on the national picture, NWL actively involved in the pioneer network, made significant progress compared to other colleagues. Information sharing is causing paralysis in system, national resource is being put into the 3 sites in the country and NWL has been chosen to be one of them.
- SP-National team might want to come out and see respective data controllers. We need to put some governance to be part of a small task and finish agreement, so we will be asking people who are interested to be more effectively engaged. We are seeking endorsement from national bodies to give stakeholders in NWL sense of integrity.
- JN- would like to also include the voluntary sector and is heavily involved with Age UK and would like to see them actively involved
- SP- agreed and emphasised that also Lay Partners
- MD- asked how NWL can be more engaged on a NWL basis with Age UK
- JN- suggested to be London Age UK, and that there is a lot of work going on to coordinate voluntary sector groups so this is vital and relevant to information sharing.

2. PKB

- SP updated the group- nearly a year in the planning, a shared care record for NWL, being sponsored by imperial but will be used for all. Signed the contract with PKB as their suppliers, which means they will now be looking to using information sharing agreements out. Alignment as much as possible to align Information sharing
- MD- agreed the more agreements we have, the more issues and confusion we will cause

3. A&E data

- SB requested help from members of the group to collect A&E data to support local dashboards. London NWL Hospital, problems with the ODS codes.
- SH offered to help link us in with the correct person to
- SB requested help from THH to find correct person to agree data feed and frequency.
- DK- Will ask the development team as they have a different process.
- **Action- SH to link SB in with person in London NW Healthcare to collect A&E data**
- **Action- DK to link SB into person in THH to collect A& E data**

4. Local Authority

- SP/DS asked for volunteers as to who would like to be involved in workshop for NWL councils
- Feedback from group that all social care would benefit from workshop, agreement that this would be informative and beneficial for all.
- **Action- Arrange NWL Social care Workshop**

5. Communication

- DS, raised the need for a comprehensive communication plan for all WSIC Partners, and highlighted work has begun to produced a comms plan and stakeholder analysis, as all have identified a comms issue locally and nationally.
- There was group agreement that all partners have to get better at it as it is vital for the success and fundamental of consent.
- JN- will help to have the NWL communication group involved in the plan, JN offered to link in with them
- **Action- SB to link in Comms Lead with Partners to start planning communication strategy**

Action Register

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	Caroline Kerby now attends on behalf of Brent CCG. Central London still open Confirm West London representation	Open
4	03.03.2015	share the diagram of sharing to the group for comment	SP	Circulation needed, will be part of IG booklet being put together by central team	Open
10	03.03.2015	log in and how to guide for all the voting members of the GG	SB	Log in were provided for all. Work still needs to be done on other	Open
13	03.03.2015	AT to bring report of uses of his data via the DPA to governing group next month	AT	No S1 data has moved into Data Warehouse yet.	Open
18	03.03.2015	Paper on log in security to be brought back to next group	SP	Cloud principles discussed at meeting, Operational Set Up group will start work on paper	Open
22	14.04.2015	Look into building area on WSIC website to hold formal Governance Group minutes and signed off papers	TW		Open
23	14.04.2015	Report outcome of 16th April workshop/meeting with partners back to Gov Group	SP/SB		Open
24	14.04.2015	An update will be provided back to the Governance Group in May informing them of any challenges	AR		Open
25	14.04.2015	Report back to group IG compliance of GPs at next meeting in May	JC/JH		Open
26	14.04.2015	share Data Quality report with Group (Ealing LA)	MU		Open

27	14.04.2015	DS to set up meeting between Social care partners, software suppliers and HSCIC	DS		Open
28	14.04.2015	Pull out recommendations in a table and then we can put what are the actions	SP/SB		Open
29	14.04.2015	Add consent model to next agenda to plan for consent workshop for NWL	SB		Open
30	14.04.2015	Legal review of PIA	AR		Open
31	14.04.2015	DS and AR define assets that are being shared across partners and which sit with SIRO	ADS/AR		Open
32	14.04.2015	change branding on PIA and send out to the partners with caveat that this is a living document that will change over time	SB		Open
33	14.04.2015	change name of THH to foundation trust and not NHS Trust	DS		Open
34	14.04.2015	Operation Set Up group to start self-assessment of cloud principles and report back to Governance Group	SP/AT		Open
35	14.04.2015	SB to send to RS for input on Social care	SB		Open
36	14.04.2015	send out Confidentiality agreement to group once updated	SB		Open
37	14.04.2015	Discussions with SP and JS around work load will be BHH & CWHHE for RA cards verification	SP/JC		Open
38	14.04.2015	Pass on matching up existing RA groups with ours to Op Group	SP		Open
39	14.04.2015	Add RBAC to next agenda for update	SB		Open
40	14.04.2015	Emma to provide feedback to group on what security checks for opt out codes SE CSU do to the group	EH		Open

41	14.04.2015	Add principles of purging need to be added to the document	EH		Open
42	14.04.2015	SH to link SB in with person in London NW Healthcare to collect A&E data	SH		Open
43	14.04.2015	DK to link SB into person in THH to collect A& E data	DK		Open
44	14.04.2015	Arrange NWL Social care Workshop	SP		Open
45	14.04.2015	SB to link in Comms Lead with Partners to start planning communication strategy	SB/All		Open
46	14.04.2015				Open