

Feedback from Information Governance Working Group And UCL Update

May 2017

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IGWG FEEDBACK



ABOUT THE GROUP

Purpose

- Liaise with Health and Social Care Information Centre (HSCIC): from July, NHS Digital
- Represent the views of all higher educational institutions affected by the IG Toolkit
- Suggest alterations and additions to the Toolkit
- Provide advice and support to HEI specialists working towards Toolkit adoption

Membership

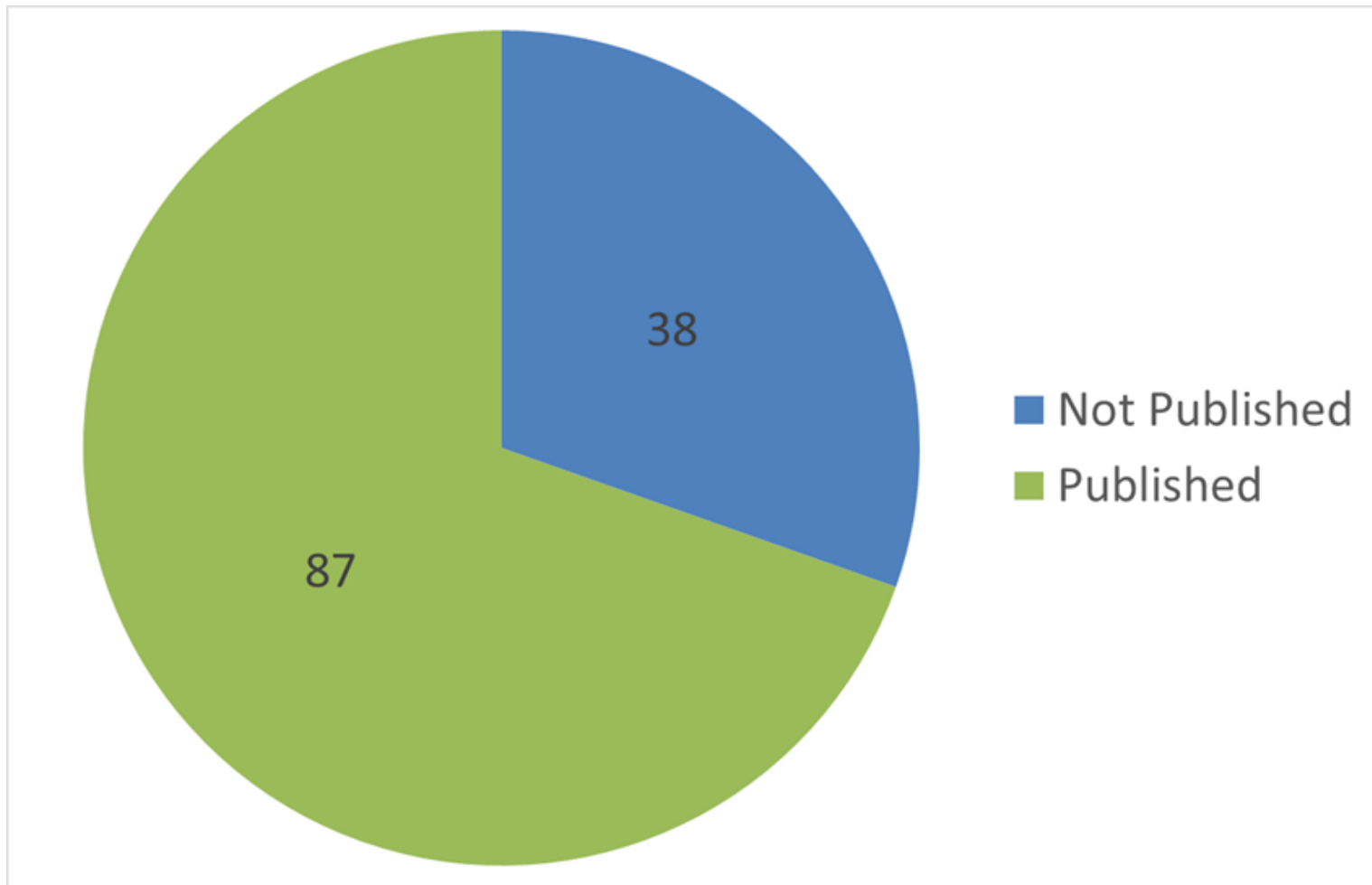
As of May 2017, 102 members representing:

- 30 HEI institutions (was 25 in May 2016)
- 6 Research organisations (was 5)
- 1 NHS trusts (was 1)
- 0 commercial bodies (was 1)
- 1 independents (was 1)
- NHS Digital
- HRA
- JISC



RECENT ACTIVITIES

IG Toolkits: HEI and Research May 2016



IG Working Group events

- Meeting 21st December 2016
 - Good attendance (19)
 - Workshop on new Toolkit (April 2018)
 - IGARD to oversee information requests
 - Requested formal relationship with NHS Digital
 - Approved report for RAG (see next point)
- Report on feasibility of one Toolkit per institution presented to Research Advisory Group, 11th Jan 2017
- CAG public and private engagement event 22nd Feb

RAG REPORT: ISSUES

- Too many Toolkits
- Toolkit scope covers areas not handling relevant data
- Multiple semi-independent relationships with NHS Digital
- Approvals process complex and flawed
- Inconsistencies between Toolkit, agreements and contracts
- Ad hoc added security requirements
- Hard to manage and track agreements
- U.K.-specific

RAG:TOOLKIT RECOMMENDATIONS

1. Organisations to minimise the number of Toolkits in operation
2. Allow a Toolkit to cover only those areas handling data in which NHSD has a legitimate interest
3. Enable an "umbrella" approach to Toolkit management
4. State security requirements only in the Toolkit, not elsewhere

RAG: GENERAL RECOMMENDATIONS

1. Provide one NHSD service, not many
2. Liaise with one named contact in each host organisation
3. Revise Data Sharing Agreements and Framework Agreements to ensure consistency with one another and with the Toolkit
4. Provide simple visibility to customers of their agreements
5. Recognise, and investigate moving to, ISO/IEC 27001 certification

RAG response?



Developments

- NHS Digital: assessment of evidence allows certification to Level 2
- Audits continuing (approx two HE Toolkits per month)
- Interview with market research org 28th March

Main topics

- Consistency of approach to HE
- Federated nature of HE
 - Communications and authorisations
 - Reissuing Framework Agreements for new studies
- Accommodation of feedback (surveys, report)
- Disparate nature of NHS Digital

Sample issues in focus

- Participation in development of successor to Toolkit
- Certification to Level 3
- Addition of ad hoc requirements to framework contracts (e.g. on encryption)
- Use of the IG Toolkit or ISO/IEC 27001 or "other" to satisfy contract



PLANS

IGWG Conclusion



- Pursue collaboration with NHS Digital on the Toolkit successor
- Challenges persist
- Working Group proposes to continue in operation
- Contact Malcolm Teague to get involved:
 - malcolm.teague@ja.net



UCL UPDATE

IGTK News

- Audit of Data Sharing Agreement in January
- Working to consolidate to fewer Toolkits:
- Single HSUT registration for School of Life and Medical Sciences
- Even more ad hoc security requirements from NHS Digital

ISO/IEC 27001 News

- Re-certification audit just completed successfully!
- Certified for 3 years
- Have applied "IT department as service provider" approach
- Testing MiSMS tool for ISO, GDPR and IGT compliance records management

The End

Thanks for your time!