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N3 – Protecting the Network through Information Governance and Assurance

NHS CFH Operational Security Team

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Introductions

The NHS CFH Operational Security Team:

- Tony Hodgson – Operational Security Lead
- David Brown – Operational Security Specialist
- Matthew Wyatt – Operational Security Specialist

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OST Mission

Our mission is to protect the N3 and maintain:

- Confidentiality – of patient data held on national programmes
- Integrity – ensure controls are in place to prohibit unauthorised access and modification of PID.
- Availability - assurance that controls are in operation and systems are available in support of patient care

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Remit and methods

- IG Statement of Compliance process (IGSoC)
- Incident Management
- Compliance
- Liaison Between Departments, Organisations & Government Agencies
- Advice and Guidance
- Security Awareness

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Out of Scope – Dispelling the myths

We Don't Do:

- Product Assurance
- General Connectivity Problem Solving
- IG Toolkit Assistance
- Performing Risk Assessments On Behalf Of NHS Organisations / CFH Departments, NPfIT Suppliers
- Audits

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Who Needs An N3 Connection?

Any Organisation providing services where access to Patient Identifiable Data, or National Services is required or possible as a result of the services being performed

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Information Governance Statement of Compliance (IGSoC)

What is it?

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Definition:

"The process by which organisations enter into agreement with NHS CFH for access to the NHS National Network (N3)"

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IGSoC

Is not:

- An Accreditation
- A ‘Certificate of Compliance’
- A Global Assurance Mechanism
- A Required Element Of Working With The NHS
- A means to transfer risk or data ownership

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IGSoC History

- Code of Connection (NHSnet)
- IGSoC (version 6)
- IGSoC Process
- Evolution

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IG Toolkit

- IGT is the strategic assurance tool developed by the DoH for NHS organisations and relevant other partners to assess and record their performance against
- IGT requirements are derived from industry good practice including ISO 27001 for information security
- The IGT is maintained via an annual self assessment submitted online and verified by the DoH IG Team
- It is intended from 2012 to extend the scope of the NHS IGT to all users of NHS patient information whether they connect to N3 or not
- IGT version 9 is in effect now and version 10 due in June 2012.

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Routes to Connect and Current Process

NHS:

- Complete IG Toolkit
- Sign IG Assurance Statement

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Non-NHS

- Application Form
- IG Toolkit
- LCA (if Direct Connection)
- Offshore Support Policy (If Required)
- ISMS (If Required)
- Sign IG Assurance Statement

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Sponsorship and the NHS

- All non-NHS organisations must have sponsorship from an NHS organisation (Local, National or DH) as part of the application process
- Because a third party supplier has completed IGSoC, it does not mean that any Trust commissioning services from them should not complete their own Risk Assessment

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Logical Connection Architecture

- Non-NHS organisations who wish to directly connect to N3 are required to complete and submit an LCA for each connection they are applying for
- Objective is to establish the agreed architecture (and associated security controls) of the local network that the non-NHS organisation wishes to connect to N3.
- Managed by OST
- v 2.0 Currently Under review (v 3.0 expected Late Summer / Early Autumn)

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Offshore

- Increase in offshore support presents additional risks
- Access to N3 provided by exception

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Offshore

- Documents reviewed by NHS CFH OST
- Formal review by the Information Assurance Working Group (IAWG)
- IAWG is responsible for technical security of N3 only
- If proposal breaches DH / NHS policy, the decision will be referred to policy experts for clarification / amendment

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This means:

- An approval from IAWG refers to the technical suitability of an organisation to connect to N3 from outside of England
- In no way infers CFH have ‘approved’ or ‘endorsed’ any working practices
- Does not mitigate and NHS Organisation commissioning services from performing their own Risk Assessments

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Maintenance of IGSoC

- Annual completion of the IGT and acceptance of the IG Assurance Statement
- Informing NHS CFH of any changes to:
  - Individuals authorised to request changes
  - Change of Chief Exec
  - Infrastructure (requires revised LCA)
  - Any Offshore activity

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Protecting Your Service

- Report incidents immediately
  - Contact cfh.servicebridge@nhs.net
- This does not exonerate Data Controllers, Caldicott Guardians or SIROs from their obligations under the DPA (1998) or DH policy

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Incident Reporting Procedure

- Email to cfh.servciebridge@nhs.net
  - Investigation
  - Resolution
  - Closure
  - Lessons Learned
- GovCert warnings

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Questions?

- Team mailbox – cfh.ost@nhs.net
- Document / Change submission: exeter.helpdesk@nhs.net