

NHS HE Information Governance Working Group

Notes of Meeting and Workshop on 12th November 2013

Present:

Kirsty Benn-Harris (KBH)	NIHR CRN Coordinating Centre (meeting only)
Sally Bridges (SBr)	Health Education Kent Surrey Sussex (meeting only)
Andrew Burnham (AB)	University of Leicester
Tito Castillo (TC)	University of Cambridge
Will Crocombe (WC)	University of Leeds
Vanessa Kaliapermall (VK)	HSCIC
Bridget Kenyon (BK, Chair)	UCL
Sarah Lawson (SL)	NPEU, University of Oxford
Janet Messer (JM)	Health Research Authority (meeting only)
Ravi Miranda	Institute of Education
Lee Moffatt (LM)	University of Manchester
Trevor Peacock (TP)	UCL
Marion Rosenberg	London School of Hygiene & Trop. Med. (workshop only)
Malcolm Teague (MT)	Janet
Alyson Williams (AW)	University of Manchester
Apologies:	
Athanasios Anastasiou (AA)	University of Plymouth
Stuart Bloom (SBI)	Independent Consultant
Lucy Lucas (LL)	HSCIC
Michael Hollis (MH)	Institute of Cancer Research
Paul Newton (PN)	HSCIC
Christopher Walker (CW)	University of Leeds
Hawys Williams (HW)	Arthritis UK

Minutes of the teleconference on 16th October 2013

- 1 These were agreed and will be made available on the website.

Matters arising not on the agenda

- 2 None.

Terms of Reference and Membership

- 3 The ToR are now agreed and on the website. MT will circulate the current membership list and it is excellent that further members have joined.
- 4 VK asked whether in paragraph 7, it was envisioned that the group would collate potential exemplar materials or provide guidance templates. SL said she envisaged collating resources initially and passing them to VK for review. It may be that some will inform the development of templates.

Update on Actions from previous meeting

5 These were as follows:

Ref.	Action	Who	Update
I.1	Working Group to review the IGT application form and feed comments back to BK or MT	All	Initial review complete, see follow-up actions. Closed.
I.2	A list of University coordinating contacts on IGT will be created as a point of reference for HSCIC and any new University applicants.	MT	Initial draft created, see follow-up actions. Closed.
I.3	Develop a mapping between ISO 27001/2 requirements and the IGT	BK	Mappings discussed on main agenda. See follow-up actions. Closed.
I.4	Review existing guidance around use of safe havens in relation to secure transfer of patient data between the NHS and research and education organisations.	MT	Carried forward.
I.5	Raise the issue of the potential DPO bypass in incident reporting with the ICO and NHS England and report back	VK	Complete and closed (post meeting note – suggestion put in change request format for submission)
I.6	The Working Group will include in its output guidance on local formal notifications to the DPO as at least a stop gap measure.	BK	The wider NHS-HE IG group could be emailed about this in the first instance, also a mention in the update at the next NHS-HE Forum. Carried forward.
I.7	Requests will be made for resources that IGT applicants are willing to share to the wider community	SL	On main agenda, see follow-up actions. Closed.
I.8	Feedback on frequently found issues reported to HSCIC to be shared	VK	Complete and closed.
I.9	The NIHR CRN IGT training	KBH	On main agenda, closed.

	package will be made available to others		
1.10	Raise the idea that the MHRA might include the IGT in their audits of CTU's etc.	JM	MT said that JM had let him know that she has done this. Closed.
1.11	Arrange follow-up meetings and workshop	MT	Closed
2.1	Provide revised wording for the minutes so they can be finalised and published.	VK	Complete. Minutes on website. Closed
2.2	Report the suggestion of a customer representative to the IGT Editorial Board.	VK	VK has raised this with Marie Greenfield and she will take it as a suggestion to the IGT Editorial Board. The Terms of Reference for the IGT Editorial Board are still being determined. Awaiting feedback.
2.3	Brief the Editorial Board on the existence of this Working Group.	VK	VK has raised this with Marie Greenfield and she will discuss with the Board. Closed.
2.4	Review the draft revised submission process and supporting guidance documents and feedback comments to MT by 4 th November.	All	To be discussed on main agenda. See follow up actions. Closed.
2.5	Add an extra column to the list of contacts to indicate the approach the University is taking.	MT	Carried forward.
2.6	Ask permission of the contacts that the list of IGT contacts can be published on the website.	MT	Carried forward.
2.7	All to send any written comments and suggestions on the IGT requirements to BK and MT for collation for the next meeting on 12 th November.	All	To be discussed on main agenda. Closed.
2.8	Consider whether it would be possible for anyone registering with the IGT from	VK	VK had given this some thought and suggested that a letter is drafted from the Working Group that can be forwarded to appropriate groups

	research and education to be told of the existence of the working group		registering for the IGT. Replace by Action 3.1: BK to draft a letter, to include the terms of reference then close.
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Review of the draft revised submission process and supporting guidance

- 7 VK had produced a revised submission process which had been circulated. SL had provided some feedback and the overall view was that it was an improvement. The specific suggestions were discussed e.g. use of term “entity”; that some of the steps could be broken down further (steps 2, 3 and possibly 4); the possible provision of a checklist and that the introduction should make it clear that the IGT might be done to demonstrate good practice or for N3 connectivity purposes as well as s251 requests. VK would consider these further.

Mapping between ISO 27001/2 requirements and the IGT

- 8 BK had circulated a mapping of the IGT Hosted Secondary Use Team/Project view cross referenced to ISO 27001 and 27002 requirements. This had been done as a high level best fit mapping. It was noted that ISO 27002 is more of a “supermarket of possible things” compared with ISO 27001 which is a mandatory set of requirements. BK would be interested in thoughts on how this mapping can be best used. WC said it would be very helpful if the mapping could be recognised as accepted. VK said it was useful to show the gaps. VK had a teleconference with Alistair Donaldson at the Department of Health as he had been interested in this work from a policy perspective. The next stage is to do a similar mapping for the Secondary Use view. **Action 3.2:** Provide mapping for Secondary Use view.
- 9 TC said he had done an internal mapping of ISO 27001 to the IGT. There is some sensitivity around the document and he can’t share with all, but he could provide it to BK. **Action 3.3:** TC to share ISO 27001 to IGT mapping document with BK.
- 10 SBI had also provided a mapping, this time of ISO 27002 coverage mapped against IGT criteria. It was noted that this used the 2005 version of ISO 27002 (no longer valid with next 2 years) rather than the 2013 version (used by BK). **Action 3.4:** BK to ask SBI if he might consider updating the mapping for the 2013 version of ISO 27002.
- 11 As previously reported, there is work underway to update the mapping of the IGT with the PSN Code of Connection. **Action 3.5:** VK will circulate an update to the group on this outside the meeting.

Resources that IGT applicants are willing to share to the wider community

- 12 SL reported that she has received documents from UCL and the BRISKit project (University of Leicester), as well as her own at Oxford. She would welcome more. Nothing has been redacted at the moment, but some things will need to be before wider publication. It was already obvious that there are different approaches. BK and VK both said that this was not to be discouraged and that the reference materials should reflect different approaches. SL agreed to leading on the redaction and tidying up of the documents to be shared.

- 13 SL was concerned there might be gaps. It was agreed that a list of key documents would be helpful as part of the next steps and VK to provide this. **Action 3.6:** Provide a list of key documents expected.
- 14 TC suggested that the exemplars should concentrate on areas that groups find the most difficult. VK said that these tended to be:
- Business continuity management
 - Data management/data quality
 - Asset management
 - For secondary use organisations - Corporate Information Governance
 - Mobile working & remote working e.g. policy for University but not necessarily used by Hosted Secondary Use Team/Project
- 15 VK said that Information Governance policies tend to vary in content e.g. some one document, others a series of documents. Both approaches are fine. VK also said that there tended to be a bit more flexibility in a few areas e.g. business continuity, and training e.g. anyone using PID has to be trained but it might be possible to train others later.
- 16 It was agreed that a JISCmail list would be created for the Working Group. SL will then be able to load documents on to this and ask members to comment etc. **Action 3.7:** MT to set up JISCmail list. **Action 3.8:** SL to add documents on to JISCmail list and ask for comments, possibly in a phased way. It is expected that proposed resources for the Knowledge Base will be needed by mid-February, although up to the end of February might be possible (will need checking with LL).

The NIHR CRN IGT training package targeted at researchers

- 17 KBH reported on this. Current plan is for the training package to be tested within the CRN from the beginning of December. The Working Group could look at it later, current plan January/early February. It was agreed that it would be useful for VK to review the system to see how it relates to the checklist for training that HSCIC provide, although KBH has reviewed the checklist as part of the development. However, VK made it clear that HSCIC cannot endorse any external IG Training materials and the offer to review/comment is a goodwill gesture to ensure quality, consistency and encourage continuous development in support of the wider Research and Education sector. **Action 3.9:** VK to review the CRN Training Package. There will be a need to reference the training package in the Knowledge Base.
- 18 SL said a number of departments are using Epic information security training. KBH said she had looked at that too to make sure that the CRN system was comprehensive.

Review of IGT Requirements

- 19 These were discussed briefly but tackled mostly in the Workshop that followed. In the workshop a number of proposed changes were created on the template for suggestions. **Action 3.10:** MT to send through the proposed changes to VK as soon as possible, partly to check the process and level of information provided.
- 20 In the course of the Workshop the following were also shared:

- New guide to confidentiality raised by TC who shared the link – VK noted that ‘The guide to confidentiality in health and social care’¹ document was published by the HSCIC September 2013 but is not the ‘Code of practice on confidential information’ which the HSCIC are required to deliver as per the Health and Social Care Act 2012 – “The Information Centre must prepare and publish a code in respect of the practice to be followed in relation to the collection, analysis, publication and other dissemination of confidential information concerning, or connected with, the provision of health services or of adult social care in England.” (Section 263 Para 1)². This code is still under development.
- WC shared a pragmatic Data Transfer document which was seen as very helpful and discussed by the group.
- TP demonstrated the UCL School of Medicine & Life Sciences risk assessment tool for Risk Assessment. Each line represents a dataflow. He noted that the tool hits three required IGT controls.

- 21 It was raised that Research Ethics Committees are key players and sometimes have dubious security standards. There is also a lot of misinformation being generated around genomics. TC said that he felt there should be more help for those using consented data. Should the group be trying to influence the broader agenda and try to get the IGT as a standard approach and requirement?
- 22 BK noted that “cybersecurity” was a current buzzword with funding and that would be a good heading to use. Groups that could be targeted include:
- Funding bodies
 - UKCRC
 - Universities UK
 - ICO
 - Russell Group IT Directors
 - Deans of Medical Schools
 - Health Research Authority, CAG. In particular HRA have the remit for Research Ethics Committees.
- 23 **Action 3.11:** BK to ask JM about HRA role with this. **Action 3.12:** VK to ask the ICO in one of her regular discussions with them.

Any other business

- 24 TP asked whether anyone else was looking at the Personal Genome Project implications as there is a team at UCL planning to do this.

Date of next meeting

- 25 Dates to be polled for January (decided 24th January)

Summary of New Actions:

¹ <http://www.hscic.gov.uk/3444> and <http://www.hscic.gov.uk/media/12822/Guide-to-confidentiality-in-health-and-social-care/pdf/HSCIC-guide-to-confidentiality.pdf>

² <http://www.legislation.gov.uk/ukpga/2012/7/section/263/enacted>

Ref.	Action	Who
3.1	Letter to be drafted from the Working Group that can be forwarded to appropriate groups registering for the IGT.	BK
3.2	Provide IGT to ISO 27001 and 27002 mapping for Secondary Use view.	BK
3.3	TC to share ISO 27001 to IGT mapping document with BK.	TC
3.4	Ask SBI if he might consider updating the mapping for the 2013 version of ISO 27002.	BK
3.5	Circulate an update to the group of the work that is going on to update the map of the IGT with the PSN Code of Connection.	VK (done)
3.6	Provide a list of key documents expected to help with checking for gaps in the exemplar resources.	VK
3.7	MT to set up JISCmail list.	MT (done)
3.8	Add documents on to JISCmail list and ask for comments, possibly in a phased way.	SL
3.9	Review the test CRN Training Package	VK
3.10	Send through the proposed changes from the Workshop to VK as soon as possible, partly to check the process and level of information provided.	MT (done)
3.11	Raise wider use of IGT e.g. with Research Ethics Committees with the HRA	BK
3.12	Raise wider use of IGT e.g. with Research Ethics Committees with the ICO	VK