NHS HE Information Governance Working Group

Notes of Meeting on 19th June 2014

Present:

Andrew Burnham (AB)	University of Leicester
Kirsty Benn-Harris (KBH)	NIHR CRN Coordinating Centre
Kyriakos Hatzaras (KH)	Kings College London
Vanessa Kaliapermall (VK)	HSCIC (by teleconference)
Bridget Kenyon (BK, Chair)	UCL
Sarah Lawson (SL)	NPEU, University of Oxford
Trevor Peacock (TP)	UCL
Lindsay Shure (LS)	UCL
Malcolm Teague (MT)	Janet
Tee Wu (TW)	Wolfson Institute, Queen Mary University of London
Apologies:	
Athanasios Anastasiou (AA)	University of Swansea
Stuart Bloom (SBl)	Independent Consultant
Sally Bridges (SBr)	Health Education Kent Surrey Sussex
Tito Castillo (TC)	University of Cambridge
Will Crocombe (WC)	University of Leeds
Gearoid Garvey (GG)	Institute of Education
Michael Hollis (MH)	Institute of Cancer Research
Janet Messer (JM)	Health Research Authority
Lee Moffatt (LM)	University of Manchester
Paul Newton (PN)	HSCIC
Ravi Miranda (RM)	Institute of Education
Debbie Ranger (DR)	University of Warwick
Marion Rosenberg (MR)	London School of Hygiene & Tropical Medicine
Julie Sherriff (JS)	University of Warwick
Christopher Walker (CW)	University of Leeds
Alyson Williams (AW)	University of Manchester
Hawys Williams (HW)	Arthritis UK

Minutes of the meeting of 23rd April 2014

1 These were agreed.

Update on Actions from previous meetings

2 These were as follows:

Ref.	Action	Who	Update
1.4	Review existing guidance around use of safe havens in	MT	Carried forward except request to discuss under a proposed change to the IGT guidance. Latest

	relation to secure transfer of patient data between the NHS and research and education organisations.		update 23/4/14: The proposed change was submitted to HSCIC and it is being considered for future releases (not v12). Wider review action remains carried forward.
2.2	Report the suggestion of a customer representative to the IGT Editorial Board.	VK	VK has raised this with Marie Greenfield and she took it as a suggestion to the IGT Editorial Board. The Terms of Reference for the IGT Editorial Board are still being determined. Awaiting feedback, not a "no". Latest update 23/4/14: no news yet, carried forward. Latest update 19/6/14: there has not been another meeting. **Action 6.1**: VK will find out the date of the next meeting.
3.1	Letter to be drafted from the Working Group that can be forwarded to appropriate groups registering for the IGT.	BK	A draft is with BK and VK. VK suggested the letter might be useful on the Confidentiality Advisory Group (CAG) web pages to pick up those investigating what they should do for the IGT. **Action 4.2**: VK to liaise with Natasha Dunkley at the HRA about this. Latest update 23/4/14: VK emailed Natasha Dunkley with the proposed letter on 28th January 2014 but as yet there is no response. Not used by HSCIC either until this feedback has been received. **Action 6.2**: BK to contact Natasha to chase this.
3.2	Provide IGT to ISO 27001 and 27002 mapping for Secondary Use view.	BK	Carried forward in BK's absence. Latest update 19/6/14 – 8 hours of development time needed, will try for next month if possible.
3.3	TC to share ISO 27001 to IGT mapping document with BK.	TC	Carried forward as far as is known in BK and TC's absence. TP offered to contact TC. TP also noted that UCL are looking to move to ISO 27001 accreditation for the wider group, and a project has been kicked off to do that. Latest update 19/6/14: BK to ask TC.
3.4	Ask SBI if he might consider updating the mapping for the 2013 version of ISO 27002.	BK	Carried forward. VK said that there is a mapping between the 2005 and 2013 versions of ISO 27001 which is being used by the HSCIC. **Action 4.3**: VK to circulate the link to the mapping between ISO 27001 versions. VK noted that the other mappings that BK did were used as a basis for further work by HSCIC. Latest update 19/6/14: VK said that Darren Mort at HSCIC had done work on this. **Action 6.3**: VK to ask Darren Mort to get in touch with BK.
4.2	Liaise with Natasha Dunkley at the HRA about use of the letter introducing the Working Group for new s 251 applicants	VK	Latest update 23/4/14: VK emailed Natasha Dunkley with the proposed letter on 28th January 2014 but as yet there is no response. Latest update 19/6/14: BK to chase Natasha, same action as for 3.1.

4.6	Share recent NPEU IGT submission on JISCMAIL file area once suitably redacted	SL	Carried forward. Will aim to do in time for the Training Day on 2nd July.
4.7	Share NIHR CRN CC IGT submission once this is made and approved (after the end of March)	KBH	Update 23/4/14: Carried forward as approval not yet official. Latest update 19/6/14: KBH confirmed that this will be available soon for loading on the file area.
4.9	Poll dates for the proposed June training session	MT	Carried forward until there is proposed programme for the training day so know who has to be available. On the agenda. Complete.
4.11	Ask colleagues at the NIHR CRN CC whether a federated model might be adopted for wider use of their training module.	KBH	Latest update 19/6/14: NIHR have a new Learning Management System based on Moodle. KBH has asked why the IG training is not yet public and has been told that this will be available next week. Any federated access would need to be negotiated.
5.1	Let VK know if anyone would like to volunteer for user acceptance testing of v12.	All	RM and GG volunteered. A successful user acceptance process had been completed.
5.2	Circulate any briefing statements that are available from HSCIC on care.data.	VK	Complete.
5.3	Find the guidance on the scope of the IGT in terms of wider NHS data and circulate to the group.	VK	Complete. Link to the standard and reference to 'Applies to':- http://www.isb.nhs.uk/library/standard/151All Providers and Commissioners which: o have access to NHS patients and/or to their information; o provide support services directly to an NHS organisation; or o have either direct or indirect access to national informatics services, including N3 - the NHS National Network. The standard is under review at the moment and going to the new standards board for approval hopefully by the end of June.
5.4	Ask WC about potential impact of ECRIN on the IGT	MT	Complete. Not thought to be a huge overlap but recommended Steve Canham, ex IT Lead at the Institute of Cancer Research, who did much of the authoring. There are 3 suites of standards: o Clinical data management standards o IT standards o General standards KH is looking in to it and will have more

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			information in October or November. UKCRC are not yet adopting it, and it has to be wholesale adoption or not at all. BK suggested that it would be useful to identify groups trying to do it. SL said that as ECRIN is not a framework then a key question is whether if you do ECRIN then are you in any conflict with IGT or vice versa. **Action 6.4**: KH to speak with Steve Canham to find out more about any overlap between ECRIN and the IGT.
5.5	Ask for the NIHR CRN Training Package link and circulate to the group.	MT	See update to 4.11 above – not yet released to wider community.
5.6	SL to draft a proposed programme for the July training day	SL	Complete.
5.7	Ask Natasha Dunkley to advertise the training day through CAG contacts	MT	Request made but not sure if anything happened. **Action 6.5**: VK offered to email out to IGT administrators and make an announcement on the IGT news page. Complete as overtaken by action 6.5.

HSCIC Update

3   VK gave an HSCIC update including as follows:
- Version 12 of the IGT went live on 13th June, although it is still being taken through the Standards Board for formal approval. The meeting for this is on 19th June (this afternoon) but there is a mandate from the DH anyway.
- HSCIC leading on an NHS focused cyber security survey over the next couple of weeks
- Work will be starting very early on version 13 of the IGT, the main reason for this being more work with Local Government. HSCIC will also be liaising and working more with smaller organisations this year e.g. GP & dental practices, eye care providers, voluntary sector – similar to that with research and education.
- The revised guidance for IGT submissions to support section 251 applications should be available in time for the Training Day on 2nd July.
- The strategic information governance network is being reinitiated to encourage wider consultation (had existed previously through the Strategic Health Authorities until they were abolished in April 2013).

4   BK thanked VK for working with us and the openness to discussion and the reaction to comments and suggestions have been really appreciated. BK wondered whether there would be value in the Working Group having amore more formal relationship with the HSCIC, and if so in what direction might this be? It was agreed to consider this further under the terms of reference agenda item.

5   VK gave an update on the proposed incident reporting tool that had been raised by the group. A meeting had taken place with an advisory group including NHS and LA representatives two days earlier. The consensus was not to make the approach too structured. There had been some support for the SIRO needing to log-in to the IGT and sign-off the incident report but others felt that they would not do that. The proposal is to audit the sign-off and record this in the IGT e.g. send draft report to SIRO/DPO and once emailed back as approved then record on the

system as "approved" (possibly a mandatory field). A facility to add contacts and who should be consulted is also being considered. The aim is to include the agreed facility in the October release. The working group agreed that this approach was a pragmatic solution and then could be reviewed later once there was some experience with it.

6   VK asked whether there was a volunteer to join the IGT system design group. For instance the design group will be looking at reporting cyber security incidents in the next year. TP volunteered and LS said he would be a back-up if TP not available.

Terms of Reference

7   A number of revisions were discussed. **Action 6.6**: A revised version will be circulated for discussion at the next meeting.

Training Day on 2nd July

8   Following the initial draft programme from SL, a number of further revisions had been agreed via email. The group reviewed the programme and made some further suggestions which will be incorporated in the final version.

Proposals for the Knowledge Base

9   SL reported that this will be the focus after the Training Day as suggestions are needed by the end of August. **Action 6.7**: request for members to offer up some of the things they have for potential inclusion in the Knowledge Base.

Potential for using some of the content from the Training Day etc to put together a document/paper to raise awareness in HE about the issues

10   This was a suggestion from AB. BK thought it a good idea to create more of a marketing document and to consider this further at the next meeting.

Google cloud-based NIHR collaboration portal

11   KH raised this issue. It is now a requirement to use the NIHR's collaboration portal for research funded through the NIHR. Initial concerns include:
      - Separate process of email accounts
      - Apparent lack of IG around its use
      Collaboration might involve data. The portal is based on Google Drive and there has been a health data breach involving Google Drive.

12   KBH said that the portal obviously impacts on her too with her role at the NIHR CRN Coordinating Centre and she will be looking in to it further. KH is going to take a view on its use on behalf of KCL where there is a standard process for reviewing systems. A key question is whether the portal conflicts or otherwise interacts with the IGT requirement. It was agreed to discuss this further at the next meeting. **Action 6.8**: KH and KBH to liaise on the portal assessment. **Action 6.9**: VK will check whether there is any HSCIC advice on this.

Any other business

13   TP noted that there had been mention by HSCIC and in a Guardian newspaper report that spot-checks might be introduced? VK said there aren't any specifics at the moment but HSCIC are considering external assessment in further alignment with ISO 27001.

14   MT said that a Janet colleague Henry Hughes was the project director for a potential project with the Farr Institute, Medical Bioinformatics initiative and the Administrative Data Research Centres on a higher assurance network between the centres and for an Authentication, Authorisation and Accounting Infrastructure (AAAI). The information governance aspects were very important in this and it would help if Henry could have access to the group e.g. via BK. BK said she would be very happy to be in touch on this. **Action 6.10**: MT to ask HH to be in touch with BK.

Date of next meeting

15   It was proposed that there should be a meeting to review the Training Day in mid-June (post-meeting note, this was later abandoned) and a meeting on 13th August 2014 so that the Knowledge Base proposals could be discussed.

Summary of New Actions:

Ref.	Action	Who
6.1	Find out the date of the next meeting of the IGT Editorial Board	VK
6.2	Contact Natasha Dunkley to chase up the proposed introductory letter about the Working Group to s251 applicants	BK
6.3	Ask Darren Mort to get in touch with BK about the latest on IGT and ISO 27001 mapping.	VK
6.4	Speak with Steve Canham to find out more about any overlap between ECRIN and the IGT	KH
6.5	Email out to IGT administrators and make an announcement on the IGT news page (post meeting note – email done, decided not to pursue website notice)	VK
6.6	Revise and circulate the Terms of Reference for the next meeting.	MT
6.7	Members to offer up some of the things they have for potential inclusion in the Knowledge Base.	All
6.8	Liaise on the NIHR collaboration portal assessment	KH and KBH
6.9	Check whether there is any HSCIC advice on the NIHR collaboration portal	VK
6.10	Ask HH to be in touch with BK regarding the Janet work with the Farr Institute etc.	MT