NHS HE Information Governance Working Group

Notes of Meeting on 8ᵗʰ January 2015

Present:

Richard Bartlett (RB)	University of Cambridge
Andrew Burnham (AB)	University of Leicester
Will Crocombe (WC)	University of Leeds
Gearoid Garvey (GG)	Institute of Education, UCL
John Hodson (JH)	HSCIC (for Vanessa Kaliapermall, VK)
Bridget Kenyon (BK, Chair)	UCL
Sarah Lawson (SL)	University of Oxford
Malcolm Teague (MT)	Jisc
Apologies:	
All other group members	

Minutes of the meeting of 21ˢᵗ November 2014

1   VK had provided some proposed corrections and these were accepted. JH would provide some suggested wording for paragraph 18. WC also asked for a clarification to be made on para. 7. (Post meeting note, changes were made for minutes to be published). There were no matters arising not on the agenda.

Update on Actions from previous meetings

2   For previous actions still open then please see the open actions summary list at the end. The actions that were closed were:

Ref.	Action	Who	Update
4.6	Share recent NPEU IGT submission on JISCMAIL file area once suitably redacted	SL	Complete. In the end the improvement plan spreadsheet was the main output and this has been forwarded to VK as a proposal for the Knowledge Base. Thanks to AB for checking the redacting. Just need to circulate to the Working Group.
7.3	Circulate the new statement on ECRIN from the UKCRC	WC	Complete.
7.13	Draft first version of the marketing document over the next few months	AB	Closed because moved to discussion on IGT training resources on the agenda.

8.1	Include incident reporting as a subject for the next training day to raise awareness.	SL	Complete
8.2	Members to ask their DPO about whether they would want to be part of the process for instigating a new IGT assessment and report back for next meeting	All	Closed. Discussed at the meeting.
8.3	Add "Accredited Safe Havens" to the agenda for the next meeting	MT	Complete, on the agenda.
8.4	Circulate date of Training Day to Working Group and to organise venue etc. via Jisc events.	MT	Complete
8.5	Ask Peter Sharratt if he might present to the Training Day on 3rd February.	VK	Complete, Peter has agreed to present which is great.
8.6	Draft a programme for the Training Day	SL	Complete, circulated for discussion at the meeting.
8.7	Consider a "take home" pack including business process model/flow diagram for the Training Day	SL	On the agenda.
8.10	Add "network of external auditors" to the agenda at the next meeting	MT	On the agenda.
8.11	Send in agreed v13 proposals to VK as soon as possible.	MT	Complete

HSCIC Update

3   JH HSCIC have been challenged by the National Information Board to create a new Information Governance Assurance Framework (IGAF2) and Toolkit to be re-launched in October 2015. There is a need for something for IG around the whole system. Still trying to determine exactly what a re-launch by October 2015 means. What is certain is that the IGT will remain, there is a clear mandate for it, and this is confirmed by Dame Fiona Caldicott in her annual report. Dame Fiona is asking for inclusions to reflect the Caldicott2 requirements as she is nervous that the IGT is preventing appropriate data sharing, so the new version has to make sure that this is not the case.

4   A programme team for IGAF2 is being recruited. Peter Sherratt has been appointed as the Programme Manager and a Project Manager started this week, Mohammed Mayet. Several staff are going to be committed to this programme for several years. A stakeholder engagement plan is being developed.

5   A possibility emerging with IGAF2 is a "flower" approach i.e. a core template for everyone and then "top-ups" for user organisation types. 27,000 IGT assessments were made last year so there would be clear benefits in making it more standard. The members of the group thought this might work well and would be keen to help work on this to get the best fit for research and education. SL said that a Clinical Trials Unit will have significant numbers of policies etc. already as they are regulated by the UKCRC, could it have a top-up from that? WC agreed and said it CTUs moved towards ECRINS standards and that could be incorporated then that would be

beneficial. BK said once the list of products required was defined then the group could help propose templates etc.

6   JH said there was going to be an IGAF2 questionnaire, expected to be launched in mid-February. He will circulate to the group once available and everyone's help in completing and promulgating this would be helpful. It will be circulated to IGT administrators. It was agreed that it would be circulated to the Working Group. **Action 9.1**: JH to send the IGAF2 questionnaire link to MT once available.

7   GG said there had been a couple of other questionnaires that he had responded too. One on incident reporting and one on Accredited Safe Havens. Any feedback on those? **Action 9.2**: JH will ask at HSCIC about the output of these surveys.

8   There has been a lot of work at HSCIC on a "cyber incident" reporting tool, building on the existing incident reporting tool. A soft launch of the new tool was expected in mid-February. JH said this was focused on "targeted attacks" rather than "mistake incidents". RB thought that it was best not to define an attack by its intent and we need guidance on the definition of a cyber-attack. **Action 9.3**: JH to circulate the guidance for the cyber incident reporting tool following its soft launch.

IGT Proposals from the Working Group

9   JH reported back on the assessment of the seven IGT change proposals that had been put forward by the group. 1, 2, 4 and 5 have been carried forward in to the IGAF2 review. Proposal 3 (inclusion of "secure file transfer to secure host" in "Appropriate Transfer Methods" list) has been accepted and will be included in version 13. Also proposal 6 was accepted (removing "Not Relevant" as an option in HSUT/P 12-334). Proposal 7 (ensuring the scope of a HSUT/P submission is recorded) has been accepted in principle but needs more of a process change and that is being assessed.

Programme and arrangements for the next Training Day on 3rd February

10   SL had provided a draft programme which had been circulated. This was discussed in detail and a number of adjustments made. AB volunteered to help with the "take away" pack. SL said a flow chart on how CAG works would be useful. JH said he had done something on this and would share it with SL. HSCIC would be bring a minimum of 3 people to assist and BK thanked JH for the great HSCIC input. **Action 9.4**: The Training Day programme will be updated and circulated etc. by MT.

Accredited Safe Havens (ASH)

11   The requirements have been developed and these are currently with Ministers. There is little chance that anything will emerge before the general election. For HE the only show in town is the CAG process. GG noted that he tried to make a strong rebuttal of HSCIC being the only ASH in his response to the ASH questionnaire.

Network of external auditors idea

12   This was carried forward in TP's absence although it could be included in the session it is hoped TP can run at the Training Day. The idea was to have an audit arrangement with peers on a quid pro quo basis.

Any other business

13   WC and GG raised the HSCIC contract. There are a number of concerns. **Action 9.5**: where we are as a community on the HSCIC contract to be on the agenda for the next meeting.

14   Jonathan Tedds at the University of Leicester has made a proposal to increase the resource on HE IGT support on the website collecting ideas under Jisc's Research Data Spring initiative. A summary had been circulated. SL thought that the Working Group had achieved a lot through the voluntary effort of the participants and it would be a shame to lose that involvement. On the other hand more could be done if individuals could be released from their day job for some time to develop resources e.g. the templates discussed for IGAF2. **Action 9.6**: AB said he would reword the submission to reflect this approach and ask Jonathan to update the proposal on the website. **Action 9.7**: It would help if everyone voted for the proposal if they agree with it.

Date of next meeting

15   It was proposed that a date be found between 13th and 24th April 2015.

Summary of Open and New Actions:

Open actions:

Ref.	Action	Who	Update
1.4	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	Proposed change to the IGT guidance accepted for IGTv13. Otherwise carried forward. Still required?
3.1	Letter to be drafted from the Working Group that can be forwarded to appropriate groups registering for the IGT.	BK	MT to amend letter and reissue to VK. Carried forward.
3.2	Provide IGT to ISO 27001 and 27002 mapping for Secondary Use view.	BK	BK reported that an initial analysis had revealed 200 pages of difference so this will take a while. Carried forward.
4.7	Share NIHR CRN CC IGT submission once this is made and approved (after the end of March)	KBH	Carried forward.

5.5	Ask for the NIHR CRN Training Package link and circulate to the group. (Also to ask about federated model for access – previously Action 4.11)	MT	**Update 21/11/14**: an email update had been received from KBH as follows: "The module will be hosted internally from Jan (however individuals can request access and will be provided this). From April 2015 it will be available via Moodle for anyone to access." Carried forward.
6.2	Contact Natasha Dunkley to chase up the proposed introductory letter about the Working Group to s251 applicants	BK	**Update 21/11/14**: Carried forward as for Action 3.1. Once Action 3.1 is done then VK will forward a copy to Natasha.
6.3	Ask Darren Mort to get in touch with BK about the latest on IGT and ISO 27001 mapping.	JH	**Update 21/11/14**: Darren is the new Security and Risk lead at HSCIC and he is doing work on IGT v13 and the updated ISO 27001standards. **Update 8/1/15**: Action carried forward, JH said he would take this action.
7.1	Comparison of ECRINS with the IGT.	LS	Carried forward.
7.2	Provide a one page summary on ECRINS to VK so she can explore it further from the HSCIC perspective.	KH	Carried forward. Still required?
7.5	Ask CAG for the criteria being used to assess the improvement plans.	VK	Update 8/1/15: JH said that he had a conversation with Natasha Dunkley about this but did not have an answer to give today. Carried forward.
7.6	Send the Design Group meeting information on to the Working Group members who volunteered for that i.e. TP and vice LS	VK	The Design Group have met to consider incident reporting. VK will send details to TP and LS. Update **8/1/15**: in the absence of TP and LS then cannot confirm this has been done.
7.14	Review the NIHR Portal using the technology assessment tool in use at KCL.	KH	With KH moving jobs this action is on hold.

7.15	Provide an example action Plan and MT to have a first go of doing this for the Working Group.	MT	VK has sent through the example. MT to change it to reflect the needs of the working group. Carried forward.
8.8	Try again to create a list of IGT contacts at each institution	MT	Carried forward.
8.9	Consider how existing contacts could be shared with other relevant departments at HSCIC	VK	Ongoing

New Actions:

Ref.	Action	Who
9.1	Send the IGAF2 questionnaire link to MT once available.	JH
9.2	Ask at HSCIC about the output of the incident reporting and Accredited Safe Haven surveys.	JH
9.3	Circulate the guidance for the cyber incident reporting tool following its soft launch.	JH
9.4	Update the Training Day programme for 3rd February 2015 and circulate.	MT
9.5	Where we are as a community on the HSCIC contract to be on the agenda for the next meeting.	MT
9.6	Reword the IGT related Research Data Spring submission to reflect the agreed approach and ask Jonathan Tedds to update the proposal on the website.	AB
9.7	Vote for the proposal in 9.6 if agree.	All