

UCL's approach to the IG Toolkit

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- Identifiable Data Handling Project
- Almost all UCL's medical research takes place in the School of Life and Medical Sciences (SLMS)
- SLMS makes up ~55% of UCL (~3,500 staff)
- Works with four main NHS trusts plus others
- Significant number of projects come under Ethics and Confidentiality Committee section 251

Section 251

- Allows identifiable information to be supplied where:
 - Anonymised information is not sufficient
 - Patient consent is not practicable
- Overseen by the National Information Governance Board (NIGB)
- Previously assessed by submission of a System Level Security Policy (SLSP)
- In 2012, the NIGB introduced the Department of Health's Information Governance Toolkit as the assessment method

- Standard tool for IG compliance across the NHS
- Backed by extensive suite of templates and training materials
- Not familiar to most of the HE sector - until now...
- Includes sets of requirements for different types of participating organization
- We chose the 'Hosted Secondary Use Team / Project'
- 14 requirements in three categories:
 - 1) IG Management
 - 2) Confidentiality and Data Protection Assurance
 - 3) Information Security Assurance
- Need to score 2 or above against each requirement

1) IG Management

- Responsibility 'owned' at a senior level – IG Board
- Structures in place to manage IG and staff training
- Policies and procedures, including contractual (HR)

This is being handled by the Identifiable Data Handling Project team

2) Confidentiality & Data Protection Assurance

- Data protection auditing, monitoring and reporting procedures
- Processes for transferring and handling information

This is a mixture of existing Data Protection and local per-research-project processes

3) Information Security Assurance

- Mobile working
- Information asset register
- Physical security
- Information incident reporting
- Pseudonymisation / anonymisation
- Separation of data handling facilities for sensitive data

Partly per-research-project, existing processes and the Identifiable Data Handling Project

Our IG Toolkit plan requires:

- Structures put in place – senior IG owner; IG Board
- Staff contractual clauses including IG responsibilities
- Mapping of suitable training role types within the IG Toolkit (nurse, clinician etc) to researchers
- A role to manage all of the above

These are not in place yet...

The IG Toolkit portal:

- Allows individual researchers to register projects under the UCL ODS code, or as a subsidiary of the UCL ODS
 - Investigating the best way forward

- How are you handling business as usual?
- Are you using the Hosted Secondary Use Team / Project organization type?
- Are you implementing new IG structures or adapting existing ones?
- What is the scope of your IG policy?
 - dept / project /institution
- Are you getting any help in doing this?
- Feeding back to the current IG Toolkit review?

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