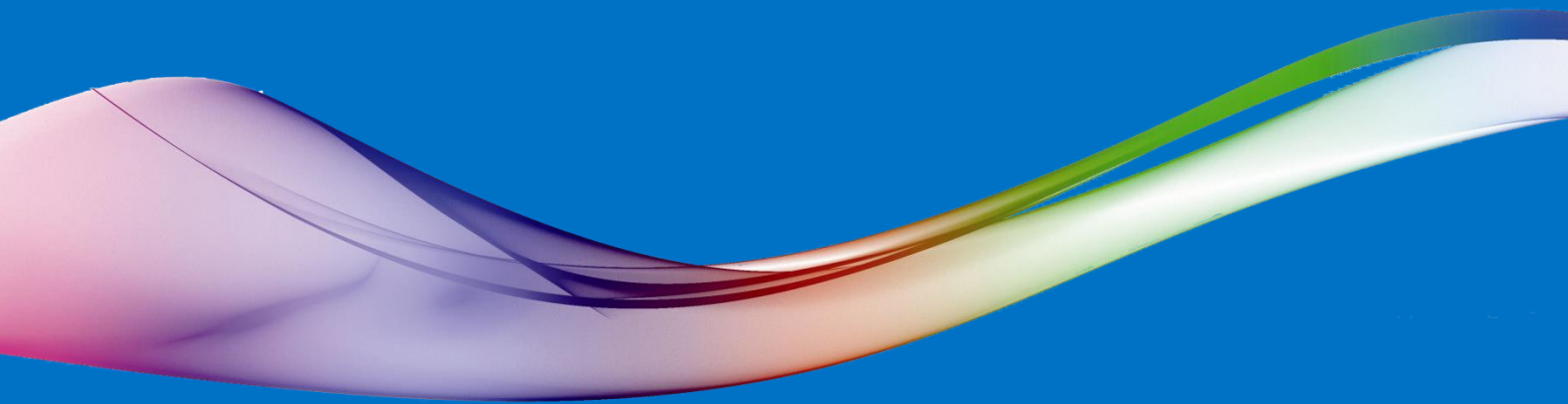




*Wigan Borough
Clinical Commissioning Group*

Privacy Impact Assessment



DOCUMENT CONTROL PAGE	
Title	Privacy Impact Assessment
Supersedes	
Minor Amendments	
Author	Business Information Manager/ CSU Information Governance Team
Ratification	Caldicott Guardian
Application	All staff
Circulation	All staff
Review	Apr 2015

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1. Introduction

- 1.1. Personal / sensitive data continues to be lost, inappropriately accessed and disposed of insecurely by third parties who public bodies have contracted services to. For example, a monetary penalty notice for £325,000 was served on Brighton and Sussex University Hospitals NHS Trust following the discovery of highly sensitive personal data belonging to tens of thousands of patients and staff – including sensitive information – on hard drives sold on an Internet auction site in October and November 2010. You can find out about other fines given by the ICO at <http://www.ico.gov.uk>.
- 1.2. The CCG has to ensure that the third parties we process and share personal confidential data with, will ensure the data is secure and confidential. To ensure this, we do a risk assessment called the Privacy Impact Assessment (PIA).
- 1.3. If you are doing any of the following:
 - setting up a new process using personal confidential data (PCD)
 - changing an existing process which changes the way personal confidential data is used
 - procuring a new information system which holds personal confidential data
- 1.4. You need to complete a **Privacy Impact Assessment (PIA)**. It is the Information Asset Owners / Administrators responsibility to ensure this is completed and submitted.
- 1.5. A PIA is a proforma or risk assessment which asks questions about the process or new system based on data quality / data protection / information security and technology.

2. The PIA Process

- 2.1. Please complete each section (where applicable) as much as possible. For example, a key piece of information is who the Information Asset Owner and Information Asset Administrator will be for a system.
- 2.2. Submit the PIA to the Governance Support Manager and the Lead Information Governance Officer.
- 2.3. The PIA proforma will be vetted and you may receive some comments / questions asking for further information. Please answer these promptly and resend the PIA again.
- 2.4. The PIA will be approved by the CCG Information Governance Service Review Group.

2.5. Once approved, the process / system can start to be introduced or modification to an existing system / process can continue.

2.6. If PIA's are not completed, there may be data protection concerns we are not aware of and therefore we could be breaching the Data Protection Act 1998! It maybe that we have to choose a different supplier for a process / system if need be if they don't have adequate data protection / information security standards in place. PIA's are completed to help you and the IG Team can provide advice and guidance along the way.

3. Important

3.1. By completing this Privacy Impact Assessment, you agree to adhere to the IG Toolkit requirements and have Information Governance and Information Security Policies in place as follows:

- System Level Security Policy including Business Continuity Plan
- Data Protection Procedure
- Information Governance Policy
- Completion of Information Governance mandatory training
- Information Governance Incident Reporting Procedures
- Safe Transfers of Information Procedure
- Information Asset Register

The list above is not exhaustive.

3.2. In the event of an incident and failure to have the above may incur to a larger monetary penalty being levied upon you by the Information Commissioners Office (ICO).

4. Help and Advice

4.1. For further help and advice, please contact the Governance Team.

Screen 1: Basic Information

Requestor Name:	Jonathan Kerry
Requestor Department:	Governance
Requestor Email:	jonathan.kerry@wiganboroughccg.nhs.uk
Requestor Telephone No.:	01942 481666
New System / Process Name:	Medical Interoperability Gateway
New System Supplier Name (if applicable):	Healthcare Gateway
Project Manager:	TBC
System / Process Objectives:	<p>Wigan Borough Clinical Commissioning Group (WB CCG) is leading on developing an integrated care strategy across Wigan. This strategy looks to ensure that the delivery of care is tailored to meet patients need and that clinicians are supported in making appropriate decisions and providing the best level of care. As commissioner the CCG is facilitating the use of MIG between all providers and care settings to ensure that information is shared securely and appropriately to best support the population.</p>

Screen 2: Preliminaries

Will the system / process (referred to as 'asset') contain / use / process personal confidential data?

Yes

No

If No is selected, a PIA does not need to be completed as they are only required when personal / sensitive data is to be processed. Please send the copy to the Senior IG Officer / IG Team.

If Yes is selected, you must complete the remainder of the form and send completed version to the Senior IG Officer / IG Team.

Screen 3: Contact Information

Project Management Details	
Project Manager:	TBC
Project Manager Email:	TBC
Project Manager Telephone No.:	TBC
Information Asset Owner (IAO) Details	
IAO Name:	Jonathan Kerry
IAO Title:	Head of Business Information
IAO Department:	Governance
IAO Email:	jonathan.kerry@wiganboroughccg.nhs.uk
IAO Telephone Number:	01942 481666
Information Asset Administrator (IAA) Details	
IAA Name:	Local Organisation IG Lead
IAA Title:	Local Organisation IG Lead
IAA Department:	Local Organisation IG Lead
IAA Email:	Local Organisation IG Lead
IAA Telephone Number:	Local Organisation IG Lead

Screen 4: Personal Confidential Data Items

Please tick below which of the personal and sensitive data items the asset / system will process.

Personal Data Items

- Forename(s)
- Surname
- Address
- Postcode
- Date of Birth
- Home Telephone Number
- Mobile Telephone Number
- Other Contact Number
- GP Name and Address
- Legal Representative Name (Next of Kin)
- NHS Number
- National Insurance Number
- Photographs / Pictures of persons
- Other – if this is ticked, please state the 'Other' items in the box below

below

Please list 'Other' personal data items to be processed:

Click here to enter text.

Sensitive Data Items

- Gender
- Religion
- Ethnic Origin
- Medical Information
- Occupation / Employment
- Other

Please list 'Other' sensitive data items to be processed:

Click here to enter text.

Screen 5: Consent and Data Sharing

<p>Informing individuals:</p> <p>How have patients and / or staff been informed of the data collection and processing?</p>	<p>Please state: A Communication strategy is being developed to ensure that patients receive information and supporting documentation which is the same across all care settings. It will be clear that information will be accessed with their permission and direct them to their GP for more information.</p>																										
<p>Information Sharing within UK:</p> <p>Will personal confidential data be shared with any other organisation?</p> <p>If yes, please state who the information will be shared with and how</p> <p>Is the information from receiving organisation sent back to originating organisation. If yes, please state how the information is transferred back:</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <table border="1" data-bbox="696 552 2045 852"> <thead> <tr> <th>From Originator Organisation:</th> <th>Data sent to via:</th> <th>To Receiving Organisation:</th> </tr> </thead> <tbody> <tr> <td>Wigan Borough Tier 1 Organisations</td> <td>MIG</td> <td>Wigan Borough Tier 1 Organisations</td> </tr> <tr> <td>Click here to enter text.</td> <td>Click here to enter text.</td> <td>Click here to enter text.</td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table> <table border="1" data-bbox="696 919 2045 1190"> <thead> <tr> <th>From Receiving Organisation:</th> <th>Data sent back via:</th> <th>To originating organisation:</th> </tr> </thead> <tbody> <tr> <td>Click here to enter text.</td> <td>Click here to enter text.</td> <td>Click here to enter text.</td> </tr> <tr> <td>Click here to enter text.</td> <td>Click here to enter text.</td> <td>Click here to enter text.</td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>			From Originator Organisation:	Data sent to via:	To Receiving Organisation:	Wigan Borough Tier 1 Organisations	MIG	Wigan Borough Tier 1 Organisations	Click here to enter text.	Click here to enter text.	Click here to enter text.				From Receiving Organisation:	Data sent back via:	To originating organisation:	Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.	Click here to enter text.			
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Click here to enter text.	Click here to enter text.	Click here to enter text.																									
<p>Information Sharing outside the UK:</p> <p>Will Personal Confidential Data be</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>																										

sent outside the UK?

If yes, please state who the data will be sent to and how?

Will Personal Confidential Data be sent outside the European Economic Area (EEA)?

If yes, please state who the data will be sent to and how?

Have data protection checks been undertaken to ensure that the non EEA country has adequate data protection / information security? If yes, please state what checks have been made:

Sending data to the USA

Is the country you are sending the Personal Confidential Data to a 'Safe Harbor' country?

Click here to enter text.

Yes

No

Click here to enter text.

Yes

No

Click here to enter text.

Yes

No

Screen 6: Asset / System Information

<p>ICO Notification:</p> <p>If a system is being used, is the Supplier registered with the Information Commissioners Office (ICO).</p> <p>If yes, please state their registration number:</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Z2866193</p>									
<p>IG Toolkit:</p> <p>Has the Supplier / Third party completed an Information Governance Toolkit Assessment & that has been internally/externally audited and/or has ISO27001 accreditation? If so, which version and to what level?</p> <p>Please provide evidence.</p>	<table border="0"><tr><td>IG Toolkit completed:</td><td>IG Toolkit audited:</td><td>ISO 27001 Accreditation:</td></tr><tr><td><input type="checkbox"/> Yes</td><td><input type="checkbox"/> Yes</td><td><input checked="" type="checkbox"/> Yes</td></tr><tr><td><input checked="" type="checkbox"/> No</td><td><input checked="" type="checkbox"/> No</td><td><input type="checkbox"/> No</td></tr></table> <p>Evidence: Evidence has been requested from Healthcare Gateway to supplement PIA</p>	IG Toolkit completed:	IG Toolkit audited:	ISO 27001 Accreditation:	<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> No	<input type="checkbox"/> No
IG Toolkit completed:	IG Toolkit audited:	ISO 27001 Accreditation:								
<input type="checkbox"/> Yes	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Yes								
<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> No	<input type="checkbox"/> No								
<p>Contract:</p> <p>Has the supplier signed the relevant contract (containing the Information Governance clauses).</p> <p>If yes, please state which contract type they have signed up to:</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p>Will be signing up to a Healthcare Gateway Contract as well as Wigan Borough Information Assurance Contract and Data Sharing Agreement</p>									

Asset / System Operation:

Does the asset use privacy invasive technologies?

Yes

No

If yes, please state the technology being used:

System only accessible via N3. Interoperability engine has to be configured to connect with local systems to ensure that only specific systems are able to produce a "call" for information.

Will the asset / system process new / different personal confidential data items which have not been processed previously?

Yes

No

If yes, please state the new personal confidential data items to be processed:

Sharing of all information using automated methods has never been available to organisations previously however the technology and system is in place in other location across the UK.

Will the asset / system involve new or changed identity authentication requirements that may be intrusive?

Yes

No

If yes, please state the new identity authentication requirements:

Click here to enter text.

Marketing:

Will the asset / system send

Yes

marketing messages by electronic means?

If yes, please state what you are intending to send for marketing purposes:

Have individuals been informed of the marketing and the option to opt in?

No

Click here to enter text.

Yes

No

Automated Decision Making:

Is automated decision making to be used within the asset / system?

Yes

No

Screen 7: System Security and Functions – only to be completed for systems

Pseudonymisation / Anonymisation: Can personal confidential data be anonymised or pseudonymised using the system / asset?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Data Quality: How will the personal confidential data be kept up to date and checked for accuracy?	<div style="border: 1px solid black; padding: 5px;"><p>Data is presented ad-hoc from source systems to ensure it is always up to date</p></div>
Access: Who will have access to the system and the personal confidential data?	<div style="border: 1px solid black; padding: 5px;"><p>Only clinicians with a legitimate relationship with the patient will be able to access the system. The system will require consent to be recorded on every attempt to view information which is then recorded within the audit trail.</p></div>
Auditing: Is there an audit trail for the system?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Storage of data: Where will the system information be stored securely?	<input type="checkbox"/> Within a paper based system stored securely <input type="checkbox"/> Within a system / application stored on secure network

	<p><input type="checkbox"/> Within a database / spreadsheet stored securely on network</p> <p><input checked="" type="checkbox"/> Other</p> <p>If Other, please state: No information is stored – all data that is accessed is done so in a view from existing systems – no data warehousing will be completed</p>
<p>Retention:</p> <p>What are the retention periods for the information processed in the system?</p>	No records will be retained
<p>Disposal:</p> <p>How will the personal confidential data be disposed of when this is no longer required?</p>	Data remains in source systems – no disposal necessary

Screen 8: Additional Comments

Do you wish to supply additional comments about the system / asset?

If yes please input comments in box:

Yes

No

This PIA is for the system as a whole – it is expected that each organisation locally connecting to the MIG will also complete a PIA to ensure their local processes meet the required level to maintain confidentiality and security. Please also see supporting framework and agreement documentation.

Screen 9: Approval and Sign off

PIA Completed by:

Organisation	Name	Date	Signature
NHS Wigan Borough CCG	██████████	█ /03/2014	
Click here to enter text.	Click here to enter text.	Click here to enter a date.	

Signed off by:

Organisation	Name	Date	Signature
Click here to enter text.	Click here to enter text.	Click here to enter a date.	
Click here to enter text.	Click here to enter text.	Click here to enter a date.	