

Thurrock CCG Safe Haven Process

Background

Under H&SCA 2012, NHS England and CCGs were established with different functions and different powers from those of PCTs.

PCTs had a statutory basis for accessing PCD, NHS England and CCGs have no such legal basis.

The default position where there is no statutory basis to process PCD, is for commissioning organisations to rely on:

- Consent (e.g. IFR's & CHC)
- Fully Pseudonymised data

Legislative Support under section 251 regulations has been sought to allow commissioners to access PCD for certain purposes to allow the use of weakly pseudonymised data.

A temporary section 251 (until 31st October 2014) has allowed the development of Accredited Safe Havens (ASHs) in commissioning organisations (and their commissioning support units) to enable these organisations to receive weakly pseudonymised data (either nhs number or postcode).

What is a Safe Haven

An accredited organisation, or a designated part of an organisation, which is contractually and legally bound to process data in ways that prevent the identity of individuals to whom the data relates from being identified

Staff who sit within the Safe Haven cannot have access to other data such as that provided by the Personal Demographics Service, PAS systems and Open Exeter to be able to look up the identity of individuals

What this means for the CCG

Minimum number of individuals nominated to sit within the Safe Haven

Access to weakly pseudonymised data by these individuals signed off by Caldicott and IG (see Appendix 1 for form)

Pre-approved flows have been identified as part of the 2013/14 IG Toolkit submission (see Appendix 2)

Process for requests from rest of CCG to "ASH team" again signed off by IG and Caldicott (see Appendix 3 for form)

Within CCG only Safe Haven staff will have access to weakly Pseudonymised data, all other staff will only be able to have anonymised or fully Pseudonymised data.

Key Definitions

Direct Patient Care - The Caldicott Review defined it as a clinical, social or public health activity concerned with the prevention, investigation and treatment of illness and the alleviation of suffering of individuals. It includes supporting individuals' ability to function and improve their participation in life and society. It includes the assurance of safe and high quality care and treatment through local audit, the management of untoward or adverse incidents, person satisfaction including measurement of outcomes undertaken by one or more registered and regulated health or social care professionals and their team with whom the individual has a legitimate relationship for their care.

Indirect Patient Care - Defined by the Caldicott Review as activities that contribute to the overall provision of services to a population as a whole or a group of patients with a particular condition, but which fall outside the scope of direct care. It covers health services management, preventative medicine, and medical research. Examples of activities would be risk prediction and stratification, service evaluation, needs assessment, financial audit.

PCD - This is a term used in the Caldicott Review and describes personal information about identified or identifiable individuals, which should be kept private or secret and includes dead as well as living people. The review interpreted 'personal' as including the Data Protection Act definition of personal data, but included data relating to the deceased as well as living people, and 'confidential' includes both information 'given in confidence' and 'that which is owed a duty of confidence' and is adapted to include 'sensitive' as defined in the Data Protection Act. Examples of identifiable data are:

- Name
- Address
- Postcode
- Date of Birth
- NHS Number

Personal Data - As per the Data Protection Act 1998, and defined by the ICO:

- Personal data means data which relate to a living individual who can be identified:

- (a) from those data, or
- (b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual

Identified Safe Haven Staff

NAME	JOB TITLE	DEPARTMENT/TEAM
James Buschor	Head of Performance	Performance & Information
Khurram Jamal	Information Manager	Performance & Information
Femi Otukoya	Head of Finance	Finance
Helen Farrugia	Finance Manager	Finance

Documented process for new requests for information

1. CCG identifies need for information
2. Request form completed by individual needing information
3. Form sent to Safe Haven Staff to see if necessary data available
4. Form passed to CSU IG Team for approval
5. If approved form passed to Caldicott Guardian for signature
6. Form sent back to Safe Haven to release data

Documented process for rejected requests

1. Request rejected by CSU IG Team or Caldicott Guardian
2. Form sent back to requestor to identify if fully Pseudonymised or Anonymised data can be used
3. If answer to 2 is yes then Safe Haven Staff provide information without identifiers

Documented process for requests where data not held

1. Is request for anonymised data?
2. If yes to 1. then request anonymised data direct from provider
3. If no to 1. and request approved by IG and Caldicott complete data deposit agreement
4. Send data deposit agreement to provider
5. Send completed data deposit agreement to DSCRO
6. DSCRO collect data from provider
7. DSCRO send weakly Pseudonymised data to CSU Information/BI Team
8. CSU Information/BI Team inform CCG that information now available

See Appendix 5 for flow diagram of above processes

Folder and File Set-up & Naming Conventions

Folder and File Set-up

The CCG will have a network structure that is made up of 3 areas. These will be:

1. Corporate – for “published” corporate documents only
2. Unrestricted – general area for all working documents and documents/files that do not contain PID or are not commercially sensitive
3. Restricted – for documents/files that contain PID or are commercially sensitive

All CCG staff will automatically get access to the first two listed above but access to the restricted area will be controlled by Information Asset Owners and access will only be given as necessary either by the Asset Owner themselves or through the IT Service Desk authorisation process.

Within each of the 3 areas on the network, a clear and logical filing structure that aids the retrieval of records must be used. The names allocated to files and folders should allow ‘intuitive filing’. Filing of records to local drives on PCs and laptops is not permitted.

The agreed filing structure will also help with the management of the retention and disposal of records.

Care should be given to the number of folders and sub-folders set-up, the minimum number possible to allow for ease of retrieval should be used and duplication should be avoided (see naming convention suggestions for version control should multiple versions of a document be needed)

Naming Conventions for documents within folders

It is important to following the naming conventions as indicated in the CCG’s Information Lifecycle Management Policy to ensure consistency and ease of retrieval. The following are the rules considered relevant for Safe Havens, the full set of rules can be found in the Policy under Appendix B: Rules of File-Naming. Whilst the examples relate in general to corporate records these apply to all record types within the CCG.

Rule 1: Keep file names short, but meaningful

File names should be kept as short as possible whilst also being meaningful. Long file names mean long file paths and long URLs which increase the likelihood of error, are more difficult to remember and recognise, and are more difficult to transmit in emails as they often ‘break’. However, avoid using initials, abbreviations and codes that are not commonly understood.

Rule 4: When including a number in a file name always give it as a two-digit number, unless it is a year or another number with more than two digits

The file directory displays file names in alphanumeric order. To maintain the numeric order when file names include numbers it is important to include the zero for numbers 0-9. This helps to retrieve the latest record number.

Rule 4 Example
OfficeProceduresV01

Rule 5: If using a date in the file name always state the date 'back to front', and use four digit years, two digit months and two digit days:
YYYYMMDD or YYYYMM or YYYY or YYYY-YYYY

Rule 5 Example
20040324Agenda.rtf

Rule 8: Order the elements in a file name in the most appropriate way to retrieve the record:

The elements to be included in a file name should be ordered according to the way in which the record will be retrieved during the course of everyday business. This will depend on the way you work. For example, if the records are retrieved according to their date, the date element should appear first. If the records are retrieved according to their description, the description element should appear first.

Rule 8 Example
/.../OatcakeCttee/20040630Agenda.rtf
/.../OatcakeCttee/20040630Minutes.rtf
/.../OatcakeCttee/20050120Agenda.rtf
/.../OatcakeCttee/20050120Minutes.rtf

Rule 9: The file names of records relating to recurring events should include the date and a description of the event, except where the inclusion of either of these elements would be incompatible with Rule 2

The file names of records relating to recurring events (e.g. meeting minutes and papers, weekly, monthly or annual reports, event management and budget planning documents) should include both the date and the event name or event description so that the record can be identified and retrieved.

When deciding the order of the elements consider rule 8. Date first will usually be appropriate for events that are time specific and recurring. Event first will usually be appropriate for events that are infrequent, but regularly recurring.

The event description could be the title of the event or the subject of the event, whatever description you choose, ensure that it is short, to the point, and readily recognisable to you and the colleagues you work with.

Rule 9 Example
/.../Website/20040301WebStats.rtf
/.../Website/20040401WebStats.rtf
/.../Planning/Budget2003-2004V10.xls
/.../Planning/Budget2004-2005V01Draft.xls

Rule 11: The version number of a record should be indicated in its file name by the inclusion of 'V' followed by the version number and, where

applicable, 'Draft' or 'Final'.

Some records go through a number of versions, for example they start out as working drafts, become consultation drafts and finish with a final draft, which may then be reviewed and updated at a later date. It is important to be able to differentiate between these various drafts by giving them each their own number. Where a version number is applicable, it should always appear in the file name of the record so that the most recent version can be easily identified and retrieved.

Rule 11 Example

IEAM2003-2004V03Draft.htm

IEAM2003-2004V04Final.htm

OrgHier2002V02.xls

OrgHier2002V03.xls

OrgHier2002V04.xls

Access to Weakly Pseudonymised Data on CSU Servers

When data is received into the DSCRO for Essex, Herts, Beds & Luton it will be passed onto the CECSU BI Team based in Witham via a secure FTP transfer directly into the CSU Server.

This will then be checked by the CSU BI team and data will be transferred into a secure section on the server with restricted access for each CCG.

Approved Safe Haven staff will be given access to the server once a form has been completed and signed off by both the CCG Caldicott Guardian and the CSU Information Governance Team. (see Appendix 1)

Safe Haven Server Access Request Form

Name

Job Role

Line Manager

AD User Name

Caldicott Guardian Sign Off

Name

Signature

Date

IG Sign Off

Name

Signature

Date

User Setup by BI

Name

Signature

Date Rcvd

Date Setup.....

Pre-approved flows of PCD

These pre-approved flows of data relate to data flow mapping carried out in August 2013, further flows will require the completion of a data request form as identified in process for request for PCD.

Information Request Form

Once completed please pass this form onto your Safe Haven Team who will check to see whether data is already held to fulfil your request and then pass the form onto the Central Eastern CSU IG Team for review. Once reviewed, if approved the request will be sent to the CCG Caldicott Guardian for approval before returning to the Safe Haven Team to provide you with the requested information.

Name

Job Title

Directorate/Team

Phone No

Email

Date

Date Required

Information Required

Summary of Information Requirement (e.g. what you need, why you need it, how frequently it is needed):

Details of all data fields that will need to be collected to produce information needed (include HRG, diagnosis or procedure code, time period etc.):

Please note the Safe Haven Team can only pass on the information in an anonymised form once received from provider and processed as per your

requirements. If Patient Identifiable Data is required by anybody outside of the CCG Safe Haven this should be discussed with the CSU IG Team separately.

For use by the CCG Safe Haven:

Can information be requested from Provider in an anonymised format? Yes/No

Is data already held to fulfil this request? Yes/No

Data passed to CSU IG Team for Approval

For use by CSU IG Team

Is Request Appropriate? Yes/No

Guidance on request for Caldicott and Safe Haven:

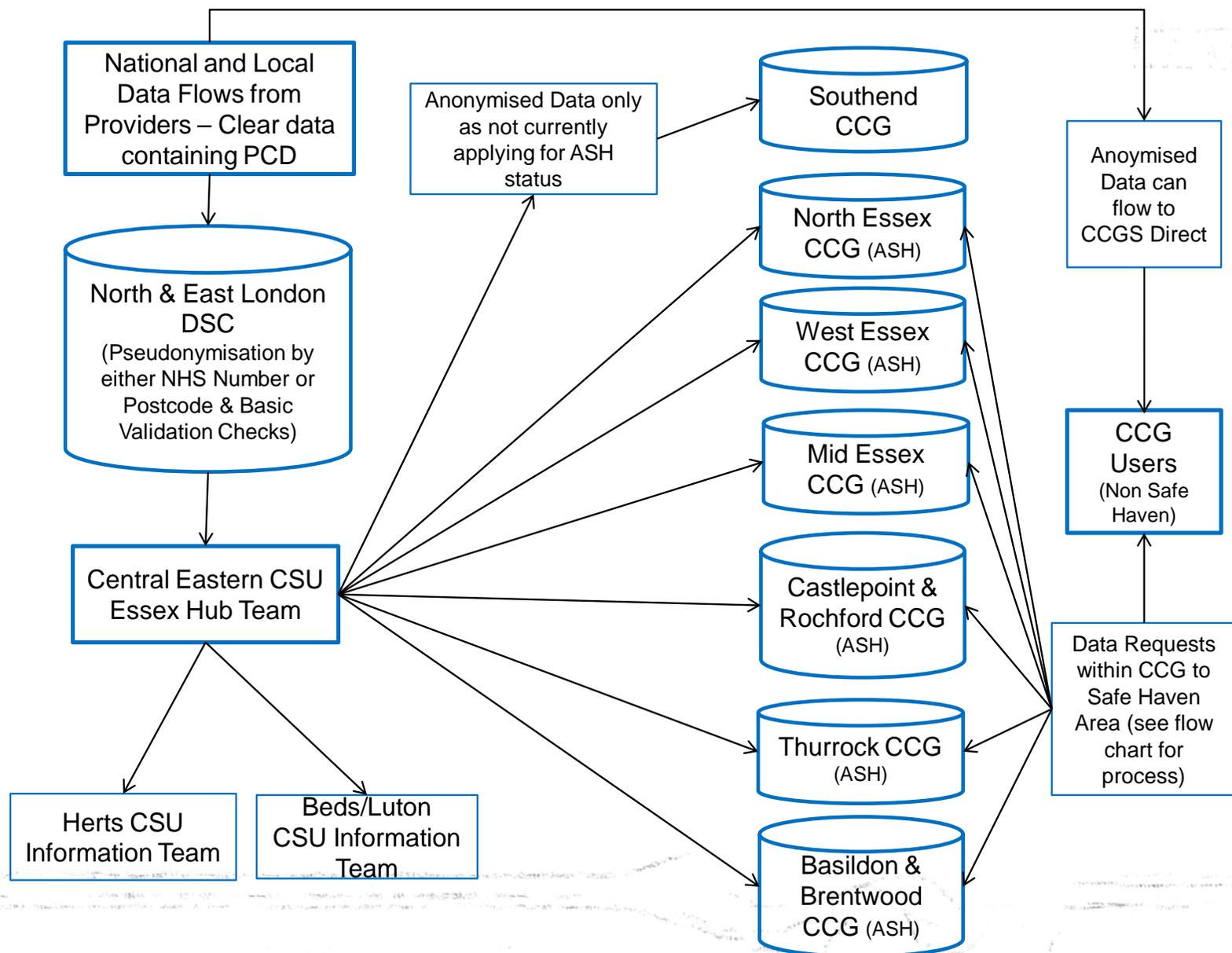
Date Approved

For use by CCG Caldicott Guardian

Name

Signature

Date



Appendix 5

