

Waking Project Privacy Impact Assessment

Description: Waking Project

To develop an alerting service with alerts pushed to secure mobile devices carried by suitably qualified clinicians.

Questions to identify Privacy Issues	Answer
Technology	
<p>(1) Does the proposal include the use of new or additional technologies with the potential for privacy intrusion?</p>	<p>The service will provide and deploy:</p> <ul style="list-style-type: none"> • An app to run on smartphones. The app will be purely for receiving alerts to specific trust employed clinicians to assist in the treatment of inpatients. The app will communicate with the webserver via a secure API. • A secure web based dashboard only accessible to suitably authorised clinicians. • A data repository provisioned by an existing ADT and Pathology HL7 data feed from the hospital integration engine. <p>The platform will include the following technical components: MySQL, Mirth, Python, Kafka, Zabbix, iOS, Android, GCMS.</p> <p>The service will be hosted in the UK on a secure N3 cloud infrastructure provided by [REDACTED]. This infrastructure holds pan-Government accreditation to store data up to and including Business Impact Level 2 (IL2). The service is independently certified to ISO20000 (IT Service Management), ISO27001 (Information Security Management), and ISO9001 (Quality Management) standards.</p>
<p>(2) Justification</p> <p>Is the justification for the new data-handling unclear or unpublished?</p>	<p>Despite the introduction of a national algorithm for alerting the presence of Acute Kidney Injury in England and Wales the condition continues to afflict a large number of inpatients, in the worst cases causing death or chronic disease.</p> <p>A reason for this is that often the alert, when generated, is not brought to the attention of a suitably qualified clinician in a timely manner. This is critical since the condition is highly time sensitive and can cause the patient condition to rapidly deteriorate without the correct clinical response. This has significant implications for the long term health of the patient and cost to the NHS.</p> <p>This is well documented, and the vision of this service is to improve outcomes of patients with AKI by providing the AKI alert to the correct clinician at the right time.</p>

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<p>(3) Identity: Does the project involve an additional use of an existing identifier?</p>	<p>The key demographic data items: NHS Number, MRN, Patient name and DOB will be used to positively identify the patient. This will be used to allow comparison between pathology results obtained within the hospital. There will be no combination with other demographic data or linkage of data obtained from disparate sources.</p>
<p>(4) Identity: Does the project involve use of a new identifier for multiple purposes?</p>	<p>The service does not involve use of a new identifier for multiple purposes.</p>
<p>5) Does the project involve new or substantially changed identity authentication requirements that may be intrusive or onerous?</p>	<p>The service does not involve new or substantially changed authentication requirements with the exception that the clinician will have the option to authenticate by fingerprint.</p>
<p>Data</p>	
<p>(6) Will the project result in the handling of a significant amount of new data about each person, or significant change in existing data-holdings?</p>	<p>The service will use data from the following existing source systems:</p> <p>PAS: Contains Demographics to allow matching of results with the correct patient.</p> <p>VitalData: List of patients receiving dialysis who are excluded from the service.</p> <p>Winpath: Pathology. Provides biochemistry results required by the AKI algorithm.</p> <p>POC: Pathology. Provides biochemistry results required by the AKI algorithm from Point of Care analysers.</p>
<p>(7) Will the project result in the handling of new data about a significant number of people, or a significant change in the population coverage?</p>	<p>The service exclusively focuses on inpatients within the hospital trust.</p>
<p>(8) Does the project involve new linkage of personal data with data in other collections, or significant change in data linkages?</p>	<p>No</p>
<p>Data Handling</p>	
<p>(9) Does the project involve new or changed data collection policies or practices that may be unclear or intrusive?</p>	<p>All data used is already being collected for the treatment of the patients.</p>

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<p>(10) Does the project involve new or changed data quality assurance processes and standards that may be unclear or unsatisfactory?</p>	<p>The service will re-use existing data from a number of source systems, including Winpath, Cerner, POC analysers, VitalData. The algorithm will use this data to determine the AKI level of inpatients. The service will not change any of the underlying data, or attempt to over-write any of the source systems.</p> <p>There are no proposed changes to existing standards on data quality.</p>
<p>(11) Does the project involve new or changed data security arrangements that may be unclear or unsatisfactory?</p>	<p>The service is hosted within the [REDACTED] and complies with NHS data security standards.</p> <p>The application will log user access and certain usage details. Note that this is a 'read-only' application, with no data entry and no ability to update or change the underlying data.</p>
<p>(12) Does the project involve new or changed data access or disclosure arrangements that may be unclear or permissive?</p>	<p>The service does not involve new or changed data access or disclosure arrangements.</p>
<p>(13) Does the project involve new or changed data retention arrangements that may be unclear or extensive?</p>	<p>The service does not involve new or changed data retention processes that are out with existing NHS data retention practices.</p>
<p>(14) Does the project involve changing the medium of disclosure for publicly available information in such a way that the data becomes more readily accessible than before?</p>	<p>The service does not involve a new or changed medium or method of disclosure which would make information already within the public domain more accessible.</p>
<p>Exemptions and Exceptions</p>	
<p>(15) Will the project give rise to new or changed data-handling that is in any way exempt from legislative privacy protections?</p>	<p>The service will not give rise to new or changed data handling that is exempt from the Data Protection Act 1998.</p>
<p>(16) Does the proposal intend to disclose personal data to, or access by, third parties that are not subject to EU or comparable privacy regulation?</p>	<p>The data will not be transferred out with the UK, nor made available to third parties.</p>