Airedale NHS
NHS Foundation Trust

Data Privacy Impact Assessment

A Data Privacy Impact Assessment (DPIA) is a process which helps to assess privacy risks to individuals in relation to any use of their personal information (known as 'processing').
*From May 2018, DPIAs will be mandatory for **any** organisation that is undertaking any project which involves new or changed use of any personal data.*

Project Administration	
Project Name:	CERNER and TPP SystmOne Integration
Project Lead:	The person responsible for managing the project and documentation.
Date Updated:	27/12/2018
Programme Governance	
Programme Board:	Integrated Health Record
Programme Lead:	The programme lead for this projects Right Care Programme.

These questions are intended to help decide if a DPIA is necessary.

- *Is new information about individuals (staff, patient or others) being collected?*
- *Is information about individuals being collected or processed in a new way?*
- *Will information about individuals be collected or stored in a new place (physical or electronic)?*
- *Will a system that stores information about individuals be reconfigured or developed?*
- *Will your project disclose information about individuals to organisations or people who have not previously had routine access to the information?*
- *Are you using new technology (software, hardware etc.) that will collect, process or store information on individuals?*
- *Will your project combine, compare or match data from multiple sources?*

Alternatively, follow the flowchart in Appendix 1 to determine if a DPIA is required.

If the answer to any of the above is yes, a DPIA is required.

Results of Initial Screening	
Is a full DPIA required?	Yes
If not, confirm reasons:	If a DPIA is incorrectly not carried out, the Trust is at risk of prosecution.
Date of screening:	15/10/2018

If a DPIA is not required, please send a copy of this front page to the Information Governance team at kevin.denham@anhst.nhs.uk. If a DPIA is required please continue.

The following template should be used to record the full DPIA process and results. You can start to fill in details from the beginning of the project, after the screening questions have identified the need for a DPIA.

Step 1 - Identify the need for a DPIA

Currently the record of patients under the care of ANHSFT is restricted (subject to consent) to those whose practice uses TPP SystmOne. There has been a technical barrier to viewing CERNER data. CERNER has been since May 2018 been the Electronic Patient Record (EPR) and PAS System in use at Bradford Teaching Hospitals Foundation Trust (BTHFT) and Calderdale and Huddersfield NHSFT. TPP and CERNER have developed a way to view patient data (subject to consent) between the system platforms to be possible. The benefits to patients is that there will be visibility of the ANHSFT SystmOne record within the BTHFT CERNER Record. This will increase the depth and breadth of information available to the clinicians, improving clinical quality and operational efficiency as well as patient experience (not having to repeat their 'stories').

Once approved, rolling this outbound and Inbound integration between ANHSFT SystmOne and BTHFT CERNER is aligned with our IM&T Strategy and also the organisations Digital Strategy.

A DPIA is required in this case as this integration will provide us and our colleagues using CERNER (subject to consent) with the opportunity view more information on patients receiving care from ANHSFT teams. This integration will also be comparing, combining and matching data from multiple sources

Step 2 - Describe the information flows

Whether or not a patient's record is shared via the SystmOne-CERNER integration is governed by the patient's Record Sharing consent settings.

Data from the external CERNER system will not be stored in our SystmOne record (or vica versa), we will consume data on a consent basis and it will be a read only real time snapshot.

The patient's sharing consent is usually recorded at the time of registration.
2 LINES REDACTED

Step 3 - Consultation requirements

Explain what practical steps you will take to ensure that you identify and address privacy risks. You should link this to the relevant stages of your project management process. Consultation can be used at any stage of the DPIA process.

Who should be consulted, internally and externally?	BTHFT IG Service, ANHSFT IG Group, IHR Programme Board, SIRO, Caldicott Guardian,
How will you carry out the consultation?	Briefing papers, Meetings, Individual consultations, Undertaken as a Business As Usual rollout rather than as directly within an IHR Project.

Step 4 - Identify privacy and related risks

Highlight KEY associated compliance and corporate risks
Larger-scale PIAs might record this information on a more formal risk register.

Privacy Issue	Risk to Individuals	Compliance Risk	Associated Organisation / Corporate Risk
Primary care record being viewed without consent for a wider group of patients than currently technically possible.	Records being viewed without consent for a wider group of patients than currently technically possible.	Audit process not being in place leading to unauthorised access	Reputational Risk

Step 5 - Identify privacy solutions

Describe the actions you could take to reduce the risks, and any future steps which would be necessary (e.g. the production of new guidance or future security testing for systems).

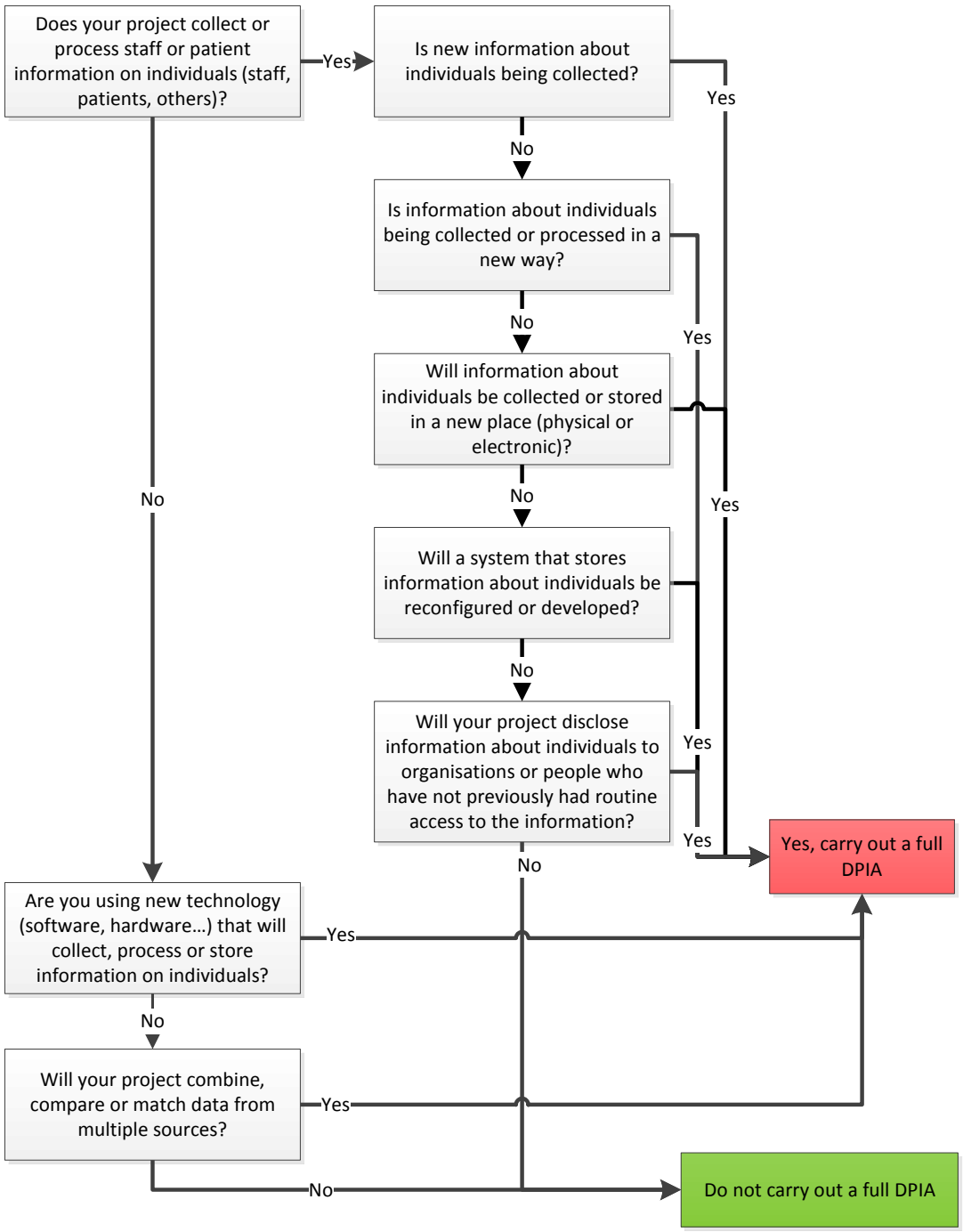
Risk	Solution(s)	Result *(Is the risk eliminated, reduced or accepted?)*	Evaluation *(Is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project?*
Records potentially being viewed without consent for a wider group of patients than currently technically possible.	Policy, and SOP supported by training and guidance to staff relating to consent capture and accessing of records. Implement Audit Procedures. Monitor and review effectiveness of audit procedures	Reduced and Accepted	Yes

Step 6 - Sign off and record the DPIA outcomes			
Solutions to be implemented:	Explain how the above solutions to privacy risks are to be implemented.		
Approved by:	Should be approved by project sponsor or other designated approver.		
Approved Date:	Date of approval.		
Step 7 - Integrate the DPIA outcomes back into the project plan			
How will DPIA outcomes be integrated with the project plan?	Consider who is responsible for integrating the DPIA outcomes back into the project plan and updating any project management paperwork. Who is responsible for implementing the solutions that have been approved, by when?		
Contact point for future privacy concerns:			

Please ensure that a copy of this completed form is uploaded onto AireShare and forwarded to the Information Governance team: Kevin.denham@anhst.nhs.uk

Please note that where a DPIA identifies a high risk and you cannot take any measures to reduce the risk, you cannot go ahead until this is referred to the Information Commissioners Office. You must refer immediately to the Information Governance team.

Appendix 1


Does your project collect or process staff or patient information on individuals (staff, patients, others)?
Yes
Is new information about individuals being collected?
Yes
No
Is information about individuals being collected or processed in a new way?
Yes
No
Will information about individuals be collected or stored in a new place (physical or electronic)?
Yes
No
Will a system that stores information about individuals be reconfigured or developed?
Yes
No
Will your project disclose information about individuals to organisations or people who have not previously had routine access to the information?
Yes
Yes, carry out a full DPIA
No
No
Are you using new technology (software, hardware…) that will collect, process or store information on individuals?
Yes
No
Will your project combine, compare or match data from multiple sources?
Yes
No
Do not carry out a full DPIA