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*Issue 11/12*

# INFORMATION GOVERNANCE – DOPs COMMUNICATION

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## Data Flow Mapping

When the new General Data Protection Regulation (GDPR) comes into force on May 25th 2018 all organisations processing personal data have to be able to provide accountability for the data they process. You must keep comprehensive records of all your data processing, both inbound and outbound. Other NHS organisations do this by completing ‘Data Flow Maps’, basically a spreadsheet type document that lists all flows of personal data however there has never been a requirement for Primary Care Organisations to do this. You can keep these records however you want but you must be able to produce a record of all processing containing personal data upon request of the Information Commissioner’s Office.

Fines for non-compliance with this requirement can be up to €10,000,000

## Sustainability and transformation plans and partnerships

NHS sustainability and transformation partnerships (STPs) are a mechanism for delivering the NHS Five Year Forward View (5YFV) and other national priorities for the NHS in England. The 5YFV, published in October 2014, was a collective vision for how the health service needed to change between 2015/16 and 2020/21.

Forty-four sustainability and transformation partnerships now exist covering the whole of England, although they vary considerably in the size of the area they cover and the populations they serve. Each of the forty-four footprints are separate partnerships made up of NHS organisations, including clinical commissioning groups (CCGs), NHS trusts and foundation trusts and primary care services, as well as local authorities.

The House of Commons Library briefing covers the context in which STPs have been developed, their funding and accountability arrangements as well as their progress so far. A key role of these partnerships was the creation of local blueprints for delivering the 5YFV, known as sustainability and transformation plans (STPs). This briefing therefore explores how these plans were developed, as well as research and debate surrounding the content and implementation of these plans.

**Please find link below to full report.**

STPs Full Report

**Yahoo 2013 Data Breach**

Yahoo has said that all of its three billion user accounts were affected in a hacking attack dating back to 2013. The company, which was taken over by Verizon earlier this year, said an investigation had shown the breach went much further than originally thought.

This is an example of why all staff should be using secure email accounts to send personal, sensitive information. NHS mail to NHS mail is secure – but if sending to other email addresses from an NHS mail account, type the word [secure] before the subject in the title and the information will be encrypted for you.

If you don’t have NHS mail accounts you need to look at alternative ways of transferring personal data securely, it must be encrypted, password protection is not strong enough.

**GDPR**

GDPR preparations should now be well under way, remember the implementation date is 25th May 2018. Visit our portal to view various documents. There hasn’t been any specific guidance for the health sector as yet but we will let you know when there is. Main points for practices:

- You need to keep a record of all the personal data you process
- You will no longer be able to charge for subject access requests and you must send the information within 1 month
- Any information incidents must be reported within 72 hours
- Privacy notices, both electronic and paper must be up to date and robust
- Review how you seek, record and manage consent.

**GDPR Myths**

The ICO (Information Commissioners Office) have created a set of blogs to try and sort fact from fiction by busting some of the myths around the General Data Protection Regulation (GDPR). New requirements to report serious breaches of personal data are high up on the list of issues we need to address.

Misleading press stories have claimed that all breaches will need to be reported to the Information Commissioner's Office and customers alike; others say all details of the breach need to be known straight away and some say there'll be huge fines for failing to report.

With nine months to go until GDPR comes into effect, the ICO recognise that businesses and organisations are concerned. This latest blog challenges a few of the myths that have sprung up around data breach reporting.

To view myths #5 to #8, please click on the link below.

Myth Busting from the ICO

**Subject Access Requests**

As from the 25th May 2018 no-one will be able to charge for subject access requests. Also the information must be sent within 1 month.

It is appreciated that this is a major change for practices and that it will be an expensive change, discussions are going on at a national level but there is not expected to be any change to this as it is seen as a further way to fulfil the rights of patients to easy and transparent access to their information.

**IG Toolkit**

Version 14.1 of the IG Toolkit is now available at **https://www.igt.hscic.gov.uk/**
Submissions must be made by 31st March 2018.
It is recommended that Primary Care Organisations should be compliant with the IG Toolkit and is mandated if you use smart cards or have N3 connections.

Remember that all the documents you need along with other information is available on our portal

https://portal.yhcs.org.uk/web/information-governance-portal/home

**IG Portal**

The IG portal is an invaluable tool for Primary Care Organisations and contains template documents for toolkit compliance, an informative Blog and information about GDPR, as well as a huge array of general IG information and links.

Come visit us at:
https://portal.yhcs.org.uk/web/information-governance-portal/home

The eMBED IG Team are here to help and support you in all matters relating to confidentiality, information governance and information security.

**Contact us any time at**: **eMBED.infogov@nhs.net**