

NHS Central Register (NHSCR) Governance Board

Information Assurance Update January 2016

Purpose

1. To update the board on Information Assurance work and to seek their endorsement of the work underway and the planned future work. The board is asked to note the paper and agree the next steps.

Background

2. Over the last nine months, taking note of the feedback received during the consultation on the proposed changes to the Local Electoral Administration and Registration Services Scotland Act 2006 (LEARS), we have been working with a range of partners to carry out a due diligence review of the assurance arrangements we have in place around NHSCR.
3. This has fallen into three main blocks of work; Privacy Impact Assessments, Data Sharing Arrangements and Governance.

General Progress

4. Overall progress has been slow but steady in this area. External factors have meant progress has been slower than we had planned but we have maintained headway.

Progress Report and Next Steps

5. Privacy Impact Assessment – The NHSCR pre-dates the introduction of Privacy Impact Assessments so none have been carried out for NHSCR until now. We decided to use the LEARS consultation as an opportunity to collect information to complete Privacy Impact Assessments (PIAs) for the new proposals. We have started with the Data Quality Activity and Tracing. These are being drafted and will be shared with the Information Commissioner's Office (ICO) for informal feedback. We will then use these as a basis for developing PIAs for all NHSCR activity.
6. Data Sharing Arrangements – We have reviewed all data sharing into and out of the NHSCR. As arrangements for data sharing with a wide range of partners have evolved over time there is a range of approaches in place describing these arrangements. We have been working on reviewing, updating and redrafting agreements with the aim of creating a coherent set of agreements, based on current best practice, that transparently describe all sharing involving NHSCR. Given the number of partners involved this has been a time-consuming task but good progress has been made.

7. Governance – We have clarified the governance arrangements around the NHSCR confirming the key roles and groups involved in this, including producing the refreshed Terms of Reference for this group.
8. Key roles and groups are:-
 - Data Controller – Registrar General (RG)
 - Information Asset Owner – NRS Head of Data Resources
 - Operational Management – NHSCR team
 - NHSCR Governance Board – Advise RG on strategic NHSCR matters
 - Information Assurance and Security Management Forum – Advise Information Services (IS) on assurance matters relating to myaccount including use of NHSCR
 - Public Benefit and Privacy Panel – Provides advice on medical research proposals relating to NHSCR

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