

Barts Health NHS Trust Confidentiality Advisory Group (Section 251) application form guidance

With consultation from the Information Governance (IG) team the following template responses have been agreed for applications to Confidentiality Advisory Group (CAG) (Section 251) when the data being accessed is at Barts Health NHS Trust (Barts Health)

The main CAG form should be completed as appropriate- guidance and access via <https://www.myresearchproject.org.uk/help/hlpconfidentiality.aspx#Applying-to-CAG>

A43. How long will personal data be stored or accessed after the study has ended?

A44. For how long will you store research data generated by the study?

Please check the Barts health records retention policy for your study type:

<https://weshare.bartshealth.nhs.uk/download.cfm?ver=6135>

Question A45. Please give details of the long term arrangements for storage or archiving of research/personal data after the study has ended. Say where data will be stored, who will have access and the arrangements to ensure security.

For details, contact Corporate Records Management

<https://weshare.bartshealth.nhs.uk/records-management>

Below we have provided template wording for IRAS Form Part B: Section 8 – Additional information for applications to the Confidentiality Advisory Group (CAG)

Question 13. Have you undertaken a self-assessment using the NHS Data Security and Protection toolkit?

Answer: Yes No

If Yes, please provide details of your scoring and a summary of the actions to be taken as a result.

<https://www.dsptoolkit.nhs.uk/OrganisationSearch/R1H>

Question 14: Who will act as Information Guardian for any health records or other personal information used by the research team during the study?

Dr Anita Sanghi, Caldicott Guardian, Consultant Obstetrician and Gynaecologist, Barts Health NHS Trust, St Bartholomew's Hospital, West Smithfield, London, EC1A 7BE, a.sanghi@nhs.net , 02035943532

For the Corporate level security policy (CLSP) section of the IRAS Form Part B: Section 9, template wording has been provided below for questions 1 to 6:

CLSP (Information below is for Barts Health only). If you are applying for another Trust or Institution, you will need to contact their IG team for the below information.

CLSP for organisation 1:

Question 1. Please give the name of the organisation:

Barts Health NHS Trust

Question 2. What security and audit measures have been implemented to secure access to, and limit use of, patient identifiable information within this organisation?

Barts Health NHS Trust submitted the 2018/19 toolkit in March 2019 and self-assessed as 'standards non met', acute Trusts were able to declare their compliance as 'standards not fully met (plan agreed)' and submit an improvement plan to NHS Digital. The Plan was approved and NHS Digital have provided assurance to third parties that the Trust has adequate controls in place to process data.

The Trust has the following IG policies

- IG policy
- Information security policy
- Confidentiality Code of Practice
- Data Protection Policy
- Health Record Keeping Guidelines
- Health Records management
- Records Retention and Disposal
- Freedom of Information (FOI) Policy
- Use of Trust email

The IG team provides annual IG training for all staff and is there to provide guidance and assurance to all staff. The IG team carries out spot-checks across all sites and any issues are fed back and actioned.

The IG Committee meets every two months and monitors the Trust compliance with IG regulations.

Electronic patient systems have access and controls that limited the access of staff to the information. There is an audit trail of access.

Question 3. Please provide an assessment of how the organisation's CLSP complies with the principles of the management and control guidelines contained in ISO 27002 (formerly ISO 17799:2005) and ISO 27001:2005 (both formerly parts 1 and

2 of BS7799 “Code of practice for information security management”). *Confirm that the policy or policies have been formally adopted by the organisation and are fully implemented. Please provide an electronic reference copy of the CLSP.*

Barts Health NHS Trust has an Information Security Policy that was updated in 2017 and was drawn up in line with the requirements stated in the IG toolkit. These requirements includes meeting

ISO27001 standards.

Barts Health submitted the 2018/19 toolkit in March 2019 and self-assessed as ‘standards non met’, acute Trusts were able to declare their compliance as ‘standards not fully met (plan agreed)’ and submit an improvement plan to NHS Digital. The Plan was approved and NHS Digital have provided assurance to third parties that the Trust has adequate controls in place to process data.

Question 4. Who is responsible for the implementation of the CLSP?

Sarah Palmer-Edwards

Head of Information Governance

Qualifications

Employer Barts Health NHS Trust

Work Address Barts Health NHS Trust, 3rd Floor

9 Prescott Street

Aldgate

London

Post Code E1 8PR

Work Email dpo.bartshealth@nhs.net

Telephone: 0203 594 6027

Question 5. What is the Data Protection Registration Number for this organisation?

Registration number: Z3086438

Date registered: 30 March 2012

Registration expires: 29 March 2020

Payment tier: Tier 3

Data controller: Barts Health NHS Trust

Address:

Trust Executive Offices, Barts Health NHS Trust

Ground Floor, Pathology and Pharmacy Building, The Royal London Hospital

80 Newark Street

London

E1 2ES

Data Protection Officer:

Barts Health NHS Trust, 3rd Floor

9 Prescott Street

Aldgate

London

E1 8PR

dpo.bartshealth@nhs.net
Telephone: 020 7480 4892

Question 6. Does the registration specify research as one of the purposes of processing and include confidential patient information in the classes of data processed?

Answer: "Yes"

We process personal information to enable us to provide healthcare services for patients, data matching under the national fraud initiative; research; supporting and managing our employees, maintaining our accounts and records and the use of CCTV systems for crime prevention'.

The Trust's registration can be found at the following link:

<https://ico.org.uk/ESDWebPages/Entry/Z3086438>

Additional: IG Toolkit organisational code is r1h

Question 7 is for study team to complete.