## Project – Information Sharing Protocol

Health & Social Care Information Sharing Agreement West Suffolk, Ipswich & East Suffolk and North East Essex STP Partners (ISA) is not a legally enforceable document or a contract. The overarching agreement identifies best practice for systematic data sharing of health and social care information between signatories and this Information Sharing Protocol sits beneath the ISA and intends to provide granular detail of specific sharing initiatives agreed to by the parties involved.

The ISP is provided to all parties to support risk mitigation and to provide a consistent approach to managing data flows that are already routinely occurring.

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| Name of Project | | |  | Changing Health | | |
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| Description of Routine Sharing Practice | | |  | Changing Health Ltd provides personalised behaviour change programmes for Type 2 diabetes management, prevention and weight loss.  This document provides a formal agreement and associated actions in relation to the sharing of personal and sensitive (special category data) patient data between GP surgeries, NEEDS, West Suffolk Hospital, and East Suffolk and North East NHS Foundation Trust. IESCCG, WSCCG and NEECCG will link Changing Health with the GPs.  Speciality Services, NEEDS, West Suffolk Hospital, and East Suffolk and North East NHS Foundation Trust. IESCCG, WSCCG and NEECCG will discuss with patients that meet the criteria (e.g. they are Type 2 Diabetic) the merits of joining the Changing Health service. If the patient agrees, they will be sent a text link to a web-based landing page where they can sign up for the service. Changing Health will provide the diabetes speciality service with updates relating to their patients on the programme, and their current status, including their health data. This data will then be inputted to the clinical system by the relevant team.  The sharing of data between changing health and speciality services is currently only scheduled to occur during the COVID-19 pandemic, after which it may return to only being the sharing of data between Changing Health and GP practices. At that point, as per below, this document shall be immediately reviewed to revise the routine sharing. | | |  |
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| Agreed Data Set | | |  | Demographic information including name, , email, phone number, date of birth, as well as:   * GP surgery * Programme Status * Weight | | |  |
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| Preferred Secure Transfer Method 1 (SystmOne) | | |  | Information will reside within the clinical system and the Changing Health system. | | |  |
| Preferred Secure Transfer Method 2 | | |  | Changing Health will email the relevant speciality service with the patient progress via email in the form of an encrypted spreadsheet to:  -- Adele Holcombe (NEEDS) - NEEDS Diabetes Service Manager - [adele.holcombe@nhs.net](mailto:adele.holcombe@nhs.net)  -- Laura Gilligan (ESNEFT) - [laura.gilligan@esneft.nhs.uk](mailto:laura.gilligan@esneft.nhs.uk)  -- Chris Kerry (WSH) - [chris.kerry@wsh.nhs.uk](mailto:chris.kerry@wsh.nhs.uk) | | |
| Other Methods | | |  | A link will be sent via text message to the patient to be able to sign up to Changing Health | | |
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| Secure Storage | | |  | Each party is responsible for secure storage of disclosed data as it remains in situ within their information asset. | | |
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| Retention Periods | | |  | Each party is responsible for retention of disclosed data as it remains in situ within their information asset. | | |  |
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| Legal Relationships | | |  | The process will involve sharing information from one Controller to another.  “Where the same personal data is processed by a series of parties in sequence, each using the data for a different purpose then they will remain separate controllers ...” (ICO Guidance) | | |  |
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| Fair Processing  / Right to Be Informed | | |  | In order to satisfy the common law duty of confidentiality and the data protection legislation “right to be informed” there is a requirement to ensure that patients are provided with sufficient information. Individuals must “reasonably expect” disclosures of their confidential information.  The parties must each include information about this initiative in their privacy notices and displayed in situ at all premises that provide information about their rights – including their right to object. | | |
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| Data Security | | |  | All signatories must;   * Have had data security and protection training within the last 12 months * Have confidentiality clauses within their employment contract * Have regard for internal protocols, in particular; * Make sure that any computer screens used to access the exchange cannot be seen by anyone who does not need to know. * Ensure that screens are locked when away from desk * Ensure that remote working practice complies with policies and procedures. * Take responsibility for keeping Personal Confidential Information secure and confidential whilst working remotely, including preventing incidental access by others in the environment | | |
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| Lawful Basis | | |  | |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | | **Purpose** | **DPA 2018 (personal data)** | **DPA 2018 (special cat)** | **GDPR (personal data)** | **GDPR (special cat)** | **ECHR Art 8** | **Common Law Duty of Confidentiality** | | Direct care to individual | Sch 9 s 5 (e) Public Task | Sch 10 s 10 8(1) Medical Purposes | Art 6 (1) (e) Public Task | Art 9 (2) (h) Medical Purposes | In accordance with the law  Proportionate | See DPIA | | | |

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| Patient Right to Object (Information Sharing Scripts) |  |  |

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| Incidents report to: |  | Emma Cooper, Suffolk GP Federation DPO  Paul Cook, DPO for Ipswich & East Suffolk CCG, West Suffolk CCG, North East Essex CCG |
| Access Rights Requests reported to: |  | Access requests shall be handled by each controller. When the patient is requesting information held regarding them from Changing Health, this request will be sent to [dpo.changinghealth@kaleidoscopeconsultants.com](mailto:dpo.changinghealth@kaleidoscopeconsultants.com) who will aid in providing the information requested. |
| Approved by: |  | A copy of this document should be provided to GPs, NEEDS, Diabetic Centres |
| Approval date: |  | April 2020 |
| Review date |  | This ISP will be reviewed in September 2020 to determine whether the sharing with the speciality services will continue after COVID-19 is downgraded from pandemic unless it is downgraded before this date, in which case it will be reviewed as soon as possible after downgrade. |
| In case of queries about the content of this document contact: |  | [Emma.cooper@kafico.co.uk](mailto:Emma.cooper@kafico.co.uk)  [Paul.Cook14@nhs.net](mailto:Paul.Cook14@nhs.net) |