

## MedICU Outreach software

### Details of Project

#### 1.1 Name

MedICU Outreach software

#### 1.2 Background and Purpose

National requirement to collect data on ICCU Outreach activities for benchmarking/audit purposes. This software will enable ICCU Outreach staff to collect data at the point of delivery on a hand-held tablet. The software is used nationally including other local NHS Trusts. The purpose of collecting this data is to support the further advancement of ICCU Outreach care.

#### 1.3 Cross reference to other/previous projects/PIAs?

No

→ cross ref any other NHS multi agency databases.  
eg S4H.  
other screening programmes

#### 1.4 Cross Reference Details (if applicable)

n/a

#### 1.5 Current Information Asset Owner(s) (IAO)

→ responsible person.

- Group Manager - CCSD

#### 1.6 System/Process Administrator(s)

- Associate Directorate Manager - CCSD

## Screening Questions

The following questions relate to your intended use of personal information and the risks that this may introduce to the organisation. It will help to ensure compliance with our legal obligations under data protection legislation.

2.1 Will you be using new technology and/or processes to store, share or process personal information? • No

Yes Medication Software.

2.2 Will you be using new technology that may be seen as intrusive, such as face recognition, biometric scanning? • No

2.3 Will the personal information be used or shared in a new way or for a different reason (i.e. not an existing one)? No

Yes benchmarking / audit

2.4 Will there be any changes to current technical or organisational safeguards or processes which may introduce new or increased risks when handling personal information? No

There should be SOP's in place.

2.5 Will you be using information that people would consider private or sensitive e.g. health records, criminal records? Yes

2.6 Will you be contacting people in ways they may not expect or may find intrusive? (i.e. different to the way they were originally contacted) No

2.7 Will you be regularly sharing personal information with people and/or organisations (i.e. third party) that you have not shared it with before? • No

Yes new piece of software.

Shared in a group of others with app.

? Who has access

?

Should be yes?

## GDPR Principles Section

The following questions should help to identify where the project might be at risk of failing to comply with the General Data Protection Regulations (GDPR).

### Identifying Information

3.1 What personal information will be used? (please tick all that apply)

Name

Address (inc. postcode)

Date of Birth

Unique identifiers (please give details below)

3.2 Unique identifiers details (e.g. Customer reference number)

Hospital Number

NHS Number

3.3 What special category information will be used? (please tick all that apply)

Physical/Mental Health

Ethnic origin

3.5 Who is providing the information or with whom is it being shared? (please give details of all relevant departments/directorates) *not answered.*

We do not expect to share this information with the software manufacturer - unless there is a critical problem with the system that cannot be resolved locally.

If this occurs we will send a 'snapshot' of affected data to the manufacturer for analysis / resolution.

The manufacturer will not store patient data and have specialist data cleansing software (WipeFile) already in use.

3.6 Is the information being provided by or to one or more external (third party) organisations? (If Yes, please give full details contained in the Information Sharing Agreement below)

No *?*  
*yes*

3.7 Information sharing details No confidential patient data will be shared.

Ultimately non-identifiable data will be shared with other NHS organisations for benchmarking purpose.

## Fair, Lawful and Transparent

4.1 How will you inform individuals about the use of their information? (e.g. privacy notice on a form, by letter)

n/a

4.2 Have you established which legislation permits the use of the information?

Yes (please give details below)

4.3 Legislation NHS Trusts National Health Service and Community Care Act 1990

NHS England's powers to commission health services under the NHS Act 2006 or to delegate such powers

251B of the Health and Social Care Act 2012

4.4 Are you relying on the consent of an individual to use their information?

No (please give details below of the lawful grounds being used)

4.5 Further details

GDPR Article 6 (1)(e) Condition for processing personal data

GDPR Article 9 (2)(h) Condition for processing special categories (sensitive data)

4.6 Do you need to amend your privacy notices? (please provide details as to why)

No *why not?*

4.7 Privacy notice details

We feel that the Trust's over-arching privacy notice covers us in this regard.

**Processed for specific purpose(s) and not used for incompatible purposes**

5.1 Will new information be collected?

No

5.2 Collection details

5.3 Does the plan cover all the purposes for using the information?

Yes

5.4 Details of purposes not covered

5.5 Have any new purposes been identified?

No

5.6 New details

5.7 Does it include data matching?

No

**Processing is adequate, relevant and necessary**

6.1 Is the information relevant for the stated purpose(s) (including any information provided by or to a third party organisation/contractor)?

Yes (please explain below)

6.2 Further details

The objective of data collection is to collect ICU Outreach activity and then this data will be analysed to assist understanding the impact and benefits of outreach interventions on the critically ill patient. We will also use this data to benchmark against other NHS organisations. The information that we intend to collect is entirely relevant for these purposes.

6.3 Is the information the minimum required for the purpose?

Yes

**Personal information is not kept longer than necessary**

7.1 Have you identified the retention period(s) for this information? (please provide further details below)

Yes

7.2 Retention Details

Indefinite retention - as per clinical data saved on Clinical Web Portal. This is in line with the Trust Information Retention and Destruction of Records Policy.

7.3 How will you ensure that it will be destroyed in line with this retention period (including that provided to any third party)

n/a

7.4 How will you ensure it will be destroyed securely (including that provided to any third party)?

n/a



**Personal information is accurate, kept up to date and errors erased or rectified**

8.1 Have you ensured the information is accurate and up to date (including any provided by or to a third party organisation/contractor)? (Please provide further details below)

No

8.2 Details

We have not started to collect the data at this point in time - however once this system goes live, data will be updated daily whilst the patient is still an inpatient receiving Outreach care.

8.3 Can the information be amended or erased if required (including any provided by or to a third party organisation/contractor)? (Please provide further details below)

Yes

8.4 Details

All data collected using the MedicUs software is editable at the time of entry and also retrospectively.

**Appropriate measures to keep information secure**

9.1 Will 'cloud' technology/storage be used?

No

9.2 Details, including the location of the server(s) (e.g. UK, Ireland, USA)

9.3 Does it include 'Bring Your Own Device' (BYOD)?

No

9.4 Details

9.5 Does it include the ability to 'Work from Home/Remote Working'?

No

9.6 Details

9.7 Will Data Protection training (either new or an update) be required?

Yes

9.8 Details

9.9 Will the information be processed by a third party organisation/contractor?

No

9.10 Details

9.11 Has an Information Security Self Assessment been completed by the third party organisation/contractor? Yes (please provide further details below)

9.12 Details This has been completed by the software manufacturer... Mela Solutions Ltd.

## **Information is processed in accordance with the wishes of the individual**

10.1 Are you still able to provide a person with a copy of their personal information, should it be requested?

Yes

10.2 Details

10.3 If applicable, is there a procedure in place to allow a person to opt out of their information being used for marketing purposes?

Not Applicable

10.4 Details

10.5 If you are using a third party organisation/contractor, are they aware of their responsibilities under this legislation?

Yes (how have they shown awareness?)

10.6 Details

We are only using a third party contractor to provide software and to resolve any software problems.

In the unlikely event that they will be able to access our patient data, then they have provided us with assurance of compliance with IG / confidentiality legislation.

## **Transfer of personal information outside European Economic Area (EEA)**

11.1 Are you required to transfer information outside of the European Economic Area (EEA) (This could include the Cloud)? No