**Folkestone, Hythe and Rural PCN Hub Pilot
Information Governance**

**Key document to support PCN adoption of hub models**

A detailed DPIA has been worked up to assess and manage risks of the Folkestone Hythe and Rural PCN (FHR PCN) hub model which is available for download. This has identified supporting IG documents any adopting PCN would need to have in place if they wish to work in this way and below you will find a list of documents, the purpose of the documents, things to consider and access to resources.

**Note:** The completed IG for FHR PCN has specifically been tailored to a lead practice model implementing this PCN hub; and whilst there is little variation in the operational element of the project, differences are in the nuances of the supporting documentation to the DPIA to ensure you are happy it suits your local needs and agreements.

Some of the documentation may be available upon request. You may also contact the pilot project team via england.seprimarycaretransformationteam@nhs.net

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| Supporting document | Purpose | Additional comments | Template (links) |
| A Joint Controller’s Data Sharing Agreement | To set out the rights and responsibilities of each contributing data controller (GP practice members of the PCN). In a lead practice model, this could include a clause on how all risks are equally distributed amongst all members of the PCN, to minimise extra risks/additional burden to the lead practice. | As a functioning (funded) PCN, PCNs should already have a JCA or a DSA (terminology vary but usually mean the same thing) governing the flow of data for their typical PCN work. This may be reviewed and adapted to suit the standing up of the PCN hub model.Alternatively, a new document may be worked up.  | You may adapt the NHS England’s Data Sharing Agreement template available here: <https://transform.england.nhs.uk/information-governance/guidance/data-sharing-agreement-template/> Also, what should be in a JCA template is available on the ICO website here: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/data-sharing/data-sharing-a-code-of-practice/data-sharing-agreements/> Alternatively, the FHR PCN JCA is available upon request (subject to acknowledgement that it has been drafted specifically for them, and must not be adopted verbatim without review) |
| Privacy notice | For a lead practice model: Member GP Practices to update their privacy notice with the data flow to the PCN’s clinical system. A flat structure: Where the PCN is a separate legal entity, it should have its own patients’ facing privacy notice which should detail the PCN hub work. | Where PNs are already in place either at GP practice level or a in a flat structure model, this should be reviewed and updated with the PCN hub work. | Where the GP Practice or the PCN legal entity does not have a PN, they can find a generic template to start off on the ICO website here: <https://ico.org.uk/for-organisations/sme-web-hub/make-your-own-privacy-notice/> An excerpt of the specific section on the PCN hub work for FHR PCN member practices is available upon request (however this will more likely than not be out of context for others to adopt). |
| Record of processing activities (ROPA) (and the Information register asset) | To record the flow of data from the GP practices to the PCN clinical system and vice versa.The information asset register to include all assets holding data at PCN level.  | Similar to the privacy notice, in a lead practice model, individual practices should update their ROPA with the data flow to the PCN; and in a flat structure, a PCN specific ROPA should be worked up. | All GP Practices as data controllers must have a ROPA, however, where one is required, a template is available on the ICO website here: [gdpr-documentation-controller-template.xlsx (live.com)](https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fico.org.uk%2Fmedia%2Ffor-organisations%2Fdocuments%2F2172937%2Fgdpr-documentation-controller-template.xlsx&wdOrigin=BROWSELINK)Or the FHR version is available upon request (this document must not be adopted verbatim without review as it would have to be personalised to specific model approach looking to build). |
| Information security (IS) risk assessment  | This must be completed on the system to be used to process patients’ data to check their security and resilience.  | FHR has completed theirs for EMIS.  | All certifications for EMIS are listed below, however this does not stop any PCN from completing their own IS risk assessment. Their information security framework has been risk assessed and they have the following subsisting certifications: * Cyber Essentials Plus
* ISO 27001:2013
* ISO 22301:2019
* ISO 9001:2015
* ISO 20000:2018
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