

Dumfries and Galloway

IJB Audit and Risk Committee

Date: 9th March 2020

This Report relates to Item 10 on the Agenda

Data Sharing (Risk Update)

Paper presented by Name(s) Graham Gault

For Noting

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List of Background Papers:			,			
Appendices:	Appendix	1: Data S	Sharing Ris	k Log		

1. Introduction

1.1 This paper presents the newly compiled Risk Register for Data Sharing between NHS and DGC as key operating bodies of the IJB. The paper is the first attempt and will mature as the level of Data Sharing increase over time.

2. Recommendations

2.1 The IJB Audit and Risk Committee is asked to:

• To note the risks identified and to sign off the listed risks as acceptable in terms of Management approach at this early stage of the initiative.

3. Background and Main Report

- 3.1 A Data Sharing Board has been created to oversee the recommendations asked by the DGC Scrutiny Committee to improve the level of sharing data across the Partnership.
- The work to date has been slow and is now picking up hence the need for a suitably detailed Risk Register to be created.
- 3.3 The risks cover Technical, Management, Information Governance and General Recommendations made by the Scrutiny Committee.

4. Legal and Risk Implications

4.1 The ISP is key to specifying how the sharing of data is allowed (or not) between the two Organisations. The normal compliance with the Data Protection Act and other Legal good practice guidance has been made to allow initial levels of data to be shared. There are risks to both Organisations in working together on this joint programme to uphold our responsibilities within the remit of Information Governance.

5. Consultation

5.1 All members of the Data Sharing Board are being consulted on this Risk Register and associated processes..

6. Glossary

EQIA	Equalities Impact Assessment
IJB	Integration Joint Board

SERVICE DELIVERY RISKS

Feb-20 = last accessed/Updated

							Current			1	
Risk	Description of risk		Likelihood	Likelihood sco					Risk Strategy		No Comments
1	MANAGEMENT: The Data Sharing Steering Group does not function effectively and progress does not meet expectations.	N/A	Possibly Occur	3	Major	4	High	12	Mitigate	DGC, NHS Lead Officers	1 Meet every 2 months 2 Weekly report on Progress now asked by COO 3 4 5
2	DGC Scrutiny Committee Recommendation 1 is not met: Electronic information data sharing systems should be enabled to share basic information by the end of 2018.		Almost certain	5	Moderate	3	High	15	Mitigate	DGC, NHS Lead Officers	Delays in matching data being addressed Delays in secure file transfer facility being addressed. Delays in extract file being addressed being addressed. Bemote access to Mosaic enabled for identified NHS users and has been for some time for some time
3	DGC Scrutiny Committee Recommendation 2 is not met: Dumfries and Galloway Council should ensure the reporting and monitoring of the transition phase, which will include staff from the Council and NHS Dumfries and Galloway sharing increased amounts of information through a		Almost certain	5	Moderate	3	High	15	Manage	DGC, NHS Lead Officers	This is being managed through changes with the ISP which changes to 1 reflect modifications to the data items being agreed to be shared. 2 3 4 5 6
4	DGC Scrutiny Committee Recommendation 3 is not met: Consider the scope for improving data sharing further across all sectors beyond 2019 as confidence and initial benefits are realised.		Possibly Occur	3	Minor	2	Medium	6	Manage	DGC, NHS Lead Officers	Is there a benefits definition or realisation framework agreed by the practitioners? This is an extensive piece of work which will needs to follow on from the implementation of sharing arrnagements across the two statutory agencies; a realistic timeframe needs to be consdiered for this to have full 3 4 5 6
5	DGC Scrutiny Committee Recommendation 4 is not met: To make full use of mobile technologies for practitioners in the field to access and update data for clients		Remote Possiblility	2	Minor		Medium	4	Mitigate	DGC, NHS Lead Officers	Social Work issued laptops, iphones and have offline form capability and 1 remote netowrk access available already. 2 Discussions with Servelect/Total/Mobile re integrated mobile solution 3 Online Mosaic portal will enable citizen self service - target go-live July 2020 4 NHS staff already have MORSE to record remtely directly into the 5 6
6	DGC Scruting Committee Recommendation 5 is not met: Develop a single consent process for clients, including a review and update process for additional permissions and changes to circumstances.		Possibly Occur	3	Moderate		Medium	9	Manage	DGC, NHS Lead Officers	1 Not discussed yet! 2 3 4 5 6
7	DGC Scruting Committee Recommendation 6 is not met: Through improved data sharing, maximise the opportunity to schedule work across the Council and NHS Dumfries and Galloway in the most efficient and effective way to benefit the user.	31-Dec-21	Possibly Occur	3	Moderate	3	Medium	9	Tolerate	DGC, NHS Lead Officers	Dynamic scheduling solution being procured within Council which could be expanded for use in HSCl 2 Not really discussed in detail yet. 3 4 5 6

Appendix 1 Con'd

SERVICE DELIVERY RISKS

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							Current					
Risk	Description of risk	Required by?	Likelihood	Likelihood sco					Risk Strategy	Risk Owner		Comments
8	INFORMATION GOVERNANCE: The Information Governance using the ISP cannot be agreed between the NIHS and DGC and therefore does not allow Users to Use the developed solution.	31-Dec-19	Possibly Occur	3	Major	4	High	12	Manage	DGC Legal Dept. NHS CLO	1 2 3 4 5	
9	MANAGEMENT: The PORTAL is not used by the user community in NHS/DGC.		Possibly Occur	3	Moderate		Medium	Э	Manage	H Collington	2 3 4 5	
10	TECHNICAL: Patient matching not effective due to Demographic Discrepancies. Incorrect <i>l</i> inaccurate information shared or disclosed.	ASAP	Possibly Occur	3	Moderate	3	Medium	9	Manage	DGC+NHS	2 3 4 5	
11	MANAGEMENT: Information not shared within appropriate timescales. Information not available when decisions are made by NHS/DGC teams.	N/A	Possibly Occur	3	Major	4	High	12	Manage	DGC+NHS	1 2 3 4 5	
12	INFORMATION GOVERNANCE: The implementation of, or the actual Information Sharing Agreement, is incorrect. Resulting in either too much information being shared than is appropriate, or not enough information to positively affect the care offered. This must be		Possibly Occur	3	Moderate	3	Medium	9	Manage	DGC Legal Dept. NHS CLO	2 3 4 5 6	
13	INFORMATION GOVERNANCE: The Chronology of Significant Events stays independently managed across organisations so key information may be missed.		Will probably occur	4	Moderate	3	High	12	Manage	DGC+NHS		
14	TECHNICAL: Orion PORTAL are unable to present Mosaic Information within the Portal.		Possibly Occur		Moderate		Medium	9	Manage	General Manager ICT - NHS	2 3 4 5	
15	MANAGEMENT: Funding availability is not in line with the requirements of the requirements? Changes made by the Service.	Ongoing	Possibly Occur	3	Major	4	Medium	9	Manage	C00s		