

## Data Protection Impact Assessment (DPIA)

Section A - Key Information	
<i>please be as comprehensive as possible</i>	
Name of Project	STP General Practice Nurse Strategy
Project Reference Number	N/A
Project Lead Name	Liz Corrigan
Project Lead Title	Primary Care Quality Assurance Coordinator
Project Lead Contact Number & Email	<a href="mailto:liz.corrigan@nhs.net">liz.corrigan@nhs.net</a> 01902 444275/07795 686725
Date completed	14 <sup>th</sup> February 2019
Information Asset Owner <i>The senior person(s) or organisation (e.g. Provider) responsible for the system/software/process</i>	Wolverhampton CCG
Description of project:	<p><b>Aim</b> The aim of this strategy and supporting documents is to provide a forward view for general practice nursing for the Black Country.</p> <p><b>Objectives</b></p> <ul style="list-style-type: none"> <li>• Align the strategy content to reflect and support the actions within national and STP documents such as <ul style="list-style-type: none"> <li>○ <u>10 Point Action Plan for GPNs</u></li> <li>○ <u>GP Forward View</u></li> <li>○ <u>NHS Long Term Plan</u></li> <li>○ STP Clinical, Workforce and Primary Care strategies</li> </ul> </li> <li>• To provide an outline of good practice using the <u>principles of compassionate care</u></li> <li>• To provide a suite of companion documents that offer: <ul style="list-style-type: none"> <li>○ A career progression framework aligned to the <u>HEE career and education framework for</u></li> </ul> </li> </ul>

	<p><u>GPNs</u></p> <ul style="list-style-type: none"> <li>○ A competency framework based on the <u>RCGP GPN</u> framework</li> <li>○ An induction and preceptorship framework based on existing programmes e.g. <u>Capital Nurse</u></li> <li>○ Guidance around Clinical Supervision for GPNs</li> <li>○ A retention strategy for GPNs</li> </ul> <p><b>Strategy Overview</b></p> <p>The General Practice Nurse Strategy provides a framework for a STP-wide nursing plan through seven domains and partners within the STP have agreed to:</p> <ul style="list-style-type: none"> <li>• Support excellence in care through learning in association with patients, their families and service users.</li> <li>• Increase focus on quality and continually seek to improve the care provided.</li> <li>• Encourage the best nurses to join practices within the Black Country STP footprint and embrace diversity through skilled appointments.</li> </ul> <p>Seven domains have been identified to support the implementation of the strategy and its companion documents:</p> <ol style="list-style-type: none"> <li>1. Having the right staff in the right place at the right time</li> <li>2. Team Structure</li> <li>3. Education and Development</li> <li>4. Excellence in care</li> <li>5. Digital Technology</li> <li>6. Research and Innovation</li> <li>7. Communication</li> </ol> <p>In addition to this the principles of <a href="#">Compassionate Care</a> will also be applied to support the implementation of the strategy.</p> <p>This strategy was originally developed by Lisa Clarke formerly of Walsall CCG (now of University of Wolverhampton) who has been involved in the strategy consultation.</p> <p>The strategy will provide best practice guidance for GP practices and all GPNs, Nursing Associates, Associate Practitioners and HCAs as supported by local nurse forums, CCG lead nurses, LMC and Practice Manager groups.</p>
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<b>Will the project involve any data from which individuals could be identified (including pseudonymised data)?</b>	<b>No</b>
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**IF THE ANSWER TO THE ABOVE IS “NO” AND THE PROJECT WILL **NOT** INVOLVE ANY DATA FROM WHICH AN INDIVIDUAL COULD BE IDENTIFIED, YOU DO NOT NEED TO ANSWER ANY FURTHER QUESTIONS AND A FULL DPIA IS NOT REQUIRED.**

**Please forward only Section A to the IG Officer for Arden & GEM CSU.**

Email: [Kelly.Huckvale@nhs.net](mailto:Kelly.Huckvale@nhs.net)

The IG Officer will review and return the form with the below section completed, the form can then be presented to the relevant board for approval and sign off.

**IF THE ANSWER TO THE ABOVE IS “YES” PLEASE COMPLETE SECTION B.**

**Sign Off / Approval (Section A only)**

<b>Title</b>	<b>Name</b>	<b>Date</b>
<b>Project Lead</b>	Liz Corrigan	19 <sup>th</sup> March 2019
<b>IG Officer</b>	Kelly Huckvale	26 <sup>th</sup> March 2019
<b>IG Officer Comments</b>	I have reviewed this DPIA and as it relates to a strategy document and the project lead has confirmed that no sharing of identifiable data will take place, I am happy to approve this DPIA and confirm that a full DPIA is not required at this stage.	

**The Project lead will then present section A of the DPIA to the relevant board for approval**

<b>Programme Board</b>		Date:
<b>Programme Board Chair</b>		Date:

## Section B – Screening Questions

Screening Questions	By CCG	By Provider
	YES or NO	YES or NO
Will the project involve the collection of <b>new</b> information about individuals?	No	No
Will the project compel individuals to provide new information about themselves?	No	No
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	No	No
Will the project use information about individuals for a new purpose or in a new way that is different from any existing use? <b>NB You will need to consider whether identifiable information may be required to evaluate the project.</b>	No	No
Does the project involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.	No	No
Will the project result in you making decisions about individuals in ways which may have a significant impact on them? e.g. service planning, commissioning of new services	No	No
Is the information to be used about individuals' health and/or social wellbeing?	No	No
Will the project require you to contact individuals in ways which they may find intrusive?	No	No

If the answer to **ALL** of the CCG and the Provider screening questions in section B are both answered “NO”, you **do not** need to complete Section C of the DPIA. Please return Section A and B to the IG Officer for sign off.

If the answer to ALL of the CCG screening questions is “NO” but one or more answer to any of the Provider screening questions is “YES”, then please liaise with the Provider to ensure a DPIA is completed (by the Provider) and the provider’s DPIA is evidenced to the CCG before commencement of the project/service.

Please return Section A and B to the IG Officer for Audit.

If the answer to any of the screening questions is “YES” for the CCG **AND** the Provider - **a full DPIA will need to be completed.**

**Please liaise with the IG Officer for an initial discussion before completing Section C.**



**Sign Off / Approval (Section A & B only)**

Title	Name	Date
Project Lead	Liz Corrigan	19 <sup>th</sup> March 2019
IG Officer		
IG Officer Comments		

The Project lead will then present Section A & B of the DPIA to the relevant board for approval		
Programme Board		Date:
Programme Board Chair		Date:

**Section C - Full DPIA**

<b>C1. Key Contacts</b>	
Key Stakeholder Names & Roles:	

<b>C2. Use of personal information</b>	
Description of data:	
What is the justification for the inclusion of identifiable data rather than using de-identified/anonymised data?	
Will the information be new information as opposed to using existing information in different ways?	
Will the project involve new or inherently privacy-invasive technologies e.g. Biometrics, facial recognition, Smart Device/ Apps?	
What is the legal basis for the processing of identifiable data?  If consent, when and how will this be obtained and recorded?	
Who will be able to access identifiable data?	
Will the data be linked with any other data collections? How will this linkage be achieved and what is the legal basis for these linkages?	

<p><b>What security measures will be used to transfer the data?</b></p>	
<p><b>What confidentiality and security measures will be used to store the data?</b></p>	
<p><b>How long will the data be retained in identifiable form? And how will it be de-identified? Or destroyed?</b></p>	
<p><b>What governance measures are in place to oversee the confidentiality, security and appropriate use of the data and manage disclosures of data extracts to third parties to ensure identifiable data is not disclosed or is only disclosed with consent or another legal basis?</b></p>	
<p><b>Are procedures in place to provide individuals access to records on request under the subject access provisions of the Data Protection Act 2018 and General Data Protection Regulations?</b></p> <p><b>Is there functionality to respect objections/ withdrawals of consent?</b></p>	
<p><b>Are there any plans to allow the information to be used elsewhere either in the CCG, wider NHS or by a third party?</b></p>	

**C3. Describe the information flows - The collection, use and deletion of personal data should be described here and it may also be useful to refer to a flow diagram or another way of explaining data flows.**

<p><b>Does any data flow in identifiable form? If so, from where, and to where?</b></p>	<p>1.</p>
<p><b>Media used for data flow?</b>  (e.g. email, fax, post, courier, other – please specify all that will be used)</p>	

#### **C4. Consultation requirements**

Part of any project is consultation with stakeholders and other parties.

In addition to those indicated “Key information, above”, please list other groups or individuals with whom consultation should take place in relation to the use of person identifiable information.

It is the project’s responsibility to ensure consultations take place, but IG will advise and guide on any outcomes from such consultations.

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#### **C5. Privacy Risks**

List any identified risks to privacy and personal information of which the project is currently aware. Risks should also be included on the project risk register.

<b>Risk Description</b>  (to individuals, to the CCG or to wider compliance)	<b>Proposed Risk solution (Mitigation)</b>	<b>Is the risk reduced, transferred or accepted? Please specify.</b>	<b>Consequence Score</b>  1= Low 1= Medium 3= High	<b>Likelihood Score</b>  1=Low 2= Medium 3=High	<b>Risk Score</b>  (C x L)	<b>Further detail if required</b>




**C6. Further information**

Please provide any further information that will help in determining privacy impact.

Once Section A, B and C has been completed, please send the completed DPIA to the Information Governance Officer who will review the impact and determine how the impact will be handled.

This will fall into three categories:

1. No action is required by IG excepting the logging of the Screening Questions for recording purposes.
2. The questionnaire shows use of personal information but in ways that do not need direct IG involvement – IG may ask to be kept updated at key project milestones.
3. The questionnaire shows significant use of personal information requiring IG involvement via a report and/or involvement in the project to ensure compliance.

It is the intention that IG will advise and guide those projects that require it, but at all time will endeavour to ensure that the project moves forward and that IG is not a barrier - unless significant risks come to light which cannot be addressed as part of the project development.

**IG Sign Off / Approval (Section A, B & C only)**

Title	Name	Date
Project Lead		

<b>IG Officer</b>		
<b>IG decision</b>  <b>(delete as applicable)</b>	<ol style="list-style-type: none"> <li>1. No action is required by IG excepting the logging of the Screening Questions for recording purposes.</li> <li>2. The questionnaire shows use of personal information but in ways that do not need direct IG involvement – IG may ask to be kept updated at key project milestones.</li> <li>3. The questionnaire shows significant use of personal information requiring IG involvement via a report and/or involvement in the project to ensure compliance.</li> </ol>	
<b>IG Officer Comments:</b>  		

<b>Once the IG lead has approved the DPIA, it may be sent to the Data Protection Officer to review and add any comments or provide advice (if required)</b>	
<b>DPO Advice (if required):</b>	
<b>DPO Name:</b>	<b>Date:</b>

<p><b>Once the DPO has reviewed the DPIA (where applicable), this will be issued to the Project Lead and IG Lead for audit.</b></p> <p><b>The Project lead will then present the completed DPIA to the relevant board for approval</b></p>	
<b>Board</b>	

<b>Board Chair</b>		<b>Date:</b>
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