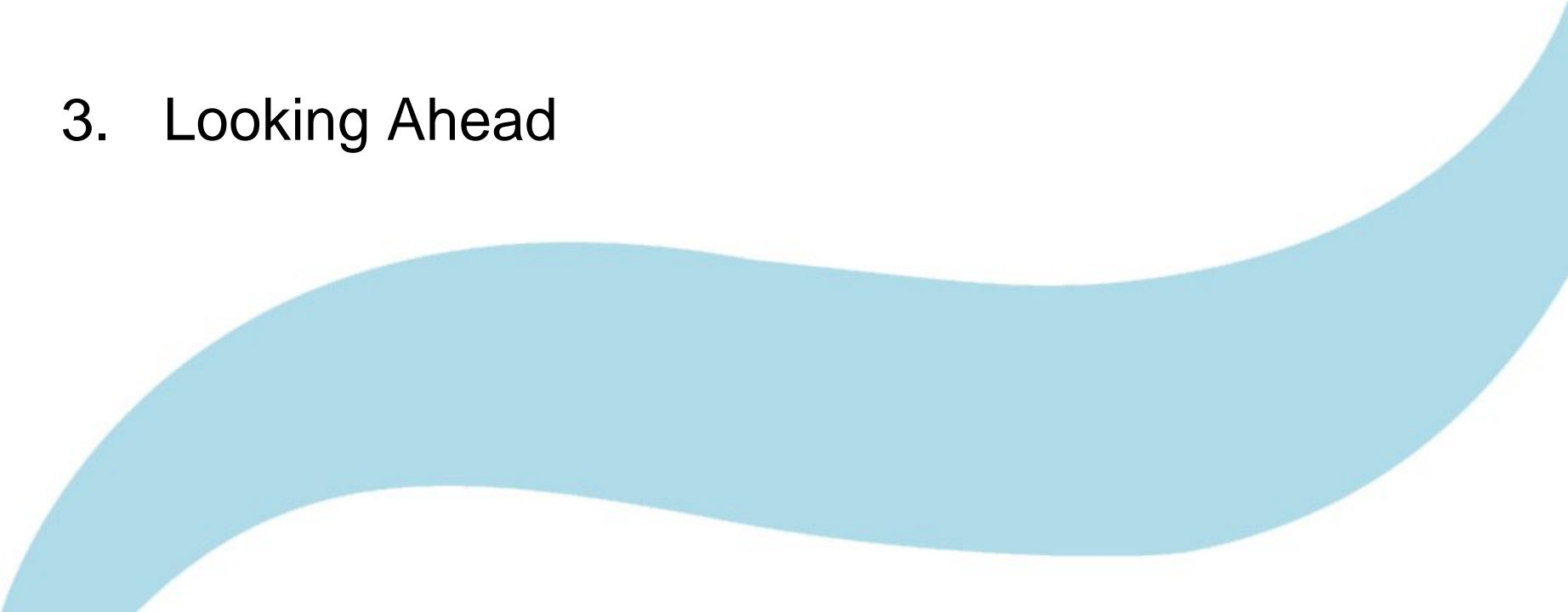


# Our Privacy Impact Assessment (PIA) Experience

*Patricia Ruddy*  
*NSS Data Protection Advisor*

# Our PIA experience....

1. About NHS National Services Scotland (NSS) and its Information Services Division (ISD)
  2. The PIA
  3. Looking Ahead
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# 1. About NSS...

Working at the very heart of the health service, we deliver services critical to frontline patient care and in support of the efficient and effective operation of NHS Scotland

<http://www.nhsnss.org/index.php?id=2>

# About NSS...

- A non-departmental public body
- Special Health Board
  - Legal name ‘The Common Services Agency for the Scottish Health Service’
- Provide national strategic support services and expert advice to NHS Scotland through a number of divisions
- 3600 staff based in a number of locations across Scotland

# About NSS...

## Health Support

Health Facilities Scotland  
Health Protection Scotland

## ***Information Services Division(ISD)***

National Services Division  
Scottish National Blood  
Transfusion Service

## Business Support

Central Legal Office  
Counter Fraud Services  
National Information  
Systems Group  
National Procurement  
Practitioner Services  
Scottish Health Service  
Centre

# About ISD...

- Scotland's national organisation for health information and statistics <http://www.isdscotland.org/isd/401.html>
- Works in partnership with health boards, hospitals, GPs, local authorities, voluntary organisations and others to analyse data to inform research, support decision making and stimulate debate
- 'Scotland has some of the best health service data in the world combining high quality, consistency, national coverage and the ability to link data to allow patient based analysis and follow up.'

# About ISD...

- Recent publications highlighted in our September 2009 Customer Update
  - Births in Scottish hospitals financial year 2007/2008
  - Drug Treatment Waiting Times Information Framework Report April-June 2009
  - Scottish Stroke Care Audit 2009 National Report: Stroke Services in Scottish Hospitals. Data relating to 2007-2008
  - Scottish Electroconvulsive Therapy (ECT) Accreditation Network Annual Report 2009, reporting on 2008
  - NHS Complaints

## 2. The PIA

- Why
- Approach
  - Overall
  - Key Aspects
- Outcome

# Why?

- A substantial and strategic development: Scottish Health Information Service (SHIS) programme
- Current Situation
  - NHS activity data provided to ISD and stored and managed centrally
    - Patient, workforce, complaints
- SHIS Vision
  - Modernise the way this data held and accessed, supporting local use, with enhanced information governance and security of patient identifiable data

# Overall Approach

May 2007	Decision to conduct a PIA
June 2007	Meeting with Assistant Information Commissioner for Scotland
June- December 2007	Scoping work, establish Steering Group, methodology drafted
December 2007	<ul style="list-style-type: none"><li>•UK ICO launched its PIA Handbook</li><li>•First meeting of PIA Steering Group</li></ul>

# Overall Approach

January 2008	Compare approach with that of ICO PIA Handbook and questionnaire agreed
February to April 2008	Questionnaire on organisational privacy management and project (SHIS) privacy management completed
End April 2008	PIA Steering Group reviewed questionnaire returns and completed its privacy impact assessment
Summer 2008 onwards	Finalisation of report and creation of a 'PIA-lite' template for division-wide use

# Approach- Key Aspects

1. Senior level sponsorship
  - Divisional Director and Caldicott Guardian
2. External Steering Group
  - Lay, Government, end users, privacy experts
3. PIA Project Manager (0.7 wte for 6 months)
4. Questionnaires
  - Organisational Privacy Management
  - Project (SHIS) Privacy Management
  - Steering Group Privacy Impact Assessment

# Outcome

1. 3 main actions and report produced summer 2008
  - Access, security, audit
  
2. Conclusion: the PIA was useful!
  - It had obliged NSS to clarify the risks and benefits involved in this strategic programme
  - It had improved communication between the various agencies involved
  - It had helped technical and governance aspects of the project to progress in step

# 3. Looking Ahead

## **SHIS**

- Progress the recommendations
- Recommendations at different levels - SHIS, ISD, NSS, national
- PIA Steering Group disbanded and monitoring passed to the SHIS Programme Board

## **ISD**

- 'PIA-lite' developed and stored with part of the division's project governance document templates
- Awareness-raising

## **(Rest of) NSS**

- Currently planning with divisional Data Protection leads how to embed and raise awareness
- Link in with our already established Data Protection Compliance Checklist