

# Regional Health and Social Care Information Sharing Agreement

COPI policies from April 2020 review (Jan 2022)

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### **Policy – Team User Accounts for Emergency Departments and COVID-19 Wards**

The general user access policy for Connected Care is for users to have individual and named user accounts. This may be achieved either by direct access accounts for Connected Care or by named and auditable user accounts in operational systems that use context launch to access Connected Care.

To facilitate an efficient COVID-19 response and process the Connected Care programme will allow team rather than individual personal user login credentials in a small number of settings where there is the potential for Connected Care not to be used as a result of operational pressures arising from high levels of urgency.

IGSG approves this policy change for the duration of the COVID-19 crisis or until IGSG rescinds the policy, whichever comes first.

### **Settings in which the policy applies**

The settings to which this policy applies are as follows:

1. Accident and Emergency Departments.
2. COVID-19 wards.
3. COVID-19 hubs.

## **Policy – Advance Care Plan Information from Primary Care**

The general policy for approving data flows into Connected Care is for data controller organisations to receive and approve Regional ISA sharing schedules as a first step before the data flows are initiated. As a second step, data flows are subsequently initiated by the practice itself approving the sharing arrangement within the GP Clinical System.

To facilitate an efficient COVID-19 response and process and to allow this important data to flow into the Connected Care system as rapidly as possible GP data controllers will be asked to approve the data flow based on the second step alone.

IGSG approves this policy change for the duration of the COVID-19 crisis or until IGSG rescinds the policy, whichever comes first.

For the processing to continue after the end of the COVID-19 crisis data controller organisations will be provided with the standard Regional ISA sharing schedules for approval.

## **Rationale**

The rationale for this policy is as follows:

1. Currently insufficient ACP information is available in Connected Care to facilitate an efficient COVID-19 response and process for patients with Advance Care Plans.
2. As a consequence the Connected Care programme has been asked to add a “GP EOL Care Plan tile” to Connected Care.
3. Some of the detail in the GP EOL Care Plan tile already flows into Connected Care. Some however does not currently flow and an additional sharing agreement would normally need to be implemented within GP systems.
4. Connected Care provides a secure and well controlled platform for accessing health and social care data as evidenced by the Connected Care Clinical Platform DPIA (<http://www.regisa.uk/documents/DPIA0001v3Publish.pdf>).
5. The delay involved in applying the normal data flow approval process from practices would materially impact the Frimley ICS and Berkshire West COVID-19 response.

### **Policy – Primary Care Free Text Data Display**

Free text data associated with coded data in GP clinical systems currently flows into Connected Care but is not presented to users through the Connected Care Clinical Console.

To facilitate an efficient COVID-19 response and process and to allow this important data to be made available to end users as rapidly as possible IGSG approves the presentation of the free text data to end users through the Connected Care Clinical Console.

IGSG approves the presentation of the free text data to end users through the Connected Care Clinical Console for GP free text data recorded on or after 1<sup>st</sup> April 2020.

IGSG does NOT approve the presentation of the free text data to end users through the Connected Care Clinical Console for GP free text data recorded before 1<sup>st</sup> April 2020.

Although the data flow is expected to significantly benefit the Frimley ICS and Berkshire West COVID-19 responses the policy is not restricted to the COVID-19 response.

### **Rationale**

The rationale for this policy is as follows:

1. Currently insufficient consultation detail is presented through Connected Care to facilitate the most effective COVID-19 response and process for patients.
2. As a consequence, the Connected Care programme has been asked to present GP free text data to end users through Connected Care.
3. The GP free text data already flows into Connected Care.
4. Connected Care provides a secure and well controlled platform for accessing health and social care data as evidenced by the Connected Care Clinical Platform DPIA (<http://www.regisa.uk/documents/DPIA0001v2Publish.pdf>).
5. The delay involved in applying the normal data processing change approval process from practices would materially impact the Frimley ICS and Berkshire West COVID-19 response.

## **Policy – Primary Care Consultation Data**

The general policy for approving new and revised processing and data flows associated with Connected Care is for data controller organisations to receive and approve Regional ISA sharing schedules as a first step before the processing and data flows are initiated. As a second step, data flows are subsequently initiated by the practice itself approving the sharing arrangement within the GP Clinical System.

To facilitate an efficient COVID-19 response and process and to allow this important data to be made available through the Connected Care system as rapidly as possible GP data controllers will be asked to approve the data flow based on the second step alone.

IGSG approves this policy change for the duration of the COVID-19 crisis or until IGSG rescinds the policy, whichever comes first.

IGSG approves the flow and processing of GP consultation data recorded on or after 1<sup>st</sup> April 2020.

IGSG does NOT approve the flow and processing of GP consultation data recorded before 1<sup>st</sup> April 2020.

For the processing of detailed primary care consultation data to continue after the end of the COVID-19 crisis data controller organisations will be provided with the standard Regional ISA sharing schedules for approval.

## **Rationale**

The rationale for this policy is as follows:

1. Currently insufficient consultation detail is available in Connected Care to facilitate the most effective COVID-19 response and process for patients.
2. As a consequence, the Connected Care programme has been asked to add GP consultation data to Connected Care.
3. Some of the GP consultation detail already flows into Connected Care. Some however does not currently flow and an additional sharing agreement would normally need to be implemented within GP systems.
4. Connected Care provides a secure and well controlled platform for accessing health and social care data as evidenced by the Connected Care Clinical Platform DPIA (<http://www.regisa.uk/documents/DPIA0001v2Publish.pdf>).
5. The delay involved in applying the normal data flow approval process from practices would materially impact the Frimley ICS and Berkshire West COVID-19 response.

### **Policy – Household Members with COVID-19**

To facilitate an efficient COVID-19 response and process and to improve the safety and effectiveness of the various clinical triage arrangements the Connected Care programme will provide additional data processing and alerting regarding household members' COVID-19 status.

To support clinical triage by registered clinical professionals, the additional processing will match people who have the same address as a COVID positive or suspected COVID positive patient. Alerts will be generated in Connected Care Clinical Platform for the people with this address correlation when they request or present for care.

The additional data processing does not disclose the household member's personal details and identity.

The general policy for approving new processing using Connected Care is that, if the processing is not fully covered by existing data controller approvals, the data controller organisations receive and approve Regional ISA sharing schedules as a first step before the processing is initiated.

IGSG approves this additional processing without the need for individual data controller approvals for the duration of the COVID-19 crisis or until IGSG rescinds the approval, whichever comes first.

### **Rationale**

The rationale for this policy is as follows:

1. All of the data currently flows into Connected Care.
2. Connected Care provides a secure and well controlled platform for accessing health and social care data as evidenced by the Connected Care Clinical Platform DPIA (<http://www.regisa.uk/documents/DPIA0001v2Publish.pdf>).
3. The household member's personal details and identity are not disclosed.
4. Although there is a small risk that the COVID health status of third parties is disclosed there is a strong Public Health and public interest legal basis for the processing.
5. The delay involved in applying the normal data flow approval process from all Connected Care data controllers would materially impact the Frimley ICS and Berkshire West COVID-19 response.
6. The processing is required and authorised by the Secretary of State's COPI (Control of Patient Information) notice for the COVID-19 response.

