

Regional Health and Social Care Information Sharing Agreement

Information Governance Steering Group 8th August 2023

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Policy – Delays Implementing Arrangements Approved by IGSG

It is recognised that from time to time, the implementation of membership and joint processing and sharing arrangements approved by IGSG under the Regional Health and Social Care Information Sharing Agreement may be delayed.

The policy for these delayed implementations is as follows:

1. Where implementation is delayed beyond three months of the original decision, the implementation decision needs to be reviewed by a member of IGSG before being completed;
2. Where the implementation relates to a new member joining the Regional ISA, the implementation may go ahead provided that the member's qualifying standard compliance status is materially equivalent to or improved from the organisation's status at the time of the decision;
3. Where the implementation relates to a joint processing and sharing arrangement, the implementation may go ahead provided that the arrangement remains materially consistent and compatible with the agreed:
 - a. DPIA covering the processing and sharing
 - b. Purpose and legal basis for the processing and sharing
 - c. Processing and privacy arrangement for the processing and sharing
 - d. Data flows and data types defined for the processing and sharing
 - e. User role arrangements for the processing and sharing;
4. In all other circumstances the arrangements must be resubmitted to IGSG for re-approval; and
5. The IGSG member reviewing the delayed implementation notifies IGSG of the review outcome at the IGSG meeting following the signing of the Regional ISA master agreement by the Care Home member.

This policy takes effect from 13th July 2021 and expires on the 30th April 2028.

Version 1 (final).