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# *Data Protection Impact Assessment*

***Short form for temporary usage on projects to maintain running of essential services during the COVID-19 outbreak***

This is simplified Data Protection Impact Assessment (DPIA) that has been developed for use with urgent Data Protection / IT developments during the COVID-19 Coronavirus outbreak, so as to not delay the development / deployment of essential services during the pandemic. It has been designed to ensure rudimentary due diligence in line with Data Protection legislation, so as to capture and manage any immediate Data Protection concerns. It does not cover all elements required of a standard DPIA that would be used within a Business As Usual scenario. Consequently, **once the immediate pandemic situation has subsided, the Team implementing the project to which this DPIA relates will be required to complete a full retrospective DPIA**.

The Civil Contingencies Act enables sharing of Personal and ‘Special Categories’ (including health) data to be shared between Category 1 and Category 2 responders. **This short DPIA should only be used where information is requested by one of the organisations listed on page 3 to support the emergency response.**

**Step 1: Project Administration**

**Lead organisation:** *Dr Rasib & Partners*

**Project Title:** *Remote access and making patient phone calls from Home during the Covid 19 period*

**Senior contact person for the project:**

Name: *Sam Rasib*

Job Title: *Managing Partner*

Email: *s.rasib@nhs.net*

Extension/Mobile Number: *07846 579024*

**Date:** *23rd March 2020*

**Name of person completing this form:** *Sam Rasib*

**Job title of person completing this form:** *Managing Partner*

**Organisation person completing this form belongs to:** *Dr Rasib & Partners*

**Step 2: Project Details**

2.1 What are the full details and rationale of the project?

*During the Covid 19 outbreak the Management team want to support appropriate clinical staff to be able to work remotely and provide high quality patient care during this difficult time. This includes contacting patients to conduct a video/telephone consultation and provide necessary treatment wherever appropriate.*

*This would mean accessing the GP Clinical systems from home and also making phone calls to patients. This would help to reduce the amount of patient footfall into the GP practices, reduce the risk of spreading the virus and ultimately protect the Health & safety of all staff.*

2.2 What is the name of the system / application to be used?

*Remote access of Emis Web, Docman, (these are the Clinical systems used at the practice.)*

2.3 Is the system / application being used in any similar organisation to this, and if so, which?

*Some practice staff are already accessing patient data remotely due to self-isolation etc. with the practices consent*

2.4 Outline any risks to service users (or other) of the project not going ahead at this point in time:

*Patients would still have to go to the practice to attend for their appointments and this would increase the risk of the virus being spread within the practice to both staff and other patients/service users. Working from home where possible and offering telephone/video consultations will protect the Health, Safety & wellbeing of all practice staff and patients alike.*

**Step 3: Risk Assessment and Mitigation**

3.1 Are there any risks to the **Confidentiality** of personal data? *Confidentiality is defined as unauthorised disclosure of, or access to, personal data.*

*Yes. The use of private Internet, other household members coming into the room where the member of staff is working and seeing the data on screen, failure to lock the screen of the laptop when unattended*

3.2 Are there any risks to the **Integrity** of personal data? *Integrity is defined as unauthorised or accidental alteration of personal data.*

*Yes. The use of private Internet, other household members coming into the room where the member of staff is working and seeing the data on screen, failure to lock the screen of the laptop when unattended*

3.3 Are there any risks to the **Availability** of personal data? *Availability is defined as unauthorised or accidental loss of access to, or destruction of personal data.*

*Yes. The use of private Internet, other household members coming into the room where the member of staff is working and seeing the data on screen, failure to lock the screen of the laptop when unattended*

3.4 Are there any known or immediate technical / IT / Information Security / Cyber Security concerns?

*Yes. The use of private Internet.*

3.5 If the answer is “Yes” to 3.1, 3.2, 3.3 or 3.4 how are these to be Reduced or Mitigated?

*We will ensure the team use only work provided laptops. Personal laptops will not be permitted for work business.*

*All authorised clinical staff staff will use a personal mobile phone due to the current circumstances (work phone not available for use) but will not keep any records of phone numbers, conversations etc. This has been agreed with* ***Sam/Dr Rasib****. Partners at Dr Rasib & Partners, GP Suite, Cannock Hospital.*

*We will instruct all approved staff that any work conducted should be done in a separate room from the rest of their family members and ensure they adhere to locking laptop screens when not in use, and the equipment is stored safely. The individual staff member will have specific criteria to follow, which will be with the approval of Sam Rasib/Dr Rasib.*

3.6 Once the mitigations in 3.5 are implemented, how would you score any remaining risk in the following Risk Assessment? If you consider that there are no remaining risks give a value of 1 for both Likelihood and Severity.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Likelihood** *(please tick)* | | |  | **Severity** *(please tick)* | | | **=** | 3 |
| **1** | x | Rare | **1** |  | Negligible |
| **2** |  | Unlikely | **2** |  | Minor |
| **3** |  | Possible | **3** | x | Moderate |
| **4** |  | Likely | **4** |  | Major |
| **5** |  | Almost certain | **5** |  | Catastrophic |

Any risks scoring above 6 will need to be reviewed by the organisations Senior Information Risk Owner, Data Protection Officer or where these staff are unavailable due to the outbreak, a Directorial member of staff.

**Step 4: Civil Contingencies Act**

4.1 Select all organisations below who are involved in this project:

Please see over for details of which organisations are considered within these categories: -

|  |  |  |  |
| --- | --- | --- | --- |
| **CATEGORY 1 RESPONDERS** |  | **CATEGORY 2 RESPONDERS** |  |
| Emergencies services |  | Utilities |  |
| Local authorities |  | Transport |  |
| Health bodies | X | Government agencies |  |
| Government agencies |  |  |  |

**Step 5: Project Sign-Off**

The IG Team will prioritise this DPIA for review and sign off. For those scoring above 6 in Q3.6 this must be reviewed by the CSU’s or relevant CCG’s Senior Information Risk Owner, Data Protection Officer or where these staff are unavailable due to the outbreak, a Directorial member of staff, demonstrating that risks have been acknowledged and accepted for the duration of the pandemic, and will be added to the CSU or relevant CCGs Risk Register.

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Job Title: Managing Partner

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Extension/Mobile Number: 07846 579024

Date: 23/03/2020

**APPENDIX A**

**Category 1 and 2 organisations**

|  |  |
| --- | --- |
| **Category 1 responders (“core responders”)** | **Category 2 responders (“co-operating responders”)** |
| **Emergencies services** | **Utilities** |
| * Police forces | * Electricity distributors and transmitters |
| * British Transport Police | * Gas distributors |
| * Fire authorities | * Water and sewerage undertakers |
| * Ambulance services | * Telephone service providers (fixed and mobile) |
| * Maritime and Coastguard Agency | **Transport** |
| **Local authorities** | * Network Rail |
| * All principal local authorities (i.e. metropolitan districts, shire counties, shire districts, shire unitaries) | * Train Operating Companies (passenger and freight) |
| * Port Health Authorities | * London Underground |
| **Health bodies** | * Transport for London |
| * CCGs and CSUs | * Airport operators |
| * Acute Trusts | * Harbour authorities |
| * Foundation Trusts | * Highways Agency |
| * Local Health Boards (in Wales) | **Government agencies** |
| * Any Welsh NHS Trust which provides public health services | * Health and Safety Executive |
| * Health Protection Agency |  |
| **Government agencies** |  |
| * Environment Agency |  |
| * Scottish Environment Agency |  |