



## Sharing patient information

Brighton and Sussex University Hospitals NHS Trust uses patient information in lots of different ways to ensure the best treatment for our service users.

To ensure each new regular use of information is legal, we undertake a Data Protection Impact Assessment (DPIA), which is a risk assessment recommended by the Information Commissioner's Office (ICO), which is the regulator of the Data Protection Act 2018. These assessments are processed by the Trust's Information Governance Team and approved by the Caldicott Guardian.

To make sure we are being transparent with our patients about what we are doing with their information, we regularly publish and update our most recent list of approved DPIAs.

Following the Trust's updating its DPIA documentation to meet the needs of the new Data Protection Legislation from May 2018, any DPIAs authorised using that documentation now have a detailed summary of the project it concerns and its benefits.

## Recently approved DPIAs

Ratified	Project	Details
11/06/2018	Diamnant Data Management System	Renal Department is acquiring new dialysis machines for its Brighton, Worthing and Bexhill units aiming to improve patient's quality of treatment.  The purpose of Diamant system, although being an EPR itself, for the Renal Department is to transfer dialysis sessions data from the machines to our system CV5. This should be possible with the development of an interface in co-operation between CCI, CV5 vendor and Diasoft, Diamant vendor.



	NHS Trust	
06/06/2018	ICE Access - Spire-Montefiore	Clinical staff at Montefiore Private Hospital request pathology tests to be carried out at BSUH Pathology department. Results are issued via the Pathology reporting system (ICE) and personal data is required to ensure test results are linked to the appropriate patient. A data protection impact assessment has been carried out and there are acceptable security controls and staff training procedures in place. A comprehensive service level agreement and contract provides robust data protection protocols.
13/08/2018	FFRct-Heartflow	This project will allow access to Heartflow analysis of cardiac CT datasets to evaluate fractional flow reserve (a marker of coronary plaque stenosis) on coronary vessels. This analysis will allow more extensive evaluation of the coronary anatomy in patients and identify significant coronary stenosis which may require further intervention.
		Brighton and Sussex University Hospitals has been recognised as a high volume centre for cardiac CT and as such has been nominated by Heartflow as a project site for the NHS England Innovation project. This centrally funded national NHS England project allows access to Heartflow tools until April 2019 giving the opportunity for cardiac centres to fully embed this novel analysis tool in clinical pathways for patients presenting with stable chest pain. The utility of FFRct as tool for coronary assessment is also supported in eth recently published NICE guidance (CG95) for stable chest pain.
		The DPIA process, transference and anonymization of patient data has been carefully explained in the preceding statements. The theoretical risks have been fully explored by clinical, IT and information governance teams at Brighton and Sussex University Hospitals.





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23/08/2018	Free NHS WiFi	This project was started off the back of a government initiative to offer free Wi-Fi to all patients visiting NHS sites. A guest WiFi service was offered, however this was through a 3rd party and did not conform to the NHS Digital standards and policies.  This DPIA covers the usage of personal data that is submitted through the internet portal guest registrations process.  As part of this work, no risks were highlighted to data subjects
05/10/2018	BSUH-SASH OpenNetII	Clinical staff at BSUH and SASH request pathology tests to be carried out at their respective Pathology departments. Results are issued to clinicians via the Pathology reporting system (ICE) and personal data is required to ensure test results are linked to the appropriate patient.  Where there is patient shared care between BSUH and SASH it is desirable for clinicians to view pathology test results on each other's ICE systems. ICE OpenNetII provides this functionality.  A data protection impact assessment has been carried out and there are acceptable security controls and staff training procedures in place at each trust. A comprehensive East Surrey and Sussex data sharing agreement provides robust data protection protocols, BSUH and SASH are signatories to this agreement.
05/04/2019	Medway PAS	Brighton and Sussex University Hospitals Trust (BSUH) must replace the existing Allscripts Oasis Patient Administration System (PAS) by 30 November 2018. A replacement PAS solution must be operational within this timescale if the Trust is to avoid significant costs in terms of contract and maintenance payments to the incumbent supplier.





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		Given the criticality and reduced timescale for deployment, in January 2018 the BSUH Board approved the procurement of System C Medway PAS system to replace the Oasis system and the current Theatres Management System. The contract was signed on 23 January 2018 with intent to go-live on 28 October 2018. The Trust has used Oasis as its core Patient Administration System for 14 years.
		The DPIA has been produced in accordance with guidance provided. A structured approach to identifying the privacy risks associated with the processing of personal data and for implementing appropriate controls to manage those risks has been undertaken. The process comprises the following six distinct steps and a parallel stream of consultation: Identify the need for a DPIA.
12/02/2019	SMS Texting – Medway PAS	The risk assessment has determined that all risks identified have low residual risk when mitigated.  Brighton and Sussex University Hospitals Trust
		(BSUH) has replaced existing Allscripts Oasis Patient Administration System (PAS) on 28th November.
		Since the System C Medway PAS was introduced it has been observed that the DNA rate has increased across a number of specialties. This has significant implications both financially in terms of lost income, and clinically, from the perspective of patients missing their appointments and delaying treatment. It should be noted also that patients have complained that they have not received SMS text reminders.
		The SMS text messaging service is provided by Health Communications, a third party supplier who work from an extract of forthcoming patient appoints (with consent). The Service is managed by the OP Booking Hub.
		The previous PAS, OASIS, was set up to autoconsent for all patients meaning that if a



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		patient had provided their mobile number, this would automatically be used to send a text reminder for any upcoming outpatient appointments. The system held the consent field that we used to indicate – this also allowed the patient to dissent meaning that text messages would not be sent.
		Medway, however, cannot be set up to autoconsent. It is for this reason that patients are
22/07/2019	NHSMail	not receiving text messages.  Project to move to NHS mail is in line with NHS Digitals mandate to be on a secure messaging platform. There is also a significant cost saving to the trust by taking this opportunity to migrate.
		As this is a nationally hosted secure system, this will further increase the security of the trust and the emails they send. Having to manage the governance around how to send secure messages will be eased by this transition.
02/05/2019	Endoscopy Digital Image Capture Kits	The project will enable server-based storage and retrieval of digital images from bronchoscopy, cystoscopy and GI procedures. Digital storage of clinical patient files (endoscopy images) on the Brighton and Sussex University Hospitals server will provide improved resilience and faster retrieval of patient information. The images are currently captured on the Unisoft System and printed using polaroid ink and film and stored in the patient's hardcopy patient file).
		A data protection impact assessment has been carried out and the theoretical risks have been fully explored by clinical, IT and information governance teams at Brighton and Sussex University Hospitals.  There are acceptable security controls and staff training procedures in place.
24/06/2019	Herpes Simplex Virus Surveillance Study	Herpes Simplex Virus (HSV) is a very common virus which causes minor symptoms (such as cold sores) in adults and older children. However, in babies it very dangerous and causes lifethreatening disease and long term disability. We





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		need to know more about the disease and the way it presents in order to improve the way that we treat these patients.
		This project is a surveillance study, investigating the incidence and impact of the herpes simplex virus on babies under 90 days of age. It is being run alongside the British Paediatric Surveillance Unit (BPSU), which is part of the Royal College of Paediatrics and Child Health (www.rcpch.ac.uk/bpsu). This organisation investigates rare diseases in children using 'active surveillance' methods. Paediatric consultants across the UK and Ireland receive a list of rare conditions every month from the BPSU. If they have seen a case of any of the conditions, the clinician will notify the BPSU, who in turn, informs the study team that a case has been
		identified. The study team then contacts the clinician directly, requesting clinical information about the case (via a clinical questionnaire). The
		psuedonymised responses will be uploaded to REDCap (Research Electronic Data Capture) which is a secure web application for building and managing online surveys and databases.
24/04/2019	Electronic Observations	Electronic Observations will be used to capture the vital signs (temperature, heart rate, blood pressure etc.) of every inpatient and calculate the appropriate Early Warning Score (EWS), this will enable clinical staff to ensure appropriate care is provided thus increasing patient welfare and safety, Improves assessment of patient acuity and the priority of ward round It also demonstrates compliance and the ability to meet with CQUIN, KPIs and contract monitoring e.g. Sepsis, AKI, VTE.
		As Information Asset Owner, I am happy that the DPIA has correctly assessed the risks associated with the introduction of the Patientrack system. The deployment of the system will drive improvements in patient safety and handle the data in a safe, controlled manner. As a user of the system in Western Sussex Hospitals NHS



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		Foundation Trust, the benefits have been proven
		time and again and I look forward to seeing the
		same delivered at Brighton.
23/07/2019	Glooko/Diasend	Diasend has been used within the paediatric
		diabetes team for 3-4 years as a resource for our
		patients to share with us their data from blood
		glucose meters, insulin pumps and continuous
		glucose monitor systems. The adults diabetes
		team have also used this resource for almost the
		same amount of time. Diasend is invaluable to
		both teams as an integral part of clinic
		appointments as well as a way to help patients
		and families remotely. Along with the medical
		and care-providing benefits for both patients,
		families and teams, Diasend is an effective, time
		saving method of capturing and interpreting this
		important information from patients which in the
		past has had to be read out by patients and hand
		written by the clinical team.
05/08/2019	Mitel Voice Recording and	Security control rooms within the Brighton and
	Monitoring System	Sussex University Hospital, have been previously
		utilised to field calls from callers outside of the
		hospital who are making threatening and abusive
		calls to a ward or a staff member, these have
		normally occurred out of hours.
		The Security control room also takes calls from
		persons that may wish to give information
		regarding staff or patients who may be breaking
		the law and has also received Abusive calls from
		member of staff, which goes the Trust Values and
		Behaviours policy.
		It was felt that BSUH Security needed to have a
		system in place that could if needed gather
		information, to be used Evidential to aide in
		reporting criminal offences.
11/07/2019	Sharesource	Sharesource is a web based programme for
		patients on automated peritoneal dialysis (APD).
		Sharesource will provide Clinicians with the
		ability to remotely manage their patients' care.
		The information stored in the APD machines will
		be accessed remotely to inform clinical staff of
		how well the dialysis is performing and if





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	required make changes to the dialysis
	programme remotely improving the quality of
	care.

If you would like further information about any of these DPIAs or the information being shared, please email <a href="mailto:bsuh.informationgovernance@nhs.net">bsuh.informationgovernance@nhs.net</a>