Recommendation	Action	Target date	Progress	RAG

1) That the HSCIC undertakes a programme of work to ensure that data has been deleted appropriately for all data releases referenced in the PwC report, where the agreement has ended.	• Issue letters to all data recipients with Data Sharing Agreements (DSA) where the agreement has ended to confirm data deletion.
	• Review options to support customers in deleting the data.
	• Confirm data deletion complete.
		31/07/14
		
		31/07/14
		
		30/09/14
			• Deletion letters sent to:
			  • HES customers with expired agreements – 18/06/14
			  • All other customers with expired agreements – 25/07/14
			• 542 customers contacted.
			• 33 customers being traced. These delays are principally due to the age of the DSAs.
			• 129 'Certificates of Data Destruction' received as of 18/08/14
			• Additional resource has been allocated to manage enquiries.
				G

2) That the HSCIC develops one clear, simple, efficient and transparent process for the management of all data releases.	• Develop approach and specification for Data Access Request Service. • Identify existing re-useable components for integration. • Transition components and implement Data Access Request Service. • Provide simple intuitive access point for customers.	30/06/14 15/07/14 31/07/14 31/07/14	• Single access point for access to data (Data Access Request Service (DARS)) implemented. • Additional temporary resources engaged to support 'applications' stage enabling dedicated resource to focus on backlog and new applications. • Learning from DLES incorporated into development of the DARS processes. • SLAs measuring service performance and ongoing improvement developed, for implementation in Nov 14. • Webpage providing single access point for access to data went live on 31/07/14.	G

Recommendation	Action	Target date	Progress	RAG
3) That the HSCIC implements a robust audit function, which will enable ongoing scrutiny of how data is being used, stored and deleted by those receiving it.	• Identify resources to undertake audits. • Submit paper to EMT to agree approach. • Create framework, methodology and audit checklist. • Identify candidate organisations for initial audit. • Complete first wave of audits. • Develop approach and plan for full audit capability.	30/06/14 03/07/14 31/07/14 27/06/14 31/08/14 31/09/14	• Internal resources have been engaged to undertake initial audits. • ISO27001 training undertaken by further resources to support audit process. • An approach paper was developed and agreed by the appropriate Executives. This confirmed the approach of a desk-based review of the contract; followed by a site visit and production of report. A more detailed audit can then be undertaken if any issues are identified. • Draft Audit framework and methodology developed. • First wave of audits scheduled for completion by 01/09/14 for four organisations. • Reports on key findings will be prepared following each site visit with an organisation. • Outcome of the audits and any associated follow up activities to be published on the HSCIC website once available.	G
4) That the HSCIC publishes its policy, process and governance for the release of data.	• Incorporate learning from Partridge review into development of revised policy, process and governance. • Develop and implement revised policy and process. • Develop and implement revised governance arrangements. • Publish policy, processes and governance for release of data on HSCIC website. • Refine and update processes.	30/06/14 31/07/14 31/07/14 31/07/14 30/09/14	• Revised single process for all data access requests has been implemented. • New webpages went live on 31/07/14 providing simplified customer process (broken down to the 3 key steps of 'Apply, Approve and Access'). • A simple set of criteria against which a request will be assessed has been included on the website. This will be further developed into a more detailed policy, in line with developments of the Care Bill regulations and guidance from CAG.	G

Recommendation	Action	Target date	Progress	RAG
5) That the HSCIC ensures there is clear, transparent and timely decision making, via the appropriate governance for all data releases, and that all decisions are documented and published on its website.	• Develop transparent, clear process that is accessible to all users. • Document and publish all decisions from DAAG. • Recruit patient and public representatives to DAAG.	31/07/14 31/707/14 31/11/14	• DAAG membership is being strengthened to ensure greater levels of independence and to support management of the backlog. • Training developed for new members. First training session delivered on 15th August. • All DAAG recommendations are being published on DAAG website. • Terms of Reference for Data Publication and Dissemination Group (replacing DAAG in November) being developed. • Acting Chair of DAAG engaging with key stakeholders regarding development of new group.	**G**
6) That the HSCIC implements a robust record keeping approach and that the details of all data releases (including the purpose for which they are released) are made available on its website.	• Enhance and unify existing data sharing 'trackers' for short term management of releases. • Develop unified order management approach using Customer Relationship Management (CRM) system as single source of truth. • Publish quarterly Data Release register. • Complete transition to order management process across the organisation for management of all data requests.	30/06/14 31/07/14 04/07/14 31/10/14	• CRM in place and being used to track all data requests. • Dashboard created for weekly reporting providing tracking and monitoring against progress. • Data release register published on 02/07/14 covering data releases made between 01/01/14-31/03/14. Next release scheduled for beginning of October.	**G**
7) That the HSCIC develops one Data Sharing Agreement (DSA), which is used for all releases of data, and which includes clear sanctions for any breaches.	• Review and revise rules for Data Dissemination. • Develop revised Data Sharing Agreement. • Agree plan and approach for transition from current to revised Data Sharing Agreements.	10/06/14 31/07/14 31/07/14	• Data dissemination rules developed and being embedded into the data release checklist, which is being used to assess applications. • Revised Data Sharing Contract and Agreement published on the new Data Access Request Service website on 31/07/14. Feedback being sought from customers. Contract and Agreement will also be shared with key stakeholder groups including DAAG, CAG, ICO and medConfidential. • Plan for transition to new contract and agreement in development.	**G**

Recommendation	Action	Target date	Progress	RAG
8) That the HSCIC actively pursues a technical solution to allow access to data, without the need to release data out of the HSCIC to external organisations.	• Develop scope and identify options. • Produce and publish road-map for provision of secure data access / data lab.	31/07/14 30/11/14	• High level scope and potential options have been developed. • Resources engaged for delivery of tactical solutions and roadmap. • Key stakeholders identified. • Public event held on 21/07/14 provided useful insight into perspectives of customers groups and further contacts to engage with during the consultation period. • Further consultation planned for Sept to ensure wider engagement with range of stakeholders.	G
9) That the HSCIC quarterly Register of all data releases includes the number of law enforcement agencies' person tracing requests processed by the National Back Office. The Register will also include all data being released under NHS IC data sharing agreements, ensuring it is providing a comprehensive account to the public of all data being shared.	• Publish number of law enforcement agencies' person tracing requests processed by the National Back Office (NBO). • Update quarterly register with data being released under NHS IC data sharing agreements.	04/07/14 04/07/14	• Data release register, incorporating number of tracing requests processed by NBO, published on 02/07/14. • Next release of register scheduled for beginning of October.	G