

Data Access Request Backlog

Author: Simon Croker

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Background

In March 2014, the HSCIC undertook a review of Data Releases made by its predecessor organisation, the NHS Information Centre. The findings of this review were published on June 17th.

In response to the review, and specifically to recommendations made by Sir Nick Partridge, the HSCIC Board introduced a series of steps to guarantee greater openness and reassurance to the public, stricter controls over data use and better clarity for data users. During the time that this review was being undertaken and whilst new processes were being designed, a backlog of data requests built up, such that over 800 outstanding requests for data were identified in June 2014.

Initial forecasts suggested that it would be possible to clear this backlog by the end of November 2014 and whilst early progress was in line with the forecast up until the end of August 2014, the rate of progress slowed significantly for reasons outlined in the previous paper to the HSCIC Board. In response to this, a re-forecast delivery date of the end of January 2015 was accepted.

The purpose of this paper is to provide an update on progress against that re-forecast date and outline plans for transition to the Business as Usual service for management of requests for data.

Progress

Since the November Board, the following progress has been achieved:

- A Triage function has been established to raise quality at the front end of applications stream and ensure timely engagement with customers.
- The Business as Usual structure for the Data Access Request Service (DARS) end to end process has been developed and is going through proposal for change processes. Roles from the temporary structure that directly match those in the permanent structure have been slotted in.
- Data Sharing Framework Contract (DSC) and Data Sharing Agreement (DSA) templates with supporting guidance published on the DARS webpages in November 2014
- Work to ensure all existing customers are signed up to Data Sharing Framework Contracts is ongoing.
- A review of the requirements in The Code of Practice on Confidential Information published in December 2014 and their impact on current DSAs / DSCs is underway.

- Detailed operating procedures for each of the functional areas involved in the DARS process have been produced.
- Service Level Agreements (SLA) for requests for extensions to data have been measured from November 17th 2014.
- A pilot is in development to provide a web form to enable customers to complete their data application online.
- A review is underway for options for an online customer login and progress tracker.
- Key stakeholders continue to be engaged by senior staff and Information intermediaries have been engaged formally through a workshop in December.
- A strategy for management and utilisation of the benefits information captured in the application form is being developed.

Progress on Data Request Numbers

Since the November Board meeting, progress has continued on target to deliver the backlog (requests received prior to Aug 1st 2014) by the end of January. In the eight weeks since the last Board, the total number of outstanding data requests has reduced from 355 to 210, with the actual backlog reducing from 181 to 46.

The below table provides a breakdown of the number of data requests as of 15th January 2015:

Backlog	46
(Number with customer)	(22)
MRIS (medical research)	15
BAU (post Aug 1 st 2014)	149
(Number with customer)	(38)
Total	210

Clearance of the backlog

In line with the current rate of clearance it is expected that there will be no data requests in the backlog (those received prior to August 1st 2014) remaining with the HSCIC by 31st January 2015. There will likely be some outstanding cases that remain with the customer to provide a response. Where responses are required from customers, the applications team actively engage customers via email and telephone and follow up to check on progress and offer support, however the timeliness of the customer response sits outside of HSCIC control.

Clearance of current BAU (1st Aug 14 – 31st Jan 15)

As agreed at the November HSCIC Board meeting, Service Level Agreements for all data requests other than extensions (which have been measured since 17th November 2014) will be measured for applications received from February 1st 2015. The current BAU items (applications received since August 1st 2014 – 31st January 2015) will not be included in this reporting but will remain as a priority focus with the aim of clearing these items by May 31st 2015. From this point, all applications for data will be subject to Service Level Agreements.

The table below provides an aged debt analysis of the current BAU data requests. These have been calculated from the date the enquiry was received.

Duration	Number of data requests
0-1 month	35
1-2 months	39
2-3 months	23
3-4 months	19
4-5 months	15
5-6 months	18
Total	149

Roll out of Data Sharing Framework Contracts

Each organisation wishing to receive data from the HSCIC is now required to sign a Data Sharing Framework Contract which sets out the overarching principles of data sharing between the organisation and the HSCIC. Each individual instance of data sharing will then be covered by a Data Sharing Agreement. The target for transferring all customers to the new contracts is the end of February 2015.

Roll out of the Data Sharing Framework Contracts commenced on 24th October 2014, with contracts being sent to all existing customers. A follow up email was sent on 14th December setting a deadline for response of 31st January. A chasing email will be issued w/c 19th January.

Customers in the process of requesting data are being actively engaged with and informed that they will not be able to receive data until a contract is signed and returned.

At the time of writing however, around 30% of customers contacted have returned their contracts. As such, additional resource has been brought in to support this process and

further engagement is planned to ensure all customers who receive data are transitioned to the new contract by the end of February.

Business as Usual (BAU) Service

Secure, effective and timely delivery of data to customers via use of the Data Access Request Service (DARS) process is a critically important function of the HSCIC. Since June 2014, this service has been delivered by permanent staff seconded from existing teams within the Data Dissemination Services sub-Directorate and additionally as of October 2014, a specialist operations team convened on a temporary basis to facilitate faster clearance of the backlog. Secondments of permanent staff have been extended until the end of March to ensure service is maintained whilst the Business as Usual service is implemented, however the specialist operations team will be disbanded at the end of January upon clearing the backlog.

To mitigate against the risk of a resource gap between the end of January and full recruitment to the BAU team, members of the specialist operations team who permanently reside in the Data Dissemination directorate will be retained; additional resource has been brought in from the directorates portfolio resourcing and there will be a phased departure for the head of the operations team.

The process of accessing data has been simplified to three stages; Application, Approvals and Access.

Work is underway to implement a permanent and sustainable function to deliver the Business as Usual service designed around these three stages which builds on and maintains the progress made by the teams in the last 6 months.

A proposed structure has been developed and is going through proposal for change processes. Roles from the temporary structure that directly match those in the permanent structure have been slotted in. The new structure for the Data Access Request Service will consist of four main functions:

- Data Access Request Service Performance Management
- Data Applications Service
- Data Access Approval Support
- Data Production Service

Data Access Request Service Performance Management:

This new function will have responsibility for the performance management of the end to end process of the Data Access Service, including adherence to SLAs, performance

improvement and quality management implementation. This is a new function that is currently being delivered in part by the specialist operations team and as such will need to be recruited to for the Business as Usual Service.

Data Applications:

The Data Applications Team will manage the day to day operations of the Data Applications part of the DARS process. This function is currently provided by seconded staff, many of whom will continue in this role on a permanent basis. This function will be bolstered by additional recruitment.

Data Access Approvals Support:

The Data Access Approvals Support Team will provide expert advice and assurance for the Data Approvals part of the Data Access Request process and will be responsible for supporting IAOs in assuring and developing their submissions to the Data Access Advisory Group (DAAG). This is a new function that is currently being delivered in part by the specialist operations team and as such will need to be recruited to for the Business as Usual Service

Data Production:

The Data Production Team will support the Data Production part of the Data Access Request process. This function is currently provided by the Data Linkage and Extract Service (DLES) team, the Medical Research Information Service (MRIS) team and the HES Data Interrogation System (HDIS). These teams will be brought under the single Data Production function and no further recruitment is required for the Business as Usual Service.

Improved Processes

A substantial piece of work has been ongoing to map current processes and develop revised processes to improve the customer experience and increase the efficiency of the service. Included in this is the development of detailed operating procedures for each of the functional areas involved in the DARS process.

As part of this process improvement, an initial triage function has been established, performed by the Data Access Information Service (DAIS) and the Data Applications teams which will review applications as they are received, enabling any issues to be highlighted and facilitating early feedback to customers. This function will also be responsible for categorising applications and assigning the appropriate service level to them, enabling customers to better understand when they can expect their request to be fulfilled.

The revised processes also include specific 'post-dissemination' functions to be fulfilled by Performance Management team, identified in the new structure. This will include management of invoicing for data dissemination, aligned with the finance operations of the HSCIC and pro-active monitoring and management of deletions. Flags will be included on

the Customer Relationship Management (CRM) system, which provides the single system for management of all data requests, to automatically identify which Data Sharing Agreements (DSA) are due to expire. This will allow customers to be notified in good time to either renew their application or provide a data deletion certificate on expiry of the DSA.

Delivering the BAU service

Good progress has been made in preparing for the transition to Business as Usual, however the following represent the key areas required to ensure the service is established with minimal impact:

- Completion of recruitment to the agreed structure
- Completion and finalising of detailed operating procedures for each of the functional areas.
- Definition and formalising of management reports and key performance indicators
- Roll out of awareness / process training for staff and involved parties
- Communication to customers of new processes / service.

Capacity Management

The revised structure being implemented for Business as Usual is designed to be capable of delivering the service within agreed service levels for current demand, with resilience to handle the incorporation of several new data sets currently being managed by different teams across the directorate. It is expected that requests for data from the IAPT, SHMI and LD data sets will be managed through the DARS process in the near future and this has been factored into the resource requirements for the Business as Usual process.

Demand can be planned for based on awareness of forthcoming events such as the incorporation of new datasets and capacity can be managed accordingly.

Resilience will be delivered through three key areas as the service becomes established:

- 1) **The adoption of new technology and automation of processes:** A proof of concept is in development to provide a web form to enable customers to complete their data application online. This will in turn be used to generate the application form that goes to DAAG and will be used to generate the Data Sharing Agreement, removing the current overhead for manual processing of each of these. Further technical developments and automation such as online tracking of progress and improved automation through CRM will bring in further efficiencies. Additionally, technical improvements in the data production environment, such as automation of bespoke extracts from HES and other datasets will reduce the processing overhead on the production team.

- 2) **Customer familiarity with the requirements / process:** As customers become more familiar with the requirements placed upon them to provide robust information as a result of stricter controls around the dissemination of data, the involvement required from the Applications and Approvals team with each customer should decrease. This is already being evidenced by the improved quality of applications coming through at this point in time. Likewise, applications that come through for renewal that have already been through the current process will require considerably less involvement from the Applications and Approvals teams.

- 3) **Higher skilled staff:** In recognition that the success of this service is dependent on having a motivated team with a range of skills and experience in service delivery; customer relationship management; service development and the application of information governance principles, higher skilled staff will be recruited to the Business as Usual teams at the appropriate banding. This will deliver capability that will grow as staff become familiar with the requirements under the new process. By introducing greater skill sets throughout the structure, there will be greater resilience to managing complex requests without the need to refer up to senior management.

Ongoing capacity planning will be required as the service is established to monitor resilience to change and to review the composition of the teams as appropriate.

Service Level Agreements

The HSCIC made a public commitment to implement Service Level Agreements for the processing of applications and release of data. These agreements range from 14 days for simple applications (extensions) to 60 days for complex applications.

These SLAs will be measured as elapsed time with the HSCIC only, and exclude the time during which responses are being awaited from customers as the HSCIC has no control over this period.

The 14 day SLA for simple applications will apply to requests for extensions to Data Sharing Agreements. These are not required to go through DAAG where they do not contain sensitive data therefore can be progressed more rapidly. Measurement against this SLA commenced for all new requests being put forward for extension as of 17th November.

The 30 day SLA will apply to new, low to medium complexity applications and amendments and the 60 day SLA will apply to complex applications (where the legal basis is not clear, where complex slices of data across multiple data sets are required etc). Measurement of these will commence for all applications received from the 1st February 2015 onwards.

To facilitate delivery against these SLAs, internal SLAs between teams involved in the DARS process are being developed. These will be monitored as part of the performance management function of the BAU service.

Under the new structure, requests for data will be triaged upon receipt by the DAIS and Applications teams. This will result in either a rejection of the application at that point in time, or acceptance and categorisation into the appropriate service level. The SLA will be measured from the point at which an application is accepted by the triage team.

Performance against the SLAs will be reported via the HSCIC website on a regular basis.

Progress against Service Level Agreements

The SLA for extensions to Data Sharing Agreements (14 day SLA), wherein the customer is requesting to hold the same data for longer, have been measured for all requests received since November 17th.

Since November 17th, 17 requests for extensions have been received. 8 of these requests have been fulfilled, all within their SLA (table 1) and there are currently 9 live requests for extensions to data. At the point of time of writing, all of these are within their SLA. The status of each is detailed in table 2.

Table 1. Completed requests for extensions to Data Sharing Agreements

Request	Request Status	Age (working days - excludes pause time)	SLA status
Org 1	Completed	11	Within SLA
Org 2	Completed	4	Within SLA
Org 3	Completed	6	Within SLA
Org 4	Completed	4	Within SLA
Org 5	Completed	2	Within SLA
Org 6	Completed	1	Within SLA
Org 7	Completed	4	Within SLA
Org 8	Completed	1	Within SLA

Table 2. Live requests for extensions to Data Sharing Agreements

Request	Request Status	Age (working days - excludes pause time)	SLA status
Org 9	Paused (with Customer)	12	Within SLA
Org 10	In Progress	1	Within SLA
Org 11	Paused (with Customer)	13	Within SLA
Org 12	Paused (with Customer)	8	Within SLA
Org 13	Paused (with Customer)	4	Within SLA
Org 14	Paused (with Customer)	4	Within SLA
Org 15	Paused (with Customer)	7	Within SLA
Org 16	Paused (with Customer)	1	Within SLA
Org 17	Paused (with Customer)	3	Within SLA

Communications and future reporting

A range of internal and external communications will be delivered at the end of January informing staff and customers of progress against the backlog, new processes and the implementation of the Service Level Agreements. Communication plans are in development for this.

Additionally, reports will be developed for the regular reporting, via the HSCIC website, of performance against the SLAs. These reports will include an update on progress being made for completion of requests for data made between August 1st 2014 and January 31st 2015, which are not subject to SLAs.

Actions Required of the Board

For information.