

North Staffordshire GP Federation – Homeless Project data sharing - IG support



Midlands and Lancashire
Commissioning Support Unit

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Background

North Staffordshire GP Federation (the Federation) is a membership organisation to all 76 GP practices currently serving the whole of North Staffordshire. The Federation have commissioned the MLCSU Information Governance Team to provide Data Protection Officer support services. This will provide a named Data Protection Officer, and ensure accountability and key approvals are evidenced throughout their processing activities.

Action

The GP Federation have been commissioned by Stoke-on-Trent City Council and Stoke-on-Trent CCG to provide a health care support service to the homeless – the homeless would need to be defined as being homeless on the streets of Stoke-on-Trent in order to receive support under this scheme. The service will be operational from Brighter Futures, Whittle Court, Hanley and the support team will consist of a Nurse Practitioner and a Health Care Assistant, both of whom are employed by the North Staffordshire GP Federation. Health information would need to be shared with other organisations (City Council, The Police, Housing, Brighter Futures, and any 3rd sector housing associations) along with sharing with the registered GP of the homeless person. The Acute Trust and Combined Healthcare would also need to be partial to the sharing of this data especially in cases of high-volume attenders.

Information on specific cases would be shared at Multi-Disciplinary meetings, to involve key representatives from the organisations involved. The meetings are recorded for accuracy purposes and the confidentiality requirements will be stipulated in the Terms of Reference for this group.

To ensure the effectiveness of this scheme, it is very heavily dependent upon effective data sharing mechanisms being implemented to ensure the best outcome for the homeless individuals who would benefit so heavily from such a scheme. The MLCSU Primary Care Business Partner worked alongside the GP Federation to produce a Data Protection Impact Assessment and get the required Data Sharing Agreement in place, and ensure accountability can be evidenced throughout the process.

The Process

To ensure the GP Federation understood their roles and responsibilities in relation to the data sharing requirements of the homeless project, initial discussions were held with the Data Protection Officer, who advised that a Data Protection Impact Assessment would be required to clearly identify any risks to the rights and freedoms of the individuals concerned, followed by the production of a Data Sharing Agreement, to hold all organisations accountable to the highest standards of use. A meeting was arranged with the Information Governance Business Partner for Primary Care, who discussed all aspects of the process, the mechanism for sharing the data, the legal basis and the way to evidence accountability throughout. Once the DPIA received IG validation, it was then sent for DPO approval, who reviewed the document in line with current legislation and was happy to approve the scheme and the purpose for data sharing.

The Data Sharing Agreement was then produced and all organisations involved in this vital scheme were required to sign the document, and ensure they fully understood the requirements in relation to the sharing of special categories of personal data.

The process was handled with high levels of attention to detail, and ensured at all times adherence to the data protection legislation. The process was made so much easier with effective, clear communication from both the MLCSU IG Team and the North Staffordshire GP Federation, who throughout the process, remained committed to the requirements.

“We received excellent support from Liz from the CSU Information Governance Team in terms of a project we have recently started where we support the homeless and rough sleeping population in the City Centre of Stoke-on-Trent. The advice was hands on, thorough and timely which was a huge help in terms of the timescales we had for getting the project started. As a Federation we also purchase our Data Protection Officer service from the CSU as do most of our member GP Practices – to support that there is training available and a regular newsletter so that we are operationally aware of what we need to do and any new requirements’.”

Ian Gibson, Associate Director of Operations & Services, North Staffordshire GP Federation