



Data Controller Console

Standard Operating Procedure (SOP)

Information Sharing Agreement & Data Processing Contract
management via the Data Controller Console (DCC)

Nov 2018

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Document Version History

Version number	Reason for Change
0.1	First draft
0.2	Updated draft
0.3	Updated draft
0.4	Comments from A. Ghosh incorporated
0.5	Updated draft
0.6	Comments from M. Hall incorporated
0.7	Minor updates plus addition of 'Invite org to join ISA' section
0.8	User Roles
0.9	Updated for DCC release V1.2
1.0	Final version for release following QA
1.1	Updated for DCC Release V1.3
1.2	Updated for DPIA & Local Authority Release V1.4
1.3	Updated for Data Flow Release V1.5
1.4	Update for eISA Release V1.6

NOTE:

Readers should be aware that paper copies of this document may not be the latest available version.

The latest version, which superseded all previous versions, will be made available via (insert local organisation link).

Those to whom this procedure applies are responsible for familiarising themselves periodically with the latest version.

Purpose/Scope

The purpose of this Standard Operating Procedure (SOP) is to describe the process to be used by organisations for managing their Information Sharing Agreements (ISAs), Data Protection Impact Assessments (DPIA) and Data Processing Contracts (DPCs) and using the Data Controller Console application.

Management of this SOP

This SOP should be reviewed annually by all organisations using the Data Controller Console, unless there is an identified need to review the SOP as a result of planned process changes or significant software update.

The owner of the SOP should follow the standard policy for updating/reviewing SOPs, ensuring that all necessary parties are involved in the review and the final updated version is made available to all staff via the intranet.

Background

Many health and social care organisations (e.g. GPs, Acute Trusts, Local Authorities and Third Sectors) currently share information/data with each other to support effective care delivery, using Information Sharing Agreements (ISA's), resulting in many organisations having numerous discreet ISAs often sharing the same information to multiple recipients.

The process for managing these ISAs is time consuming and predominantly manual, with numerous paper documents that are hard to track for small and large organisations alike. ISA's also enable relationships between the organisations to develop on a local and regional level however the on-going management of the processes, the lag time to sign new agreements and the complex communication between multiple parties can slow information sharing down and make processes complex and unable to keep up with demand.

With this in mind the Healthy London Partnership in consultation with stakeholders across London have co-designed and developed the Data Controller Console (DCC). The DCC is an online application that enables organisations to have visibility and aid administration of their ISAs, reducing time and effort for organisations involved. It will provide a safe and secure mechanism for organisations to create and join sharing networks and rationalise/reduce the number of ISAs in use through awareness of all current ISAs; making best use of resource and moving towards the concept of a 'Club' by developing a 'trusted' data sharing environment for organisations across geographies and organisational boundaries.

The Beta Release of the DCC will provide the functionality to;

- Register an organisation
 - Record relevant information governance details

- Identify key contacts for the organisation
 - Create User accounts
- Register ISAs
 - Record key ISA details
 - Identify ISA contacts
- Manage ISAs
 - Search for ISAs
 - Assign participating organisations to an ISA and invite them to 'join'
 - Manage requests

Enhancements in release 2 contain the following functionality:

- Audit & Reporting
 - Enables an organisation to view and extract information on ISAs that are associated with their organisation
- Organisation Tagging
 - Enables an organisation to add 'tag' groups based on the type of services the organisation provides, and the Boroughs these services are provided to
- Ability to search for an organisation by:
 - Services Provided and Boroughs Serviced
- Ability to delete a document uploaded in the ISA
- Ability to record an ISA that has no end date

Enhancements in release 3 contain the following functionality:

- New Data Processing Contract (DPC) Tab

Create and a Data Processing Contract (4 Types):

Data Processing Contracts

Dara Processing Deeds

Service Level Agreements

Service Contracts

Add a processing organisation to your DPC

Maintain a Data Processing Contract (DPC)

Edit & Update your organisations DPC

Upload New Version of a document in your organisations DPC

Delete a document from your organisations DPC

Export to Excel feature

Terminate a DPC

Link DPCs to ISA's

Add a DPC to your own Organisations ISA (Add as a host of an ISA)

Add DPC to another organisations ISA (Add as a participant of an ISA)

Approve / reject another organisations DPC request

Delete your organisations DPC from your organisations ISA

Delete your organisations DPC from a participating ISA

Enhancements in release 4 contain the following functionality:

- Updates to ISA:
 - A new DPIA future is added to OSU and AU roles.
 - User can filter ISA based on DPIA status:
 - Not Required – Historic ISA
 - Not Required – Checklist
 - Checklist Required
 - Required
 - Completed Digitally
 - Completed by Upload
 - RSU users have read only access to DPIA.
- Updates to Organisation Profile:
 - Organisation type – Local Authority is added
 - Contacts - Where organisation type is Local Authority user can select Role Category:
 - Adult Social Care
 - Children's Social Care
 - Accreditation - 2 new options added (HSCN, OFSTEAD).
 - Organisation Tagging: Boroughs serviced – Instead of selecting Individual Boroughs if required User can select 'All London Boroughs'

Enhancements in release 5 contain the following functionality:

- *Data Flow (now Data Links) release*
 - *Data link function with mapping*
 - *Configurable data export capability*
 - *ISA*
 - *DPC*
 - *Organisation*
 - *New aggregated reporting*
 - *ISA Summary Report*
 - *DPC Summary Report*
 - *RSU Updates*
 - *RSU can fully manage organisations*
 - *RSU invite report*
 - *Email Updates*
 - *Sender's name included in organisation invite email*
 - *From address now includes environment*
 -

Enhancements in release 6 contain the following functionality:

- Ability to create an E-ISA via an automated template –
 - Upload or create e-ISA template
 - e-ISA template mandatory for London HIE use, other with the other HIEs the template is optional (this will change if local areas ask for it to be mandatory)
 - Keep upload ISA Creation and e-ISA in DCC
 - DPIA (and risks) workflow to be changed to beginning of e-ISA template and ISA Upload
 - E-ISA template to be able to be saved in draft before sent
 - Choice to create e-ISA from scratch or from ISA Registry list, and clone full ISA to edit

- Clone e- ISA from registry
 - Summary page once completed e-ISA and Data directory to view all at once
 - Items all mandatory in e-ISA
 - Summary page at end of e-ISA for viewers to save and continue or save in draft
 - Ability to stay and save to draft format or continue, after every section
 - Version to be automatically updated when information is changed e-ISA and uploaded ISA
 - Keep audit trail of changes to e-ISA and uploaded ISA (were applicable)
- Standard format for introduction for e-ISA or Upload ISA;
 - **Standardised format:** Location, Purpose, Month, - auto generated, Year- auto generated
 - **Add ISA reference No.** Automatic generate
 - **Add Start date of ISA** format dd/mm/yyyy
 - **Add Expiry date of ISA** format dd/mm/yyyy
 - **Add Expiry notification date** format dd/mm/yyyy
 - **Add No expiry date** Tick box
 - **Add Review date of ISA** format dd/mm/yyyy
 - **Add Version** Make Available previous version -Date and version
 - **Add HIE connection** Drop-down list (options)
 1. North London
 2. North West London
 3. North East London
 4. South East London
 5. South West London
 6. London
 - **Background** free text box
 - free text box for description of added item/s
 - **Add Fair Processing Notice- published on Public facing website if selected**
 - drop-down list (options)
 - None (is this an option)
 - Document
 - Website link
 - Add – publish to website: e-ISA or PDF and Fair Processing notice
 - Add – Make available to others – search and clone
- **Data Controllers need to specify what they are sharing in an e-ISA**
 - Section in e-ISA to capture ‘information Shared’
 - All sections multi selection
 - Drop-down list (options)
 - Adult
 - Children
 - Add Care Setting ; Drop-down list (options)
 1. Mental Health
 2. Social Care

3. Community
 4. Primary Care
 5. Acute
 6. Specialist Services i.e. prison, dentistry
 7. Care – please specify
 8. Other – free text
- **Add Data Type**
 - Drop-down list (options) multi selection
 1. Personal Confidential Information
 2. Pseudonymised Data in line with ICO Code
 3. Anonymised Data in line with ICO Code
 - **Add Data transferred outside EEA** Drop-down list (options)
 1. I confirm no data is being transferred outside the EEA
 2. Data is being transferred outside the EEA
 3. If option 2. free text box specify where and why
 - **Add Configuration of system** Drop-down list (options)
 1. My system is not currently configurable therefore I am sharing the whole record
 2. My system is configurable
 - **Add My system is configurable, I am sharing (options)** drop-down list (options)
 1. Full record
 2. sharing full coded record
 3. limited coded record
 - Add Assurance requirements for sharing
 - ICO registration
 - ISO 27001
 - Data Security and Protection (DSP) Toolkit
 - Other Please Specify
 - **Add section so that users can specify data ‘ Sharing’**
 - All options are multiselection
 - **Add Sharing for** drop-down list (options)
 1. Direct care,
 2. Secondary purposes : Optional drop down –
 3. Audit and planning,
 4. Population Health Management
 5. improve health outcomes (research)
 - **Add Lawful Basis for Sharing** drop-down list
 1. Statutory basis GDPR Article 6(1) drop-down list
 2. Special Conditions 9 (2)- drop down
 3. Provision to Services via NHS Commissioners
 4. Health and Social Care (Safety and Quality) Act 2015
 5. Common Law Duty of Care
 6. Other please specify – tick and free text
 7. Pulled over information from DPIA

- **Add 'Purpose' drop-down list (options)**
 1. Sharing for individual care and treatment'.- citizens receive care, a diagnosis, treatment or services to support their general wellbeing
 2. Sharing to create Local Health and Care Records
 3. Data being recorded is used by health and care professionals to help make diagnoses and decisions about a patient's care
 4. Other please specify
 - Other option - Add free text box
- **Add Records Management**
 - Adhering to the IGA Records Management Code of Practice 2016' tick box
 - Pulled through from e-ISA – mandatory text box if answer is yes
- **Who will have access- pulled through from data directory in summary e-ISA view**
- **How will information be accessed? drop-down list**
 1. Read only
 2. Secure file Transfer
 3. Secure Email
 4. Automatic Transfer between systems
 5. Secure Cloud Sharing 'Other' to allow for user to specify brand
 6. Information Exchange Engine
 7. read and write back
- multi-select option
- Sharing Arrangement - pulled through from data directory in summary e-ISA view
- Privacy level- pulled through from data directory in summary e-ISA view
- **Confirm Retention Policy**
 - Drop down list based on IGA records management
- **Add Privacy Data Level – this will be pulled through from the data template drop-down list (options)**
 1. Low
 2. Moderate
 3. Normal
 4. Unrestricted
 5. Restricted
 6. Very restrict
- multi-select option
- **Add section called 'Principles'**
 - **Principles drop-down list with 12 options** – see upload for wording
 1. tick box to select all
 2. other free-text box specify
 - **Add Agreement;** drop-down list with 6 options – see upload for wording
 - tick box to select all option
 - **Add information being shared (data item)**
 - Pulled through from Data Directory Summary **Add Requirements for participation** tick box to select for 9 – multi-selection
 - option to add others and free text box
 - **Add Assurance requirements for sharing**

- tick box to select all
- **Make contact points available on e-ISA's and on Organisations Profiles**
 - **Contact Points**
 - Contact points from list for Profile
 - FOI requests
 - Section 29 requests
 - Subject access requests
 - Correction or Amendments to records
 - Incident Management
 - Contact name, Email
 - In ISA
 - Responsible for ISA – per ISA not on profiles – any contacts in profile page, or can free type details
 - tick box option for all org.s
 - Multi selection of contact points list, select which one is most appropriate to this sharing arrangement
- **Section for additional information on e-ISA**
 - Add PDF Upload for another other documents
 - PDF uploads
 - Free text description box per upload
 - End of E-ISA
- **Update to already established tabs in the DCC**
- **Organisation Profile**
 - Take out services required from org profile as this is already in the e-ISA
 - Contact points to be added to the profile
 - Contact points from list
 - Responsible for ISA
 - FOI requests
 - Section 29 requests
 - Subject access requests
 - Correction or Amendments
 - Incident Management
 - Name, job Title , Email
- **Ability to report on e-ISA's and make audit who has authorised**
 - Add who has authorised ISA to audit tab
 - Add who accepted ISA or e-ISA onto the audit tab
 - Add new fields onto export reports
- **Present E-ISA onto public facing website**
 - Conceal sensitive e-ISA items when ISA is published/ exposed on the PFW
 - Sensitive items to be obscured
 1. Configuration of System
 2. My system is configurable; I am sharing (options)

3. Records Management (tick Box)
 4. Make searchable by others
 5. Format of data
- Show there is an arrangement even if no e-ISA is published
- **Update DPIA Checklist**
 - Q11. Update question to answer: Adult's children' corporate multiselect
 - **Q1. What type of information are you sharing? Drop-down list options**
 - Drop-down list (options)
 - Personal Confidential Information
 - Pseudonymised Data in line with ICO Code
 - Anonymised Data in line with ICO Code
 - **Update DPIA Checklist Q3. What is the purpose? Drop-down list options** Drop-down list (options)
 1. Sharing for individual care and treatment'.- citizens receive care, a diagnosis, treatment or services to support their general wellbeing
 2. Sharing to create Local Health Care Records
 3. Data being recorded is used by health and care professionals to help make diagnoses and decisions about a patient's care
 4. Other
 - a. Add free-text box to specify
 - **Update digital DPIA what is the lawful basis for sharing information?**
 - Update 'GDPR (from 26/05/2018)' with GDPR 2018
 - Remove Data Protection Act 1998
 - **Update options to Q. Are there privacy notices to enable information sharing? If a 'Yes' option is selected** Add option - Make available on myhealthlondon website via DCC
 - Add data structure to 'Select Data'
 - Data Structure Options
 1. Structured data
 2. Unstructured data
 3. Images
 - Pull through adhering to IGA records management to e-ISA: Outside EEA – add a mandatory textbox if YES
 - Add new questions to the DPIA Under People Questions
 - Add new question - Do you adhere to the accessibility information standards
 - Options: Yes, No, Unsure
 - Remove as an option for question 'Are there privacy notices to enable information sharing?'
 - Under Process Questions
 - Question: Have all organisations sharing or consuming information met the Data Security and Protection (DSP) Toolkit
 - Answer: Yes, No, Unsure
 - If 'No' - has the purpose a current ISO 27001 certificate?
 - Question: Will any information stated in the ISA transferred outside the EEA?

- Answer: Yes, No, Unsure
 - If no: If limited to the USA, is the processor on the Privacy Shield Scheme?
 - Answer: Yes, No, Unsure
- **Draft status**
 - An ISA will be permitted to be saved in with a DRAFT status – in this state the following will apply
 - Not all current mandatory sections/fields will be mandatory
 - Possibly the following:
 - Title
 - Dates
 - DPIA
 - Introduction section
 - Organisations added to the ISA will be in a DRAFT status as well and will NOT be notified until the DRAFT status is removed from the ISA
 - NO APPROVAL workflow within ISA – that is a local matter and anyone that has the ability to modify ISAs on the DCC can move from the DRAFT state
 - Once moved from the DRAFT state an ISA cannot go back

Clone an ISA

- It will be possible to clone an ISA which will pre-populate a new DRAFT ISA containing relevant information from an existing ISA. This information will include (fields underlined)
- Dates
- Searchable by others
- Contacts
- Other parties involved
- DPIA
- DPIA Risks/Issues
- Data Directory
- e-ISA details
 - will only be copied if host organisation makes searchable by others

New Requirement B- Data Directory

- **Data Directory attached to e-ISA: Filters for data**
 - High level filters mandatory for e-ISA
 1. Care setting – acute, community, mental health, primary care, social care, specialist commissioning
 2. Special code categories – immunology, diabetes clinic
 3. Data type- alert, assessment, care plan
 4. Data being shared – most granular level we go to
 - Ability to upload data items on mass using these fields
 5. Pop-up alert box for what's is mandatory in data directory
 - Mandatory for e-ISA speciality and type of data
 - Mandatory for LIE flow the data being shared (most granular level)
 - User to indicate which system supplier used to share/host data i.e. EMIS, TPP, Cerner

- **Ability to add more than one data template per E-ISA**
 - Ability to have more than one schedule of sharing in the ISA template
 - 3 sharing arrangements per schedule of sharing, can be mixture of all 3 in e-ISA
 - 1. People to People sharing;
 - a. Need to set who can see the data , overarching privacy level, free-text box where user can write what they're sharing, retention period optional, care setting based on the selection in e-ISA
 - 2. Person to System sharing;
 - a. Need to set who can see the data , overarching privacy level, retention period, state which care setting, optional to use standardised headings, care setting based on the selection in e-ISA
 - 3. System to System sharing;
 - a. RBAC and privacy level, retention period, to be based on PRSB headings with the ability to upload on select from the drop down PRSB data directory –, upload functionality or use PRSB templates, care setting based on the selection in e-ISA
 - Add Retention Policy: Automatically Updated Once section in Data Directory (Doc Type and Treatment function) is filled in from IGA Records Management Code of Practice (Page 54 onwards) – we will provide excel file for you
 - Privacy Level
 - Low
 - Moderate
 - Normal
 - Unrestricted
 - Restricted
 - Very restrict
- **Ability to set differences per data schedule**
 - Minimum requirements for adding another schedule of sharing, following fields needs to filled in per schedule
 - Who can see it- RBAC
 - Privacy levels
 - DPCs
 - Data Retention period – drop down or free text to override
 - Record which system(s) are being used to share information
 - a. When chosen – all sections within will be preselected and can be removed if not part of this sharing
 - b. Templates will contain a number of sections and these sections will hold the following information
 - i. SNOMED Code (unique identifier)
 - ii. Name
 - iii. Display Name (if different)
 - c. Changes in this tab will be audited separately from the full ISA and date/timestamped details will be available for viewing by users in a popup.

- d. Both templates and sections will exist as filters on relevant ISA and Data Flow (to be renamed Data Sharing?) tabs
- **Ability Schedules of Sharing in Data Directory must contain the following**
 - Text box for title of schedule of sharing
 - sharing for – multiple selection box
 - care setting- multi selection or option in uploaded templates
 - who can see information - RBAC – 3 options
 - Access to records
 - Privacy levels
 - data retention
 - data format – multiselection
 - data template / PRSB
 - Configuration of system
- **Choice in either Upload data templates or using pre-defined PRSB templates**
 - Ability to upload own template if appropriate template is not available
 - Upload option
 - Use PRSB Template
 - Snowmed coding
 - Use own Data Template
 - Upload own Template
 - Data Directory to allow for new additions to data directory- upload functionality, *would be good to have excel file to download, fill in and upload to keep consistency*
 - All edits/ changes to have date/ time stamp for audit purposes
 - All previous versions of data templates to be made available for viewing for control/ audit purposes
 - Changes to the data template will have 2 options;
 - a. inform
 - b. re-sign e-ISA
 - Option to
 - a. publish dataset to data directory for others to use
 - b. Option to publish dataset to website
 - All data templates in data directory to have ability to be unselected data items so can be used adhoc
- **PRSB templates**
 - 10 PRSB templates for the upload functionality
 - Ability to de-Select data items in each PRSB data template
 - If de-select free text for rationale why de-selecting as this is a national standard
 - Data
 - a. Templates

- i. Acute Care Discharge
- ii. Mental Health Discharge
- iii. Emergency Care Discharge
- iv. Outpatient Letter
- v. Crisis Care Plan
- vi. Admission Record
- vii. Handover
- viii. Clinical Referral
- ix. Healthy Child Record
- x. Digital Care and Support Plan
- b. Sections
 - i. additional Supporting Plan(s)
 - ii. Admission Details
 - iii. Allergies and Adverse Reactions
 - iv. Assessment scales
 - v. Attendance Details
 - vi. Birth Details
 - vii. Care and Support plan(s)
 - viii. Clinical narrative
 - ix. Clinical summary
 - x. Clinical Review of Systems
 - xi. Clinical Risk Factors (relevant)
 - xii. Contingency plan(s)
 - xiii. Crisis Care Plan
 - xiv. Demographic History
 - xv. Developmental Skills
 - xvi. Diagnoses
 - xvii. Discharge Details
 - xviii. Distribution list
 - xix. Educational History
 - xx. Emergency Care Attendance
 - xxi. End of Life circumstances
 - xxii. Examination Findings
 - xxiii. Family history
 - xxiv. Feeding Status
 - xxv. GP Practice
 - xxvi. Health and Wellbeing Assessment and Reviews
 - xxvii. History
 - xxviii. Immunisations
 - xxix. Individual requirements
 - xxx. Information and advice given
 - xxxi. Investigation results
 - xxxii. Legal Information
 - xxxiii. Measurements
 - xxxiv. Medications and Medical Devices
 - xxxv. National Screening Programme
 - xxxvi. Parent/Guardian/Personal Comment

- xxxvii. Participation in research
- xxxviii. Patient concerns, expectations and wishes / About me
- xxxix. Patient Demographics
 - xl. Personal Contacts
 - xli. Plan and requested Actions
 - xlii. Presenting complaints or issues / Problems and issues
 - xliii. Procedures
 - xliv. Professional Contacts
 - xlv. Reason for Referral
 - xlvi. Referrer Details
 - xlvii. Safeguarding
 - xlviii. Safety alerts
 - xlix. Social Context

- **Optional fields boxes added for sensitive codes**

- Optional to complete
- Exclusion codes in separate data table
- Special Category Codes- sensitive or exclusion codes optional and can be uploaded

- **Upload functionality using PRSB Headings**

- Ability to unselect pre-uploaded data templates
- Add in question asking 'Are you sharing special categories data?' to data template to prompt to fill in sensitive data table
- Tick box for ability to record participant opt-out if using sensitive data.
 - a. When clicked a free-text box provided for rationale

- **RBAC (Role Based Access Control)/ Who can see the data?**

- Pull through where possible to data templates
- Multiselection per schedule of sharing
- 3 roles:
 1. Administrative Staff Supporting Direct Care – full record, partial record, limited record
 2. Registered Health or Care Professionals – full record, partial record, limited record
 3. Unregistered and supervised health and care professional – full record, partial record, limited record
 4. Other free-text box specify (full record, partial record, limited record)
- multi-select option per schedule of sharing

- **New requirement C: HIE Profile**

- Create unique profile for host of LHCIE
- E-ISA mandatory for users of LHCIE

- E-ISA will mark up whether data is flowing around the LHCIE, this will automatically be flagged up / notification sent to the host processor
 - The host processor will therefore be able to view the relevant e-ISA's and will be able to attach DPC's to them as required
 - When the DPC is attached then the DC's will have the ability to accept or reject the DPC. DC's will all need to resign option
 - Host will be able to have extra audit of DC that accepted DPC
 - Update reporting to match new functionality
 - HIE profile to only be set by symphonic on request from programme
 - Ability to upload a DPC and also hold in draft format
-
- **New Requirement: Part D SOCIAL CARE ORGANISATIONS**
 - **Profile for social care organisations to join the data controller console**
 - Add extra profile option called Social Care Organisation
 - Add Name of specific organisation, Drop down list:
 - Hospice
 - Care home
 - Domiciliary Care
 - Retirement community operative
 - Care Provider
 - Home Care Services
 - Other Please Specify
 - Record whether first toolkit submission (DST) or ISO 27001 certification- mandatory for sharing
 - Can have both ISO and IGT)
 - Borough serviced – mandatory
 - ICO code - mandatory
 - IG Lead/Main contact – mandatory
 - DPO – mandatory to name
 - DPO not mandatory to publish to public facing website- as to publish details to website
 - Optional: Contact points i.e FOI
 - Optional: Other Qualifications i.e. CQC, OFSTED other
-
- **New Requirement Part E: Data Sharing Tab**
 - **Update Data Sharing Tab to include information gained from E-ISA**
 - Rename data flows tab to 'Data Sharing' tab
 - All fields multi-selection
 - Ability to see whether e-ISA or Uploaded ISA
 - Ability to see DPIA overarching risk RAG rating
 - Ability to see if there are DPC's linked to ISA's
 - Additional filters to data flow mapping

- Purpose- direct care, secondary, research
- Coverage (what is the extent of the data flow): How many organisations involved
- Data Types- 3 types pseudonymised, anonymised, Personal Identifiable
- Legal Basis
- Data of: Childrens, Adults, Corporate
- Can search per e-ISA or per schedule of sharing i.e. pseudo, corporate data as part of overarching ISA
- View data sharing per schedule of sharing in e-ISA
 - Ability to view own data flows from source to destination and back
 - Add filter for 'Means of sharing': People to People Sharing, People to System Sharing, System to System Sharing
 - Ability to search using all 3 criteria: Name, ODS Code, ICO code
- **Ability to view organisational sharing arrangements and Other organisational arrangements**
 - Search for sharing arrangements of other organisations and view ISA or e-ISA if have selected make searchable by others (source and destination)
 - Ability to clone e-ISA if made searchable by others
 - Notification to host of e-ISA that another has cloned their e-ISA
 - Read, write access, or both
 - Ability to search using all 3 criteria
 - Name
 - ODS Code
 - ICO code
- **Audit and Reporting Update**
 - Update reporting tab so can pull off new data sharing tab fields so can pull off reports of selected fields
 - Audit and reporting record of how many people have cloned e-ISA

For the purposes of this document, 'users' are those staff who as all/part of their role are required to access/use the DCC e.g. IG Manager, Caldicott Guardian etc.

Applies to

All staff (managerial, clinical and administrative) who manage the information sharing governance processes or contribute to the process.

It is suggested that every organisation will have a minimum of two Organisation Super Users to facilitate appropriate management and access to the DCC.

The DCC has four levels of User Groups defined, see table below.

DCC User Groups

Regional Super User (RSU)	<p>A key role of the Regional Super User is to 'approve' or 'reject' organisations who request to join the data controller console 'club'.</p> <p>This user has access to ALL functionality (register organisation, create ISA, update Org and ISA, create users, update user details, upload docs etc.) INCLUDING the ability to 'Approve/Reject' an organisation's application</p>
Organisation Super User (OSU)	<p>Key roles of the Organisation Super User are to manage their organisations ISAs (in conjunction with Active Users) and manage the creation of the User Accounts associated with their organisation</p> <p>This user has access to ALL functionality (see examples above in RSU), EXCLUDING the ability to 'Approve/Reject' an organisation's application</p>
Active User (AU)	<p>A Key role of the Active User is to manage the organisations ISAs on a day to day basis</p> <p>This user has access to functionality for: View all details and Create ISA, Update ISA, Remove ISA, Upload docs and approve or reject an invitation to participate in an ISA, excluding the ability to amend their Organisations details and create User Accounts</p>
View Only User (VOU)	This user has access to functionality for: View only

Organisational Responsibilities

Starters and Leavers Policy

It is the responsibility of the nominated organisation lead (**insert contact details**) to ensure that the 'users' of the DCC platform within their organisation is up to date i.e. users are added and removed in line with organisation's starters/leavers policy or a user has confirmed a change in role/responsibilities that impacts their user access profile.

User Access Responsibilities

The beta release of the DCC will be available to access via the web. To assist in managing access to the application there will be a requirement for each organisation to manage a 'whitelist' of contacts i.e. domain details of each user. Access to the application will be restricted to those domains that are registered on the Whitelist. It is the responsibility of the organisation to keep this list accurate and up to date and the Supplier informed.

The use of personal email accounts e.g. hotmail, gmail will not be supported/allowed.

In the current Beta Release access to the DCC will be managed via;

- Access is only possible if email account domains on a managed 'whitelist' e.g. nhs.net, .gov.uk (Only for Health and Care Organisations)
- Identifying named users from recognised organisations
- Restricting access to those with email address e.g. nhs.net, nhs.uk, .gov.uk
- Password protected log on

Training Responsibilities

It is the responsibility of managers/supervisors that they and their staff, particularly new staff, have a full and comprehensive introduction to the DCC application, the supporting manual, videos, digital systems and processes. These can be found on the Healthy London Partnership (HLP) website.

It is each individual's responsibility to ensure that they maintain their knowledge and arrange appropriate updates and training as necessary.

Misuse and reporting defects within DCC

The use of the DCC is for those persons who are required as part of their role to view/manage ISAs only.

It is the responsibility of each individual User to notify the nominated organisation lead (**insert contact details**) of any defects/issues that they may witness as a result of using the DCC, giving comprehensive details/screenshot where possible.

Training and Helpdesk service

Point of Contact - *Please mention in the Subject line of the email that it relates to either*

- *DCC Training*
- or*
- *DCC Technical*

Hours of service: Monday to Friday, 09:00 to 17:00 only

Email contact: England.DccSupport@nhs.net

If your question is regarding:

- Training or how to use the DCC Portal, you will hear from us within one working day
- A specific technical issue in the system, we may need to investigate and get back to you within the next working day

Organisation Sign up Procedure & Verification

Pre-requisites for Organisations using the DCC

1. Organisations who wish to use the DCC application will need to be 'registered' via the online DCC process and must ensure that they are able to provide the following details;
 - a) ODS number
 - b) Organisation PostCode
 - c) IG Toolkit level 2 to satisfactory or above
 - a. If you do not meet level 2 for all standards, you can provide an action plan to cover appropriate areas
 - d) ICO registration number
 - e) Contacts within the organisation:
 - i. For general communication
 - ii. For communication related to an specific ISA
 - iii. For those individuals that require access to use the DCC

2. Registration may be initiated by:
 - a. The organisation itself, by completing their registration details
 - i. With the application subsequently approved / rejected by the regional super user
 - b. A regional super user registering the organisation i.e. the registration details are completed on another organisations' behalf
 - i. With application details sent to the organisation to confirm
 - ii. Once the organisation confirms the application, it is reviewed and subsequently approved / rejected by the regional super user
3. Once an organisation is successfully registered, they will be able to add their information sharing agreements (ISAs) details.

Who needs to be registered to use the DCC

User	Example staff role
Regional Super User (RSU)	At a level that embraces multiple individual entities/organisations e.g. CCG <ul style="list-style-type: none"> • IG Manager • Senior Information Risk Owner [SIRO]
Organisation Super User (OSU)	At individual entity/organisation level e.g. Acute Trust, GP Practice <ul style="list-style-type: none"> • IG Manager • Senior Information Risk Owner [SIRO] • Caldicott Guardian
Active User (AU)	Any user who needs to manage ISAs on a day to day basis <ul style="list-style-type: none"> • IG Manager • Caldicott Guardian
View Only User (VOU)	<ul style="list-style-type: none"> • Data Controller • Caldicott Guardian

Log-on to Data Controller Console

Log-on

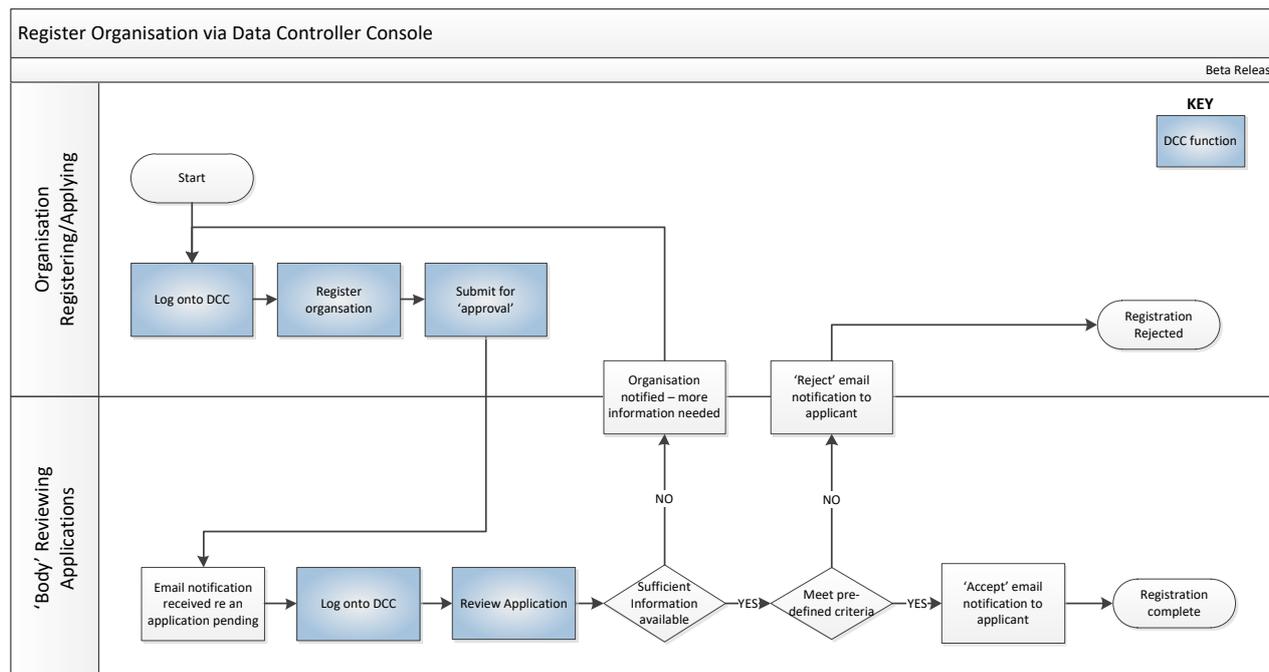
Step	Task	Role(s) responsible
1	Access DCC via username and password	Users

Log-on: Exceptions

Step Ref	Exceptions	Actions

1	Unable to log-on (forgotten password)	Select 'Forgot your password?' link and enter the registered email address and await response
1	Unable to log-on as 'locked out' due to multiple log-on attempts	Select 'Forgot your password?' link and enter email address and await response. N.B. A link to reset your password will be sent by email from no-reply@datacontroller.london If you have rules set up to send all these DCC notifications into a designated e-mail folder, please check this folder for the e-mail and re-set your password within 15 minutes of receiving the e-mail.
1	Unable to log-on (system down; planned/unplanned downtime)	Contact <insert organisation contact details> to seek information
1	User is assigned as a regional super user but also needs to be assigned as an organisational super user	Refer to 'Manage User Accounts' in the User Guide
1	User is assigned as an organisational super user but also wishes to be assigned as a regional super user	Contact the area Regional Super User and confirm that they will support your application to be assigned a RSU role. Complete DCC feedback form (General Comment option) and document request, identifying the name of the supporting RSU

Register Organisation



Preparation

Step	Task	Role(s) responsible
1	<p>Have organisation details available;</p> <ul style="list-style-type: none"> • ICO Registration Number • ICO Expiry Date • ODS Code • Organisation Name • Organisation PostCode • Organisation Type (NHS/Local Authority/Third Party) • Provide Direct Care (Y/N) • Organisation Region (NWL, NEL, NCL, SWL, SEL) • Organisation Tagging (Type of Services provided & Boroughs Serviced by the organisation) 	Super User
2	<p>Have list of organisation contacts, ideally at least two contacts, one of whom MUST be the designated Caldicott Guardian and one must have the Organisation Super User Role allocated (registration cannot be submitted without this information).</p> <ul style="list-style-type: none"> • First name • Last name • Role <ul style="list-style-type: none"> ○ Local Authorities may enter: ○ Caldicott Guardian (Adult Social Care) & ○ Caldicott Guardian (Children's Social Care) • (role other details) • Email 	Super User

	<ul style="list-style-type: none"> • Phone • Mobile • Create User Account (Y/N) 	
3	Know file location of relevant documents that may be uploaded to support registration process (optional)	Super User

Register Organisation

Step	Task	Role(s) responsible
1	Access DCC and complete organisation profile, including organisation contacts, identifying those who need user accounts and complete the Organisation Tagging	Super User
2	Application is submitted	Super User

Register New Organisation: Exceptions

Step Ref	Exceptions	Actions
2	Registered Organisation indicates that they haven't received the Invitation email	Access the DCC 'Organisations' tab. Ensure that the organisations status column reads 'Invited' (This feature doesn't work for Pending or Accepted, which means that one person from the organisation has already accepted the invitation). Select the ISA you are hosting in the 'Invited' status. Select the Resend Invite button adjacent to the organisations contact name.
2	Notification received that registration submission 'rejected'	Contact <insert contact details> to discuss
2	Notification received requesting 'more information required'	Access DCC and complete information as requested
2	Application submitted in error (no ISAs added)	Contact <insert contact details> to request application is removed/deleted
2	Application submitted in error (and ISAs added)	Contact <insert contact details> to request application is removed/deleted
2	Registered organisations have merged (and ISAs are in place)	Contact <insert contact details> (supplier) to request merger of organisations

User Accounts

Step	Task	Role(s) responsible
1	Notification received: new user account created and login required to update password	User

User Accounts: Exceptions

Step Ref	Exceptions	Actions
1	No user account notification received from no-reply@datacontroller.london	Contact <insert organisation contact details> the Organisation Super User and check if you have been identified as a 'user' and confirm contact details are correct
1	Unable to perform actions needed within the DCC	Contact <insert organisation contact details> the Organisation Super User to understand the level of access granted and request a change to level of access e.g. 'view only' to 'active'
1	User unable to change account password	Contact <insert organisation contact details> for assistance
1	User account no longer required	Refer to local Starters & Leavers Policy or contact <insert organisation contact details>

Approve / Reject Organisation's Submission

Approve/Reject Organisation's submission

Step	Task	Role(s) responsible
1	Access DCC and review submission from organisation	RSU
2	'Approve' submission	RSU

Approve/Reject Organisation's submission: Exceptions

Step Ref	Exceptions	Actions
2	Insufficient information in submission to support approval	Choose 'Request more information' option detailing the information required AND contact the

		submitting organisation in person to discuss
2	Supporting information does not meet the acceptance criteria	Choose 'Reject' option AND contact the submitting organisation in person to discuss

Update Organisation Profile

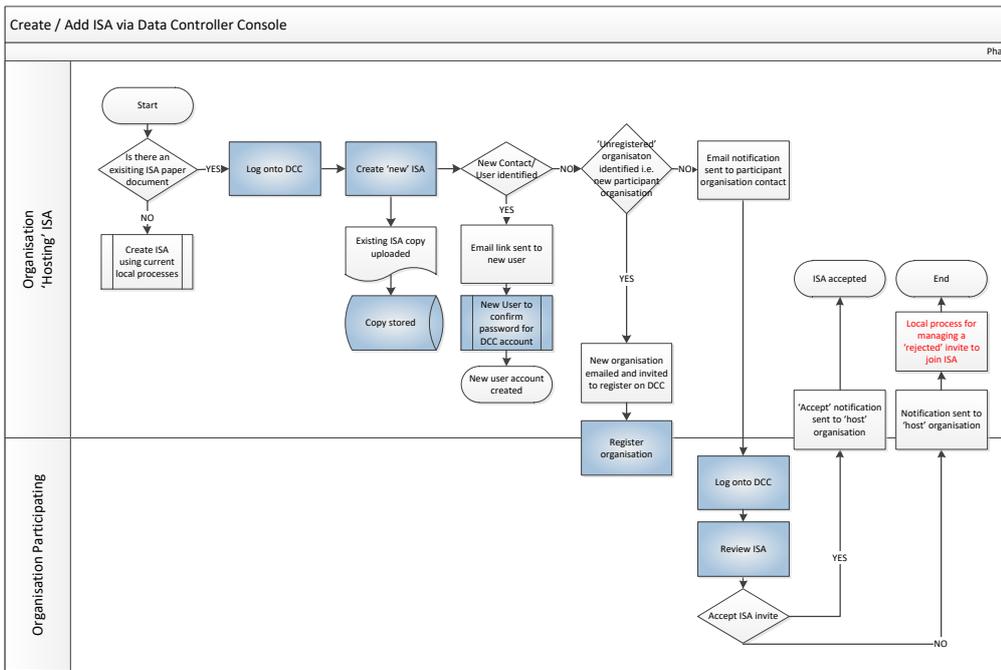
Update Organisation Profile

Step Ref	Task	Role(s) responsible
1	<p>Access DCC, from the Organisations Tab, select 'Register New Organisation' and complete the following details</p> <ul style="list-style-type: none"> • Organisation Codes (ICO / ODS) • Organisation Profile details • Organisation contacts, identifying those who need user accounts and complete. • Organisation Tagging <ul style="list-style-type: none"> ○ Services Provided ○ Boroughs Served (option for All London Boroughs) • Accreditations and upload related documents e.g. HSCN - Allows you to enter a date OFSTEAD - Inspection Date, Add Rating and Notes Other information <p>N.B. If a Local Authority there is the option in Contacts to add two Role Categories:</p> <p>Caldicott Guardian (Adult Social Care) Caldicott Guardian (Children's Social Care)</p>	RSU/OSU
2	Update saved	RSU/OSU

Update Organisation Profile: Exceptions

Step Ref	Exceptions	Actions
1	Unable to update/edit/save organisation details	Contact <insert details> to understand level of access granted and request change to level of access if appropriate

Add Information Sharing Agreement



ISA Preparation

Step	Task	Role(s) responsible
1	Have email notification that the organisation application complete i.e. registration successful	OSU
2	Ensure all copies of ISAs are available on local drive	OSU/AU
3	Have following ISA details readily available; <ul style="list-style-type: none"> • Agreement Title • Description • Valid From • Valid To (if on-going ISA, then ISA review date) • Version • Owner/Custodian 	OSU/AU
4	Have list of organisation contacts, ideally at least two contacts per Agreement, one of whom MUST be the Caldicott Guardian; <ul style="list-style-type: none"> • First name • Last name • Role • (role other details) • Email • Phone • Mobile • Notify of updates? 	OSU/AU
5	Have other ISA related information available; <ul style="list-style-type: none"> • Organisations involved/participating in the agreement • Other parties involved (Data Processor / Sub Data 	OSU/AU

	Processor <ul style="list-style-type: none"> • Data relates to direct/indirect care • Services provided 	
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ISA Preparation: Exceptions

Step Ref	Exception	Action
1	No registration notification received	Check registration submitted online Contact < insert details > to confirm receipt of submission and that contact details are correct
2	ISA available as paper documents only	Scan and upload paper only copies to local drive
3	ISA 'Valid to' date exceeded	Contact Caldicott Guardian/Information Governance group to notify of expiry date (there may be cases where ISA has expired and the ISA has been superseded). If the ISA has no expiry date, then obtain a review date.
4	Caldicott Guardian not identified on agreement	Confirm CG contact for the ISA
4	Caldicott Guardian (CG) details not available	Obtain CG details as ISA addition cannot be completed without them

Add ISA

Step	Task	Role(s) responsible
1	Access DCC and go to 'ISA – Registry' to Create new ISA including Details, Contacts, Organisation and Non-Registered Organisations and DPIA Tabs. DPCs Tab optional	RSU, OSU, AU
1	Upload new Documents: Title (If not entered will take document name as Title) Description (Mandatory) Category (Mandatory)	
2	'Save' details	RSU, OSU, AU

Add ISA: Exceptions

Ref to Step	Exceptions	Actions
2	ISA added in error	Select the Delete button adjacent to the uploaded document in the 'Details' tab. Documents deleted in error can be restored by contacting <insert contact details> (supplier)
2	ISA contact details are incorrect	Access DCC and update/edit details
2	ISA organisation identified as participating are incorrect	Access DCC and update/edit details
2	ISA data details are incorrect	Access DCC and update/edit details

Invite Organisation to join ISA

Step	Task	Role(s) responsible
1	Access DCC and go to 'ISA – Registry', select Organisations tab	RSU, OSU, AU
2	Select the organisation you would like to be involved in the particular ISA and 'add selected' Select the Select organisation button to search for the organisation(s) you would like to involve in this particular ISA by using their Name, Region, ODS code, Type of organisation or the Services provided or Boroughs serviced tags. Place a tick in the checkbox(s) then click the Select button to invite the organisation(s) to the ISA	RSU, OSU, AU

Invite Organisation to join ISA: Exceptions

Step Ref	Exceptions	Actions
1	Unable to find an Organisation to invite to an ISA	Select the 'Non-Registered Organisations' tab and search for the organisation using Name, ICO number or ODS code

Update Information Sharing Agreement

Update/Delete ISA

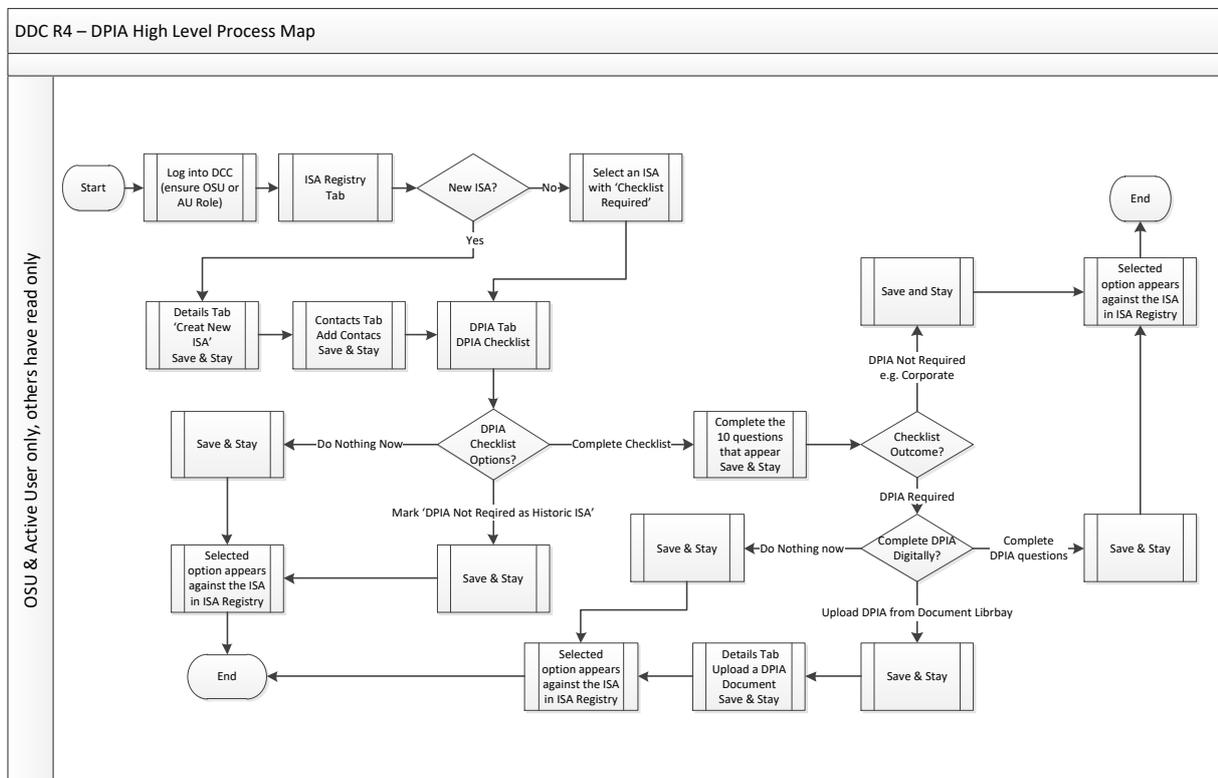
Step	Task	Role(s) responsible
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1	Access DCC and update/edit ISA and give reason for update	RSU/OSU/AU
2	Access DCC an delete ISA and give reason for the deletion	
3	Update saved	RSU/OSU/AU

Update/Delete ISA: Exceptions

Step Ref	Exception	Action
1	Unable to update/edit/delete and save ISA details	Contact organisation super user to understand level of access granted and request change to level of access e.g. 'view only' to 'active' if appropriate

Complete Data Protection Impact Assessment (DPIA)



DPIA Preparation

Step	Task	Role(s) responsible
1	Decisions to be made: <ol style="list-style-type: none"> 1) Do nothing 2) Complete a DPIA checklist 3) Mark DPIA not required as historic ISA 	OSU, AU
2	Ensure to have the 10 DPIA Checklist questions to hand	OSU, AU
3	If a DPIA is required, decide whether to complete it: <ul style="list-style-type: none"> • Digitally or • Upload document (ensure copy available on local drive). This can be uploaded via the Details Tab 	OSU, AU
4	Have the following 10 checklist answers readily available for Digital completion; <ol style="list-style-type: none"> 1) Type of information are you sharing 2) New data? 3) What is the purpose? 4) Does the information sharing introduce new or additional technologies? 5) Does the information sharing about the individual raise privacy concerns? 6) Does the information sharing involve you using new technology which might be perceived as being intrusive? For example, the use of data to make a decision about care that's automated? 7) Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information? 8) Will the project require you to contact individuals in ways which they may find intrusive? 9) Will 3 or more organisations be involved in sharing the information? 10) Will the information sharing involve new or significantly changed consolidation, inter-linking, cross referencing or matching of personal data from multiple sources? 	OSU, AU
5	Have following DPIA answers readily available for Digital completion; <ul style="list-style-type: none"> • People <ul style="list-style-type: none"> ○ Are there privacy notices to enable information sharing? <ul style="list-style-type: none"> ▪ If Yes, select Location of Privacy Notices ○ Do you have a defined subject access request process? <ul style="list-style-type: none"> ▪ If yes, provide Link details • Process <ul style="list-style-type: none"> ○ What is the lawful basis for processing 	OSU, AU

	<p>information?</p> <ul style="list-style-type: none"> ▪ See pick list ○ Are the new purposes for processing information stated in the current ISA likely to be identified in the future? ○ Have all organisations sharing or consuming information met the minimum IG Toolkit Level 2? ○ Will any information stated in the ISA be transferred outside EEA? <ul style="list-style-type: none"> • Technology <ul style="list-style-type: none"> ○ If required, do you or any parties subject to the ISA have the means to make changes to the data? ○ Is there a section within the ISA that covers Data Quality? <ul style="list-style-type: none"> ▪ If Yes, specify section from the ISA? ○ Does the organisation and agreement comply with records management code? <ul style="list-style-type: none"> ▪ If Yes, provide Link details ○ Is your information security proportional to the sensitivity of the data being transferred? • Data <ul style="list-style-type: none"> ○ Select the data covered? (Pick list) 	
6	Decide if a print out of the Digitally completed ISA / DPIA will be required?	OSU, AU

DPIA Preparation: Exceptions

Step Ref	Exception	Action
2	If the Type of information being shared is 'Corporate', a DPIA will not be required	The Digital DPIA questions will not appear in this scenario unless you have also selected more than one Type.
3	Unable to enter a valid DPIA Date	DPIA Date cannot be a future date, ensure to enter a current date

Complete DPIA Checklist and DPIA where required

Step	Task	Role(s) responsible
1	<p>Access DCC and go to ISA Registry Tab</p> <p>Either:</p> <ul style="list-style-type: none"> • Select an existing ISA which has 'Checklist Required' in 	OSU, AU

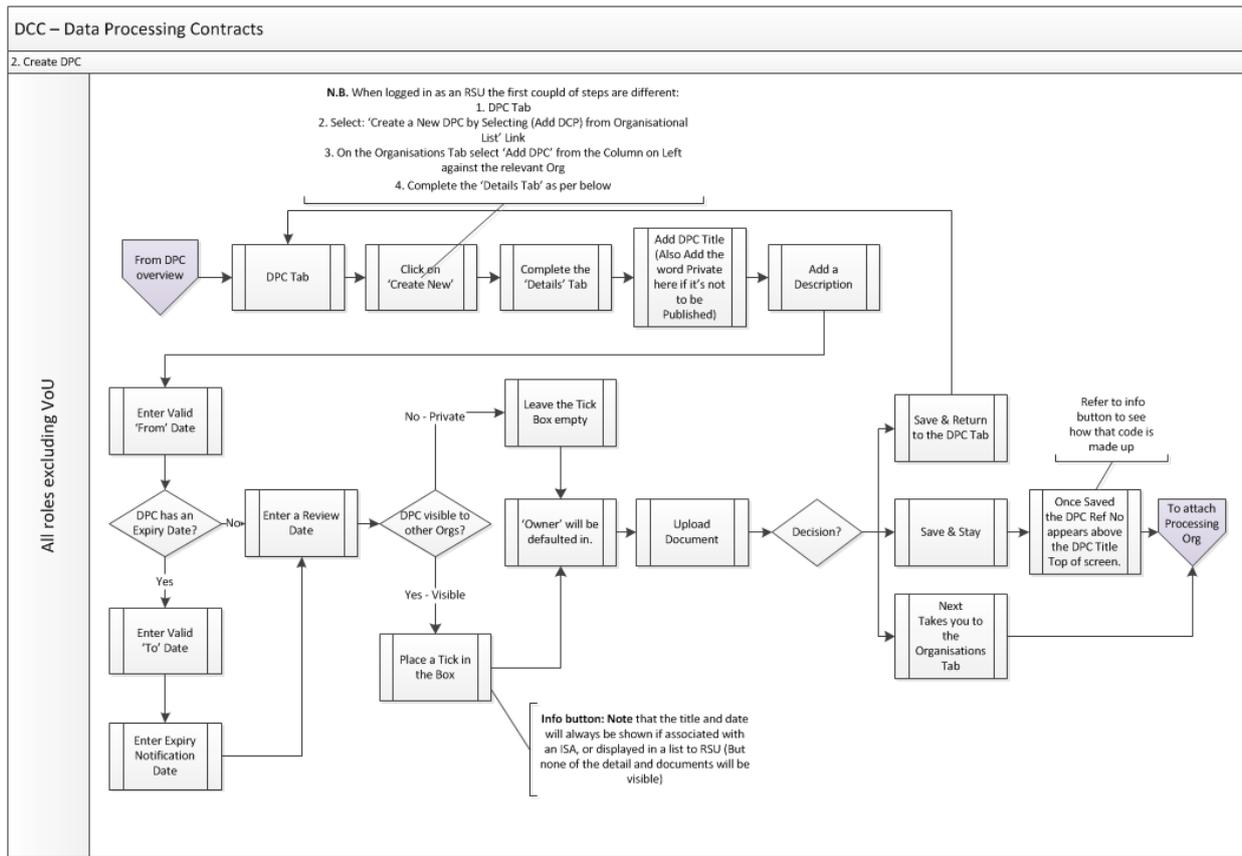
	<p>the DPIA Column or</p> <ul style="list-style-type: none"> • Create a New ISA and complete the Details and Contact Tabs as a minimum before selecting the DPIA Tab. 	
2	<p>Complete the 10 Checklist questions as per DPIA Preparation section above.</p> <p>Outcome of Checklist: DPIA Required / Not Required</p>	OSU, AU
3	<p>DPIA Required?</p> <p>Decision point: Select either</p> <ul style="list-style-type: none"> • Do nothing now • Continue to Complete Digitally via the DPIA Tab or • Upload DPIA document via the ISA Registry Tab, Details Tab (as you did to upload the ISA). 	OSU, AU
4	'Save' details	OSU, AU
5	Print DPIA via browser if required	OSU, AU

Complete DPIA Checklist & DPIA: Exceptions

Ref to Step	Exceptions	Actions
1	User Roles	RSU & VO Roles will only have read only access to DPIAs
3	Digital DPIA details are incorrect	Access DCC and update the DPIA details digitally then save and stay
3	DPIA document uploaded in error	Select the Delete button adjacent to the uploaded document in the 'Details' tab. Documents deleted in error can be restored by contacting <insert contact details> (ISA host)

Data Flows

Create a Data Processing Contract (DPC)



DPC Preparation

Step	Task	Role(s) responsible
1	Ensure all copies of DPCs are available on local drive	RSU, OSU, AU
2	Have following DPC details readily available; <ul style="list-style-type: none"> • DPC Title • Description • Type • Valid From • Valid To (if on-going DPC, then DPC review date) • Version • If you wish the DPC to be 'Visible to others' 	RSU, OSU, AU
3	Have list of processing organisations Names, ICO Registration Numbers or ODS codes. Note: Important to note that the DPC may be between One data controller and several data processors, Several data controllers and several data processors, Several data controllers and one data processor.	RSU, OSU, AU

DPC Preparation: Exceptions

Step Ref	Exception	Action
1	DPC available as paper documents only	Scan and upload paper only copies to local drive
2	DPC 'Valid to' date exceeded	Contact Caldicott Guardian/Information Governance group to notify of expiry date (there may be cases where DPC has expired and the DPC has been superseded). If the DPC has no expiry date, then obtain a review date.

Create a DPC

Step	Task	Role(s) responsible
1	Access DCC and go to 'DPC' tab to Create new DPC including details and processing organisations	RSU, OSU, AU
2	'Save' details	RSU, OSU, AU

Create a DPC: Exceptions

Ref to Step	Exceptions	Actions
1	DPC document uploaded in error	Select the Delete button adjacent to the uploaded document in the 'Details' tab. Documents deleted in error can be restored by contacting <insert contact details> (DPC host)
1	DPC details are incorrect	Access DCC and update/edit details
1	DPC processing organisation identified as incorrect	Access DCC and update/edit details
1	DPC data details are incorrect	Access DCC and update/edit details

Attaching DPC to hosted ISA

Step	Task	Role(s) responsible
1	Access DCC and go to 'ISA-Registry' tab to open the ISA that the DPC will be associated with.	RSU, OSU, AU
2	Navigate to the 'DPCs' tab within the ISA and search for and attach your organisations DPC.	RSU, OSU, AU
3	'Save' the ISA.	RSU, OSU, AU

Attaching DPC to hosted ISA: Exceptions

Ref to Step	Exceptions	Actions
2	DPC added in error	Select the Delete button adjacent to the uploaded DPC document in the 'DPCs' tab. Documents deleted in error can be restored by contacting <insert contact details> (supplier)
2	DPC organisation identified as participating are incorrect	Access DCC and update/edit details
2	DPC data details are incorrect	Access DCC and update/edit details

Attaching DPC to an ISA as a participant

Step	Task	Role(s) responsible
1	Access DCC and ensure that your organisation has Accepted the invitation to participate in the ISA and it is visible by your organisation.	RSU, OSU, AU
2	Access DCC and go to 'DPCs' tab in the participating ISA. Search for and Add your organisations DPC.	RSU, OSU, AU
3	'Save' details.	RSU, OSU, AU
4	The DPC will be attached once the host organisation of that ISA has accepted your request to attach your DPC.	RSU, OSU, AU

Attaching DPC to ISA as a participant: Exceptions

Ref to Step	Exceptions	Actions
2	DPC added in error	Select the Delete button adjacent to the uploaded document in the 'Details' tab. Documents deleted in error can be restored by contacting <insert contact details> (supplier)
2	Not able to view other DPCs / a DPC has a pad lock symbol.	This DPC is marked as private and you will need to contact the organisation hosting the ISA to request further information.
2	DPC organisation identified as participating are incorrect.	Access DCC and update/edit details

2	DPC data details are incorrect.	Access DCC and update/edit details
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Audit & Reporting

Housekeeping Report

Step	Task	Role(s) responsible
1	Access DCC and select the 'Reports' tab	RSU
2	Select the Report Type drop-down and select the House Keeping Report	RSU
3	View data table or select the [Export Report] link to download the report into an excel spread sheet	RSU

Housekeeping Report: Exceptions

Step Ref	Exception	Action
3	Unable to view or download the Housekeeping report	Use the DCC Leave Feedback option from the banner bar to report the fault
1	Unable to access the functionality	Contact organisation super user to understand level of access granted and request change to level of access e.g. 'view only' to 'active' if appropriate

Non-Registered Organisations Report

Step	Task	Role(s) responsible
1	Access DCC and select the 'Reports' tab	RSU/OSU/AU/VOU
2	Select the Report Type drop-down and select the Non-Registered Organisations Report	RSU/OSU/AU/VOU
3	View the data table or select the [Export Report] link to download the report into an excel spread sheet	RSU/OSU/AU/VOU

Non-Registered Organisations Report: Exceptions

Step Ref	Exception	Action
1	Unable to view or download the Non-Registered Organisation report	Use the DCC Leave Feedback option from the banner bar to report the fault

1	Unable to access the functionality	Contact organisation super user to understand level of access granted and request change to level of access e.g. 'view only' to 'active' if appropriate
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Summary Report

Step	Task	Role(s) responsible
1	Access DCC and select the 'Reports' tab	RSU/OSU/AU/VOU
2	Select the Report Type drop-down and select the Summary Report	RSU/OSU/AU/VOU
3	View the data table or select the [Export Report] link to download the report into an excel spread sheet	RSU/OSU/AU/VOU

Summary Report: Exceptions

Step Ref	Exception	Action
1	Unable to view or download the Summary report	Use the DCC Leave Feedback option from the banner bar to report the fault
1	Unable to access the functionality	Contact organisation super user to understand level of access granted and request change to level of access e.g. 'view only' to 'active' if appropriate

Other Related SOPs

<Organisation to insert IG related SOPs >

References and Related Policies

<Organisation to insert IG related policies, e.g. Starters & Leavers Policy>

Abbreviations / Definitions

ISA	Information Sharing Agreement	General term used to cover agreements that define the sharing/processing of data/information
DCC	Data Controller Console	An online application used to manage ISAs

RSU	Regional Super User	Provides the Approve/Reject authority for organisations applications
OSU	Organisation Super User	Manage their organisations' application
AU	Active User	DCC user who manage ISAs on a day to day basis
VOU	View Only User	DCC user who may need to view ISA information
ORG/org	Organisation	An individual entity/organisation
DC	Data Controller	A person responsible for controlling/sharing data/information
HST	Host	An entity/organisation that 'owns' the ISA
	Whitelist	A whitelist is a register of entities that are being provided a particular privilege, service. Entities on the list will be accepted, approved and/or recognized. Whitelisting is the reverse of blacklisting, the practice of identifying entities that are denied, unrecognised.
DPC	Data Processing Contracts	Data processing contract is a contract that sets out the legal responsibilities of the organisation being engaged to process the data on behalf of the data controller. This is in line with data protection legislation that requires contracts in place between a data controller and a processor in order to set out the nature of the processing, purposes, duration, types of data etc. Contracts are usually used where there is a financial element to the processing.
DPD	Data Processing Deeds	Data processing deed is similar to a DPC but is used in the event that financial elements are not included in the document. Some organisations use the term Data Processing Agreement instead of Data Processing Deed. In either case the document sets out the nature of the processing, purposes, duration, types of data etc..
DPIA	Data Protection Impact Assessment	Data Protection Impact Assessments (DPIAs) help organisations to identify the most effective way to comply with their data protection obligations and meet individuals' expectations of privacy. DPIAs can be an integral part of taking a privacy by design approach.

		The GDPR sets out the circumstances in which a DPIA must be carried out.
LA	Local Authority	Local government in London takes place in two tiers; a citywide, strategic tier and a local tier. Citywide administration is coordinated by the Greater London Authority (GLA), while local administration is carried out by 33 smaller authorities .
SLA	Service Level Agreements	Service level agreements are used throughout the NHS to list the minimal service requirements and or limits of the service to be provided by one organisation to another. They may be stand alone or sit alongside a service contract. These SLA's may also include directions on what can be done with data.
SC	Service Contracts	A contract for services to be provided by one or more organisation to another/others. An example of this could be a contract between the NHS and a third party when outsourcing services following a successful tendering process. These contracts will usually include a commercial element as well as the data sharing arrangements and as a result be highly commercially sensitive with implications for FOI responses.