

REVIEW OF THE WORK OF THE N. IRELAND PRIVACY ADVISORY COMMITTEE 2017

The NI Privacy Advisory Committee (PAC) has the following ongoing responsibilities:

- To oversee the implementation of the recommendations agreed by Minister on Protecting Personal Information;
- To manage a Project Team to complete a Programme of Work to give effect to the recommendations agreed by Minister;
- To report regularly to the Department on progress on implementing the recommendations;
- To keep consent and confidentiality matters in HPSS under continuous review and to provide timely and relevant best practice advice to HPSS bodies; and
- To consider current and new uses to which personal information is put in HPSS bodies and to authorise such uses of personal information, taking particular account of the legal and ethical issues surrounding privacy and confidentiality.

The following is an update on the work of PAC over the past twelve months.

1. Advice and guidance to inform service users and staff

PAC responded to the GMC's consultation on their new draft guidance on patient confidentiality. PAC Chair continued his work as a member of the GMC Task and Finish Group, reviewing the current GMC guidance on confidentiality and to assist with the development of updated GMC guidance on confidentiality.

Members of PAC also contributed at a public seminar on the Life and Times survey of public attitudes to data sharing.

PAC responded to the Department of Health requests for advice on informal consultation questionnaire, compliance of the Code of Practice with the GDPR and informal consultation on regulations for the HSC (Control of Data Processing) Act 2016.

2. Procedures to improve working practices

Personal Data Guardians. PAC has continued its yearly meetings with Personal Data Guardians and Executive Directors of Social Work to share and discuss current issues relating to Service User Confidentiality and informational privacy.

The Chair of PAC met with Information Governance Leads and agreed arrangements for annual meetings.

The Health and Care Number. PAC continues to encourage the use of the Health and Care Number which should, among other things, facilitate arrangements for pseudonymisation. An example has been discussions with ICNARC data flows from NI to the National Cardiac Arrest Audit database.

3. Training to increase awareness and understanding on confidentiality

Personal Data Guardian Training. The new training arrangements, introduced in 2013 and organised by the HSC Leadership Centre, The Beeches continues to work well. A ninth training day for Personal Data Guardians was provided in 2017, which included top-up training.

PAC continues to review training arrangements. This year's participant feedback has again been very positive. Further training is being arranged for 2018.

Staff Training. The E-learning module, based on the Code of Practice on the Protection of Service User Information, is available for all HSC staff through the HSC Leadership Centre.

4. Information and communication technology improvements regarding access and security of personal information

PAC has continued to support the Board's ICT Unit in the promotion of privacy enhancing technologies, the incorporation of methods to record consent and the use of anonymised databases for secondary uses.

5. New legislation

PAC has supported the work to develop regulations for the HSC (Control of Data Processing) Act 2016.

6. Advisory Role

PAC, in fulfilling its responsibilities as outlined in the recommendations provided by the Minister, has continued to advise on existing and new uses of personal information and to generally advise on confidentiality issues in HPSS.

PAC provided advice on several national projects approved by the Confidentiality Advisory Group of the Health Research Authority, where access to HSC (NI) data or service users was being sought. These included the Mental Health Clinical Outcome Review Programme, the Adult Critical Care and National Cardiac Arrest Audits.

PAC also provided advice to HSC R&D, the DoH and to individual researchers and clinicians.

Roy McClelland OBE
Chairman, Privacy Advisory Committee N. Ireland

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