

# SAVVI IG QA Working Group Meeting Notes

29 July 2021, 10am-12pm

Link to the notes:

[https://docs.google.com/document/d/1NfUSlyHpdX89KJ2MH-0HrNTolAQey-UZpbZA\\_uvzm5E/edit?usp=sharing](https://docs.google.com/document/d/1NfUSlyHpdX89KJ2MH-0HrNTolAQey-UZpbZA_uvzm5E/edit?usp=sharing)

Link to the slide deck:

[https://docs.google.com/presentation/d/1TsDeJrg62gsh8N3o5rHt\\_EBPllc6LI0BYhF9g95i-KM/edit?usp=sharing](https://docs.google.com/presentation/d/1TsDeJrg62gsh8N3o5rHt_EBPllc6LI0BYhF9g95i-KM/edit?usp=sharing)

## Agenda

10:00am	10 mins	<b>Welcome &amp; Introductions</b> Shelley Heckman, iNetwork
10:10am	30 mins	<b>Update: IG Learning from the SAVVI Pilots</b> John Curtis, Bolton Council and Aidan Richmond, GMCA
10:40am	20 mins	<b>Update on the SAVVI Catalogue</b> Paul Davidson
11:00am	5 mins	<b>Short comfort break</b>
11:05am	15 mins	<b>Reflection &amp; Learning from the House of Lords Public Service Inquiry on Vulnerable Children</b> Shelley Heckman & Paul Davidson
11:20am	15 mins	<b>BOLD: Linking Data across Government</b> Charlotte Owen, MoJ
11:35am	15 mins	<b>Barriers to Health Data</b> <ul style="list-style-type: none"><li>• <b>Barriers to Health Data Workshop</b></li><li>• <b>Section 251 of the NHS Act 2006</b></li></ul> Paul Davidson, iStandUK & Emily Griffiths, University of Manchester
11:50am	10 mins	<b>Next Steps</b> Paul Davidson, iStandUK

12:00pm	0 mins	<b>Session Ends</b>
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## Welcome & Introductions

Name	Job title	Organisation
Shelley Heckman	SAVVI Project Manager	SAVVI - iNetwork (Tameside MBC)
Paul Davidson	SAVVI Product Owner	SAVVI - Sedgemoor DC
John Curtis	Acting IG Team Leader	Bolton Council (SAVVI IG Lead)
Aidan Richmond	Informations Governance Lead	GMCA (SAVVI IG Lead)
Cheryl Boland	Information Governance Lead	St Helens Council
Debbie McCarron	Data Compliance Officer	Salford Council
Emily Griffiths	Information Governance Manager	The University of Manchester
Sarah Deignan	LDU Lead - SAVVI Support	MHCLG
Mevish Khalid	Social Media & Comms Lead	SAVVI - iNetwork (Tameside MBC)
Michelle Kern	Partnership Office Manager	SAVVI - iNetwork (Tameside MBC)
Charlotte Owen	Head of Strategy for BOLD Programme	MOJ
David Willis	Senior Information Security Officer	Healthier Lancashire and South Cumbria Health and Care Partnership

## Update: IG Learning from the SAVVI Pilots

John Curtis & Aidan Richmond

JC - Work predominantly focused on the SENA project, Huntingdonshire DC

How can we identify someone in need and the risk?

A lot of this work has been coordinated through the SAVVI coach who has been critical in capturing this information

Purpose/Find/assess

- Purpose is the starting point
- Risk stratification
- Debate around consent and appropriate legal basis
- Secondary purposes
- HDC received challenge at district and county level
- When GDPR came into force LA's didn't know what they would need
- Right path - lawful, transparent, process
- DPA as a discovery tool

How can IG be embedded into the thinking?

How can the learning be best shared with the 2 pilot councils?

Lawfulness of processing - reframe thinking, consent is not the only lawful basis

What are the implications of some of this?

- Accountability
- HDC asked - What are the due diligence checks? Answer - this depends on a number of factors
- Need to determine other roles
- Complete DPI's from the start so can overcome hurdles further down the line
- Trying to ensure that someone who works within service delivery can follow the SAVVI model
- The presentation assists people who work within transformational teams to understand the options open to them and therefore they are not totally reliant on an IG officer
- SAFER model - Different processes to follow which will be trialled with HDC and NYCC
- Practical guide - ensure IG is embedded into service re-design/projects at the start
- Adapt where we can - Contact point, every child matters etc
- Simple Flowchart - 7 golden rules around a DPIA and IG requirements
- Looking at the digital economy act, section 251 etc - how do we feed back to central government?
- How do we feed back on data barriers?
- How do we overcome issues around secondary use and feed back to central government?

JC - ask for feedback from the IG group

As with plenty of other organisations HDC is a district council and their IG maturity is behind their ambition for an early identification project.

Ethics - what should councils be doing? How do they think that they are transparent etc?

We can learn from Universities who have looked at this from an ethical perspective  
LAs are looking at the ethics around the re-use of data - it may be legal is it ethical?  
Bolton have signed up to ethical charters

EG - Thinks may jump into legal jargon too early - suggest re-jigging the order and providing a more basic introduction

Ethics- Orgs may have an equality impact assessment and perhaps highlight this

- May be a group or independent panels
- Everyone should think of ethics, this should be encouraged,
- Consulting with people is vital

Consent

Are people ok with this?

DMc - Consent - struggled at Salford, people use consent as a term but it's not always in a compliant format- 'agree to engage' terminology now used to take away the term 'consent'

Have a consent guide - moving from an old to new social care system, happy to share this guide with colleagues

Ethics - process has to be justified and this is the term used instead of ethical

CB note in chat - 'We find it difficult to convey to service managers in relation to consent to work with individuals and consent for the use of the data'

Action:- JC & AR to take up conversation with CB & DMc

## Update on the SAVVI Catalogue

DWP have agreed that Bristol CC can re-use benefits cap data as an indicator of homelessness

PIP provide vulnerability co-hort services, if provided with data for their 'black box' they can create listings to indicate vulnerability

DWP have indicated that as an LA if you put in the same request as Bristol you are likely to be successful

SAVVI wants to do this in a smarter way for all LA's - eg. regulation

PD took the group through the Bristol CC request

Policy in Practice - showed SAVVI 3 applications

- Legal Gateway
- Legal Basis

Does DWP agree with this - yes for 2 requests, but did not agree with the 'Free school meals' request

SAVVI to create a buildable catalogue

Contributors - Bristol, PIP, DWP, SAVVI etc

- Look at it from a thematic perspective - homelessness, COVID, adult social care a way for us to group things
- Diagram - attributes etc that you can pick out from
- Data from searchlight system and UC feed

DMc - looks fabulous! To have it in one place is great. It will be time consuming to keep it updated but it looks great!

DW - Pan Lancashire sharing group - police, councils etc.

DW wants SAVVI in the loop

Thames Valley have established a sharing group and South East are also about to kick off an information sharing group

## Reflection & Learning from the House of Lords Public Service Inquiry on Vulnerable Children

Link to the document:

[https://docs.google.com/document/d/1\\_WI7pCpakPduYGmTdicMqM3KtE\\_KmJA7BThYJ0IIRD8/edit#](https://docs.google.com/document/d/1_WI7pCpakPduYGmTdicMqM3KtE_KmJA7BThYJ0IIRD8/edit#)

Enquiry - SAVVI is at the heart of vulnerability issues and is trying to solve the data issues

SAVVI blog - lots around data sharing and needs

SH gave an overview

Common threads across vulnerability issues and data sources

Important to recognise that children may not be vulnerable in themselves but may be in a vulnerable situation.

PD findings from recordings:-

- Need to improve data exchange and operability
- A number of common identification systems which can create a barrier
- Needs to be a common data source for information in one place

- Requirement for a single information portal

DMc - the Digital <https://brighterfuturesforchildren.org/privacy-policy-2021/>

The digital economy act is a good way to share lots of data sources but is an onerous process - an example to use would be sharing data on people in Ctax arrears with organisations like Citizens Advice to help them to get people back on track.

PD - Code of Practice does look onerous but feels that SAVVI as a community should look at this and come back with feedback

## BOLD: Linking Data Across Government

Charlotte Owen, MoJ

Leading on data strategy for BOLD

Clearance now to publicise the shared outcomes fund award of 20 million over 3 years - **but no formal announcement from HMT or CO yet and any comms need to be cleared by relevant teams.**

Working with MHCLG, PNS, ONS etc

Link up data for better insight - ties in with SAVVI

4 sub projects

- 1) Homelessness
- 2) Victim pathways
- 3) Drug misuse
- 4) Reducing reoffending

Key work stream - common framework to share data across government

Asset to outlive the project timeframe

- Scalable - model to be re-used
- Data sharing across local and central government
- Still in pre- discovery stage
- Keen to speak to people re linkages and data linkages

EG - The project is ambitious - how does the framework differ from ICO code of practice for data sharing?

CO - Trying to avoid data sharing from the ground up - re-use existing data sources -

Differs from the ICO website which is guidance. BOLD will be agreed by all and orgs will be able to use data straight away

DW - like the idea of someone taking ownership from the top - all doing stuff in the same way. Dipping into regional work now and taking learning to facilitate the BOLD project  
Some of the failures are with public health data - pulling data up but not able to regurgitate and send back for purposeful use.  
Stuff was great for staticians but not able to resend to GP's to do something useful with it  
Hope this lesson can come across and for BOLD to do something about this

PD - SAVVI sponsor is Phil Swan GMCA, Toby (MOJ) has suggested that Phil could sit on BOLD's board and this is a way to be cited on stuff and have SAVVI be a local focus

Early sight for intervention - finding predictors and intervening earlier. BOLD and SAVVI about how to find people so councils can use the data and make people's lives better

- SAVVI proposes a set of data standards
- Eco system of data standards and sharing
- Working with tech industry on data standards - working on semantics and data sharing links
- SAVVI keen to be part of BOLD's work and would love to be part of portals work etc
- Would like to take Charlotte through SAVVI process

DMc - Wanted to mention from a practical stance an example:-

DWP - for data sharing take an MOU whereby organisations to sign up to to the principles of data sharing and then have a document for each respective thread

With regard to Criminality data (part 3) - for a competent authority this might have implications on some of the work BOLD do with us

PD gave an overview of the maturity of the SAVVI project in response to CO question on this - SAVVI will meet with CO to give more background

Moving into Phase 2 we need more competent health and criminality data under the second regime of the Data Protection Act 2018.

## Barriers to Health Data

Paul Davidson & Emily Griffiths

Initially met with NHX and DfE to discuss barriers to sharing health data

Meeting with tech suppliers - organisations explained they had the tech but had issues with obtaining health data - section 251 of NHS act  
SAVVI wants to unblock health data, secondary use data and socialise this

EG - works with health data for which there are decades old regulations - for secondary use of identifiable health records you need people's consent or an overriding public benefit. This stems from common law around confidentiality and human rights law around privacy. It provides additional hurdles on top of the Data Protection Act.

Section 251 - outlines overriding use cases for certain secondary uses of NHS data - the Confidentiality Advisory Group [have a register online](#) and publish minutes from discussions of around 60 applications per year. Applicants can wait for over a year to find out definitively if their application has been approved/refused, and this bottleneck is profound at the moment as the COPI notice is coming to an end and Covid19 research previously exempted from CAG needs to now get this approval. This is the kind of extra approval the Data Protection Act Schedule 1 points to under special category processing condition Article 9(j) where valid explicit consent is not obtained.

- Applying to CAG is a large undertaking that often requires specialist health IG input. There is a lot of paperwork and guidance to go through!
- Questions for clarification can come back from CAG - this adds delay and confusion. There is a single application portal (IRAS), which somewhat reduces the administrative burden around NHS research ethics.
- Projects with experience of using NHS data and teams used to working with NHS data may understand this but other public sector orgs may not understand and this can cause issues, for example not recognising approval.
- Born in Bradford project had consent regarding health data but was trying to look at educational vulnerabilities among children diagnosed with autism. It took a long time to receive appropriate educational information even after the s251 approval was received. Although they have published a paper showing how they achieved such linkage, s251 involved such a large administrative burden that Bradford now uses anonymised data for general intelligence (see comment).

Brighter futures for children - private limited company completely owned by a council - runs children's social care within Thames Valley

- What is legal basis of use - 20 pieces of data they use
- Once people realise it's just not the Care act 2006 that can facilitate information
- Legal powers within powers that allow it to happen without consent, eg a hospital not releasing data - an MP can write to the hospital and obtain medical records
- DW - wrote in that will also advise patient that the record has been requested
- Implicit and complied consent - right to opt out rather than consent to having your data used for running the business/research
- NHSD - fell over with regard to common law



- Reviewed by Queens Counsel - GDPR - other laws say that without making people aware beforehand it is not lawful
- Dept of Justice asks for information - may be one or 2 lines in law that can facilitate this
- Could SAVVI help with this process?

PD - Powerful for phase 3 bid

- PAN Lancs sharing - police and domestic violence data sharing
- Digitise the flowchart - who I work for and what I need to be shared
- Need a common digital system

DMc - GMIGG looking at sharing health and social care data across GM - great for SAVVI to get involved in this

**What issues and barriers have you experienced with access to, or sharing of, Health data?**

Name	Barrier/Issue

## Next Steps

Paul Davidson

Take catalogue to next step - group to assist and quality assurance  
 JC and AT work  
 Support Charlotte  
 Health Data work

## Meeting chat:-

From Shelley Heckman to Everyone: 10:16 AM

I forgot to mention that we have got a Google Doc for notes:

[https://docs.google.com/document/d/1NfUSlyHpdX89KJ2MH-0HrNTolAQey-UZpbZA\\_uvzm5E/edit?usp=sharing](https://docs.google.com/document/d/1NfUSlyHpdX89KJ2MH-0HrNTolAQey-UZpbZA_uvzm5E/edit?usp=sharing)

Please do enter your names in the doc, and to add to it throughout the course of the session today.

From Cheryl Boland (St Helens Council) to Everyone: 10:41 AM

We find it difficult to convey to service managers in relation to consent to work with individuals and consent for the use of the data

That's a really good terminology Debbie!

From Debbie McCarron (Salford Council) to Everyone: 10:47 AM

Sorry, I have a delivery!

From Debbie McCarron (Salford Council) to Everyone: 11:00 AM

This is a fantastic resource, Paul! Very impressed...

From Shelley Heckman to Everyone: 11:06 AM

[https://docs.google.com/document/d/1\\_Wl7pCpakPduYGmTdicMqM3KtE\\_KmJA7BThYJ0IIRD8/edit#heading=h.s9gvpy1nskh](https://docs.google.com/document/d/1_Wl7pCpakPduYGmTdicMqM3KtE_KmJA7BThYJ0IIRD8/edit#heading=h.s9gvpy1nskh)

From David Willis to Everyone: 11:15 AM

Would it be ok to share this document as part of the Pan Lancs project ?

I take it everyone is aware that new legislation is due in June next year that will force statutory requirements on multiple organisations around sharing information about domestic violence?

From David Willis to Everyone: 11:20 AM

<https://brighterfuturesforchildren.org/privacy-policy-2021/>

From Debbie McCarron (Salford Council) to Everyone: 11:47 AM

The GMIGG (Greater Manchester Info Gov Group) should be able to help you. It's a group of IG people from the GM Health sector and Jenny Spiers is the chair

From Cheryl Boland (St Helens Council) to Everyone: 11:50 AM

Apologies I need to leave. Everything is sounding very positive

From Shelley Heckman to Everyone: 11:50 AM

Thanks Cheryl for joining us

From Debbie McCarron (Salford Council) to Everyone: 11:50 AM

Can't the research be carried out on behalf of a data controller? That would mean the DC's powers could be used rather than those of the researchers...

From Debbie McCarron (Salford Council) to Everyone: 12:04 PM

Thank you - great session