Digital Health & Care Scotland

Getting your "IG" sorted in your project

I have a project that needs data to be processed or used by many parties.

What do I have to do to get my "IG" right?

1. Identify **who your data controllers are**. They make decisions on the data, the means and purposes of the processing. These are the organisations legally accountable for the processing (not only the data).

2. Is there an **IG advisor** within your organisation or the main data controller who can help? (e.g. for National Digital Health and Care Projects lead by Scottish Government, the "Information Assurance Team" (former eHealth) provides guidance and support with the IG Pack, health boards, GPs, local authorities (integrated services only), PBPP (NHS Scotland Public Benefit and Privacy Panel), etc.

3. You will need to prepare an **IG Pack** (https://www.informationgovernance.scot.nhs.uk/istresources/). For that to happen, you need to engage with different **people** who will help you with:

a) Identifying the data that is required
b) Drafting the data flows
c) Identifying the parties involved: data controllers, subcontractors (data processors) and how seriously they take the security of the data and privacy rights.
d) Providing details about the security measures of the systems and the organisations involved.
e) Deciding best ways to explain to the population what your project does with the data (and getting consent when needed).
f) Negotiating amongst the parties how the data is going to be shared and used. Also processed by subcontractors).
g) Agreeing amongst the parties how the privacy rights are going to be looked after and how people can exercise their rights.
h) Reflecting on the information risk and managing the risk so key stakeholders manage it at appropriate levels.
i) Get formal approval and sign off by all parties.
j) Train staff accordingly.

What people I need to reach?
- Information Governance Leads
- Protection Officers
- Information Asset Owners
- Data Custodians
- Information Security Officers
- System Administrators
- Caldicott Guardians
- Senior Information Risk Owners
- Local Project Leads, managers and staff
- Representation of the public (e.g. if you need further public engagement).

4. You will need to **get approval** from all data controllers. There are panels (e.g. PBPP) with delegated powers to approve on behalf of some data controllers, but you may need to ask for approval in various places.