logo

**Processing of data at national scale:**

**The “IG PACK”**

Organisations or individuals wishing to process health data related to NHS Scotland patients, must obtain approval from PBPP (Public Benefit and Privacy Panel).

Once approved, the following IG PACK must be sent to each Data Controller (Data Protection Officer). The email of NHS Scotland DPOs is available here:

<https://www.nhsinform.scot/care-support-and-rights/health-rights/confidentiality-and-data-protection/how-the-nhs-handles-your-personal-health-information#data>

Please use the tick boxes in the second column below to indicate which documents you have included in your IG PACK submission. Wherever possible please use the document names in the first column below for the convenience of the recipients. Note the published IG Pack doesn’t contain templates for all the required documents listed below.

|  |  |  |
| --- | --- | --- |
| **Doc name** |  | **Description** |
| DOC00a |  | IG Pack checklist (this document) |
| DOC00b |  | Executive letter |
| DOC01a |  | A copy of the full PBPP application |
| DOC01b |  | PBPP approval letter (with conditions if apply) |
| DOC02a |  | Overall project/proposal risk triage |
| DOC02b |  | DPIA – Data Protection Impact Assessment (signed off by data controllers or approved as part of a PBPP submission on behalf of NHS Scotland). |
| DOC03 |  | CHIAG approval (if use of CHI is involved in the proposal) or indication in the PBPP application that it was sent to CHIAG and what meeting (CHIAG date minutes) was approved – generally it is included in the PBPP application and the DPIA – just ensure this is stated in these documents. |
| DOC04a |  | Data Processor Agreements to be used (DPA) (if a subcontractor is used) |
| DOC04b |  | Information Sharing Agreements (ISA) applicable (if data is shared with other parties that are also or will become data controllers for the data in this proposal) |
| DOC04c |  | Opt-in / Opt-out / Sign off templates as applicable (e.g. when a large number of organisations can join an Information Sharing Agreement) |
| DOC05 |  | Official mandate (e.g. Ministerial mandate or Scottish Government Executive Letter as applicable) – if existent this letter should be used to address the IG Pack to the Data Protection Officer of each relevant data controller (e.g. health boards, GPs, etc. as applicable) |
| DOC06a |  | IA Registration Form Summary (or amend the information about this proposed processing in the IA Register if the IA is already registered) |
| DOC06b |  | IA Data Recipients Registration Form |
| DOC07 |  | Privacy notices (existent or new) |
| DOC08 |  | Evidence of relevant data protection training for all staff involved in the processing |

For complex projects or if high risks are identified (privacy or security) in DOC02a/DOC02b

|  |  |  |
| --- | --- | --- |
| DOC09 |  | Full Information Asset Risk Assessment |
| DOC10 |  | ICO feedback (if consulted, e.g. when high privacy impact is foreseen) |

If electronic/digital systems are involved (e.g. data captured, sent or accessed via digital means):

|  |  |  |
| --- | --- | --- |
| DOC11 |  | Security policy and risk assessment of each system involved |
| DOC12 |  | Security questionnaire of the organisation(s) involved in the management and use of the system (and copies of any relevant Certification, e.g. ISO27001) |

**Further resources:**

Scottish Information Sharing Toolkit:

<http://www.informationgovernance.scot.nhs.uk/is-toolkit/>

PBPP (Public Benefit and Privacy Panel):

<http://www.informationgovernance.scot.nhs.uk/pbpphsc/>

[PLEASE ADD ANY OTHER RELEVANT LINKS FOR YOUR PROJECT HERE]