SCI Store to Store access protocol

This document sets out the terms under which the Caldicott Guardian for the remote NHS Board and the Director of Public Health for NHS Orkney (in the role of Caldicott Guardian and delegating to the SCI Store administrator) will permit staff working within another Health Board access to patient information, namely demographics and investigation results held in NHS Orkney SCI Store.

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A Purpose of Document

The objectives of the document are to:

1. Define the purpose for which access is required.
2. Set out the agreed parameters under which access is permitted.
3. Define the roles and responsibilities of those involved in the operation of this protocol.
4. Provide a framework that ensures patient data confidentiality is maintained.

B Description of Business Function

Patient information access is required within the NHS Orkney by healthcare professionals within other Health Boards to and organisations to facilitate individual patient care. These patients may have been within an NHS Orkney facility receiving related care prior to their transfer/admission. This will:

1. Enable the remote healthcare professionals to have related patient information available at the point and time of need.
2. Assist efficient communication and identification of patients.
3. Help maintain high standards of confidentiality.

C Data Being Accessed

SCI Store access will be granted according to the following principles:-

1. SCI Store access will only be authorised for an individual in the remote NHS Board where it is necessary for that individual to carry out the business function they perform. Users of the remote SCI Store should not be granted access to the NHS Orkney SCI Store by default.
2. The data items to be accessed by any individual will be limited as far as practicable to the minimum required for that individual to carry out the business function they perform.
3. The level of access will also be limited to read only access.
4. Auditing of user activity is undertaken to ensure access is not misused, and audits will be provided to the remote NHS Board.
5. Administration of end users in the remote SCI Store will be the responsibility of the remote SCI Store System administrator and the remote SCI Store administrator will provide the NHS Orkney SCI Store administrator with appropriate details whenever a user is granted access to the NHS Orkney SCI Store.
6. Access must only be granted to an individual as long as is required.

D Roles & Responsibilities

Responsible Party	Proposed Remit In Relation To Protocol
NHS Orkney Director of Public Health / Caldicott Guardian	- Take overall responsibility for the SCI Store data held within the NHS Orkney SCI Store. - Agree with remote NHS Board Caldicott Guardian, the terms under which access to NHS Orkney SCI Store is permitted. - Work with remote NHS Board Caldicott Guardian to ensure that the protocol is implemented. - Agree with remote NHS Board Caldicott Guardian how adherence to protocol is monitored. - Agree which remote NHS Boards are to be given access. - Ensure users are authorised appropriately to have access to SCI Store. - Ensure patient confidentiality is maintained. - Report any confidentiality concerns or actual/potential breaches of patient data confidentiality to the remote NHS Board Caldicott Guardian. - Ensure that the remote NHS Board signs up to implementing the Access Protocol (this document).
Remote NHS Board Caldicott Guardian	- Take overall responsibility for conformance to the protocol within the remote NHS Board - Agree with NHS Orkney Caldicott Guardian, the terms under which access to SCI Store is permitted - Ensure that all access to the SCI Store is in accordance with the agreed protocol - Report any confidentiality concerns or actual/potential breaches of patient data confidentiality to the NHS Orkney Caldicott Guardian. - Ensure users are authorised appropriately to have access to SCI Store. - Patient confidentiality is maintained. - Ensure that the organisation signs up to implementing the Access protocol (this document).
Remote SCI Store	To manage the setting up of approved user accounts, user privileges and

System Administrator	access controls. • Carry out appropriate audit exercise to monitor adherence to the protocol
Remote User	• Access SCI Store only within the terms of the agreed SCI Store access protocol. • Reports to the SCI Store Data Controller any confidentiality concerns or actual/potential breaches of patient data confidentiality or other issues associated with the use of the protocol.

E Management of Access

The key relationships are as follows:-

1. NHS Orkney Caldicott Guardian delegates authority to the NHS Orkney SCI Store administrator to ensure that the terms of the protocol are met. The SCI Store administrator reports evidence of the levels of conformance to the protocol to the Caldicott Guardian and advises on any remedial action required.
2. The SCI Store administrator agrees the parameters of the group profiles with each NHS Orkney Clinical Lead and authorises the implementation of these profiles on behalf of the Director of Public Health
3. The SCI Store administrator provides access to the individual remote users.
4. All remote users must adhere to the agreed terms and conditions for SCI Store and report any issues associated with the use of the protocol to the SCI Store administrator.
5. Information on SCI Store must only be accessed on a 'need-to-know' basis. This requires that those who access/ use a patient's information:

- Is who they claim to be through authorisation identity checks.
- Have a legitimate care relationship with the patient.
- Only see information their role allows.

An audit trail record is kept of everyone who views a patient's SCI Store record.

F Authorisation Process for SCI Store Access Requests

Requests for new groups to access the SCI Store should be directed to the SCI Store administrator.

Access to the SCI Store, within the parameters of existing, agreed group profiles would be authorised by the SCI Store administrator.

G Regulatory Environment

Various items of legislation provide the regulatory environment within which access to the SCI Store is managed. These include:-

- Data Protection Act 1998
- Human Rights Act 2000
- Common Law

In addition there are other policies and procedures that impact upon access to the SCI Store including:-

- Professional standards of conduct
- NHS Orkney IT security policy

- Caldicott principles

H Protocol Maintenance

The protocol will be reviewed annually and the process managed by the protocol administrator on behalf of the Caldicott Guardian. Any changes required within the period of annual review must be initiated by the Director of Public Health.

I Security

The following will provide the measures adopted to ensure that security and confidentiality is maintained:-

- NHS Orkney IT security policy
- Retention and Destruction of Clinical records policy
- Training
- Incident Reporting procedure

The provision of an Audit Trail is a fundamental requirement of information governance. Audit Trail enables users to be made accountable for their actions in the system, and offers a security record for use in analysing breaches of security and policy. Within SCI Store whenever data is accessed a record will be made in an audit trail. These in-built audit logs allow identification of all system users who have accessed or modified a patient record over a given period (who, what, where and when).