



# GDPR compliance within East of England Ambulance Service NHS Trust with the help of HealthAssure.

In May 2018 the UK implemented a new data protection regime, this comprised of the General Data Protection Regulations (GDPR) and the new Data Protection Act 2018 (DPA 2018). At a time when data and its uses have grown exponentially, there are growing concerns about its use and misuse. Confidentiality between those giving and those receiving health care is long established dating back at least to the Hippocratic Oath (269-370 BC). It is clear that any modern health and/or social care provider must ensure that they comply with current legislation, protect the information within their custody and ensure that it is available for the benefit of patients.

## Our challenge

East of England Ambulance Service NHS Trust (EEAST) provides emergency A&E services as well as Patient Transport Services over six counties. We cover a population of 5.8 million people and 7,500 square miles.

We engage with 19 CCGs and 17 acute trusts, numerous local authorities, police services, fire services and voluntary services. We have 4,000 staff operating from over 130 sites and 786 vehicles receiving up to a million emergency phone calls per year. Our challenge was how to meet the needs of the GDPR and DPA 2018 across an organisation this size with a team of five people.

## Our approach

To meet these challenges EEAST realised that it would need to pull together a small dedicated group of staff and a technological solution that was cost effective and easy to use. The Information Governance Manager (and DPO) brought together a team consisting of:

- Information Governance Manager (Data Protection Officer)
- Information Governance Assurance Officer
- Data Protection Facilitator
- Corporate Records Manager/ Freedom of Information Officer
- Clinical Records Manager/ Freedom of Information Officer

A decision was made to use our existing HealthAssure platform, this provided a cost-effective solution that was familiar to the organisation and could be brought on stream rapidly.

The modules used to assist with GDPR compliance were:

- Information Asset Register
- Corporate Records Management
- Data Security and Protection Toolkit

This suite of modules is providing the backbone of EEASTs drive to meet the challenges of GDPR and Data Protection Act 2018 compliance.

## Implementation - Our step by step guide to success

### Step 1: Planning

A well thought through action plan is an essential place to start, the NHS Digital Data Security and Protection Toolkit provides a reasonable framework from which to build an action plan.

### Step 2: Discovery and mapping

Understanding what data you own, who uses it, why they use it and how they store it are crucial elements to becoming compliant to data legislation. This is a voyage of discovery There is vastly more out there in your organisation than you know, little pockets of data exist in the most unusual places.

### Step 3: Policy review

Do you have the right policies? Do they cover the points in the new legislation? And do they reference the current legislation?

### Step 4: Staff training

Is your training fit for purpose? What level of training is supplied for specialists?

### Step 5: Support & monitoring compliance

Do you have sufficient resources to undertake this? Does your team have the knowledge and skills, and are there physically enough people in the team? Do you have the skills, systems and infrastructure to investigate data incidents?

### Step 6: The continual cycle of monitoring

Collecting and collating evidence against the NHS Digital DSPT to provide continual assurance to the SIRO and Trust Board.

## Our outcomes

By using the combined knowledge and experience of the Information Governance Team and the benefits of the HealthAssure system, EEAST plans to achieve the following outcomes over the next 12/18 months.

- Compliance to the National Data Guardian Standards
- Data Security and Protection Toolkit Compliance at the highest level
- Accreditation from an ICO certificated organisation, currently no UK organisations have been approved by the ICO, but this is expected over the next 12 months.

The plans and steps contained in the presentation are simple to adapt and implement for any size or type of organisation.

## Lessons for others

1 star hard – 5 stars easy

### Have the right people the job ★★★

For us it was necessary to bring together a dedicated team to support the process. Don't hesitate to engage people who have knowledge outside your area of expertise as this can help speed up the process in the long run.

### Have the right tools for the job ★★★

It's important to have an action plan, but it is not always necessary to reinvent the wheel. The NHS Digital Data Security and Protection Toolkit provided an adaptable framework for the transfer to GDPR compliance and HealthAssure, which we were already familiar with, allowed us to efficiently implement it.

### Understanding your data ★★★

Understanding what data you own, who uses it, why they use it and how they store it is imperative! This is especially challenging when you work across and in partnership with multiple services, but necessary to ensure all data is compliant.