



London Office of Technology & Innovation

Information Governance Workshop

Lead borough: Camden

Agenda

| | |
|--------------|--|
| 09:30 | Arrival |
| 09:45 | Introductions - <i>Ed</i> |
| 10:00 | Objectives for the day - <i>Ed</i> |
| 10:05 | Exercise 1: What would we like to be different? - <i>LOTI</i> |
| 10:50 | Break |
| 11:00 | Exercise 2: What barriers are preventing our desired outcomes? - <i>Sudip and Foz</i> |
| 11:45 | Information sharing in the Tri-borough - <i>Ben Goward</i> |
| 12:00 | Lessons from IG in Greater Manchester - <i>Phillipa Nazari</i> |
| 12:15 | A suggested IG approach for London - <i>Paul Hodgson</i> |
| 12:45 | Lunch |
| 13:15 | Exercise 3: What do we need to do to solve the IG-related barriers to data sharing in London? - <i>Sudip and Foz</i> |
| 14:20 | Closing thoughts and departure |
| 14:30 | Workshop ends |

09:45

Introductions

Objectives for the day

1. **Build up a detailed picture of what outcomes we wish to enable**
2. **Understand the problems that are currently preventing those desired outcomes**
3. **Review potential IG solutions that already exist and agree on approach for London**

Exercise 1: Outcomes

Starting with the end in mind, what would we like to be different?

(45mins)

LOTI's Outcomes-Based Methodology

Start here!

| | PROBLEM | | SOLUTION | |
|-----------------|--|--|---|--------------------------------|
| | 2 - Discover | 3 - Define | 4 - Develop | 5 - Deliver |
| Phase | Generate | | Focus | |
| Key Question | What are the real problems and what do we know about them? | What specific problem(s) will we try to solve? | What hypotheses do we want to test by prototyping? | Which prototypes perform best? |
| Tech & Data | What problems relate to technology and data? | | What role can technology and data play in enabling the desired outcome? | |
| Non Tech & Data | What problems relate to people, processes and conditions? | | Beyond technology, what is needed to achieve the desired outcome? | |

OUTCOME

1 - Motivate



*(This is **not** the solution, tech or data!)*

LOTI's Outcomes-Based Methodology

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OUTCOME

1 - Motivate



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“We wish to enable public sector organisations in London to be able to quickly and easily share data with each other when it is appropriate to do so, in a way that is legal, ethical and secure.”

Exercise 1:

Starting with the end in mind, what would we like to be different?

Adding detail:

- What specific use cases would you like to make possible?
- Who would you like be able to share data with, and receive data from, more easily?
- If we spend time working to make data-sharing easier, what other benefits would you like to realise?
- What would good look like?

25mins table discussion

15mins feedback

10:50

Break

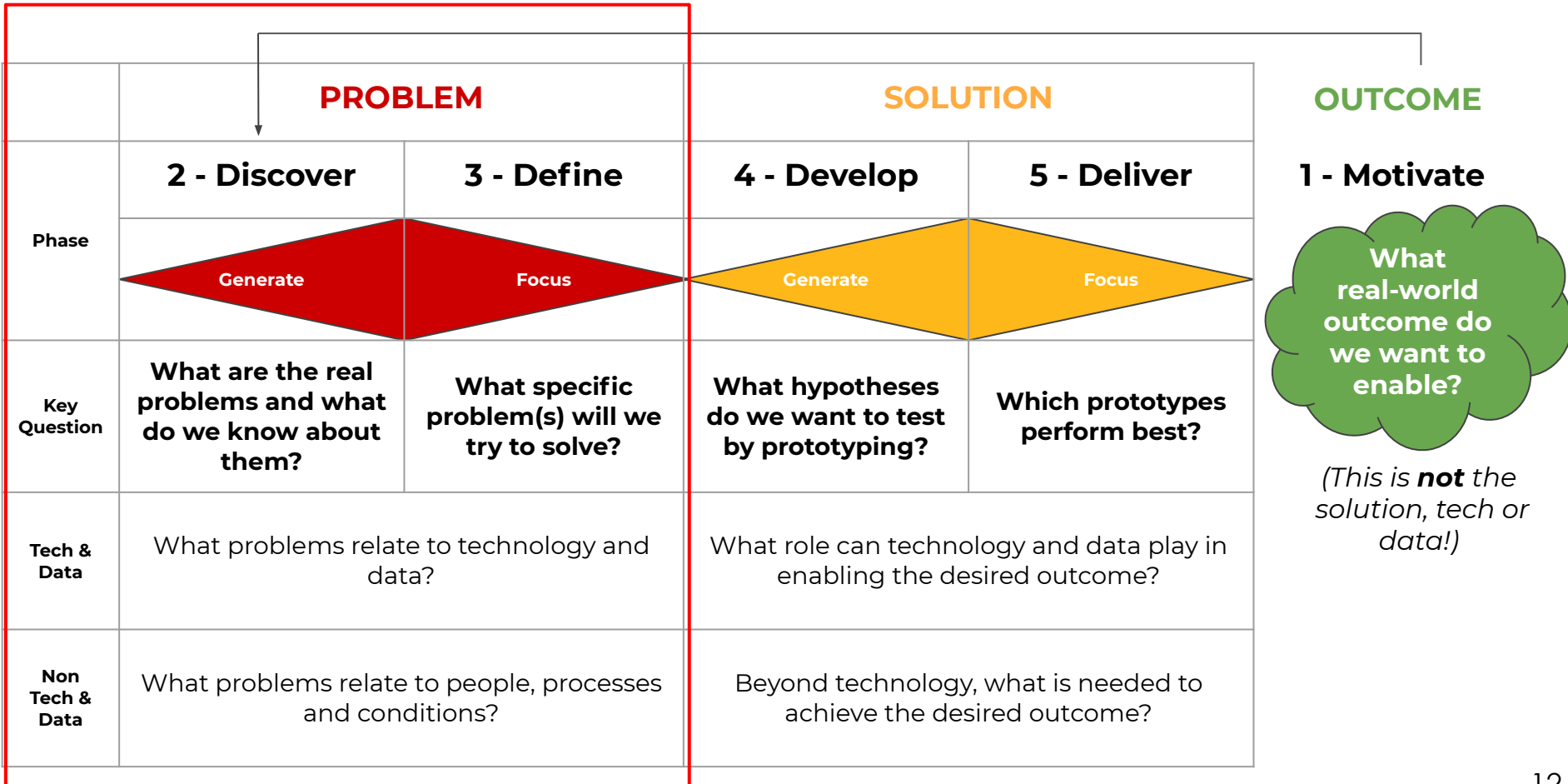
Exercise 2: Problems

What barriers are preventing our desired outcomes here in London?

(20 Mins Discussion)

(20 Mins Feedback)

LOTI's Outcomes-Based Methodology



Why data sharing is hard (and how to make it easier)

Why it's hard

Technology

- Bespoke, siloed IT systems
- Legacy IT that makes data hard to extract
- Outsourced IT providers charging for data access
- Lack of common platform for data sharing

Data

- Data in hard-to-use formats like PDF
- Data inconsistently entered
- Use of different standards
- Lack of common identifiers
- Lack of open data

Legal

- Risk averse leadership
- Staff unsure about data protection rules
- Most senior data professional in org is Data Protection Officer
- Different approaches to information governance

Organisation

- Teams created to focus on their siloed remit
- Lack of dedicated time and resources for data collaboration
- Leaders lack understanding of role and means of using data

How to make it easier

Technology

- Use tech conforming to common standards for interoperability
- Insist all IT has open APIs
- Ensure contracts give full access to data
- Invest in common platform for data sharing

Data

- Record all data in machine-readable format
- Enforce consistent data entry
- Use common standards
- Use unique IDs, e.g. UPRNs
- Release non-personal data openly by default

Legal

- Train all staff in Privacy Impact Assessments
- Appoint Chief Data Officer tasked with responsible data sharing
- Create common ISPs and template ISAs

Organisation

- Establish Offices of Data Analytics
- Free up time of in-house analysts to work on data science projects rather than KPI reporting
- Leaders insist on using data to inform decisions

Exercise 2: Mapping issues against common barriers to data sharing

Technology

Data

Resources

Legal

Organisation

Skills

Our Hypothesis:

Creating a more standardised approach to Information Governance is likely to be a big part of the solution

Ben Goward

Information sharing in the Tri-borough

12:00

Phillipa Nazari

Lessons from IG approach in Greater Manchester

Paul Hodgson, GLA

A suggested IG approach for London

- 1) UKSA
- 2) Legal gateways
- 3) Information Sharing Gateway

1) UK Statistics Authority – Self-assessment framework



“[your scientists] were so pre-occupied with whether or not they could, they didn’t stop to think if they *should*”

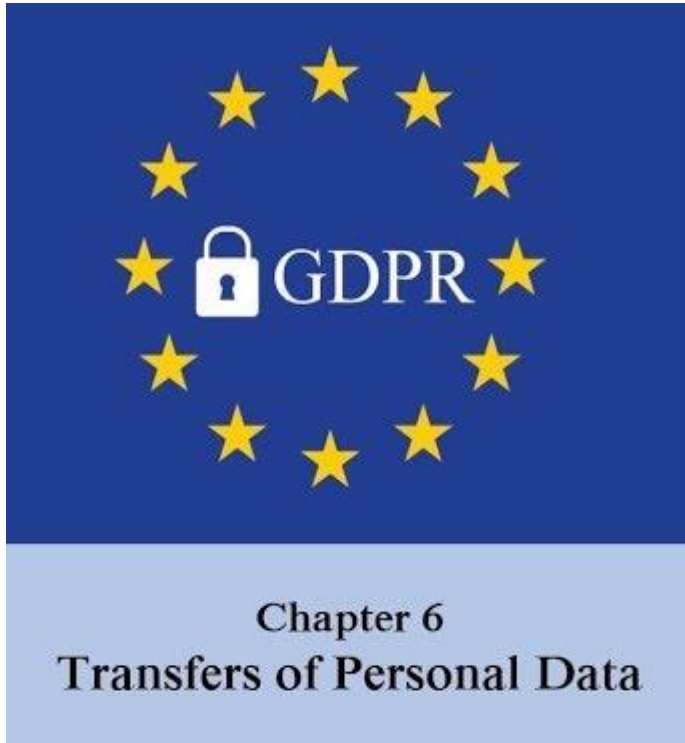
- Dr. Ian Malcolm

1) UK Statistics Authority – Self-assessment framework



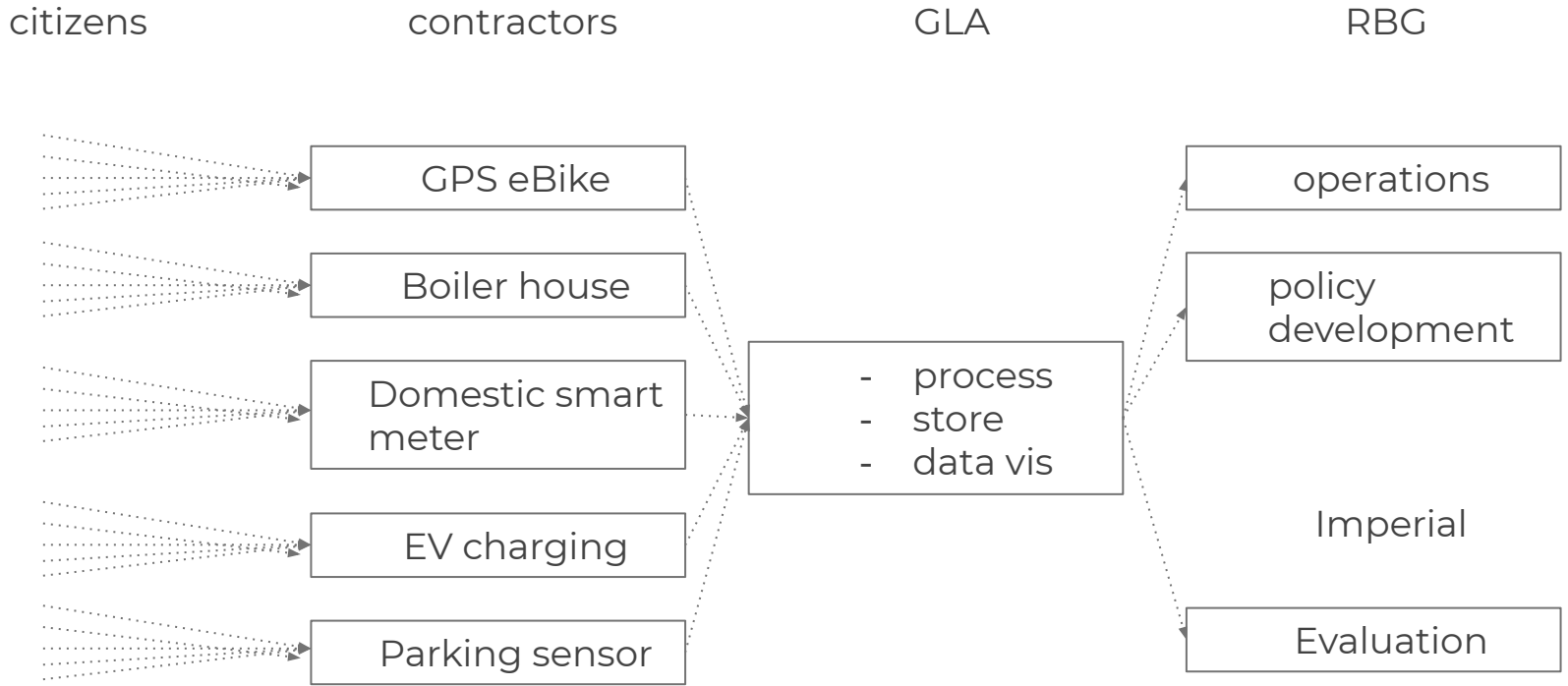
- Used by Research Accreditation Panel
- Self-assessment form
- Guidance
- Supports consideration of the ethical risks throughout the project cycle

2) Overview of Legal Gateways for public bodies to share personal data



1. Consent of the data subject
2. Contractual necessity
3. Non-contractual legal obligations of data controller
4. Vital interests of the data subject
5. Tasks carried out in the public interest / authority vested in the controller
6. Legitimate interest of data controller
7. Order by the Secretary of State

3) What's covered by the Information Sharing Gateway (ISG)



3) What's covered by the Information Sharing Gateway (ISG)












1. A catalogue of data sharing agreements
 - For a given dataset – who am I sharing it with (and under what terms)?
 - For a given organisation – what are we already sharing with them?
2. Create 'high-level' agreements between organisations
 - Signed off by Information Governance lead
 - Can be referenced by the individual data flows
3. Electronic sign-off
 - Delegated authority
4. Organisation assurance

| Organisation Name | Single Lic | ICO Number | Category | Contact Email | Assurance | Admin Group | Lic | Setup % |
|--|--------------------------|------------|-----------------|---------------------------------|---------------|-------------------------------------|-------------------------------------|---|
| GREATER LONDON AUTHORITY | <input type="checkbox"/> | Z4760661 | Local Authority | Paul.Hodgson@london.gov.uk | Significant | London Information Sharing Alliance | <input checked="" type="checkbox"/> | <div style="width: 100%;"><div style="width: 100%;"></div></div> 100% |
| LONDON FIRE & EMERGENCY PLANNING AUTHORITY (LFEPA) | <input type="checkbox"/> | Z7122455 | Fire Service | andrew.mobbs@london-fire.gov.uk | Significant | London Information Sharing Alliance | <input checked="" type="checkbox"/> | <div style="width: 86%;"><div style="width: 86%;"></div></div> 86% |
| LONDON LEGACY DEVELOPMENT CORPORATION | <input type="checkbox"/> | Z3138681 | Local Authority | DannyBudzak@londonlegacy.co.uk | Not submitted | London Information Sharing Alliance | <input type="checkbox"/> | <div style="width: 57%;"><div style="width: 57%;"></div></div> 57% |

3) What's covered by the Information Sharing Gateway (ISG)

5. Below each data sharing agreement, you can record individual 'data flows'

- How are you transferring the data
- How are you storing it?
- For a given organisation – what are we already sharing with them?

| ISGID | Status | Summary Name | Data Flow Name / Identifier | Risk Rating | Added | First Signed | Export | Copy | Archive / Delete |
|----------|---|---------------------------|--|--------------|------------|--------------|---|---|---|
| DF002687 |   | PSMA data for contractors | OS AddressBase data to Energy Saving Trust | Not Assessed | 23/01/2018 | |  |  |  |
| DF002686 |    1/1 | PSMA data for contractors | OS AddressBase data to RetrofitWorks | Not Assessed | 23/01/2018 | 23/01/2018 |  |  |  |
| DF002690 |   | SafeStats: LFB | GLA disclosure to LFB (via SafeStats) | Not Assessed | 25/01/2018 | |  |  |  |

6. GDPR

- ISG is ICO compliant and will be GDPR compliant
- Can use ISG to respond to requests such as “what are you doing with data about me?”
- Can carry out Privacy Impact assessment as part of setting up a data flow

3) What's covered by the Information Sharing Gateway (ISG)

7. Organisations

- 100 initial licences
- Full use of ISG
- Generally defined as an entity that has its own Information Governance set up

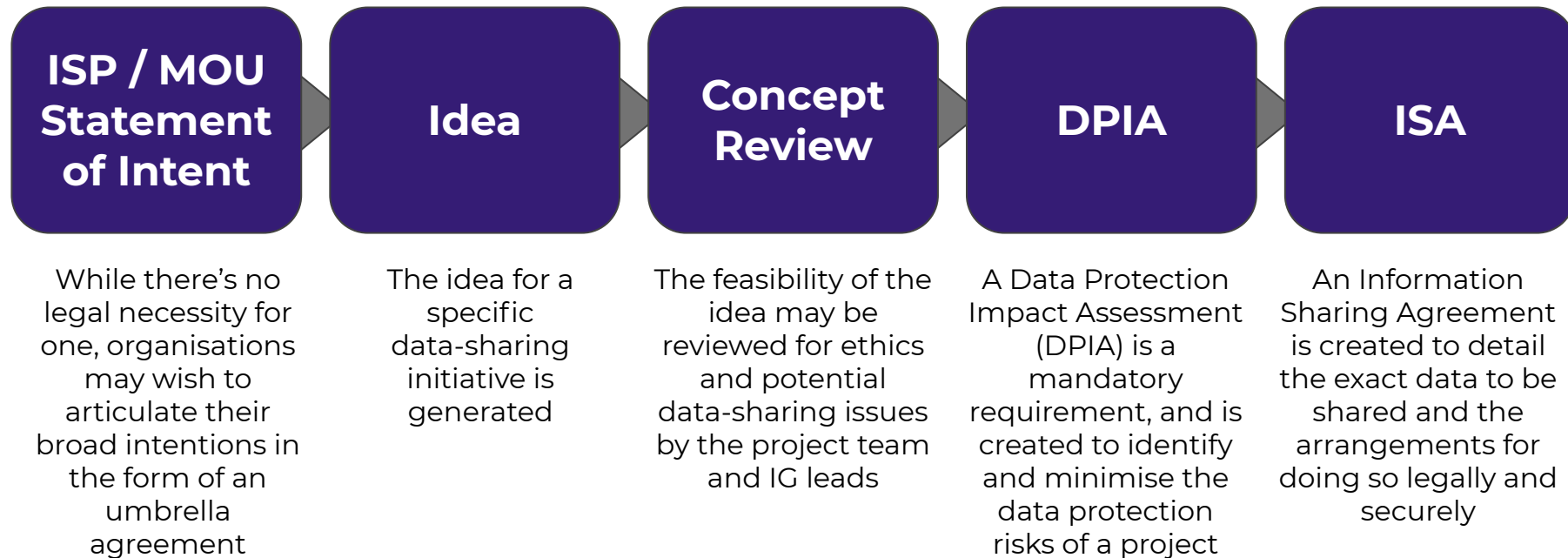
8. Sponsored Organisations

- Unlimited
- Can only use ISG to share data with the sponsoring organisation
- Smaller organisations (e.g. schools, community groups, etc)

12:45

Lunch

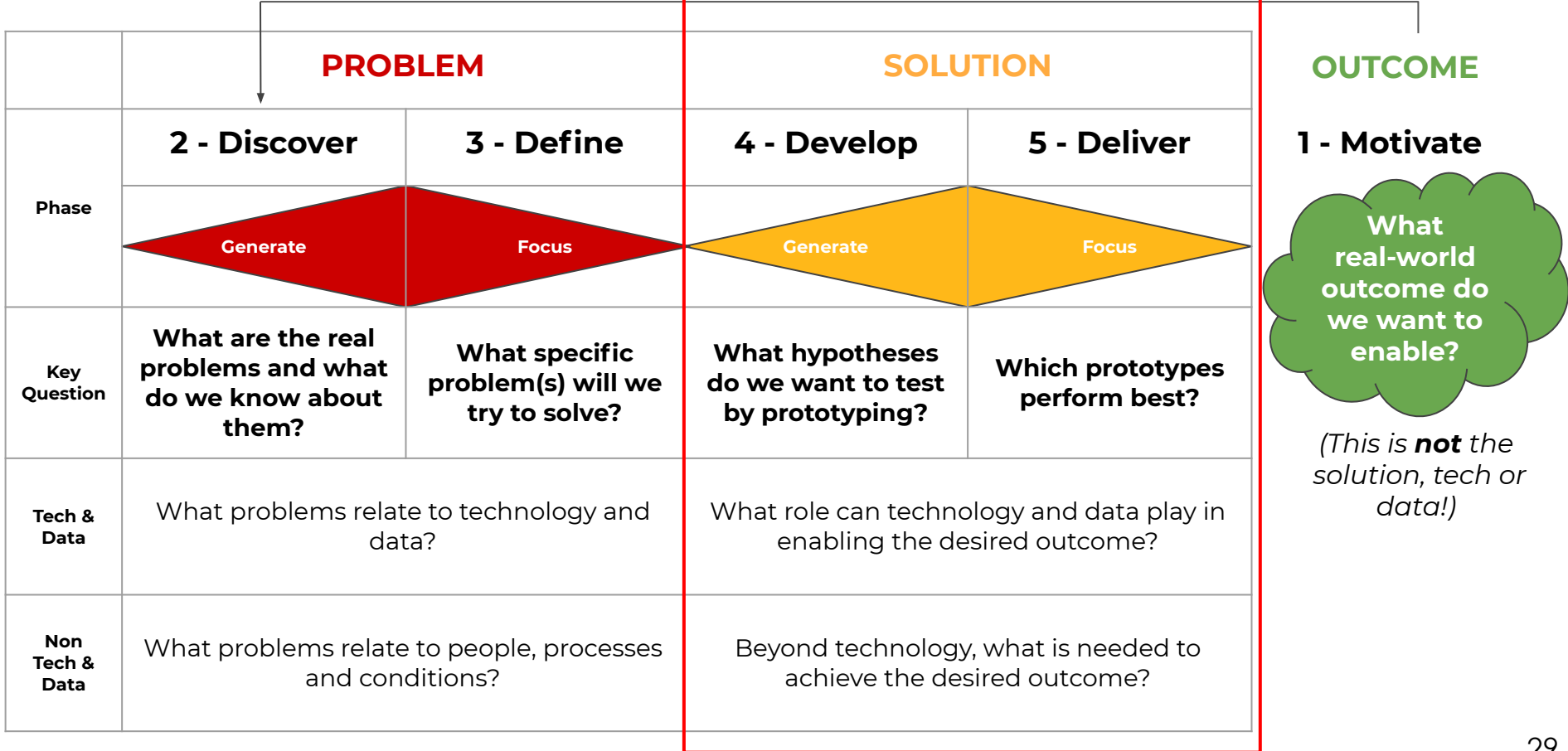
Information Governance Steps



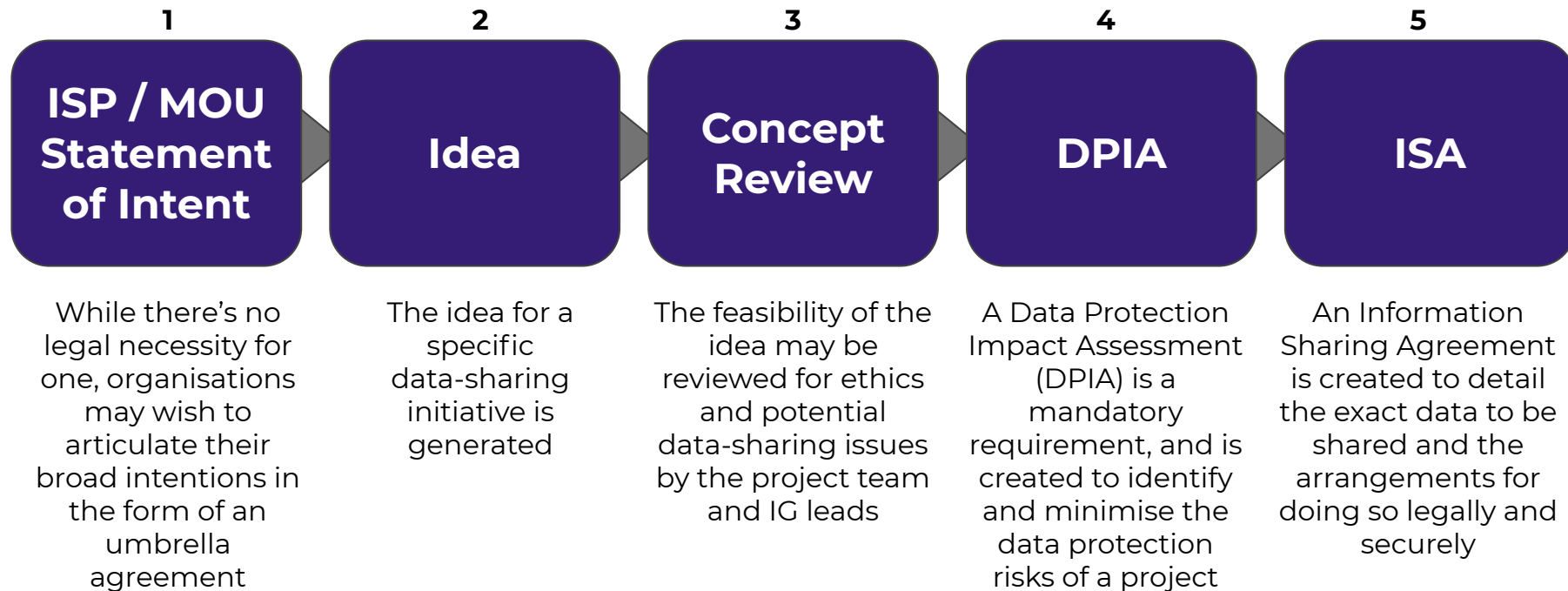
Exercise 3:

What do we need to do to solve the IG-related barriers to data sharing in London?

LOTI's Outcomes-Based Methodology



Information Governance Steps



Exercise 3:

What do we need to do to solve the IG-related barriers to data sharing in London?

60mins

Working in teams, design a roadmap of specific, actionable steps you can take to address the IG-related barriers discussed today.

You might like to consider:

- Which, if any, of the existing approaches and tools available could benefit London? How might they need to be adapted?
- What else is needed to address the IG aspects of this problem?

Discussion: 20 mins

Feedback: 25 mins

(Hint: You might wish to think about these steps in the context of a specific project)

Next Steps:

- Acting on the roadmaps (who will do what)
- Piloting the ISG (with actual projects)
- Staying in touch via BaseCamp

Appendix

Typical component parts of an Information Sharing Protocol

| Introduction | Aims and Objectives | Participating organisations | Legal status of the Protocol |
|--|--|--|--|
| Definition of what the ISP is | Overview of what the ISP is designed to achieve | List of organisations covered by the terms of the ISP | Whether or not the ISP is legally binding or an MoU |
| Updating the Protocol | Purpose of information sharing | Types of information to be shared | Special category data |
| Procedure for updating the terms of the ISP | Reasons for sharing data using this ISP | Categories of personal information that can be shared | Types of sensitive data and how they will be handled |
| Related legislation | Data handling requirements | Staff roles and responsibilities | Subject Access Requests |
| Outline of legislations that may have impact on related ISAs | How data will be handled and kept secure | Who is responsible for each aspect of sharing, using and protecting data | How Subject Access Requests will be handled |
| FOIA Requests | Breach of confidentiality | Breach of security | Complaints |
| How FOIA requests will be handled | Procedures for protecting and handling breaches of confidentiality | Procedures for protecting and handling breaches of security | How complaints will be handled from public or between partners |