

Report to the NHS Somerset Clinical Commissioning Group on 23 September 2021

Title: Annual Report 2020/21: DSP Toolkit	Enclosure K
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Version Number / Status:	N/A
Non-Executive Leads:	N/A
Clinical Lead:	-
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Summary and Purpose of Paper

The Data Security and Protection Toolkit Annual Report is enclosed for information.

Recommendations and next steps

The NHS Somerset CCG Governing Body is asked to **Note** the Data Security and Protection Toolkit Annual Report and to raise any items of concern or for clarification with the Lead (Kevin Caldwell)

Impact Assessments – key issues identified

Equality	N/A			
Quality	N/A			
Privacy	N/A			
Engagement	No issues identified. The report is included on the Somerset CCG website http://www.somersetccg.nhs.uk/			
Financial / Resource	N/A			
Governance or Legal	No issues identified.			
Risk Description	N/A			
Risk Rating	Consequence	Likelihood	RAG Rating	GBAF Ref
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DATA SECURITY AND PROTECTION TOOLKIT

2020/21 SUBMISSION

1 BACKGROUND

- 1.1 The Data Security and Protection Toolkit (DSPT) is an online self-assessment tool that allows organisations to measure their performance against the National Data Guardian's 10 data security standards.
- 1.2 All organisations that have access to NHS patient data and systems must use the DSPT to provide assurance that they are practising good data security and that personal information is handled correctly.
- 1.3 The DSPT is an annual assessment. As data security standards evolve, the requirements are reviewed and updated by NHS Digital to ensure they are aligned with current best practice.
- 1.4 As an NHS body, Somerset CCG is required to complete the annual DSPT assessment, we are a Category 2 organisation.
- 1.5 For 2020/21, the COVID-19 pandemic resulted in a change to the timescales for organisations to complete the DSPT. Traditionally DSPT completion has been required by 31 March each year. In 2020/21, the deadline was moved to 30 June 2021 to recognise the demands of organisations responding to the pandemic. However, in maintaining the continued requirement to complete during the period of pandemic response highlights the importance of maintaining data security and protection standards across the NHS.

2 DSPT STRUCTURE AND CONTENT

- 2.1 For 2020/21 the DSPT consisted of 146 assertions within the DSPT, a decrease of 11 assertions from 2019/20. Of these, 91 were mandatory and 55 non-mandatory.
- 2.2 The National Data Guardian's 10 data security standards and number of mandatory and non-mandatory assertions within each for 2020/21 (and change on 2019/20) are:

National Data Guardian Standard	Mandatory Assertions 2020/21	Change from 2019/20	Non-Mandatory Assertions 2020/21	Change from 2019/20
1 – Personal Confidential Data	21	-8	6	No change
2 – Staff Responsibilities	2	-2	1	No change
3 – Training	7	No change	1	No change
4 – Managing Data Access	10	No change	9	-2
5 – Process Reviews	2	-1	3	-3
6 – Responding to Incidents	11	-4	6	No change
7 – Business Continuity	9	No change	3	-1
8 – Unsupported Systems	10	+1	3	+1
9 – IT Protection	15	+1	17	+10
10 – Accountable Suppliers	4	No change	6	-1
Total	91	-13	55	+4

2.3 There were 58 assertions which were either new or reworded for 2020/21 – 51 of which were mandatory and 7 non-mandatory.

2.4 DSPT self-assessments for all registered organisations are published on the DSPT website and have the following status classifications applied:

- Not Published
- Standards Not Fully Met (Plan Agreed)
- Standards Met (all mandatory requirements)
- Standards Exceeded (meets all mandatory and at least one non-mandatory requirement)

3 REVIEW 2020/21

3.1 A completed DSPT for Somerset CCG was published for 2020/21 within the required timescales at the end of June 2021. Having met all 91 mandatory requirements and 48 out of 55 non-mandatory requirements, Somerset CCG reached a Toolkit status of 'Standards Exceeded'.

- 3.2 100% of mandatory requirements were met and 87% of non-mandatory requirements giving an overall percentage of 95% of all requirements met.
- 3.3 The self-assessment was reviewed and approved by the Director of Operations and Commissioning on behalf of the CCG Senior Information Risk Owner (SIRO).
- 3.4 The Information Governance, Records Management and Caldicott Committee (IGRMCC) maintain oversight of progress to completion of the Toolkit each year, providing operational assurance to the CCG.
- 3.5 The Information Governance team co-ordinate the completion of the DSPT and develop and implement improvement plans with the aim of ensuring the CCG meets its obligations of achieving required standards for data security and protection.
- 3.6 The two previous years of DSPT assessment were:
- 2018/19 – 90% (118/131 assertions completed)
 - 2019/20 – 92% (144/157 assertions completed)
- 3.5 A summary report of the DSPT detailing responses to each requirement was reviewed by the IGRMCC at its August 2021 meeting.

4 RECOMMENDATION

- 4.1 The Governing Body is asked to note the publication annual DSP Toolkit for Somerset CCG and the assurance this provides in demonstrating a good level of organisational compliance with the data security and protection obligations of the CCG.
- 4.2 Should Governing Body members have any further queries or require greater detail on any aspect of the DSP Toolkit, please contact Kevin Caldwell, kevin.caldwell1@nhs.net.

9 September 2021