**Reminder to sign your DPP, allowing implementation of Advice and Guidance**

Further to the announcement of the implementation of Advice First from Cinapsis, providing access to specialist secondary care advice for jointly agreed services, we would like to remind practices that the Data Protection Protocol (DPP) needs to be completed as soon as possible.

We have received feedback that some practices have been concerned that the DPP gives Cinapsis access to patient data that isn’t relevant to the request for advice. We have been in touch with the ICB’s Information Governance Team to ask for clarification that this is not the case and that Cinapsis will only have access to relevant patient information when appropriate.

The ICB’s Information Governance team have confirmed that there are two elements which highlight the arrangements for Cinapsis’s access to data within the DPP.

Page 10 – Table A – includes – ‘The System supports Role Based Access – access to clinical components and personal data is restricted to clinicians, and unless requested by the data controller concerned, administrators are only able to access non-clinical and transactional data.’

Page 11 – Table A – includes – ‘Ad-hoc requests by Users for support in addressing technical issues arising will be raised with Cinapsis via the helpdesk function.  Each request will act as an instruction by the User to Cinapsis to administer the system on the User’s behalf.’

“We interpret these clauses to mean that Cinapsis system administrators are restricted to being able to access the minimum necessary data for the maintenance activities they need to carry out on the system, and that where a technical support issue is raised by a User (person designated to have access by any GP practice), then that acts as a processing instruction to access and process any personal data which would be necessary to provide support and resolve the issue reported.”

In the Data Protection Impact Assessment (DPIA), a further measure to minimise Cinapsis staff access to the system is outlined in section 1.5 - User support and administration will initially be provided by the core project team with the intention of enabling admin within each GP Practice and hospital specialty to undertake non-clinical admin roles within the system when fully rolled out.

We are confident that this further clarification will mean practices are confident when reviewing the DPIA and signing the DPP.

As a reminder the DPP was sent directly to practices on Monday 11th September 2023 and can be approved and signed via DocuSign.

The Data Protection Impact Assessment (DPIA) for Cinapsis is now available via the GP Shared area. As a reminder, your practice is a data controller in this activity and that this is a template for you to review/amend/adopt as you determine and should be processed and signed-off through your organisation’s own DPIA procedure.

If you have any questions regarding the service, please contact [advice.first@somersetft.nhs.uk](mailto:advice.first@somersetft.nhs.uk) for any queries regarding the DPP or DPIA please contact, [somicb.GPDPO@nhs.net](mailto:somicb.GPDPO@nhs.net)

ENDS