

Information Governance Checklist for the introduction a of new database*:

Title	Management (M) Aortic Graft Infection (AGI) C pilot – MAGIC		
Clinical site contact:	Dr. Nicholas Price (GSTT)		
Sponsor:			
PRIMARY SITE (GSTT) IT Contact:	Bolaji Coker (Biomedical Research Centre KCL)		
Date:			
Please indicate which applies	Implementation of a new database	x	
As part of implementing this project more than one of the list may apply	Introduction of new process		
	Setting up of new contract		
Date approved			

	Checklist Questions	Response	For IG use only: Additional information/ Actions
Proj	ect Outline		
1	Please provide a detailed outline of the project		
2	Have you funding in place to proceed with this project?		

3	For new applications/software/databases Do you have approval from the IT Project Group/ Design Authority	Not Applicable. Design Authority and deployment has been reviewed and managed at GSTT through IT support services.	
Pers	onal identifiable data - data protection		
4	Will you be using/holding personal identifiable information? Such as name, address, dob, NHS number, hospital number, photographs, CCTV, NINO	Personal identifiable information (hospital number, DOB, initials, and microbiology laboratory specimen numbers) will only be held at the local level as per clinical need. All information placed in the database will be pseudoanonymised prior to entry. Age will be used as a non-identifiable proxy for date of birth. Data at the local level will be held in concordance with local and national NHS guidelines with respect to the Data Protection Act 1998 and Caldicott Guidelines.	
5	If yes: please specify if this is patient, staff or other personal data.	N/A	
6	Will you also be holding sensitive personal data (such as ethnicity, religious beliefs, health etc)?	No sensitive personal data will be held in the database.	
7	Will you be using patient identifiable data for any other purpose other than healthcare e.g. research or training? If yes – have you put in place a process to obtain the patients consent for this use?	The project has been designated a national service evaluation by the NRES therefore patient consent is not required.	
8	Will any data be processed/shared outside the UK? If yes – please identify the countries	No	
9	Are procedures in place to provide access to records on receipt of a subject access request?	Not applicable	
10	Do you intend to send direct marketing messages by electronic means such as by telephone, fax, email, text message and picture (including video) message or by using an automated calling system?	No	
Othe	r types of data		

11	Other than the personal data described in question 3 above please outline the type of data to be held/ processed.	Baseline clinical information (comorbidities, severity of illness), infection-related and microbiological parameters, outcome data.	
12	What format will this data be held in e.g. electronic, paper?	Paper records kept for internal purposes. Electronic records are kept for analysis and shared with the national group of collaborators.	
13	Where will this data be held (off site/on site, server, website, mobile device, third party)? If any data is held off site please let us know the location	GSTT has purchased a licence for MedSciNet Clinical Trial Database Framework and pays a yearly fee for Operation, Maintenance and Support. GSTT use the service in order to develop Clinical databases used within GSTT. Data is entered into a secure electronic webbased database at http://www.gsttbrc.com/magic/ which is both HSCIC Information Governance Toolkit compliant (level 2 or above) and ISO 27001/27002:2005 certified Generated applications and the databases reside on servers in Amsterdam, provided by the company Interoute, acting as a subcontractor of MedSciNet U.K. Ltd. Interoute is accredited according to ISO 27001 and the contract between MedSciNet AB (the mother company in Sweden) and Interoute contains all necessary clauses regarding standard NHS Terms and conditions including information governance, security, confidentiality and support.	
14	For what purpose will the data be held – clinical care, service/organisation, business, research or audit?	Service evaluation	
Acce	ess controls		
15	What access controls will be introduced to control who has access to the information? Please identify the controls that will be used e.g. password, user id etc	Access to the data will be restricted to collaborators and controlled by user id and password using a role based system.	

16	Please identify the staff roles who will be involved in using this system/process.	Clinicians, nurses, statisticians, data manager.	
Thire	d party contractor		
17	Is a service being contracted from a third party?	Yes, see section 13	
18	If Yes: will they be processing Trust Data, if yes please outline what they will be doing	The system will be processing only pseudoanonymised data entered into the webbased database.	
19	If Yes: will they be providing a service e.g. supplying an application/software system?	yes, see section 13	
20	Will they require remote access to the Trust systems?	No	
Stak	eholder analysis		
21	Provide a broad list of any departments or organisations that may have an interest in, a role to play in delivering, or be affected by the project.	GSTT Directorate of Infection (Primary Service Evaluation Administration Site) GSTT BRC (IT services, database and data management support) Leeds General Infirmary (Patient Enrolling Site) University Hospital South Manchester (Patient Enrolling Site) Birmingham Heartlands Hospital (Patient Enrolling Site) The Royal Free Hospital (Patient Enrolling Site) Guys' & St Thomas' Hospital (Patient Enrolling Site)	
Info	rmation sharing		
22	Will you be sharing patient identifiable data with an external organisation?	Patient identifiable data will not be shared between partner NHS organisations. Only pseudoanonymised data will be housed within the database with each organization able to access their own data and the central site, GSTT, able to access all the data.	
23	If Yes: Who will you be sharing data with?	Not Applicable	

24	How will this information be shared with the external organisation e.g. email/ fax/ post/ internet connection/	Not Applicable	
	telephone?		
Information Security			

What type of security controls will be in place to prevent unauthorised access, loss or damage to any personal identifiable information?

Please identify what these controls are?

Users will only be able to access the online database with their username and password. These usernames, with the required access rights, will be provided by the central centre, GSTT. The only other staff that will have access to the data will be GSTT BRC data management services team and the web hosting team managing the physical servers and backups in compliance with ISO 270001. All transmission of data from the web frontend to the database backend is done through Secure Socket layers (SSL).

Only users advised by the Principal Investigator at each centre are given usernames. Initially, when a user is first given a username they are a given a temporary password and forced to change it when they first login.

In general, the management of the database will be in compliance with the GSTT data protection policy per Appendix 2 Item 7.2: The measures that the Trust has in place must ensure a level of security appropriate to the nature of the data and must consider the harm that might result from disclosure. Therefore the Trust must seek to ensure its compliance with ISO17799: which governs personnel measures; physical security; environmental security; document and media protection; hardware security; software security; data security; backup; maintenance; contingency planning; and security awareness. This policy can be provided to all stakeholders on request

2.6			
26	Will you be using any mobile devices?	No.	
	If yes – please identify the type of devices & identify		
	whether they will be encrypted		
Busi	ness Continuity		
27	Will this system/process be incorporated into the	No. Business continuity activities will be done	
	department's business continuity plan?	by the GSTT data management services team	
		and the web hosting team.	
Reco	ords management		
28	Is this information covered by the Trust Retention and	No.	
	Destruction schedule?	However the data processed for any purpose or	
	If no – add appropriate retention period to local	purposes shall not be kept for longer than is	
	retention and destruction schedule?	necessary for that purpose or those purposes.	
		With specific reference to the retention,	
		archiving and destruction of the service	
		database, the database will be held for a period	
		of 5 years from the formal closure of	
		enrolment.	
29	If appropriate have any medical records forms been approved by the MRRG?	Not applicable	
NHS	Number		
30	Will this system act as a master index to flow Patient	Not applicable.	
	Identifiable Data and NHS Numbers to other systems?		
31	Will the system be used to produce hard-copy outputs	No	
	containing Patient Identifiable Data?		
	This includes patient appointment letters, reports		
	shared externally with other organisations /		
	individuals.		
32	Will the system need to transfer information between	No	
	organisations?		
33	Will the NHS Number, as a national identifier, ever be	The NHS number is not required.	
	required to be stored against Patient Identifiable Data	·	
	in the system for e.g. audit purposes?		

Part 2

Data Quality

Author: MAGIC WORKING GROUP Information Governance Checklist

34	Are national or locally defined data standards (format and content) being used wherever possible? (please refer to the appropriate Data Set Change Notification)	Yes	
35	Where different systems are recording the same data, are processes in place to ensure there are no inconsistencies between them?	Not applicable as data is only recorded once.	
36	Confirm that a process for identifying and recording of changes to stored data is in place.	Yes. All changes to the database are logged	
Info	rmation Security		
37	Have processes been considered to protect information and physical assets from accidental loss, destruction or damage such as through flood or power failure or theft?	Yes. Databases are hosted by Interoute holding an ISO27001 certification ensuring physical security: • Auxiliary power through UPS and diesel generator; • Physical surveillance with video and infra-red cameras; • Climate control system is used for temperature and humidity monitoring; • Burglary alarm; • ESD protected elevated floor. Grounding according to IBM standard; • A pass card and PIN code is required to access the building; • Fire extinguishing system is based on aragonite gas, fire is detected by smoke and heat sensors.	
38	Are controls in place to protect the system from malicious software?	Yes. The system uses Enterprise Symantec endpoint protection tools.	
39	Are appropriate and secure backup processes in place?	Yes. Data is backed up daily, with a window of 7 days, on the server. A differential backup is also done daily and a full backup done at the weekend with a window of 30 days.	
40	Are procedures and controls in place to ensure that only authorised personnel may carry out software and hardware maintenance?	Yes. Only staff of the GSTT BRC data management service can carry out software modifications. Only staff for the web hosting infrastructure can carry out hardware maintenance.	

Acce	Access controls				
41	Are passwords enforced for access to the system?	Yes			
42	What is the password complexity for the system e.g. how many characters/alpha/numerical/symbols	Password should be at least 4 and no more than 20 characters in length.			
43	Will users have access to all information held on the system or access based on their roles?	No, users can only access their own data			
44	Are there access profiles in place for the system – if yes please provide information as to what these are and who is responsible for approving the access profiles	Yes. The system has roles for users (has read write access to all data for their centre), unit administrator (has read write access to all data for their centre and can add and disable other users for that centre), monitor (has only read access to all data, for one or more centres, and can raise queries in the data and lock them), principal (has read write access to all data at the centre, can electronically sign all patients once they have been locked by the monitor role, and can unlock data), global admin (has full rights over system by being able to add and disable users, extract data, and unlock records). The data controller for the database is Dr Nicholas Price.			
45	Who is responsible for approving system access	Senior Data manager at GSTT			
46	Is there an audit trail available of who has been accessing the system? If yes – what audit logs are available	Yes. Audit logs available include details of all successful and failed logins, details of all changes to the data (insertion and updates) – deletions are not allowed, and details of all menu actions.			
47	Is there an inbuilt time out after a period of inactive use?	Yes			
-	Capacity Planning: New systems or major changes to existing systems will require additional resources, including:				
48	Has the capacity (bandwidth and storage space) of the existing network to cope with the introduction of this system been considered as part of the implementation planning process?	Not applicable as web-based system hosted by GSTT			
49	Have implications for technical support, training, maintenance, replacement costs, human resources and other implications all been taken into consideration?	Not applicable as web-based system hosted by GSTT			

50	Have additional physical resources such as furniture, paper supplies, training materials and material storage cabinets been considered?	Not applicable as web-based system hosted by GSTT				
Test	Test System Development (Solution Build)					
	ems in development or under test can cause problems to duction as an operational system.	operational systems or live data, and should theref	ore be separated until ready for			
51	Is there a separate environment for testing purpose?	Yes				
52	Confirm that operational data is not being used on test systems. Test data should be created or the use of live data justified.	Operational data is not used in the test environment. All data used for testing and training is fictitious.				
53	Are documented procedures in place governing the transfer of software from development to operational status (see system acceptance questions below)?	Yes. All procedure documentation is held with the Senior Data manager at GSTT and can be reviewed on request.				
54	Confirm that test systems are subject to the same access and security controls as operational data.	The test environment is subject to the same access and security controls as the operational data.				
Docu	Documented Operating Procedures (Required Prior to Deployment)					
	mented operating procedures should be made available for					
	date, to reflect any changes to software/hardware or wordered operating procedures to carry out their roles.		cal support personnel will also need access			
55	Have information processing and handling instructions been produced?	Not applicable as web-based system hosted by GSTT				
56	Have instructions for handling operational errors been produced?	Not applicable as web-based system hosted by GSTT				
57	Have support contacts for operational or technical difficulties been identified?	Not applicable as web-based system hosted by GSTT				
57	Have instructions for handling output and media, including the disposal of confidential waste and failed jobs been produced?	Not applicable as web-based system hosted by GSTT				
59	Will activity audit and log data be collected for this system?	Not applicable as web-based system hosted by GSTT				
	If yes, have procedures been produced?					
Char	Change Management (CM) (Required Prior to Deployment)					

Change Management (CM) (Required Prior to Deployment)

System software, hardware and operating procedures are subject to regular change. It is essential that any changes are subject to a strict CM regime to ensure that all changes are controlled and approved. Failure to do this can result in system faults or failures. Formal documented Request for Change procedure should be used.

60	Confirm that change control management process are in place and will be applied to this system	Not applicable as web-based system hosted by GSTT			
This	bystem Acceptance This is the last stage of development where a system is moved through to operations. All IT systems should follow the Transition to Live Checklist procedure and also answer the following questions:				
61	Have error recovery and restart procedures been documented?	Not applicable as web-based system hosted by GSTT			
62	Have routine operating procedures been prepared and tested?	Not applicable as web-based system hosted by GSTT			
63	Have security controls been agreed?	Not applicable as web-based system hosted by GSTT			
64	Have any manual procedures been documented?	Not applicable as web-based system hosted by GSTT			
65	Have system dependencies been documented and assessed and added to the information asset register under the entry for this system?	Not applicable as web-based system hosted by GSTT			
66	Have business continuity plans been created and tested?	Not applicable as web-based system hosted by GSTT			
67	Have disaster recovery plans for the hardware and infrastructure components been created and tested?	Not applicable as web-based system hosted by GSTT			
68	Is evidence (through testing and calculations) that the new systems will not adversely affect existing operational systems available?	Not applicable as web-based system hosted by GSTT			
69	Has training in the use of the system for user and technical support been carried out?	Not applicable as web-based system hosted by GSTT			
70	Has there been user involvement at all stages of system development to ensure the system is as intuitive as possible.	Not applicable as web-based system hosted by GSTT			
Man	aging clinical risk				
deve	Please complete the questions below if you are implementing a clinical system, for further information please refer to DSCN 14/2009 & DSCN 18/2009. In developing and deploying any software locally, (i) do you have in place, and (ii) have you implemented, through appropriate testing, a process (where applicable) for -				
71	Ensuring that when data is transferred FROM the Trust's IT systems to your own that the data is attributed to the correct patient	Not applicable			

72	Ensuring that when data is transferred TO the Trust's IT systems from your own that the data is attributed to the correct patient	Not applicable		
73	Ensuring that where data mapping occurs between elements in the Trust's systems and your own that these are properly attributed and represented	Not applicable		
74	Ensuring that your software displays information consistent with the work practices of the Trust e.g. Trust guidelines , protocols etc	Not applicable		
75	Ensuring that your software displays data in a manner which is safe and consistent with that expected by your staff in the light of any relevant training that they may have received	Not applicable		
76	Ensuring that your software is used by your staff in the way intended and that any controls within your system are not subverted	Not applicable		
Pleas	cality of the system se indicate how critical the system is, this decision should ailability risk assessment is completed that outlines the co		ntrols in place. If the syst	em is critical to the Trust then an
77	In discussion with the IAO how critical is the loss of this system/application: for each time period specified, please indicate if the loss of the system is a low, medium or high risk	<4 hour 4-12 hours 12-24 hours 24 plus Not discussed	low low low	If a critical asset level 1-3 complete an unavailability risk assessment with the department
Syst	em security template			
78	Please complete a system security template for any application/system that contains personal identifiable data see System-level Security Policy for details	Not applicable as web-b. GSTT with no personal in		