



ACMEDICALSERVICES

The Corner House, Rectory Road  
Colwick, Nottingham  
NG4 2DU

## Data Security & Protection Toolkit Policy

### Document Control

#### A. Confidentiality Notice

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#### B. Document Details

<b>Classification:</b>	
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### C. Document Revision and Approval History

Version	Date	Version Created By:	Version Approved By:	Comments
1.0	14/11/2022	Adam Connor		Review Due 14/11/2023

#### Policy/Service Content:

- For each of the following checks, is this policy sensitive to people of different age, ethnicity, gender, disability, religion, belief, sexual orientation and transgender?
- The checklists below will help you to see any strength and/or highlight improvements required to ensure that the policy/procedure/guideline is compliant with equality legislation.

#### 1. Check for DIRECT or INDIRECT discrimination against any minority group of SERVICE USERS.

Question: Does your policy/service contain any issues which may adversely impact people from using the services who otherwise meet the criteria under the grounds of:		Response		Action Required		Resource Implication	
		Yes	No	Yes	No	Yes	No
1.0	Age		√				
1.1	Gender (male, female, non-binary etc)		√				
1.2	Learning difficulties/disability or cognitive impairment		√				
1.3	Mental health need		√				
1.4	Sensory impairment		√				
1.5	Physical disability		√				
1.6	Race or ethnicity		√				



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1.7	Religion or belief (including other belief)		√				
1.8	Sexual orientation		√				
1.9	Pregnancy and Maternity		√				
1.10	Marriage and Civil Partnership		√				
1.11	Gender Reassignment		√				

If yes is answered to any of the above items the policy may be considered discriminatory and requires review and further work to ensure compliance with legislation.

**1. Check for DIRECT or INDIRECT discrimination against any minority group relating to EMPLOYEES**

Question: Does your policy/service contain any issues which may adversely impact employees from operating under the grounds of:		Response		Action Required		Resource Implication	
		Yes	No	Yes	No	Yes	No
1.0	Age		√				
1.1	Gender (male, female and transsexual)		√				
1.2	Learning difficulties/disability or cognitive impairment		√				
1.3	Mental health need		√				
1.4	Sensory impairment		√				
1.5	Physical disability		√				
1.6	Race or ethnicity		√				
1.7	Religion or belief (including other belief)		√				
1.8	Sexual orientation		√				
1.9	Pregnancy and Maternity		√				
1.10	Marriage and Civil Partnership		√				
1.11	Gender Reassignment		√				



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If yes is answered to any of the above items the policy may be considered discriminatory and requires review and further work to ensure compliance with legislation.

### Total number of items answered "YES" indicating DIRECT or INDIRECT discrimination = 0

Number of "Yes" answers for service users				0
Number of "Yes" answers for employees				0
		<b>Yes</b>	<b>No</b>	<b>Comments</b>
1.1	Is there any evidence that some groups are affected differently?		√	
1.2	Is there a need for external or user consultation?		√	
1.3	If you have identified potential discrimination, are any exceptions valid, legal and/or justifiable?		√	
1.4	Is the impact of the policy/guidance likely to be negative?		√	
1.5	If so, can the impact be avoided?		√	
1.6	What alternatives are there to achieving the policy/guidance without the impact?		√	
1.7	Can we reduce the impact by taking different action?		√	



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<b>IMPACT</b> <b>(Please Tick)</b>		<b>HIGH</b>		<b>MEDIUM</b>		<b>LOW</b>	√
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To be completed and attached to any procedural document when submitted for consideration and approval at the Clinical Governance Committee (Clinical) or Management Meetings (Non Clinical)

If you have answered “yes” to any of the above questions, it is likely the policy will need a full EIA. Please complete a full impact assessment. If you have identified a potential discriminatory impact of this procedural document, please refer it to the Business Manager; together with any suggestions as to the action required to avoid/reduce adverse impact.

**Authorising Signature:**

**Authorising Name:** Adam Connor

14/11/2022



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# Data Security and Protection Toolkit Policy

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## Introduction

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### Guidance statement

The NHS Digital Data Security and Protection Toolkit (DSPT) is a replacement for the Information Governance Toolkit and was introduced in April 2018. The Organisation is required to provide assurance that they have good data security processes in place and patient information is managed appropriately.

### Principles

This document will illustrate the AC Medical Ltd's commitment to the safety of patient information. By adhering to the referenced guidance, staff will ensure that data and information are protected, which will reduce the risk of information security incidents in the future.

### Status

The AC Medical Ltd's aims to design and implement policies and procedures that meet the diverse needs of our service and workforce, ensuring that none are placed at a disadvantage over others, in accordance with the Equality Act 2010. Consideration has been given to the impact this policy might have in regard to the individual protected characteristics of those to whom it applies.

This document and any procedures contained within it are non-contractual and may be modified or withdrawn at any time. For the avoidance of doubt, it does not form part of your contract of employment.

### Training and support

AC Medical Ltd. will provide guidance and support to help those to whom it applies understand their rights and responsibilities under this guidance. Additional support will be provided to managers and supervisors to enable them to deal more effectively with matters arising from this guidance.



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## Scope

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### Who it applies to

This document applies to all employees, partners and directors of AC Medical Ltd. Other individuals performing functions in relation to AC Medical Ltd's such as agency workers, locums and contractors, are encouraged to use it.

### Why and how it applies to them

It is the responsibility of all staff to ensure that they handle patient information and data in the appropriate manner, and in accordance with the data security standards.

## Definition of terms

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### Data Security and Protection Toolkit

The Data Security and Protection Toolkit (DSPT) is an online self-assessment tool which allows AC Medical Ltd. to measure their performance against the National Data Guardian's ten data security standards.<sup>1</sup>

## Requirements

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### Rationale

The DSPT has been designed to support the requirements of the General Data Protection Regulation (GDPR) and the National Data Guardian's (NDG) ten data security standards.

The Organisation is required to complete an annual assessment to provide assurance that data security is of a good standard and patient information and data are handled in line with the data security standards. Assessments are to be submitted by 31 March annually.

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[NHS Digital DSP Toolkit](#)  
[NHS Digital DSPT e-learning](#)





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### NDG expectations

The NDG is Dame Fiona Caldicott and the requirements of the NDG are:<sup>2</sup>

- All staff ensure that personal confidential data is handled, stored and transmitted securely, whether in electronic or paper form. Personal confidential data is only shared for lawful and appropriate purposes.
- All staff understand their responsibilities under the NDG Data Security Standards including their obligation to handle information responsibly and their personal accountability for deliberate or avoidable breaches.
- All staff complete appropriate annual data security training and pass a mandatory test.

### Data Security Standards

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#### The ten standards

The purpose of the standards is to enhance existing data security principles, thereby improving data security across the healthcare sector. The standards outline the value of safe, secure, appropriate and lawful sharing of data.<sup>3</sup>

The Data Security Standards are:<sup>3</sup>

1. All staff ensure that personal confidential data is handled, stored and transmitted securely, whether in electronic or paper form. Personal confidential data is shared for only lawful and appropriate purposes.
2. All staff understand their responsibilities under the National Data Guardian's data security standards, including their obligation to handle information responsibly and their personal accountability for deliberate or avoidable breaches.
3. All staff complete appropriate annual data security training and pass a mandatory test, provided through Blue stream Training.
4. Personal confidential data is only accessible to staff who need it for their current role and access is removed as soon as it is no longer required. All instances of access to personal confidential data on IT systems can be attributed to individuals.
5. Processes are reviewed at least annually to identify and improve any which have caused breaches or near misses, or which force staff to use workarounds which compromise data security.

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<sup>2</sup> [NHS Digital DSPT e-learning](#)

<sup>3</sup> [DoH Your Data: Better Security, Better Choice, Better Care](#)



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6. Cyberattacks against services are identified and resisted and CareCERT security advice is responded to. Action is taken as soon as possible following a data breach or near miss, with a report made to senior management within 12 hours of detection. Significant cyberattacks are to be reported to CareCERT immediately following detection.
7. A continuity plan is in place to respond to threats to data security, including significant data breaches or near misses, and it is tested once a year as a minimum, with a report to senior management.
8. No unsupported operating systems, software or internet browsers are used within the IT estate.
9. A strategy is in place for protecting IT systems from cyber threats, based on a proven cyber security framework such as Cyber Essentials. This is reviewed at least annually.
10. IT suppliers are held accountable via contracts for protecting the personal confidential data they process and for meeting the National Data Guardian's data security standards.

## Resources

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### NHS Digital resources

NHS Digital have provided a range of resources to support the introduction of the toolkit and the implementation of the data security standards. The following are available:

- [About the DSPT](#)
- [Introducing the DSPT \(PPP\)](#)
- [DSPT for beginners](#)
- [Frequently asked questions](#)
- [DSP Toolkit – Start Guide \(All Users\)](#)
- [DSP Toolkit – Administrator's Guide](#)

## Summary

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The preservation of data and information security is crucial to maintaining the trust of the entitled patient population at AC Medical Ltd. All staff have a duty to ensure that they handle information correctly and safely, in accordance with extant guidance and in line with the data security standards.