# **EMIS Web**

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| **Title of project** | EMIS Pathway |
| **IG Reference** | PIA645Ev2 |

**Background**

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| The aim of Pathway is to bring together healthcare professions, the NHS and the Life Sciences industry to identify, diagnose and treat at risk patients. It does this by deploying sponsored clinical searches or algorithms at scale and making the results actionable directly through the clinical system (EMIS Web).  Some of the pathway modules are sponsored by industry or organisations (e.g. Barts Health) - which are visible to the practice and can be accepted or declined independently.  Through integrated tools and applications, the solution supports healthcare professionals with managing the care pathway of their patient populations in a more optimised way leading to better outcomes and experiences for patients.  This is completely separate to the LCR / HIE programmes - this is more around interrogating the GP practice for a cohort of patients to do something with - eg patients with atrial fibrillation who may have been lost to follow up or could benefit from a new medication.  EMIS Pathway is a product available to GP practices. By activating EMIS Pathway, GP practices allow EMIS to process their patient data and present a list of patients that fit a specific pathway project (Pathway module). GP practices are then able to share details of specific patients with the relevant delivery team for the pathway.  The pathway delivery team is given a pathway account and when they log in, they are able to see the list of patients shared by the GP practices. On their dashboard, they are able to move the patients in the relevant statuses.  The pathway delivery team are not required to install the system as it is integrated within EMIS.  For example - The aim of the first pathway project was to identify patients who might have or are at risk of having Hepatitis C so that the GP practices can share the details of the relevant patients with the Hepatitis C delivery network. |

**Flow of Personal Data**

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| * GP practices activate EMIS Pathway and enable EMIS to process their practice data so that the list of the relevant patients can be presented to them. By going into EMIS configuration and clicking activate next to the EMIS Pathway utility option. * GP practices are then able to activate the relevant sharing agreement for the Pathway module and share the details of the patients with the pathway delivery team. For now we have barts health looking at pathways for hepatitis and atrial fibrillation - but these are viewable with details from the EMIS Pathway screen * When the pathway delivery team log in to Pathway, they are able to see the patients that have been shared with them by the GP practice. * Pathway Modules may allow the authorised users from organisation(s) you have access to the pathway module to contact patients identified in a Pathway Module. They may be able to communicate to one or multiple patients identified in the Pathway Module via the available communication methods such as SMS, email or by generating a letter. Anyone from the GP practice with higher authorisation - eg Practice manager or partner or anyone else authorised to manage higher settings within EMIS at the practice   . |

**DPIA Questions**

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| Question | Response |
| Does this change/project involve the processing of Personal Information? | No  Yes – If no, please contact IG team – potentially no further action required. |
| Who is the Data Controller? | GP Practices |
| Who are the data subjects? | Patients  EMIS Employees  Practice Contacts  Business Contacts  Clinicians |
| Who are the data recipient/s? | Patients  EMIS  GP Practices  Pharmacists  Acute care  Business Partners (Please provide details below):  The pathway delivery team that GPs share the patients with - this could be secondary and/or tertiary care delivery teams. |
| Will data for minors be collected or processed? | No  Yes |
| Please choose the Data Categories that will be processed / changed as part of the project. | **Personal Details :**  Name  Date of birth/death  **Contact Details :**  Address  Postcode  Telephone number  Personal email address  Work email address  **National Identifiers :**  NHS number  Passport number  National Insurance number  **Other Contacts :**  Next of Kin / ICE  Guardian/Carer Details  **System Identifiers / Tracking :**  Online identifier  Location data (GPS, IP, MAC) |
| Does this involve the processing of Special Category - Health Information (Physical and Mental) | No  Yes - if yes choose from the relevant categories below:  **Health Record Types :**  Full Medical Record  Partial Medical Record  Prescriptions  Testing Results  Clinical Studies  Vaccination Information |
| Does this involve the processing of any of these other types of Special Category Data? | Information relating to sex life  Information about an individual’s sexual orientation  Genetic data  Biometric data (for identifying an individual)  Racial or ethnic origin  Political Opinions  Religion |
| What is EMIS’s Role? | Data Controller  Data Processor  Sub-Processor  Create the searches, supports the running and then transfers to the organisation that the project is about |
| Are there any other downstream Data Processors? | No  Yes – If yes please add details below commentary below:  The pathway delivery team with whom GPs share the patients with |
| Have the 8 Caldicott Principles been considered and followed? | No  Yes  Not applicable  There is a justifiable reason to use data.  It is necessary to use the data.  Data use is limited to the minimum set required.  Access is limited to only specific people who need to see it.  And only to trained individuals aware of their responsibilities.  The use complies with applicable laws.  The health care needs of the patient can override confidentiality.  Data subjects are informed about how data is used. |

**DPIA Assessment**

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| **Loss of data or accidental access** | |
| Describe controls in place to prevent inappropriate or accidental access to personal information | EMIS Pathway is only made available to GP practices who chose to active the system. By activating the system, the GP practices, as data controllers, allow EMIS to process their patient data and present a list of patients that fit a specific pathway module.  GP practices are then able to share details of specific patients with the relevant delivery team for the pathway. The pathway delivery team will be given a pathway account where they are able to see the list of patients shared on the dashboard, they are able to move the patients in the relevant statuses.  EMIS will require a list of all users, who need to see shared patients, along with their email addresses. Once received, we will create the accounts and notify the users on how to log in.  Development and testing environments have been created and use manufactured data to ensure the system is secure and functional.  Access guard controls will be in place, ensuring no unauthorised access to data within the system.  Penetration testing has been satisfactorily completed, and is performed on an annual basis. |
| **Inappropriate processing of personal data** | |
| Describe controls to prevent inappropriate or unlawful processing of personal information | EMIS has relevant contracts in place with participating GP practices to ensure there is a clear outline for the purpose of data processing. Additionally, data sharing agreements will be in place where necessary, so data will only be processed in line with agreements which form the legal basis.  Only relevant patient and medical data is processed.  Currently patient information is replicated into EXA and retained in an active state for 6 months, and is held in line with NHS standard data retention requirements  Should the GP Practice withdraw from the program, it will be the responsibility if the GP Practice and Pathway Delivery Team to obtain and retain a copy of any new data generated.  Processing of data as part of this project is heavily monitored by the GP’s, who enable the Pathway feature, activate sharing agreements, and allow patient data to be shared to pathway delivery teams as part of patient care. |
| **Inappropriate data transfer** | |
| Describe controls in place to prevent inappropriate or unlawful transfer of personal information | As per standard NHS requirements, all patient and clinical data will be held and processed within the UK in line with UK GDPR expectations.  Any downstream third parties or subprocessors will be required to sign a data sharing agreement before access to any data as part of this project. The data will be viewable within the assistant tool and should not ordinarily be transferred outside of standard EMIS Web or assistant products outside of relevant dating sharing agreements. |
| **Excessive data processing** | |
| Describe controls in place to prevent excessive data processing | The purpose of this project is to help participating GP practices to identify patients at risk of health conditions, such as HEP-C, and allow the GP practices to share these patient cohorts with the relevant pathway delivery teams.  The data being processed to enable this is kept minimal and essential to this purpose, ensuring that no special category data is needlessly processed. All data is minimal and shared only in line with relevant contracts and data sharing agreements, overall minimising any risk of excessive data processing. |
| **Loss of data integrity** | |
| Describe controls in place to maintain the Data Quality and integrity of data. How does this minimise the risk of the corruption or misallocation of personal information. | All queries and reports raised within the pathway system can be reviewed by EMIS staff - Data Stewards and Clinical Safety teams to ensure the relevance of the queries, and that cohorts created are accurate to the requirements.  GP practice users can remove patients that are identified within the EMIS Web search, ensuring that only relevant patients are shared with pathway delivery teams; this reduces the risk of inaccuracy of data within patient pathway cohorts.  Access to the pathway system is audited and controlled by both access guard and RBAC. |