



Gwasanaeth Cefnogi  
Swyddog Diogelu Data  
**Data Protection Officer  
Support Service**

IGDC • DHCW

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# Enhanced Information Governance, Data Protection Officer for GMPs Support Service Schedule

This document outlines the Digital Health and Care Wales (DHCW) IG DPO Support Service for GMPS

This Schedule is for:  
DHCW Information Governance (Service Owner)  
DHCW Primary Care Services  
Local Medical Committees  
General Practitioners Committee Wales  
General Medical Practices

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## 1.0 Document History

### 1.1 Revision History

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19/07/18	d0.2	Jeannette Short	Second draft
29/08/18	d0.3	Jeannette Short	Following stakeholder feedback
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19/09/18	d0.5	Jeannette Short	Further updates
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29/10/18	d0.7	Jeannette Short/Darren Lloyd	Further updates following comments from HB and PCS comments
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14/04/20	D1.1	Cora Suckley	Annual Review and update
08/02/22	D1.2	Cora Suckley	Review and Organisation updates (NWIS to DHCW, Job Titles and references to UKGDPR)
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06/12/23	V2.0	Francesca Harries	Finalisation following approval at DPOSS SMB
22/01/25	V2.1	Cora Suckley	Annual Review and update
07/11/25	V2.2	Francesca Harries	Annual Review and update - 2026 - draft for approval
27/02/2026	V3.0	Francesca Harries	Annual Review and update - 2026 - Final

### 1.2 Reviewers

This document requires the following reviews:

Date	Version	Name	Position
31/10/18	D1.0	GPC Wales	Chair and Committee Members
31/10/18	D1.0	Rhidian Hurle	DHCW Medical Director
18/06/20	D1.1	Darren Lloyd	Head of Information Governance, DHCW
12/10/22	D1.3	Darren Lloyd	Associate Director, Information Governance & Patient Safety, DHCW
14/10/22	D1.3	GPC Wales	Committee Executive Officer



06/12/23	D1.4	DPOSS SMB Members	DPOSS Service Management Board
17/11/25	V2.2	DPOSS SMB Members	DPOSS Service Management Board

### 1.3 Authorisation

Signing of this document indicates acceptance of its contents.

<b>Approver's Name:</b>	Darren Lloyd
<b>Role:</b>	Associate Director, Information Governance & Patient Safety
<b>Signature:</b>	 <hr/> Darren Lloyd Associate Director Information Governance and Patient Safety

<b>Approver's Name:</b>	DPOSS SMB
<b>Role:</b>	DPO Support Service, Service Management Board
<b>Signature:</b>	Quorate Board Membership in line with Section 6.1.



## 2.0 Glossary of Terms

Acronym	Meaning
Controller	Data Controller - a person, company, or other body that determines the purpose and means of personal data processing (this can be determined alone, or jointly with another person/company/body)
DHCW	Digital Health and Care Wales
DPA	Data Protection Act 2018 <a href="http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted">http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted</a>
DPIA	Data Protection Impact Assessment – a privacy related assessment whose objective is to identify and analyse how data privacy might be affected by certain actions or activities
DPO	Data Protection Officer – responsible for overseeing data protection strategy and implementation to ensure compliance with UKGDPR requirements
UKGDPR	UK General Data Protection Regulation General data protection regulation - Keeling schedule (uk-gdpr.org)
GMPs	General Medical Practitioners
GPC Wales	General Practitioners Committee, Wales
ICO	Information Commissioner’s Office <a href="https://ico.org.uk/">https://ico.org.uk/</a>
IG	Information Governance – the legal framework governing the use of personal information
LMC	Local Medical Committee
NIIAS	National Intelligent Integrated Audit Solution - is used to report on potentially inappropriate access to patient records, and pass these notifications to a designate for follow up
NWSSP	NHS Wales Shared Services Partnership
PCS	Primary Care Services, DHCW
PCSD	Primary Care Service Desk, DHCW
Personal data/ information	Information which relates to an individual, including their image or voice, which enables them to be uniquely identified from that information on its own or from that and/or other information available to that organisation.
Processor	Data Processor - any person; other than an employee, who processes data on behalf of a data controller. They have legal liability if they are responsible for a breach of data. UKGDPR places specific obligations on the Processor
Service	Information Governance, Data Protection Officer Support Service



SMB	Service Management Board – responsible for the strategic decisions and operations for the service
Special category data/information	<b>Data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.</b> Previously referred to as 'sensitive information' under DPA 1998 but with the addition of those highlighted in bold.
WCP	Welsh Clinical Portal <a href="#">Welsh Clinical Portal - Digital Health and Care Wales</a>
WASPI	Wales Accord on the Sharing of Personal Information <a href="#">WASPI Home - Welsh Accord on Sharing of Personal Information</a>

## 3.0 Background

### 3.1 General Data Protection Regulation

The Data Protection Act 2018 (DPA) and UK General Data Protection Regulation (UKGDPR) forms the data protection regime in the UK.

UKGDPR applies to 'controllers' and 'processors' of personal and special categories (sensitive) information which relates to an identified or identifiable individual.

UKGDPR sets out seven key principles that should lie at the heart of the organisations approach to processing personal information. The principle of accountability is key in demonstrating compliance with the regulation.

There are two key elements to the accountability principle; firstly, it makes it clear that the organisation is responsible for complying with the UKGDPR, meaning the organisation needs to be proactive and organised about their approach to data protection. Secondly, organisations must be able to demonstrate their compliance; therefore, they must be able to evidence the steps they take to meet their obligations and protect people's rights.

There are a number of measures that organisations can, and in some cases must, take including:

- adopting and implementing data protection policies – [Article 24\(2\) and Recital 78](#);
- taking a 'data protection by design' approach – [Article 25 and Recital 78](#);
- putting written contracts in place with organisations that process personal data on their behalf – [Article 28 and Recital 81](#);
- maintaining documentation of their processing activities – [Articles 7\(1\), 30 and 33\(5\) and Recitals 42 and 82](#);
- implementing appropriate security measures – [Articles 5\(f\) and 32 and Recitals 39 and 83](#);
- recording and, where necessary, reporting personal data breaches – [Articles 33-34 and Recitals 85-88](#);
- carrying out data protection impact assessments for uses of personal data that are likely to result in high risk to individuals' interests – [Articles 35-36 and Recitals 84 and 89-95](#);
- **appointing a data protection officer** – [Articles 37-39 and Recital 97](#); and;
- adhering to relevant codes of conduct and signing up to certification schemes – [Articles 40-43](#)



and Recitals 98-100.

### 3.2 Data Protection Officer

UKGDPR introduces a duty for GMPs, as a public authority, to appoint a Data Protection Officer (DPO), see Article 39.

The DPOs purpose is to provide the organisation independent risk-based advice to support its decision-making in the appropriateness of processing personal and special categories of data within the Principles and Data Subject Rights laid down in the Regulation.

The DPO role is to 'inform and advise' and not 'to do', they are a trusted advisor whom the Practice should actively seek their advice from. The DPO can help the organisation operate within the law by advising and helping to monitor and demonstrate compliance. They play a key role in the organisations data protection governance structure and help to improve and facilitate 'accountability'. The organisation must appoint a DPO whose job description is compliant with UKGDPR requirements and in particular must ensure that:

- the DPO directly reports to the highest management level of the organisation – *this does not necessarily imply line management at this level, but direct and unimpeded access to the senior management team;*
- the DPO is provided with adequate resources: financial and human resources, and is supported in maintaining his or her expertise;
- the DPO has proven '*expert knowledge of data protection law and practices*', the ability to perform the tasks specified in the UKGDPR, and sufficient understanding of the organisation's business and processing;
- information governance and related policies address:
  - Organisational accountability;
  - DPO reporting arrangements;
  - timely involvement of the DPO in all data protection issues;
  - compliance assurance: privacy by design and default;
  - advising on where data protection impact assessments are required;
  - the DPO's role in incident management;
- the DPO does not receive any instruction regarding the exercise of his or her tasks, and is protected from disciplinary action, dismissal or other penalties;
- where the DPO performs another role or roles, that their responsibilities are not influenced in any way and that there is no conflict of interest;
- the contact details of the DPO are published in the organisation's privacy information for data subjects and are communicated to the ICO.

It is important to consider the Working Party 29 Guidelines that state:

*'[t]he DPO **cannot** hold a position within the organisation that leads him or her to **determine the purposes and the means of the processing** of personal data. Due to the specific Organisational structure in each organisation, this has to be considered case by case'*

and further:

*'As a rule of thumb, conflicting positions may include senior management positions (such as chief executive, chief operating, chief financial, chief medical officer, head of marketing department, head of Human Resources or head of IT departments) but also other roles lower down in the Organisational*



structure if such positions or roles lead to the **determination of purposes and means of processing**.

DPOs may be shared by multiple organisations that are 'public authorities' taking into account organisational structure and size and may be either a member of staff or may fulfil the tasks on the basis of a service contract, provided there is no conflict of interest. A DPO team with a nominated contact for each organisation is an acceptable approach.

### 3.3 Qualities and Tasks of the DPO

The DPO shall be designated on the basis of professional qualities and, in particular:

- expertise in data protection legislation and practices and an in depth understanding of the UKGDPR;
- sufficient understanding of the processing operations carried out, as well as the information systems and data security and data protection needs of the organisation;
- demonstrable ability to fulfil his or her tasks.

The principal tasks of the DPO from the UKGDPR are to:

- provide advice to the organisation and its employees on compliance obligations;
- advise on when data protection impact assessments are required and to monitor their performance;
- monitor compliance with the UKGDPR and Organisational policies, including staff awareness and provisions for training;
- co-operate with, and be the first point of contact for the Information Commissioner;
- be the first point of contact within the organisation(s) for all data protection matters;
- be available to be contacted directly by data subjects; subject to limitations detailed in Section 5.7. The contact details of the Data Protection Officer will be published in the organisation's privacy notice;
- take into account information risk when performing the above.

### 3.4 Information Governance

Information Governance (IG) is the way in which an organisation handles all of its information, in particular the personal and sensitive information relating to patients and employees. It comprises of a set of multi-disciplinary structures, policies, procedures, processes and controls implemented to manage information and supports the organisations immediate and future regulatory, legal, risk, environmental and operational requirements.

Patients entrust their personal information to medical professionals and healthcare organisations, creating distinct requirements for confidentiality, privacy, and security.



## 4.0 Service

### 4.1 Purpose of this Service Schedule

This schedule defines the mechanisms to support General Medical Practices (GMPs) across Wales discharging their Data Protection Officer duties and deploying their Information Governance responsibilities in-line with legislation and national standards.

It ensures that there is clear responsibility for the service provision, defines the operational processes and supports a managed deployment. For the purpose of this document, the Enhanced Information Governance, Data Protection Officer for GMPs Support Service will be referred to as “the Service”.

In summary, this schedule provides the following:

- Definition of the service;
- Description of the support model;
- Identification of groups and roles involved in the support service;
- Identification of delivery requirements;
- Overview of support processes;
- Overview of roles and responsibilities of the IG DPO Support Team.

IG is about setting a high standard for the handling of information; therefore, the intention is to provide GMP's with the tools to achieve those standards and ultimately for them to demonstrate that they can be trusted and are consistent in the way they handle both personal and corporate information.

### 4.2 Service Model

The Service model aims to establish an All Wales approach for GMPs; providing a consistent level of advice, training and support to subscribed General Practices across Wales around the UK General Data Protection Regulation 2016 and Data Protection Act 2018.

The Service is funded by a levy fee (See Section 5.4) from each subscribed practice which provides access to full DPO support and a comprehensive enhanced IG support service.

Practices not subscribing to the service will receive existing baseline Information Governance support in the form of the IG Support Service as provided by Digital Health and Care Wales (DHCW). This support service is currently funded by contributions from all health boards in Wales and will continue to offer a basic service free of charge to GMPs. This service is limited to the provision of the Welsh IG toolkit and associated IG Website, IG advice relating to Primary Care Service Programmes and Projects, WASPI and Monitoring of GP access to WCP as detailed within the Information Governance Support for Primary Care Service Schedule and does not include Data Protection Officer Support.

The functions of each available service are outlined in Appendix A.

### 4.3 Key Functions

The Service will include a number of activities that centralise around an all Wales support model that will cover the following functions:

- **Provide** a dedicated contact for requesting consistent and timely advice on data protection



legislation, national standards and guidance;

- **Establish** a programme for UKGDPR and DPA compliance, including gap analysis, review legal basis and processing activities ensuring technical and organisational controls are in place;
- **Measurement** of IG compliance against National IG Standards and various legislation via the Welsh IG Toolkit for GMPs;
- **Development** and maintenance of comprehensive online knowledge base resources;
- **Raise** awareness with the highest level of management within each GMP;
- **Education** on current best practice, standards, and evolving legislation through development of various online resources;
- **Review** third party contracts and agreements to reflect the new data protection obligations placed on data processors;
- **Informing** on all IG issues and good practice from ICO, BMA and other governing bodies;
- **Integration** of services and Information Sharing via the GMP Cluster model;
- **Data extraction** advice for the GP operational systems used for indirect care uses of data;
- **Support forums** for change management, legislative knowledge and guidance, updates and improvement.

#### 4.4 Standard Service Functions

The Service will offer a variety of functions. These will include, but are not limited to:

**Dedicated Communications** – providing up to date and relevant topical information dedicated to our subscribers via a variety of methods, including secure subscribers only webpage containing a range of resources, templates, and a monthly newsletter. Dedicated support service email address for submission of enquires with a guaranteed response time of 5 working days.

**Welsh IG Toolkit for GMPs** – enables GMPs to measure their IG compliance on an annual basis, against legislation and national standards. Completion of the Toolkit is mandatory for all subscribers to the service and will help provide evidence of regulatory requirements and national standards.

The Service will facilitate the auditing and analysis of the IG Toolkit for subscribed practices, to support internal compliance.

**Knowledge Base Resources** – resources have already been developed for adoption by practices and work will continue to review, develop and maintain a further range of suitable documentation on current and emerging legislation, to support the compliance with legal and regulatory frameworks and the measures set out in the IG Toolkit.

These will be made available through the dedicated service website and will include, but are not limited to, national standards and best practice guidance, template All Wales policies, procedures, guidance, privacy notices etc. The established DPO Service monthly newsletter will promote regular updates on the latest developments in IG.

**Training and Learning** – will be made available to all GMP staff via online resources through the dedicated website, to assist them in understanding their responsibilities as Data Controllers. The Service will provide training targeted on specific areas of IG and data security compliance, through observations of output attainment from the IG Toolkit and from identified training needs.

Awareness raising for this work area, will be promoted by the Service in developing and adopting training resources making them available for all practice staff through various formats depending on



training requirements and service availability.

**Informing and Advising** - will be provided to the practices on their data protection obligations through direct communications and through the website. This will include, but not limited to, advising on the risks associated within the scope, context and purposes of processing operations, and providing guidance on the DPIA process and review of practice completed Data Protection Impact Assessments (DPIA), and acting as contact point for data subjects, see Section 5.7 for limitations, and the Information Commissioners Office, particularly around personal data breach reporting.

General advice and Ad-hoc requests for guidance and support will be received through the Service's call management system; 'ActionPoint'.

**Information Sharing** - advice will be available to GMPs and supported with a range of good practice template documents developed in-line with the WASPI Framework and guidance on the Welsh Control Standards for Electronic Health Records. These will support and promote compliance when sharing as a singular entity or as a cluster collaborative, for example, provide guidance in the development of DPIAs;

**Audit + data extraction processes** - from the GP operational systems for indirect care uses of data, requires the IG DPO support to understand if the data recipients have approval, have appropriate agreements in place and to ensure appropriate IG controls are adopted in respect of onward use of the data. This advice will extend to the extraction of data for national collections. The DPO will represent GP interests (as required) on national uses of data and concepts of data extraction for onward reporting.

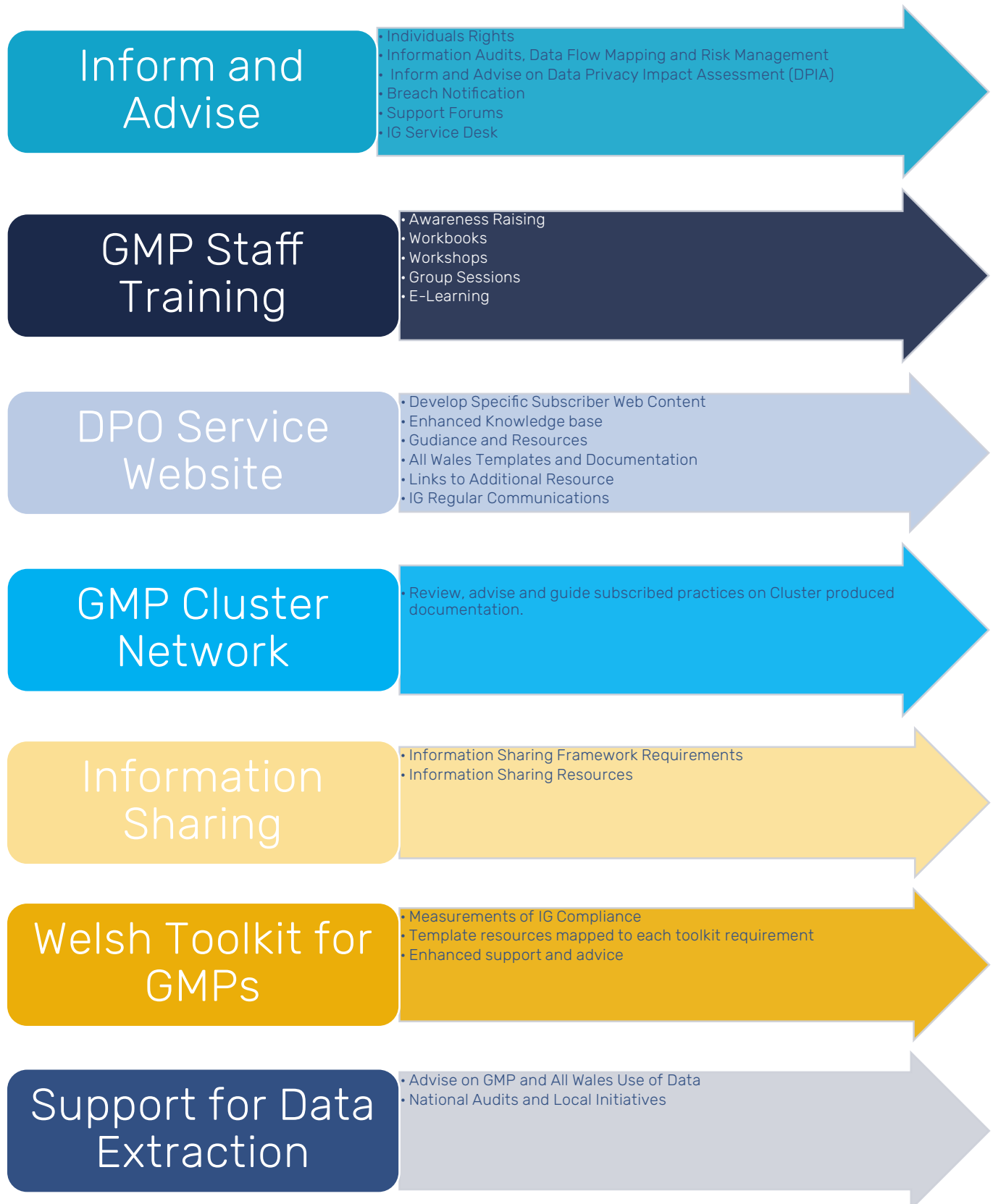
**Section 4.6** provides an overview of the support model, which is reinforced in more detail within Appendix A.

#### 4.5 Optional Service Features

The service can provide additional information governance work outside the scope of the service schedule. Organisations interested in receiving additional services should contact the DPO Service Manager to agree the scope of work or initiatives required and obtain a quotation. Work can be completed on a consultancy day rate or longer-term contract basis. This service is available to both subscribers and non-subscribers.



## 4.6 Overview of Support Model



## 5.0 Operating Model

### 5.1 Term of Agreement

The Service became effective on the 1st December 2018 and will remain in force until such time as DHCW, the signatory or other representative of the GMP exercise their rights to exit the Service as defined within Section 5.8 of this schedule.

### 5.2 Subscription to the Service

In order to proceed with the formal, take up of the service, GMPs are required to complete two agreements:

- Agreement for the provision of IG DPO Support Service (Appendix C)
- Authorisation for DHCW Enhanced IG, DPO Support Service Levy (Appendix D)

Both agreements specify the detail required and where to send the completed authorisation.

Appendix C confirms that the GMP will subscribe based on the content of this schedule.

Appendix D confirms that the GMP authorise NHS Wales Shared Services Partnership (NWSSP) to take a quarterly payment to the prescribed value.

### 5.3 Service Availability

The enhanced IG DPO Service supported hours are **09:00 – 17:00 Monday – Thursday, 09:00 – 16:30 Friday (excluding Bank Holidays)**.

Breach Reporting queries will be subject to ICO and UKGDPR Mandatory requirements of 72 hours.

The preferred method of contacting the Service is via the call management system, 'ActionPoint' – [DPOService@wales.nhs.uk](mailto:DPOService@wales.nhs.uk).

Calls will be triaged and awarded a suitable priority for response. The standard time to reply to queries is a maximum of 5 working days, although we will endeavour to respond sooner.

For urgent DPO enquiries, a maximum next working day response will be provided.

### 5.4 Service Charge

The costing model will be based on a 'per patient' charge of £0.114844635 in line with the most current quarter capitation reports. Payments are due to be collected by NWSSP from the GMP at the end of each quarter and then transferred directly to DHCW. The service charged will be reviewed in April of each year and increased in line with the Welsh NHS determined service level agreement inflationary uplift.

DHCW will NOT be seeking to make any surplus monies or profit from this service. The above costing model tries to anticipate inevitable fluctuations in staff and other revenue costs. If a situation arises, where economies of scale suggest that savings can be made to the cost for the GMP, then DHCW will inform all stakeholders concerned and change the calculation within the levy framework.



## 5.5 Fee Amendments

If at any point additional functions and service features are required as part of the overall package, which impact on the Service cost, then the annual subscription may be increased. Amendments to the fee level will be agreed by the DPO Service Management Board.

DHCW will inform stakeholders of such increases in April of each year.

Practices can request additional services as outlined in section 4.6, for which individual practice additional charges will be made.

## 5.6 GMP Contract Requirements

Each GMP will be required to provide details of a nominated contact within the Practice. The Service will maintain a register of contacts so that the Service is able to maintain a co-ordinated approach to enquiries and communications. Each GMP is required to inform the Service of any changes to the nominated contact.

## 5.7 Service Limitations

The service features described in Appendix A are not intended to replace or supplement day-to-day business responsibilities; typically, via the Practice Manager role. For example, responding directly to patient requests which are considered to come under 'individuals' rights' within UKGDPR.

The service will not replace any function that is already established with other services; unless agreed by all parties. For example, via the Health Boards, NWSSP or other recognised NHS Services. Appendix A details items currently excluded from the service.

The Service does not plan to define maximum time limitations in respect of support provided to any one subscribed GMP. Should the level of support provided to a particular GMP, appear to have a detrimental effect on the level of support the Service can provide to other GMPs, then the Support Service may need to impose limitations on its service provision.

## 5.8 Exit Strategy

GMPs will be required to provide DHCW with at least one calendar year notice for leaving the defined Service.

DHCW may revoke the Service if a loss of finance should exceed 25% of the total number of GMPs within any one Health Board or LMC footprint. Should this scenario arise DHCW will provide one-year notice to the GMP of the Service closure.

Any information DHCW holds on behalf of a GMP once it terminates the agreement, will be returned to the practice or destroyed within a defined retention and destruction criteria.

## 5.9 Service Dependencies (Business Impact Analysis)

The IG DPO Service has dependencies on the following DHCW services:

- Finance (via DHCW & NWSSP)
- Information Governance Team
- IG PC and Toolkit Development Team
- Information Services
- Integration & Reference Data
- IT Service Management



- Primary Care Services
- Software Development
- Workforce and HR

See Appendix B – Table One for further details on the support responsibilities by these services.

## 5.10 Service Category

The Enhanced IG DPO Service, as described within this schedule, is categorised as standard.

In providing the Service, DHCW and its officers are acting as an independent contractor and not as an employee. This agreement does not create a partnership or joint venture and is exclusively a contract for services.

## 6.0 Service Governance

### 6.1 Service Management Board

The Board will be responsible for assessing the Service performance and overseeing suggested improvements and changes to the service. The Board will include representatives from the following areas:

- GPC Wales (2)
- CP Wales (1)
- Optometry Wales (1)
- Health Boards, Primary Care Services (2)
- Health Boards, Information Governance Leads (2)
- GP Cluster Network Leads (as required)
- Individual GMP representatives (as required)
- Individual CP representatives (as required)
- Individual Optometry representatives (as required)

### 6.2 Change Management

Responsibilities will be maintained within established meetings to consider changes to business processes:

- Welsh IG Toolkit Service Management Board (SMB);
- NIIAS Service Management Board (SMB);
- GPC Wales Chair and Local Committees;
- CP Wales Chair and Local Committees;
- Optometry Wales Board and Regional Optical Committees.

### 6.3 Liabilities

The GMP will remain responsible, in their role as Controller, for compliance with the data protection legislation, and accordingly will demonstrate such compliance, regardless of how much autonomy the DPO is granted.



Should the GMP decide not to follow the advice given by the DPO, they should document their reasons to help demonstrate their decision-making and accountability.

#### 6.4 DPO Declarations of Interest

Where DHCW provides advice to multiple stakeholders then any interests on behalf of those Stakeholders/Controllers will be declared as early as possible.

#### 6.5 Confidentiality and Use of Information

In order to provide the full benefits of the Service, there may be occasions where the GMP needs to provide the Service with information in order to resolve specific queries, or to represent the Practice within the formal role of the DPO. For example, personal information of patients, GPs and employees may be required and occasionally disclosed as part of the functions.

Data minimisation will be adopted in order to demonstrate compliance with the respective data protection legislation. However, the Service will record and process certain details in order to complete assigned tasks.

As defined within the UKGDPR, DHCW will operate as a Processor on behalf of GMPs in their capacity as Controllers; or Joint Data Controllers.

The Service will treat any information obtained in the strictest confidence and will only use it within compliance of this schedule, data protection legislation and on permission of the GMP.

#### 6.6 Complaints

If a GMP has any concerns or complaints in respect of the Service delivery defined within this Service Schedule, then this issue should be directed in the first instance to the IG DPO Service Manager.

If complaints have not been resolved and accepted within one calendar month, following communication of the defined issues, then the GMP may escalate this to the Associate Director of Information Governance & Patient Safety within DHCW.

If the issue remains unresolved and GMP wishes to terminate the Service arrangement, they will be required to inform their LMC and GPC Wales. In such circumstances, the GMP may not be required to comply with the notice period as defined within Section 5.8 of this schedule.

#### 6.7 Review of the Service Schedule

This Service Schedule shall be reviewed on an annual basis. However, if changes in legislation or national standards arise, the IG DPO Support Service Management Board may consider updating the schedule earlier.



## Appendix A: (Functions mapped against the support model in Section 4.7)

<b>Enhanced IG DPO Service Functions</b> Specific functions to Service subscribers	<b>All Wales Standard Functions</b> Existing DHCW support functions freely available	<b>Excluded Functions</b> Defines limitations of the Service
<b>Inform and Advise - Individuals Rights</b>		
<ul style="list-style-type: none"> <li>• Provide advice and guidance to nominated practice leads on dealing with requests under 'Individuals Rights' as defined under the UKGDPR.</li> <li>• Liaise with Individuals regarding any concerns or complaints as appropriate</li> <li>• Support practices with complex queries and communications.</li> </ul>	<ul style="list-style-type: none"> <li>• Basic advice regarding 'Individuals Rights' provided through the IG Toolkit and via the IG Website.</li> </ul>	<ul style="list-style-type: none"> <li>• Receipt and Management of Individual Rights Requests, including requests under Subject Access Requests.</li> </ul>
<b>Inform and Advise - Information Audits and Mapping</b>		
<ul style="list-style-type: none"> <li>• High-level analysis and advice of combined lists of data flows into and out of the Practice. Sign posting to templates and good practice</li> <li>• Enhanced support guidance templates to support robust asset register collection.</li> </ul>	<ul style="list-style-type: none"> <li>• Basic advice regarding 'ROPA' provided through the IG Toolkit and via the IG Website</li> </ul>	<ul style="list-style-type: none"> <li>• Creation and management of an asset register for the practice</li> </ul>
<b>Inform and Advise - Data Privacy Impact Assessments</b>		
<ul style="list-style-type: none"> <li>• Provide advice for projects and initiatives on and when DPIAs are required</li> <li>• Provide support and advice in conducting DPIAs</li> <li>• Review draft DPIAs to assure any proposed mitigations and monitor performance</li> <li>• DPO 'sign off' of activity and content</li> <li>• Consult with the Information Commissioners Office (ICO) in the absence of proposed mitigations</li> </ul>	<ul style="list-style-type: none"> <li>• Basic advice regarding 'Risks and DPIAs' provided through the IG Toolkit and via the IG Website.</li> </ul>	<ul style="list-style-type: none"> <li>• Population of a DPIA</li> </ul>



<b>Inform and Advise - Risk</b>		
<ul style="list-style-type: none"> <li>• Provide advice and guidance on the creation and use of a Practice IG Risk Register</li> <li>• Analysis of Practice IG Risk Register and DPO recommendations for improvement and mitigation of identified risks</li> <li>• Provide advice and guidance on third party contracts and agreements from an IG perspective, to reflect the obligation placed on data processors through legislation</li> </ul>	<ul style="list-style-type: none"> <li>• Basic advice regarding 'Risks and DPIAs' provided through the IG Toolkit and via the IG Website</li> </ul>	<ul style="list-style-type: none"> <li>• The creation of Practice IG Risk Register</li> </ul>
<b>Inform and Advise - Breach Notification</b>		
<ul style="list-style-type: none"> <li>• Practice incident reporting procedure</li> <li>• Centralised reporting database</li> <li>• Cooperate with the Information Commissioners Officer (ICO) in any matters relating to data protection compliance and in relation to breach notifications</li> <li>• Advise on reporting thresholds on individual incidents</li> </ul>	<ul style="list-style-type: none"> <li>• Links to ICO Guidance and breach reporting metrics</li> </ul>	<ul style="list-style-type: none"> <li>• Initial investigation processes</li> </ul>
<b>Inform and Advise - Support Forums</b>		
<ul style="list-style-type: none"> <li>• Online access to guidance for DPO subscribers only</li> <li>• Expert led training sessions for DPO subscribers only</li> <li>• Online training packages and videos for DPO subscribers only</li> </ul>	<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>	<ul style="list-style-type: none"> <li>• Access to external legal services</li> </ul>
<b>Inform and Advise - IG Service Desk</b>		
<ul style="list-style-type: none"> <li>• Access to dedicated points of contact via ActionPoint</li> <li>• 9am to 5pm (Mon- Thurs) and 9am to 4.30pm (Fri) availability with a maximum 5-day response time to queries</li> </ul>	<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>	<ul style="list-style-type: none"> <li>• Out of hours and weekend advice</li> </ul>



<ul style="list-style-type: none"> <li>• 9am to 5pm (Mon- Thurs) and 9am to 4.30pm (Fri) availability with a maximum 24 hr response time to urgent breach notifications</li> </ul>		
<b>GMP Staff Training – Awareness Raising</b>		
<ul style="list-style-type: none"> <li>• Development of awareness raising material for Practice Management Team</li> <li>• Animated videos on a variety of IG topics</li> <li>• Regular GMP related monthly Newsletter</li> </ul>	<ul style="list-style-type: none"> <li>• Basic advice regarding 'Training and Awareness' provided through the IG Toolkit and via the IG Website</li> </ul>	<ul style="list-style-type: none"> <li>• Provide specific training to Practices individually</li> </ul>
<b>GMP Staff Training – Workshops</b>		
<ul style="list-style-type: none"> <li>• Delivery of live virtual workshops offering practical information and guidance about a range of IG topics and issues</li> </ul>	<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>	<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>
<b>GMP Staff Training – Virtual Group Sessions</b>		
<ul style="list-style-type: none"> <li>• Virtual training for DPO Subscribers only, with subject matter content based on GMP Feedback and focused areas identified through analysis of the IG Toolkit</li> </ul>	<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>	<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>
<b>GMP Staff Training – IG E-learning Tool</b>		
<ul style="list-style-type: none"> <li>• E-learning resources, specific for GMP DPO subscribers only</li> </ul>	<ul style="list-style-type: none"> <li>• Access to IG, Records Management and Cyber Security eLearning module</li> </ul>	<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>
<b>DPO Service Website</b>		
<ul style="list-style-type: none"> <li>• Availability of enhanced subject specific additional online resources to DPO Subscribers only</li> </ul>	<ul style="list-style-type: none"> <li>• Availability of online resources for all available via the IG website</li> </ul>	<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>
<b>Information Governance Website – Guidance Resources</b>		
<ul style="list-style-type: none"> <li>• Range of guidance tools available via the IG website for DPO Subscribers only</li> </ul>	<ul style="list-style-type: none"> <li>• Guidance available via the IG website, to support the completion of the IG Toolkit</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Specific interpretation of any existing guidance from external sources</li> </ul>



Information Governance Website - All Wales Template Documents		
<ul style="list-style-type: none"> <li>A range of template documentation including, policies and procedures, made available for DPO Subscribers to localise and adopt.</li> </ul>	<ul style="list-style-type: none"> <li>Templates created as part of the Wales Accord for Sharing Personal Information (WASPI) resource</li> <li>All Wales Policies for Primary Care Service Providers</li> </ul>	<ul style="list-style-type: none"> <li>Not Applicable</li> </ul>
Information Governance Website - IG e-Alerts		
<ul style="list-style-type: none"> <li>Monthly DPO Service Newsletter</li> </ul>	<ul style="list-style-type: none"> <li>Already established and widely distributed IG – e-Alerts service</li> </ul>	<ul style="list-style-type: none"> <li>Automated notifications service</li> </ul>
GMP Cluster Network - Good Practice Documentation Pack, Guidance Resources, Ratify Joint Data Controller Agreements		
<ul style="list-style-type: none"> <li>Review of Information Sharing Agreements (ISA), Data Sharing Agreements (DSA), Joint Controller Agreements (JCA) and Memorandum of Understanding (MOU) to ensure the relevant IG content is accurate and consistent</li> <li>See the Inform and Advise section – Data Protection Impact Assessments</li> <li>Review, advice and guide subscribed practices, in relation to cluster developed documentation and projects, focused on individual practice risk</li> </ul>	<ul style="list-style-type: none"> <li>Not applicable</li> </ul>	<ul style="list-style-type: none"> <li>Interpretation of formal contractual provision as should be supported by lawyer/solicitor functions</li> <li>Development of documentation for cluster-based projects and advanced cluster programs</li> </ul>
Information Sharing - Information Sharing Resources		
<ul style="list-style-type: none"> <li>Advise on requests for local information from Health Board and All Wales data collections</li> </ul>	<ul style="list-style-type: none"> <li>As included on the current WASPI website</li> </ul>	<ul style="list-style-type: none"> <li>Resolution of technical information sharing barriers with NHS England establishments</li> </ul>
Information Sharing - WASPI		
<ul style="list-style-type: none"> <li>Not Applicable</li> </ul>	<ul style="list-style-type: none"> <li>Advise on the 'sign up' to the WASPI Accord</li> </ul>	<ul style="list-style-type: none"> <li>Completion of ISP etc</li> </ul>



	<ul style="list-style-type: none"> <li>Advise on the use and assurance of Information Sharing Protocols (ISP) under the WASPI Framework</li> <li>Access to regional assurance groups</li> <li>Posting of ISP onto the WASPI website</li> <li>Access to resources on the WASPI website</li> </ul>	<ul style="list-style-type: none"> <li>DPO taking responsibility for complying with the framework</li> </ul>
Welsh IG Toolkit for GMP – Assessment and Content Maintenance		
<ul style="list-style-type: none"> <li>Annual review of IG Toolkit question set and mapping of DPO resources.</li> <li>Breakdown of the IG Toolkit question set</li> </ul>	<ul style="list-style-type: none"> <li>Maintenance of the IG Toolkit; assessments and content updated in line with any new legal requirements or national standards</li> </ul>	<ul style="list-style-type: none"> <li>Population of the IG Toolkit</li> </ul>
Welsh IG Toolkit for GMP – Supporting Resources		
<ul style="list-style-type: none"> <li>Enhanced support with documentation including templates, guidance and training resources required for Toolkit compliance</li> <li>Section by section workshops</li> </ul>	<ul style="list-style-type: none"> <li>Guidance/training on Toolkit functionality and using the platform</li> <li>Basic guidance on the IG Toolkit requirements</li> </ul>	<ul style="list-style-type: none"> <li>Implementation of resources into practice</li> </ul>
Welsh IG Toolkit for GMP – Measurement of IG Compliance		
<ul style="list-style-type: none"> <li>Analyse/ audit IG Toolkit submission and identify areas of requiring development for inclusion in the Practice improvement plan</li> </ul>	<ul style="list-style-type: none"> <li>High level analysis by Cluster for reporting to Health Boards as required</li> </ul>	<ul style="list-style-type: none"> <li>Population of the IG Toolkit and associated improvement plans</li> </ul>
National Intelligent Integrated Audit Solution (NIIAS) – Monitoring of Patient Record Access		
<ul style="list-style-type: none"> <li>Not Applicable</li> </ul>	<ul style="list-style-type: none"> <li>Equal support for monitoring via NIIAS to all users of the Welsh Clinical Portal</li> </ul>	<ul style="list-style-type: none"> <li>Monitoring and Audit of local GP systems such as EMIS, INPS</li> </ul>
National Intelligent Integrated Audit Solution (NIIAS) – Onward analysis of Notifications		
<ul style="list-style-type: none"> <li>Not Applicable</li> </ul>	<ul style="list-style-type: none"> <li>NIIAS auditing team for all users of WCP in Primary Care</li> <li>Practice specific report on notification profile if using Welsh Clinical Portal</li> </ul>	<ul style="list-style-type: none"> <li>Practice specific reports generated from NIIAS</li> </ul>



<b>Support for Data Extraction – Advice to GMP on all Wales uses of data</b>		
<ul style="list-style-type: none"> <li>Specific advice and guidance to DPO Service subscribers only</li> </ul>	<ul style="list-style-type: none"> <li>GPC Wales representative discussions on use of data for indirect care</li> </ul>	<ul style="list-style-type: none"> <li>Not Applicable</li> </ul>
<b>Support for Data Extraction – National Audits and Local Initiatives</b>		
<ul style="list-style-type: none"> <li>Specific advice and guidance to DPO Service subscribers only</li> </ul>	<ul style="list-style-type: none"> <li>Advice on national audits</li> </ul>	<ul style="list-style-type: none"> <li>Not Applicable</li> </ul>



## Appendix B: DHCW Service Support Arrangements

### Table 1

A number of DHCW support teams, detailed in the table below, will be involved in providing end-to-end support for the IG DPO Service.

Team	Responsible for
IG Team	<ul style="list-style-type: none"> <li>• IG DPO Support Service</li> <li>• Development and maintenance the Welsh IG Toolkit</li> <li>• NIIAS</li> <li>• WASPI</li> </ul>
Primary Care Services	Engage with the IG DPO Service and co-ordinate with GMPs
IT Service Management	ActionPoint (Call management system)
Financial Accounting Team	Financial functions
Workforce	Providing professional HR advice and support
Information Services	Data Extraction from the source GP systems
Integration and Reference Data	Connectivity to the NIIAS Services
Software Development	<p>Leading on the development of the Caforb platform which the IG Toolkit sits on.</p> <p>Support for Mura platform which hosts both the IG Website and DPO Support Service website.</p>



## Table 2

A number of individual roles, detailed in the table below, are required to underpin the support of the IG DPO Service.

Role	Responsible for	Hosted by
<b>Associate Director of Information Governance and Patient Safety</b>	Is the figurehead DPO for the IG DPO Support Service. Responsible for managing the content and commitment laid out in this Service Schedule, including service performance monitoring and reporting, development of the service management processes. In addition, providing the strategic direction for the service and supporting the DPO Service Manager as required.	DHCW
<b>IG DPO Support Service Manager</b>	Managing the IG DPO Support Service team, having managerial and operational responsibility for maintaining and developing the identified IG DPO requirements for GMPs as laid out in the Service Schedule.	DHCW
<b>Deputy DPO Support Service Manager</b>	Supporting the IG DPO Support Service Manager in operational delivery of the service	DHCW
<b>IG Assurance Manager</b>	Providing structured documentation, advice and guidance to GMPs on the areas described above	DHCW
<b>IG DPO Support Service Officers</b>	Being a key point of contact to triage the IG DPO functions across the existing and new Support Service	DHCW
<b>IG DPO Support Service Administrator</b>	Responsible for providing comprehensive and effective administrative support for the DPO Support Service	DHCW
<b>WASPI Code Manager</b>	Managing the WASPI Service	DHCW
<b>National Monitoring System Development Manager</b>	Managing the National Intelligent Integrated Audit Solution (NIAS) integration and monitoring process	DHCW



Appendix C:

**Agreement for the provision of the  
Enhanced Information Governance, Data Protection Officer Support  
Service**

**Between:** Digital Health and Care Wales (DHCW)  
Tŷ Glan-y-Afon, 21 Cowbridge Road East, Cardiff CF11 9AD

**And:** \_\_\_\_\_  
[Insert name and address of General Medical Practice]

**Signed by:** \_\_\_\_\_  
*(Formal agreement should be signed by the Lead GP)*

Name and  
Position: \_\_\_\_\_

Tel No: \_\_\_\_\_

E-Mail: \_\_\_\_\_

Date: \_\_\_\_\_

**Name and  
position of  
Nominated  
Contact:** \_\_\_\_\_

Tel No: \_\_\_\_\_

Email: \_\_\_\_\_

*(The above information will be used as a default contact point for the practice and to distribute any materials, communications (which may sometimes be confidential in nature) and alerts that may be required as part of the service provision)*

By signing this agreement, we authorise Digital Health and Care Wales (DHCW) to provide the Information Governance (IG), Data Protection Officer (DPO) Support Service to the General Medical Practice (GMP) named above. This service provision, as detailed within in the IG, DPO Support Service Schedule, will commence on receipt of this signed agreement if later.

Please return this completed form to [DPOService@wales.nhs.uk](mailto:DPOService@wales.nhs.uk) or post to the IG, DPO Support Service, 6<sup>th</sup> Floor, Tŷ Glan-y-Afon, 21 Cowbridge Road East, Cardiff CF11 9AD



Appendix D:

## AUTHORISATION FOR DHCW IG, DPO SUPPORT SERVICE LEVY

To: The Director of Finance, NHS Wales Shared Services Partnership

I, the [Insert name of suitable authority]  
undersigned:

of: \_\_\_\_\_  
[Insert name and address of General Medical  
Practice]

\_\_\_\_\_ a duly appointed representative of the practice having entered into an agreement with Digital Health and Care Wales (DHCW), whereby it will provide an Information Governance (IG), Data Protection Officer (DPO) Service as defined in V1.0 of the accompanying Service Schedule, hereby authorise and request the NHS Wales Shared Services Partnership (NWSSP), Primary Care Services (PCS) (unless and until this Authority and Request shall be revoked) to deduct from the sums due to me such an amount per quarter in respect of each of the persons included in my list at the commencement of each quarter.

Cost per patient per annum - £0.114844635 x practice patient count based on quarterly capitation reports.

and I hereby request and authorise the NWSSP to pay DHCW the sum as described in the aforesaid per patient value.

Signature:

\_\_\_\_\_

Date:

\_\_\_\_\_

Please return this completed mandate to [DPOService@wales.nhs.uk](mailto:DPOService@wales.nhs.uk)

Or via post to the IG, DPO Support Service, 6<sup>th</sup> Floor, Digital Health and Care Wales, Tŷ Glan-y-Afon, 21 Cowbridge Rd East, Cardiff, CF11 9AD

FOR OFFICE USE ONLY:

Sent to Database Coordinator on:	Entered by Database Coordinator on:	Checked by Responsible Officer on:

