



PINN MEDICAL CENTRE PATIENTS' ASSOCIATION
Registered charity No: 1095260

Minutes of Board Meeting held at the Pinn Medical Centre
Wednesday 25 April 2018

Attendance

George Bardwell (Secretary) - **GB**
Phillip Snell (Treasurer) - **PS**
Sheila Cole (Trustee) - **SC**
Yvonne Haines (Trustee) - **YH**
Brian Yim Lim (Trustee) - **BYL**
Rupa Yagnik (PMC) - **RY** - (Part meeting)

1 Apologies for Absence

Joanne Daswani **JD** - (Chair), Nicky Heskin, Jagdish Kapur, Dr Isobel Bleehen (PMC). In the Chair's absence George Bardwell was Acting Chair.

2 Minutes of Previous Meeting

The Minutes of the Board Meeting held on 12 January 2018 were approved.

3 Action Points and Matters Arising from Previous Meetings

The Action Points from previous meetings had been cleared or were covered in subsequent agenda items, with the exception of:

- a link to the Harrow Patient Participation Network on the PMCPA website **(GB)**;
- the Governance Handbook **(GB)**;
- updating the Travel Vaccinations page on the PMC website **(PMC)**;
- consideration of a members survey on what they wanted from the PMCPA **(Membership Subcommittee)**;
- a Safeguarding Strategy **(JD)**.

4 Chair's Report

Sheila reported on a discussion with Jo Daswani in which she had outlined the way in which her work on our patient transport service was being covered by Steve Jepson and Kevin Mahon during her unavoidable absences over the next few weeks. They had also discussed the need for an approach to the drivers over a photographic pass, and DBS checks, and responsibilities under the General Data Protection Regulations. And an article would be prepared for the Pinn Piper aiming to recruit more drivers **(JD/SC/GB)**.

5 Treasurer's Report

Phillip tabled the accounts for the period May 2017 to date. The current balance at the bank was £7,283. It was noted that the income from our transport scheme now stood at some £1,500 for the year. Phillip would offer another wheelchair to the PMC. It would be useful for transporting patients into the PMC and should be fitted with a simple anti-theft device such as the long pole identified online **(PS/RY)**.

6 PMC Report

Rupa had provided a full report on the PMC (attached as an Annex to these Minutes) covering the following:

- HR;
- Patient Engagement;
- IT;
- Clinical Performance.

Brian raised an apparent problem with the telephone appointment system which appeared, at some times, to go into an endless loop. Rupa said that this had now been rectified.

7 Compliance with the General Data Protection Regulations

George introduced and summarised his paper (attached to these Minutes) on the General Data Protection Regulations (GDPR) on which the Board needed to take some clear decisions and introduce new procedures in respect of our membership records. More detailed work, including drafting the mandatory Privacy Notice, would be taken forward by the Membership and Communications Subcommittee which was due to meet on 3 May.

The GDPR set out the following six principles, which were noted by the Board:

1. Processing personal data fairly and lawfully;
2. Using data for the correct purpose;
3. Data shall be adequate, relevant and not excessive for the purposes;
4. Keep any data accurate and up to date;
5. Data should not be kept for longer than is necessary;
6. Data should be secure and in a system that permits easy identification of the data subject.

The Board also noted the rights to be enjoyed under the GDPR by data subjects - our Members.

The Association had been registered with the Information Commissioners Office (ICO) under reference ZA343663 with effect from 17 April 2018. George was the nominated point of contact. It was clear that the Association was not under an obligation to appoint or nominate a Data Protection Officer; contact details of the Secretary were available on the ICO website.

The Board discussed and approved the Description of our Information Processing (Annex A of the paper) registered with the ICO with the following amendments:

- The deletion of an intention to share information with family, associates or representatives;

- The inclusion of the PMC as an organisation with which we might share information - it would be necessary to validate new applications for membership, and to introduce a system whereby we became aware of patients who were no longer registered with the PMC - for whatever reason;
- The inclusion of the Google Suite, and Gapps Experts, Shared Contacts for Gmail as sharing organisations.

The Board agreed that the lawful basis for processing should be declared as Consent. And it noted George's view that membership registration from September 2016 onwards had valid consent in that they had completed an application form which explicitly invited them to agree to the use of their email address - although all would be informed that this was our view. For membership registrations before September 2016, where no date or type of application was held, explicit consent would be sought on an individual basis.

The Board agreed the Proposed PMCPA Members' Database (Annex B of the paper) with the following amendments:

- Delete Qualifications/Decorations;
- Delete separate Landline and Mobile telephone entries allowing a single number only;
- Add Telephone Yes/No to Consent to Processing/Communications entry;
- Delete Date Ceased to be a Member - the whole record would simply be deleted.

It was also agreed that neither gender nor date of birth should be included.

As noted above there will be detailed consideration of all aspects of compliance with the GDPR at the Subcommittee meeting the following week.

8 Recruitment of Trustees

The Board considered in the detail the paper Trustee Recruitment Exercise January 2018 which had been circulated on a confidential basis to Trustees only. The Board approved the recommendation that the following should be offered appointment as a Trustee - to be ratified at the forthcoming AGM:

- Martin Grossman;
- Kevin Mahon; and
- Jenny Stephany.

And that Anita Manek should be invited to become an Assistant Treasurer of the PMCPA and be co-opted to the Board - again to be ratified by the AGM. Nicky and Jagdish having signified in advance of the meeting that they supported the recommendations, the Board's approval was unanimous. All four newcomers should be invited to the Board Meeting on 14 June, and an Induction Programme arranged.**(GB)**

9 Dates of Next Meeting

It was agreed that the next Board Meeting would be held on:

Thursday 14 June 2018 at 1800 hrs.

GB April 2018

Pinn Medical Centre Report

April 2018

HR

There have been a number of changes since our last meeting; Dr Nikul Patel left the Pinn in March to become a Partner in a practice, in a neighbouring CCG. We are pleased to announce that we have recruited Dr Zohra Ismail –Panju and Dr Nailah Nisar in April. Dr Ismail- Panju will be working 6 sessions at The Pinn and Dr Nailah Nisar will work 4 sessions. Mrs Miksha Patel joined the team in April, she is employed as a clinical pharmacist and will work alongside the clinical team in serving our patients.

We hope you will join us in welcoming them to our team.

Dr Anjali Pabari is now on Maternity leave and has given birth to a beautiful baby girl. Both Mother and babe are in good health.

I will be going on Maternity leave in August this year; we are currently in the process of interviewing a locum Practice Manager to cover my leave.

Lastly, one of our assistant practice managers, Natacha Morar has taken up a post as Practice Manager in a surgery in a neighbouring CCG. Natacha was with us for 13 years and we are very proud of her personal development and what she brought to the Pinn. We will miss her dearly. We will be assessing the business needs and recruiting accordingly over the next month.

Patient Engagement

Out of hours phone lines

Feedback

This appears to have gone smoother than anticipated!

As a reminder we have decided to stop the usual phone line from ringing between the hours of 18:30 – 08:00 Monday to Thursday and 18:30 on Friday to 08:00 Monday. An answerphone message will be put in place so that the patients are assured that for a medical emergency that cannot wait until the next routine appointment they are able to access the walk in centre 08:00 – 19:45 every day, but for other routine matters they will need to call back on Monday at 08:15 when the lines re-open.

This decision has not been taken lightly and we will review the outcome of this at 3 months.

Prescribe Wisely

It has been noted that the change in prescribing guidance (issued by the CCG) has not been effectively communicated with patients throughout Harrow.

The PMC PA were notified of changes in January, however, the patient population would only be made aware of this change if they had attended the surgery. After discussing this with the Chairman we would be happy if some of the information

below was used to inform our patients of the prescribing change via the next edition of the Pinn Piper:

NHS North West London Collaboration of Clinical Commissioning Groups (CCGs) is launching two programmes to change the way we prescribe medicines across our borough

Earlier this year, NW London CCGs engaged with public and stakeholders around the following proposals:

- Reducing prescribing of medicines and products that can be purchased without a prescription
- Reducing waste associated with repeat prescribing

Following a period of engagement and supplementary EQIA work, the “Prescribing wisely**” were approved by North West London Collaboration of CCGs and officially launched on 30 October 2017.

The engagement and supplementary EQIA processes gave rise to a number of responses around potential inequalities and risks. To mitigate against these risks, NW London CCGs have added exempted groups to the proposals.

The groups of people exempted from these proposals are:

- School age children, if the product needs to be given at school.
- Care home residents
- Individuals with funded care packages that require a carer to administer a medicine or treatment
- Anyone officially declared homeless
- People with a diagnosis of dementia
- People with a diagnosed learning disability

There are 2 significant changes with prescriptions:

1. Pharmacies will no longer be able to request batch scripts on a patient's behalf. Patients must request any medications for themselves and can do so in the following ways:

- a. Online - patient access
- b. Drop Off - completing the script request form at reception and handing in
- c. Post

Patient Exceptions to this are:

- patients who cannot request their own repeat medicines, and who do not have a friend or carer who can request for them
- disabled patients who say that asking their community pharmacy to request their prescription is a ‘reasonable adjustment’ under the Equality Act 2010.

2. Stop issuing certain medications that patients can buy over the counter.

This is to save both money and time. This will be a GP decision!

Patient Exceptions are:

- School age children, if the product needs to be given at school

- Care home residents
- Individuals with funded care packages where a carer is required to administer a medicine or product
- Anyone officially declared homeless
- People with a diagnosis of dementia
- People with a diagnosed learning disability

If a patient wishes to complain about either of the above, they can contact the NWL Team on:

•020 8966 1106
 bhhcomplaints@nhs.net

Articles for The Pinn Piper

In addition to the article on prescribing changes (above) Our team would like to submit articles around the following areas for the next edition of The Pinn Piper:

- Pre-diabetes article, Dr Mathi Woodhouse
- Coeliac article, Dr Amol Kelshiker
- Asthma article, Dr Mark Levy (external)
- Travel vaccination article, Dr Mehul Lakhani
- General PMC update, Ms Rupa Yagnik
- Receptionists thoughts (a poem on the day to day management of the front desk)

IT

Shared Emisweb for the Walk in centre (WIC)

In January 2018, we were planning to launch a system that would allow doctors (with the patients consent) to view patient records for those patients who live in Harrow but are not registered at the Pinn. There are three WICs in Harrow, the other two WICs had already started to use this platform in Autumn last year. We hope to learn from and avoid the issues they faced when they launched this system. We do not anticipate major problems with this. For various reasons, we didn't go live in January, but are planning on going live this week.

Clinical Performance

Quality Outcome Framework (QOF) and Care Plans

I am proud to report that The Pinn successfully achieved maximum targets for both these areas.

PMC April 2018

PINN MEDICAL CENTRE PATIENTS' ASSOCIATION

Board Meeting 25 April 2018

Compliance with the General Data Protection Regulations

1 This paper has been prepared to inform a discussion, at the PMCPA Board Meeting of 25 April 2018, on our obligations under the General Data Protection Regulations coming into force on 25 May 2018. It is based on:

- a review of guidance issued by the Charity Commission and others;
- an online training course by High Speed Training entitled GDPR Training undertaken by George Bardwell, and
- two discussions between George and the Advice Service for Small Organisations of the Information Commissioners Office.

2 The paper covers:

- Registration with the Information Commissioners Office;
- A Description of our Information Processing;
- The Data to be held on our Members;
- The Lawful Basis for Processing;
- Obtaining Valid Consent from our Members;
- The Next Steps.

Registration with the Information Commissioners Office

3 It is clear that we are under an obligation to register with the Information Commissioners Office. As an organisation we are a Data Controller and we must be able to demonstrate compliance with the General Data Protection Regulations, and the Data Protection Act 1998. It is an open question as to whether or not our IT consultant, Neil Rands, is a designated Data Processor for us. Given the scale of our activities we are not obliged to appoint or nominate a Data Protection Officer. Registration of the PMCPA with the Information Commissioners Office was carried out on 17 April 2018, and our details can be seen on their website. George Bardwell is nominated as the point of contact for the ICO.

A Description of our Information Processing

4 As a first step we are obliged to set out in our registration a description of the information processing we intend to carry out. Annex A of this paper is a copy of the description of our information initially included in our registration. The registration document provides a template description that can be edited to suit any particular organisation.

5 The description is for discussion and agreement by Trustees, and will form the formal definition of what processing we do, and - by implication - how we use Members' personal data. It represents, perhaps, a minimalist approach, and we may wish to expand it. In particular there is a strong case for including

the Pinn Medical Centre in the section on sharing information. We may well wish to ask the PMC to verify that any new applicant for membership is a PMC patient aged 16 or over. And we may occasionally wish the PMC to advise us on whether or not any of our Members are no longer patients - for whatever reason. To do this the PMC will need access to our list of Members. The reference to transfers of data to the EEA has been included on advice relating to the back-up of our data on the cloud - which may be held overseas. We will verify whether or not this is necessary and remove if appropriate.

The Data to be Held on our Members

6 The data we hold on our Members is currently all held on a gmail contact list attached to the domain pinnpatients.org. The contact entry for all Members contains their name, and at least one of address, email address or telephone number. For many we hold all three. The contact entry for Members who registered after September 2016 uses the Notes Box to include further data - and the allocation of Members to subcategories such as Village Show 2016 gives the source of their application. Among other items, the Notes Box is used to record their preference for Pinn Piper delivery and the date of the acknowledgment of their application and the version of the Chair's Welcome Letter they have been sent. As is obvious there is, unfortunately, no consistency in the data we hold on our Members.

7 It seems appropriate, not least for GDPR and our ICO registration, to take a clear decision on the data we wish to hold on our Members, and the use we will put it to. Even if for many we do not in fact hold all the data. Annex B contains a proposed set of items for a new database of PMCPA Members. The Board is invited to discuss and agree the list, adding or deleting items. This may, of course, impact on the Description of our Information Processing discussed above. Two items not currently included but which the Board may wish to discuss are gender and date of birth. We would need a reason to include such data. Although with this and all entries providing the data could itself be voluntary - and withholding it would not be a bar to Membership.

The Lawful Basis for Processing

8 Data Controllers (such as the PMCPA) are obliged to decide on the lawful basis on which they are processing data, and document that basis. There are six possible lawful bases:

- **Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).
- **Vital interests:** the processing is necessary to protect someone's life.
- **Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- **Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

9 In the case of the PMCPA it seems clear that the lawful basis on which we should rely is that of consent. Membership of the PMCPA is clearly voluntary and we would only wish to proceed on the basis that all our Members consent to us holding their information.

Obtaining Valid Consent from our Members

10 One major objective of the GDPR is to strengthen the rules for obtaining consent. Under the Data Protection Act consent is defined as:

"....any freely given, specific and informed indication of his wishes by which the data subject signifies his agreement to personal data relating to him being processed" .

11 This has been changed in the GDPR to

*"...any freely given, specific, informed and **unambiguous** indication of the data subject's wishes by which he or she, **by a statement or by a clear affirmative action**, signifies agreement to the processing of personal data relating to him or her"*

12 And this definition is only the starting point for the GDPR standard of consent. Several new provisions on consent contain more detailed requirements including various conditions for consent, with specific provisions on keeping records of consent, clarity and prominence of consent requests, the right to withdraw consent, and avoiding making consent a condition of a contract. In essence, there is a greater emphasis in the GDPR on individuals having clear granular choices upfront and ongoing control over their consent.

13 As is noted above the personal details of our Members are held in a gmail contact list. Although there is a single list of all Members who are signed up, since September 2016 we have subdivided the list to show how and when the Member was recruited, and included some further data in their record. Since that date we have also, for the most part, obtained and retained the completed Membership Application Forms that contain the phrase "By giving us your details, you are allowing us to keep you informed about our activities by POST* or EMAIL* (*Delete if applicable)". We have also been routinely asking whether we can use Member's email address to send the Pinn Piper. Although it seems that we have valid GDPR consent for this category of Members it is proposed that we email or write to all of them, attaching our Privacy Notice and a Description of our Information Processing and reminding them that they can withdraw consent at any time.

14 We hold no application forms for Members recruited prior to September 2016 and although it is reasonable to assume consent under the Data Protection Act (they voluntarily provided their email address), we cannot assume consent under the tougher conditions of the GDPR. We should therefore write to this category of Member attaching our Privacy Notice and a Description of our Information Processing, and asking them to send us a clear reply consenting to the use of their personal data.

The Next Steps

15 It is proposed that, following this Board Meeting, a meeting of the Communications and Membership Subcommittee is held urgently to draft the Privacy Notice and a statement of the steps we are taking to protect Members' personal details. We can also see the extent to which we can immediately create an online database to automate some of the steps we are having to take to comply with the GDPR, including storing details of the responses from Members.

George Bardwell

19 April 2018

Nature of Work Description (from ICO Registration)

Nature of work - Charity (Local)

Description of processing

The following is a broad description of the way this organisation/data controller processes personal information. To understand how your own personal information is processed you may need to refer to any personal communications you have received, check any privacy notices the organisation has provided or contact the organisation to ask about your personal circumstances.

Reasons/purposes for processing information

We process personal information to enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution; administer membership records; to fundraise and promote the interests of the charity; manage our volunteers; maintain our own accounts and records.

Type/classes of information processed

We process information relevant to the above reasons/purposes. This may include:

- personal details,
- membership details

Who the information is processed about

We process personal information about:

- members
- volunteers
- trustees
- complainants, supporters
- enquirers

Who the information may be shared with

We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the Data Protection Act (DPA). What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons.

Where necessary or required we share information with:

- members

- family, associates or representatives of the person whose personal data we are processing.

Transfers

It may sometimes be necessary to transfer personal information overseas. When this is needed information is only shared within the European Economic Area (EEA). Any transfers made will be in full compliance with all aspects of the Data Protection Act.

Proposed PMCPs Members' Database

The following items are proposed for inclusion, with an indication of any options offered:

Title Mr Mrs Miss Ms Dr other

Surname/Family Name

First Names

Qualifications/Decorations

Postal Address

First Line

Second Line

Third Line

Postcode

Email Address

Telephone Number

Landline

Mobile

Pinn Piper Delivery

Email Yes/No

Household delivery Yes/No

Consent to Processing/Communications

Date Given DD/MM/YY

Email? Yes/No

Post Yes/No

Date of First Registration DD/MM/YY

Source of Application

Type and Date of Acknowledgment DD/MM/YY

Date Ceased to be a Member DD/MM/YY (and reason)

Voluntary Activity? Description (eg Driver, Pinn Piper delivery, lecture, donation)

Trustee? Yes (with dates)/No

PMCPA Officer? Yes (with office and dates)/No