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Request for Information Reference: 11.18.31

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Email only

5th December 2018

Freedom of Information Act 2000 – Request for Information

Thank you for your request for information received on 22 November 2018 in relation to the County Durham and Darlington NHS Foundation Trust (Trust). We are dealing with your request under the provisions of the Freedom of Information Act 2000.

You requested information regarding feral systems. Specifically you requested information as follows:

It is widely recognised that there are a large number of “shadow IT” or “feral” systems storing patient identifiable data deployed in most NHS trusts. These range from simple databases developed for audit purposes to highly specialised systems developed or procured within individual departments.

Estimates vary widely a typical acute Trust from 500 - 7,000 such system.

These systems are typically developed without the involvement of Trust IT personnel. While usually no individual feral system is of much importance at Trust level, these systems are often very important to those using them and, taken together, their removal would bring most Trusts to a standstill.

Shadow IT or feral systems create compliance risks in relation to cybersecurity, information governance, clinical safety, interoperability and business continuity. With the advent of GDPR, this risk is amplified: an inability to identify ALL systems storing patient Identifiable data presents a serious non-compliance.

Such systems might include Excel spreadsheets, Access databases, mobile apps or more substantial applications. They are generally developed to plug gaps and weaknesses in the corporate IT provision.

Under the provisions of the FOI Act, we request answers to the following questions:

- 1. Does your Trust have a policy relating to shadow IT and feral systems? If yes, can you provide a copy of that policy?**

Answer: The Trust has an IT Security Policy in which the access database request process is detailed. The IT Security policy contains some business sensitive elements and cannot be disclosed to undetermined recipients without a contract in place.

- 2. Has your Trust carried out a recent audit of shadow IT and feral systems?**

Answer: As part of our ongoing GDPR compliance we have a list of approved databases on the Trust network and we are reviewing these as per our Information Risk Management policy and procedure and ensuring all are added to the Information asset registers and records of processing. This is the same for excel spreadsheets where personal data is stored.

- 3. If yes, can we have a copy of that audit? If No, will you provide an estimate of the number of such systems in your Trust?**

Answer: N/A – This is part of the ongoing GDPR compliance work. The Trust estimates that there are 4270 such systems in place.

- 4. If you are unable to identify ALL shadow IT and feral systems, will you explain how you intend to meet your obligations under GDPR?**

Answer: N/A rolling programme in place within information risk management processes.

- 5. Do you have a picture of how many feral systems adhere to NHS national data standards?**

Answer: Yes. The Trust has an access database request form which must be approved by the Data Security and Protection Team. Forms are stored to enable audits to take place and identify data owners as well as assessing risks.

- 6. Are shadow systems currently covered under your trust's Cyber Security policies and IG Toolkit?**

Answer: IG Toolkit is now void. We are currently completing the new Data Security and Protection toolkit which under NDG standard 8 – unsupported systems this area is captured and an action plan is in place, also covered within Cyber essentials plus.

In line with the Information Commissioner's directive on the disclosure of information under the Freedom of Information Act 2000 your request will form part of our disclosure log. Therefore, a version of our response which will protect your anonymity will be posted on the County Durham and Darlington NHS Foundation Trust website.

If you have any queries or wish to discuss the information supplied, please do not hesitate to contact me on the above telephone number or at the above address.

If you are unhappy with the way your request for information has been handled, you can request a review by writing to:

The Chief Executive
County Durham & Darlington NHS Foundation Trust
Darlington Memorial Hospital
Hollyhurst Road
Darlington
DL3 6HX

If, you remain dissatisfied with the handling of your request or complaint, you have a right to appeal to the Information Commissioner at:

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113
Website: www.ico.gov.uk.

There is no charge for making an appeal.

Yours sincerely

Joanna Tyrrell
Freedom of Information Officer