



ICO Consultation on Transparency in Health and Social Care

FEDIP Feedback

3 January 2024

About The Federation for Informatics Professionals in Health and Care (FEDIP)

FEDIP is the Federation for Informatics Professionals in Health and Social Care, a collaboration between the leading professional bodies in health and care informatics supporting the development of the informatics profession.

The federation brings individuals and organisations together from professional groups to establish professional standards in health informatics and maintain a public register of experienced practitioners. This offers greater confidence to employers, clients, colleagues, government and the wider society, both UK and overseas. The professional bodies that collaborate with FEDIP are; The Association of Healthcare Analysts (AphA), The Chartered Institute for IT (BCS), The Library and Information Association (CILIP), The Institute of Health Records and Information Management (IHRIM) and The Society for Innovation, Technology and Modernisation (Socitm).

Health informatics is a combination of technology and information. Accurate information allows decisions to be made and technology allows the decision to be implemented. The outcome of these decisions is, of course, an improved environment for practitioners and better outcomes for patients. A health informatician is someone who helps patients, staff and citizens through the use of technology.

The institutions licensed to award FEDIP offer their members registration at five levels – Associate Practitioner, Practitioner, Senior Practitioner, Advanced Practitioner, Leading Practitioner – dependent on the competence, knowledge and experience of the applicant in the field of health informatics.

Feedback

FEDIP is pleased to see the guidance on Transparency in Health and Social Care, this will give additional support to the key staff working in the field of digital/health informatics. We look forward to circulating the guidance once the consultation has completed. There are only a few areas that we would like to make comment.

Page 5 Paragraph Three

Recommend adding 'electronic patient record' in brackets after 'health record system' as this terminology has been used more widely and people are likely to be more familiar with it.

Fourth bullet point

Research takes place with more than just patients, as an example a pregnant woman is not considered to be a patient. Consider using another descriptor that encapsulates all service users, or just use 'service users' also better for consistency throughout the document. Socitm has also provided comment on this in their response.

Page 7 last bullet points

What is Transparency?

'use of personal information' will this also include 'sensitive information'? should this read 'use of personal and sensitive information'? this is mentioned further down the document but could be mentioned here sooner.

How can organisations help to support those people/service users who are lacking digital skills and knowledge? Should there be some 'go to' places that they can access further information?

Data Protection Impact Assessment

Feedback

Option 1: Problem definition

Fifth paragraph first sentence – grammatical error 'A lack of public understanding can be the result of by poor transparency practices' – 'by' should be removed. The second sentence doesn't make sense either 'A report on the GP data for planning and research programme (GDPR) found shortcomings in the scheme's transparency and communications programme, which contributed to the delay of the programme – add in 'the' to make better sense.

FEDIP also endorses the separate response from The Society for Innovation, Technology and Modernisation (Socitm). Socitm is one of FEDIP's collaborative professional bodies working in Local Government and Social Care.