

SMS Engagement Hub Questions

1. What is the SMS Engagement Hub service for?

The SMS Engagement Hub is a centralised hub for SEL CCG to send bulk SMS messages to total, and targeted, patient populations to the SEL wide population. iPlato is a service provider that provides a platform that connects multiple practices to centralise patient communication and can act as a global practice phonebook to send messages to a group of patients from multiple practices all under one gateway. It is necessary for iPlato to process information (outlined in question 10) to send SMS text messages to patients.

2. Why do we need the SMS Engagement Hub?

A population wide SMS capability is requirement by NHSE England for all ICSs for dealing with critical population messaging such as second wave Covid-19. However, the hub will only be used in extreme emergencies and local boroughs and practices will need to continue to utilise existing SMS provisions to accommodate operational and routine primary care SMS flows.

3. When will the SMS Engagement Hub be used?

For critical population wide messaging, **where critical means that an urgent message needs to get to a group of the population immediately.** All established local borough and SEL wide methods of communication with local residents, as agreed as part of the communication plan, will be the default. South East London CCG will only utilise this method of communication if all other methods have been exhausted and in extreme emergency circumstances. The use of the engagement hub will be restricted to those messages that will need to reach the whole of the South East London registered patient group within 3 hours and is deemed to be an emergency requiring immediate action.

4. What is the relationship between the Data Subject Access (DSA) request and the SEL Data Control Console (DCC)?

It would be possible to manage the DSA through the DCC but it would require iPlato to register to the DCC, replicate the DSA, and then have the practices re-sign. As Practices have already begun signing up, there does not appear to be any benefit to have the DSA rerouted through the DCC. It might also add confusion by sending out new comms regarding sign up.

5. Has it had a Data Protection Impact Assessment? And has it gone through the Data Protection Officer?

SEL CCG are currently engaging with the Information Governance (IG) Team to complete a DPIA for the service. This will identify any risks and actions to be taken as mitigation. The IG Team will provide approval for the DPIA, and this will then go to the CCG's senior information risk owner and Caldicott Guardian for their approval. The DPIA will then be presented at the next IG Steering Committee.

6. Who is leading on IG for SEL?

The NEL CSU IG team is the CCG's commissioned IG service provider who also provides the DPO service for SEL CCG. Within the CCG, the Director of IT & IG will be maintaining oversight of the service.

7. Why share data with 3rd parties for text messaging rather than send out text messages via established pathways within boroughs?

The established communication methods will be the default. The SMS Engagement Hub is for emergencies where individual borough or practice communications have been exhausted or when general practice is closed. The current established pathways cannot send out SEL wide population text messages.

8. How long has the service been commissioned from iPlato? How long will the data be processed for? Will they hold the data in their systems until the agreement is finished and then delete it?

The SMS Engagement Hub service has been commissioned from iPlato until the service is no longer required. There are no running costs for maintaining the service and the data is extracted from GP clinical systems (where the data is stored) each time an SMS message needs to be delivered and will be deleted following delivery.

9. How often will iPlato be extracting the data? E.g. only when a message is required or on a more frequent basis for keeping the data they hold up to date?

Data will be extracted from the practice database at the point in which iPlato need to send an SMS message. The data will then be deleted following the delivery of the SMS messages.

10. What type of data is extracted?

The data extracted from the clinical systems is personal data as set out below and not special category data.

Name, Home Address, Postcode, NHS Number, Date of birth, Mobile Number.

The NHS number is required so that iPlato can update the patients record to record that the message that has been sent. This is to ensure that iPlato are compliant with MPS & MDU guidance on patient communications. The DOB is essential if there is a need to send out SMS messages to a limited age range of patients. It will ensure the most relevant information is sent to the most relevant groups. Home address and postcode is required to send out postal communications in case patients are unable to be contacted via text message and should there be a need to send out postal communications.

11. Will practices be informed via the bulletin or other methods which messages have been sent to their patients under their practice name?

Practices will be informed via the bulletin when a message will be delivered, and an email will be sent from iPlato notifying the practice of the intended message and the opportunity to opt out before a given date. Alternatively, SEL CCG will notify practices through the various channels available include the whatsapp group, newsletters, email or bulletins that a message will be sent out. Should a practice wish to opt out of a message, they only need to contact/reply to iPlato via email requesting to opt out.

12. How will the groups, who messages are sent out to, be defined?

Based on the extracted data, it will only be possible to send out messages to groups defined by age or address. This has been corrected from a previous version of the FAQs where it stated business addresses and email addresses would also be extracted. **To confirm – business addresses and email addresses will not be extracted.**

13. How will patients and practices be able to opt out?

As noted in question 11, practices will be informed via email and bulletin of an intended SMS message. At this point, practices will have the opportunity to opt out before a given time by responding to the email or requesting to opt out. Patients can opt out from the SMS service through the usual channels at their GP by changing their communication preferences.

14. Will a privacy statement be provided regarding this process and for practices to display physically as well as add to their websites?

A privacy statement will be provided in order to update practice privacy notices.

15. How much of this has been discussed/communicated to patient groups like Healthwatch? There are concerns that patients would still be unhappy about their data being shared by their GP?

Patients have a right to opt out as do practices as described above. However, currently all boroughs have arrangements in place to enable practices to send SMS messages to their patients, and therefore this is a system which many patients are familiar with.

A copy of these Frequently Asked Questions has been shared with Healthwatch.