



Blood and Transplant

Managing Data Protection at NHSBT, UK

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Data Protection Officer

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Caring Expert Quality



Blood and Transplant

Who we are

We provide a blood and transplantation service to the NHS, looking after blood donation services in England and transplant services across the UK. This includes managing the donation, storage and transplantation of blood, organs, tissues, bone marrow and stem cells, and researching new treatments and processes.

Caring Expert Quality

Aims of the Presentation

- To provide information on the strategies, procedures and measures in place to collect, process and control data at the NHSBT
- Look at the impact of GDPR on Blood Service and IG management, our governance structure and how this ties in with the Quality function

NHSBT – Our Structure

Caldicott Guardian and Senior Information Risk Owner (Board Members)

Independent DPO
Company Secretary

Assistant Director of
Cyber, IG, Data and Tech

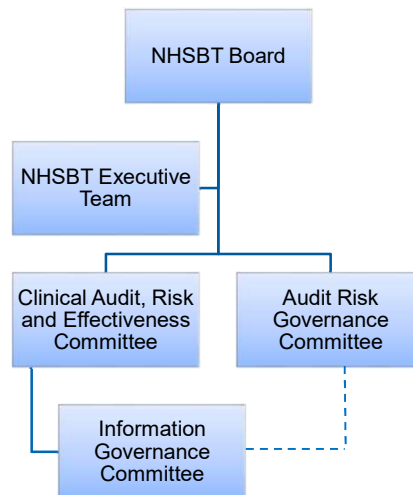
Head of
Information
Governance

Head of
Information
Security and Cyber

Subject Matter
Expert Managers
and support teams

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Expert Managers
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Reporting Lines



Blood supply and GDPR

When implementing GDPR into practice the most significant challenges to blood supply were around consent, ensuring there was a clear separation between consent to the donation process and consent to use and hold information.

A key challenge for a quality team was making sure we balanced appropriately individuals right under GDPR to be forgotten and our obligations on traceability of donations.



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Data Protection Impact Assessments

Devising a DPIA process which was streamlined to meet Medicines and Healthcare products Regulatory Agency (MHRA guidelines)

Making DPIA mandatory requirements of other processes such as projects, change control, contracts and tenders

Reviewing legal basis for different data flows (as a number of activities relate to marketing, research and audit) which are not secondary uses



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Impact of COVID19

NHSBTs COVID-19 response – initiating DPIA lite process to enable DPIAs to be approved much more quickly working with the SIRO

Updating privacy policy to ensure transparency and openness

Creating a COVID-19 asset register

Put in place data sharing agreements and contracts with providers of data and processors of NHSBT data



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Records Management

Records management and adhering to quality standards for BSQR05 which would support full traceability

Ensuring NHSBT systems capture relevant information Blood Unit Identification, Data of collection, Donor information



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How do we measure compliance?

Reporting on key performance indicators (KPIs) against statutory timeframes

Monitoring complaints data

Learning from near misses/reviewing incident reporting procedures to conduct effective root cause and analysis

Audit and spot checks

Training all staff annually

Annual submission of Data Security and Protection Toolkit - NHS compliance framework, mandatory submission



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Thank you for your time

