

Changes to the RCSLT Online Outcome Tool data sharing agreement

December 2023

What changes are being made?

- 1.1. A routine review of the data governance aspects of the [RCSLT Online Outcome Tool](#) (ROOT) identified that the relationship between the RCSLT and the organisations/businesses using the ROOT needed to be reassessed.
- 1.2. Until this point, the relationship between the two data controllers has been described as a 'joint controller¹' relationship.
- 1.3. Given the evolution of the ROOT and the scale of adoption across the speech and language therapy profession, it is deemed that the relationship between the data controllers is now more accurately described as a 'controller-to-controller relationship²'. This has been verified by the Information Commissioner's Office³ (ICO) and aligns with feedback on the current arrangement that has been received from some organisations/businesses who are interested in using the ROOT.
- 1.4. This change is in force **with immediate effect**.
- 1.5. The data sharing agreement has been updated to reflect this change. Each party now has more clearly defined and distinct responsibilities. The aims and objectives of the ROOT have not changed.

What does this mean in practice?

- 2.1. The main benefit of this change is that the data controllers will have more clearly defined and distinct individual responsibilities, particularly with regard to

¹ In a joint controller relationship, both parties jointly determine the purposes and means of processing the same personal data. In the context of the ROOT, there are two categories of 'personal data':

- Data about individuals receiving speech and language therapy (which is pseudonymised)
- Data about speech and language therapists (and other staff) who have a ROOT account

² In a controller-to-controller relationship, the data is simply shared between controllers and the means and purposes of data processing activities are decided individually for each party's own distinct purposes.

³ The Information Commissioner's Office is the UK's independent body set up to uphold information rights in the public interest. More information is available [on their website](#).

compliance and responsibilities in the event of a data breach. This will mean that neither party can be held responsible for events outside of their networks or domains, that they ultimately cannot control. We anticipate that this will be a welcome change.

- 2.2. Despite this lower level of compliance, best practice dictates that a data sharing agreement should be put in place between the two controllers, outlining the nature of the data sharing. Therefore, the data sharing agreements in place between the RCSLT and the organisations/businesses using the ROOT will need to be updated.

What do I need to do?

- 3.1. You do not need to do anything at the current time. A member of the RCSLT staff will be in contact with you in due course:
 - 3.1.1. If you have registered to use the ROOT and are in the process of seeking approval of the data sharing agreement we have previously sent to you, you will be sent a revised version of the data sharing agreement as soon as practicable.
 - 3.1.2. If you are already using the ROOT, we will be contacting you with information about signing the updated data sharing agreement ahead of the review date for the data sharing agreement already in place⁴. You are welcome to request an updated version of the data sharing agreement sooner, but this is not required by the UK GDPR. To do this, please contact root@rcslt.org.

Where can I find more information?

- 4.1. More information is provided in the ROOT Information Governance Pack, which is available to [download from the ROOT](#).
- 4.2. The team at the RCSLT are also on hand to answer any questions that you have. Contact root@rcslt.org with any questions and/or to arrange a conversation with the RCSLT data protection officer.

⁴ The ROOT data sharing agreements are, and will continue to be, reviewed every two years.