



**RCSLT Online Outcome Tool
Information Governance Pack**

RCSLT Online Outcome Tool Information Governance Pack

Executive summary

The Royal College of Speech and Language Therapists (RCSLT) is working to support speech and language therapy services to improve the collection of data and to assist with demonstrating the impact of therapy for individuals with speech, language, communication and swallowing needs.

The RCSLT Online Outcome Tool (ROOT) has been developed in collaboration with speech and language therapists, to collect and collate Therapy Outcome Measures (TOMs) (Enderby and John, 2015; Enderby and John, 2019) data and generate aggregated data reports. These reports can be utilised by speech and language therapists to inform clinical decision making and offer the potential to demonstrate the impact of speech and language therapy (SLT) interventions for individuals accessing services and cohorts of individuals. The reports can be used to assist with service evaluation and quality assurances purposes. The de-personalised datasets submitted by SLT services contribute to a national database, which supports the profession with benchmarking and exploring variation across the UK. It also provides evidence that can be used nationally to demonstrate the impact of the profession and to influence key decision makers.

This document has been developed to support speech and language therapy services with understanding the legal requirements and local policy relevant to the use of the ROOT, and with demonstrating due diligence with regards information governance and data security legislation. Local and national policies and procedures must always be followed.

Key points

- The information and resources provided in this pack are for guidance and support only and do not replace local documentation or national guidance. Local and national policies and procedures must always be followed.
- This document makes reference to “Data Protection Legislation”, which means (i) the UK General Data Protection Regulation and (ii) the Data Protection Act 2018.
- The RCSLT consulted with the Information Commissioner’s Office (UK) during the course of the development of the ROOT.
- The data collected via the ROOT is within the scope of Data Protection Legislation and, therefore, best practice indicates that a data sharing agreement will be required between the organisation providing the speech and language therapy service and the RCSLT (the data controllers). This can be completed electronically. Data sharing agreements will be routinely reviewed on 2-yearly basis.
- Individuals have the right to be informed about how data about them is used. Therefore, speech and language therapy services using the ROOT should be transparent with service users about the ways in which data is used. This can be covered by an organisation’s fair processing notice.
- Speech and language therapy services wishing to use the ROOT will be required to confirm that they have satisfied all local policies and procedures related to information governance, including completion of all documentation required by their organisation, before access to the ROOT will be granted.

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1. Introduction

The RCSLT has developed the RCSLT Online Outcome Tool to support a national approach to collecting information on outcomes related to speech and language therapy (SLT) intervention. This is to support speech and language therapists in clinical practice as well as service users, service managers and other key stakeholders. For practising clinicians, outcome measurement increases reflective practice leading to improvements in patient care, professional development and informing clinical decision making. At a service level, outcomes data can assist in informing service change, quality improvement, and resourcing decisions. In addition, outcomes-based commissioning in some parts of the UK requires services to evidence in a validated, robust and reliable way the outcomes for individuals receiving speech and language therapy.

Furthermore, a robust and validated demonstration of the impact of SLT has the potential to be useful evidence to present to commissioning bodies, to demonstrate how the profession contributes to the delivery of policies and frameworks across the UK and to influence key decision makers.

2. Overview of the RCSLT Online Outcome Tool (ROOT) and data collected

The RCSLT Online Outcome Tool (ROOT) facilitates the collection of Therapy Outcome Measures (TOMs) (Enderby and John, 2015; Enderby and John, 2019) data to support with monitoring, evaluating and reporting on outcomes for individuals receiving speech and language therapy. The ROOT has been developed by, and is hosted by, Different Class Solutions Ltd. It facilitates the collection of data about individuals' outcomes at different points in time, using TOMs. It is a stand-alone online tool that collects, collates and reports on outcomes data.

Speech and language therapy services can enter TOMs data for service users directly into the ROOT, or, alternatively, data held in local electronic systems/databases can be uploaded in bulk to the ROOT (Figure 1).

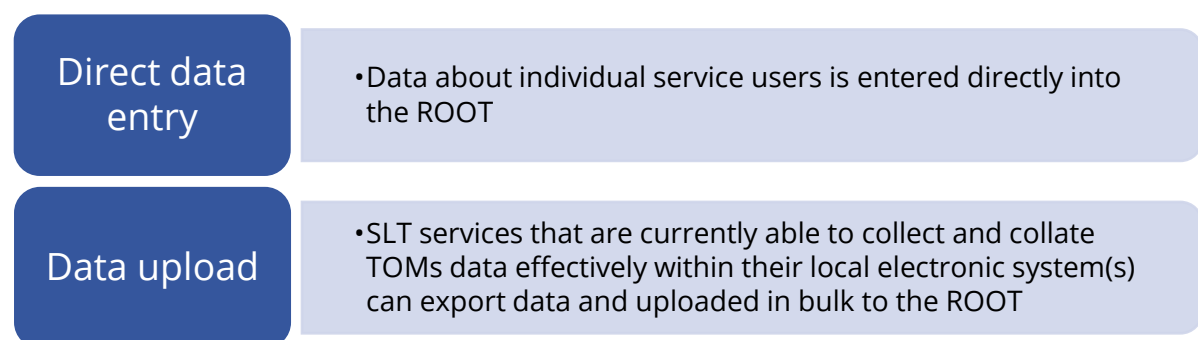


Figure 1: ROOT data collection methods

Speech and language therapists can access reports that show change over time for individuals in association with interventions. The ROOT also aggregates data collected across an SLT service and generates reports on groups of service users. Filters can be applied to the reports to drill down to specific clinical groups at the required level for data analysis and reporting. SLT services using either method of data collection detailed in Figure 1 will have access to aggregated data reports about the outcomes delivered by their service.

Further information about the ROOT is available on the [RCSLT webpages](#). The RCSLT has adopted a privacy-friendly approach in the development of the ROOT, with respect to the information collected about the individuals receiving speech and language therapy and the individuals using the tool.

Data about individuals receiving speech and language therapy

The RCSLT has received advice from the Information Commissioner's Office about the data collected via the ROOT about the individuals receiving speech and language therapy. The data collected about service users are pseudonymised/de-personalised. In the majority of cases, individuals will not be identifiable from the data, nevertheless, the data should be treated as personal data. The [ROOT data specification](#) details the core information collected about individuals. This includes a unique patient identifier, which is required to enable outcomes to be monitored over time for individual service users. The unique patient identifier used to de-identify the data is at the discretion of the data controller, but this should be an identifier known only inside the organisation. Pseudonymised data falls within the scope of Data Protection Legislation. Please refer to section 7 for information about the data sharing agreements that will need to be put in place before any information can be submitted to the ROOT.

In addition to core data items, the ROOT also has the capability to record additional data items, if required, locally; any additional data shared with the ROOT by users of the system must comply with local information governance policies and will be detailed in the data sharing agreement, which will be reviewed on a biennial basis.

Any data shared with the ROOT is a pseudonymised copy of the data recorded in the organisation's local speech and language therapy records; the ROOT is an addition to rather than a part of the organisation's case management system.

Data about speech and language therapists and other individuals using the ROOT

The ROOT collects personal data about the speech and language therapists and any other individuals who have to the ROOT. This is limited to key information, such as name, email address, employing organisation, RCSLT membership number (where applicable) and IP address. This information is provided by the employing organisation and the individual themselves on registration.

Each individual user is informed of how their personal data is used via a privacy notice prior to access to the ROOT being granted.

3. Purposes of processing

The ROOT has been developed to support the speech and language therapy profession to collect and report on outcomes data to improve the quality and provision of care.

The specific aims for this project are as follows:

Primary aims:

1. To support practising speech and language therapists to increase reflective practice leading to improvements in patient care, professional development and informed clinical decision making.
2. To support speech and language therapy services at a local level to:
 - demonstrate the impact of speech and language therapy;
 - inform service change/quality improvement;
 - inform resourcing decisions;
 - benchmark the effectiveness of speech and language therapy services;
 - inform commissioning; and,
 - ensure services are of good quality for those receiving speech and language therapy and sustainable for the future.

Secondary aims:

3. To support the speech and language therapy profession at a national level by developing a national database which:
 - provides evidence to present to commissioning bodies and influence key decision makers;
 - demonstrates the value of the profession, and its contribution to the delivery of policies and frameworks across the UK; and,
 - supports research and development of the evidence base for speech and language therapy.

Further information about the nature, scope, context and purpose of processing is summarised in the data protection impact assessment, available on request.

4. Roles and responsibilities

Organisational roles and responsibilities

The governance arrangements and roles and responsibilities of the RCSLT, the organisations submitting the data and Different Class (the data processors) are set out in Annex 1. In summary:

- The RCSLT is a data controller. It is responsible for validating requests to use ROOT from organisations providing speech and language therapy to ensure that organisations using the system are legitimate and have a justified purpose for accessing the system.
- The organisation providing speech and language therapy services is a data controller. It controls the data shared with the ROOT and is responsible for ensuring compliance with all legal requirements and local policies and procedures related to information governance. The organisation can assign user accounts to its staff and is responsible for allocating the correct level of access (Annex 2). This is to ensure that only persons with valid reasons can access the system, manage the administrative functions of the system and view the reports.
- Different Class Solutions Ltd is the data processor and also hosts the ROOT. Different Class Solutions Ltd will process the data as instructed, as set out in the data processing agreement in place with the RCSLT.

Individuals' roles and responsibilities

All users of the ROOT are allocated a password-protected user account to protect access to the system and the data stored in the databases. All users, including contractors and temporary staff, are required to agree to the Acceptable Use Agreement (Annex 3) to confirm their understanding and acceptance of what constitutes acceptable use of the ROOT before being granted access. Users of the system must ensure that they use it in a way that complies with current local and national legislation, policies and frameworks related to information governance and information management and use it in an acceptable way. Any demonstrable misuse of the ROOT will result in the suspension/revoking of system use.

5. System security overview

The software developer and data processor, Different Class Solutions Ltd, has put in place a number of security measures to ensure data shared with the ROOT is secure in transit and storage. Different Class Solutions Ltd is ISO 27001:2017 certified, has achieved Cyber Essentials accreditation and has completed NHS England Data Security and Protection Toolkit.

Encryption

The ROOT is a securely hosted web systems utilising SQL Server 2016 and ASP.net 4.8. The servers have SSL certification to ensure that all data flowing to and from the server is encrypted and could not be deciphered if intercepted in transit. The servers are protected by firewalls to protect the data and prevent unauthorised access by anyone else. The data is stored in Microsoft Azure (cloud) and is protected by the Microsoft Azure infrastructure. No physical access to the hardware is possible.

Servers

The servers are located in UK data centres. The data centre is provided by Microsoft Azure, all meeting the security standards of ISO27001.

Audit

The specific content of any transactions and other system use is logged and monitored to look for unusual/unexpected use patterns that may be indicators of improper use. Regular audits of use will be undertaken by the data processor to monitor this and to ensure the Acceptable Use Agreement (Annex 3) is adhered to. The system provider, Different Class Solutions Ltd, maintains the right to monitor the volume of system use and navigation.

Further information about system security is provided in Annex 5.

The ROOT has been developed to be compatible with all modern, secure web browsers. Please be aware that, if using an out of date or insecure web browser, you will not be able to access all of the content and functionality available. This is likely to be the case if you are using Internet Explorer, for example.

6. Privacy risks

Although the amount of personal data collected by the ROOT is minimal, a data protection impact assessment has been undertaken, which is available on request. This includes a summary of the privacy risks identified for the project and risk mitigation strategies.

7. Documentation

Data Sharing Agreements

Under the UK General Data Protection Regulation, pseudonymisation is a security measure and can reduce the risks to the data subjects, however, the UK GDPR classifies pseudonymised data as 'personal data' and so data collected via the ROOT is within the scope of the UK GDPR.

Although it is not a requirement under the UK GDPR (and DPA 2018) for data controllers in a controller-to-controller relationship to have a data sharing agreement in place, it is best practice.

The RCSLT stipulates that a data sharing agreement (annex 4) is put in place between each organisation submitting data to the ROOT and the RCSLT before data sharing commences.

A data sharing agreement:

- helps all the parties be clear about their roles;
- sets out the purpose of the data sharing;
- covers what happens to the data at each stage;
- sets standards;
- provides a framework to help all parties meet the requirements of the data protection principles.

A data sharing agreement will be sent to you once you have registered to use the ROOT. Alternatively, to request an electronic copy of a data sharing agreement, please contact ROOT@rcslt.org, confirming the name and address of your employing organisation and the contact details of your data protection officer (where relevant).

Other documentation

Speech and language therapy services may be required to complete local documentation to comply with local processes and procedures around information governance to receive authorisation from their organisation to use the ROOT. Examples of such documentation include Data Protection Impact Assessments, Data Mapping and Processing Forms, and Data Protection Notification Forms. These documents require details about how the information is being collected and shared, any risks to privacy and the precautions that have been undertaken to mitigate any risks.

Fair processing notice

Individuals have the right to be informed about how data about them is used. Therefore, speech and language therapy services using the ROOT should be transparent with service users about the ways in which data is used. This can be covered by the organisation's (or service's) fair processing notice.

The ICO provides checklists to assist with developing fair processing notice in their [guidance on individual rights](#). To support with informing individuals about the ROOT specifically, the RCSLT has also developed some templates that could be adapted, including an easy-read version. Copies of these templates are available to [download from the ROOT](#).

8. Terms of use

Speech and language therapy services will be required to confirm that they agree to the terms of use when registering to use the ROOT. They will also need to confirm that they have satisfied all local policies and procedures related to information governance, including completion of all documentation required by their organisation, before access to the ROOT will be granted.

9. Further information

Annex 5 contains a summary of frequently asked questions. For further information about the ROOT please contact ROOT@rcslt.org or visit the [RCSLT webpages](#).

10. References

Enderby, P. & John, A. (2015). *Therapy outcome measures for rehabilitation professionals*, Third Edition. Guildford: J&R Press Ltd

Enderby, P. & John, A. (2019). *Therapy Outcome Measure User Guide*. Croydon: J & R Press Ltd

Enderby P, John A, & Petheram B. (2006). *Therapy outcome measures for rehabilitation professionals*, Second edition. London: Wiley

Information Commissioner's Office (2012). *Anonymisation: managing data protection risk code of practice*. [Online]. Available at: <https://ico.org.uk/media/1061/anonymisation-code.pdf> <Accessed 10 August 2023>.

NHS Digital (2019) *National Data Opt-out Operational Guidance Document*. [Online]. Available at: <https://digital.nhs.uk/services/national-data-opt-out/operational-policy-guidance-document> <Accessed 10 August 2023>.

World Health Organization (2001). *International Classification of Functioning, Disability and Health (ICF)*. Geneva: WHO Publishing

Annexes

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Annex 1: Governance Arrangements: Organisational Administrative Roles and Responsibilities

Organisation	Roles and Responsibilities
Royal College of Speech and Language Therapists (RCSLT)	<ul style="list-style-type: none"> • Data controller (in a controller-to-controller relationship with organisations submitting the data) • Provides data sharing agreement template, and routinely reviews signed data sharing agreements on a biennial basis • Provides oversight of the data processor and their activities on behalf of the data controllers • Ensures the required data processing agreement is in place • Ensures that organisations using the system are legitimate and have a justified purpose for accessing the system • Validates requests from organisations to use the system • Provides organisations with access to the ROOT
Different Class Solutions Ltd	<ul style="list-style-type: none"> • Data processor: processes information as instructed by the data controllers • Provides a regular quality report to RCSLT and organisations on user log-ins / activity • Monitors the volume of system use and navigation¹ • Complies with, and completes relevant documentation in accordance with, Data Protection Legislation • Registered with the Information Commissioner’s Office (data protection registration number: Z2840119) • Has ISO 27001 and Cyber Essentials certification/accreditation • Has completed the NHS England Data Security and Protection Toolkit.
Each organisation submitting data to the ROOT	<ul style="list-style-type: none"> • Data controller (in a controller-to-controller relationship with the RCSLT) • Reviews data sharing agreement on a biennial basis • Manages user accounts linked to their organisation • Assigns roles and permissions to users linked to their organisation. • Appoints local administrative user(s) to manage users which will include:

¹ The specific content of any transactions and other system use is logged and monitored to look for unusual/unexpected use patterns that may be indicators of improper use.

	<ul style="list-style-type: none">○ adding users to the ROOT○ changing user roles and privileges○ monitoring users○ removing/suspending users● Ensures that usernames are valid email addresses and all users have a legitimate reason for accessing the database● Ensures all users agree to the Acceptable Use Agreement● Revokes /removes users<ul style="list-style-type: none">○ when the user leaves the organisation○ when a user acts in way contrary to the Acceptable Use Agreement● Ensures that their organisation adheres to the principles of fair processing● Ensures that information security and records management standards are met (international, national and local)
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Annex 2: Users of the ROOT

ROOT User Type	Description of access	Purpose
<p>Local user</p> <p><i>User can enter data directly into the ROOT. This might be a clinician or delegated to an administrator. Use of the system would mirror existing working practices.</i></p>	<ul style="list-style-type: none"> • Access to pseudonymised data for service users under their care • Access to reports for individual service users under their care • Access to aggregated data reports on outcomes at a team/service level and external benchmarking level² • Must comply with all policy, legislation and the local organisation's protocols, working in a way that mirrors existing working practices • Must also agree to the Acceptable Use Agreement (Annex 3) 	<ul style="list-style-type: none"> • To evaluate the impact of interventions • To inform patient-centred care • To support clinical decision making
<p>Local admin</p> <p><i>User responsible for monitoring and validating access to the online tool for users within an organisation, in addition to "Local User" functions</i></p>	<ul style="list-style-type: none"> • Access to pseudonymised data for service users under their care • Access to reports for individual service users under their care • Access to aggregated data reports on outcomes at a team/service level and external benchmarking level² • Access to the data upload functions of the ROOT, where appropriate • Access to user administration functions • Access to reports monitoring appropriate use of the system and other audit reports 	<ul style="list-style-type: none"> • To evaluate the impact of interventions • To inform patient-centred care • To support clinical decision making • To evidence the impact of SLT input to decision makers and commissioners • To support sharing of best practice and reflect on service outcomes • To inform changes to service delivery • To manage and validate user accounts for access to the ROOT • To monitor use of ROOT for auditing purposes

² Benchmarking reports will not identify organisations without explicit consent

	<ul style="list-style-type: none"> Local admins must comply with all policy, legislation and the local organisation's protocols, working in a way that mirrors existing working practices Must agree to the Acceptable Use Agreement (Annex 3) 	
RCSLT administrative users	<ul style="list-style-type: none"> Access to user administration functions Access to anonymised service-level and national-level reports (which do not contain data for fewer than 6 service users) Access to the pseudonymised patient data for the purposes of providing help and support to users Must agree to the Acceptable Use Agreement (Annex 3) 	<ul style="list-style-type: none"> To assist with technical and administrative enquiries To support SLT services with service evaluation and service improvement To support SLT services to benchmark the effectiveness of SLT services To support development of the evidence base and identification of research priorities
Different Class Solutions Ltd administrative users	<ul style="list-style-type: none"> This role has special access to all system features, functions, and data The organisation is ISO 27001 certified, has achieved Cyber Essentials accreditation and has completed the NHS England Data Security and Protection Toolkit. Different Class Solutions Ltd is registered with the Information Commissioner's Office 	<ul style="list-style-type: none"> To install, or upgrade computer components and software To provide routine automation To maintain security policies To troubleshoot To train or supervise staff; or offer technical support To support the upkeep, configuration, and reliable operation of computer systems To ensure that the uptime, performance, resources and security of the server and software meet the needs of the users

Annex 3: Acceptable Use Agreement

The ROOT has been developed to support speech and language therapy services with collecting, collating and analysing outcome data.

In using the ROOT, users must ensure they do so in an acceptable way, and must not engage in any of the behaviours considered unacceptable.

It is the responsibility of the users of the ROOT to use the system in a way that complies with existing standards and expectations about fair processing in accordance with Data Protection Legislation³. Use of the ROOT is fully monitored and audited.

- I understand that it is my responsibility to use the ROOT in a way that complies with existing standards and expectations about fair processing in accordance with Data Protection Legislation⁵
- I am aware that the use of the ROOT is fully monitored and audited and that any demonstrable misuse of the ROOT will result in the suspension/revoking of system use.
- I will not attempt to use someone else's login details to access the ROOT
- I will not allow anyone else to use my login details. I am aware that passwords should be kept securely and I will not disclose my password to anyone else.
- I will not attempt to search for information on a service user that I am not authorised to access
- I will not download information to use in ways that run counter to the system's objectives
- I will not attempt to access unauthorised areas
- I will not introduce any spurious or non-existent cases into the system⁴
- I will not attempt to alter, deface, block, erase, destroy or conceal records with the intention of preventing disclosure under a request relating to the Freedom of Information Act 2000 or the Data Protection Legislation.
- I will not remain logged on to the ROOT when unattended.

Any demonstrable misuse of the ROOT will result in the suspension/revoking of system use.

³ "Data Protection Legislation" means (i) the Regulation (EU) 2016/279 General Data Protection Regulation (GDPR) and (ii) the Data Protection Act 2018

⁴ Please note, there is test environment available to use with 'dummy data' for training purposes

Annex 4: Data Sharing Agreement

A data sharing agreement will be required between the organisation providing the speech and language therapy service and the RCSLT.

A sample data sharing agreement can be downloaded from [the ROOT](#).

Once your organisation has registered to use the ROOT, a data sharing agreement will be sent to you. This needs to be signed by the appropriate person within your organisation and returned to the RCSLT before access is granted to the ROOT.

Alternatively, to request an electronic copy of the data sharing agreement for the ROOT, please contact ROOT@rcslt.org, confirming the name and address of your employing organisation and the contact details of your data protection officer (where relevant).

Annex 5: Frequently Asked Questions

1. *Why is the information being shared?*

Information is being shared with the ROOT for the purposes of collating outcomes data to generate data reports. This will support SLT services to:

- demonstrate the impact of SLT
- inform commissioning
- demonstrate contribution of SLT services to national policy outcomes
- ensure services are of good quality for service users and sustainable for the future
- benchmark the effectiveness of their SLT service

Further details about the purposes of processing is provided in section 3 of this document.

2. *What information is being shared?*

The following information about the speech and language therapists (and any other individuals using the ROOT) is shared:

- The user's name
- The user's email address
- Employing organisation
- RCSLT membership number
- The IP address that the user connects from

The [ROOT data specification](#) provides a detailed summary of the information shared about individuals accessing speech and language therapy by organisations using the ROOT. This includes:

- A pseudonymised local patient identifier
- Gender
- Year of birth
- Medical diagnoses
- Communication and swallowing disorder descriptor(s)
- Outcomes data (e.g. Therapy Outcome Measure scales, scores, rating dates)

Additional fields may be added, if required. Additional data shared with the ROOT by users of the system must comply with local information governance policies and frameworks and is not the responsibility of the data processor or the RCSLT. Please contact ROOT@rcslt.org for further information.

3. Will the project involve the collection of new information about individuals or collection of information in a new way?

All data shared with the ROOT is already collected by the organisations prior to their involvement with this project. The ROOT provides speech and language therapy services with an electronic method of data collection and analysis.

4. Will the project compel individuals to provide information about themselves or will information be collected without explicit consent?

The personal data about the speech and language therapists (and other individuals) accessing the ROOT is provided by the individuals themselves and/or their employing organisation.

The data collected about service users are pseudonymised. In the majority of cases, individuals will not be identifiable from the data, nevertheless, the data should be treated as personal data. Pseudonymised data falls within the scope of Data Protection Legislation and data controllers should consider the lawful basis for processing. Consent is one of the available lawful bases for processing; nevertheless, the GDPR defines high standards for consent and if consent does not meet the criteria, it is not valid under GDPR. Furthermore, under GDPR, consent must offer the individuals genuine choice and control over the processing of their personal data. Therefore, consent may not be the most suitable basis and data controllers may wish to consider alternative options. Local processes around gaining consent should be followed.

Nevertheless, individuals have the right to be informed about how data about them is used, which can be covered by the organisation or service's fair processing notice.

5. Will using the ROOT involve using information about individuals for a purpose it is not currently used for?

The use of the ROOT involves the sharing of data that has been pseudonymised/de-personalised. The ROOT generates anonymised, aggregated reports at (i) a service level (ii) national level (iii) external benchmarking, which are additional uses of the data already collected by the organisations involved in the project. Individuals are not identifiable from these reports.

6. Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations?

Information about the speech and language therapists (and other individuals) using the ROOT will only be used in relation to their use of the system. Users are informed of how their information is used via a privacy notice.

Information about service users is pseudonymised. The aggregated reports generated by the ROOT do not contain data for fewer than 6 service users to minimise risk of service users being identifiable from the reports. Furthermore, organisations are not identifiable to other organisations from external benchmarking reports.

7. How will the information be stored?

The data is stored securely in the cloud. This means that encryption technology is used to ensure that all data flowing to and from the server is encrypted and could not be deciphered if intercepted in transit. The servers used are protected by firewalls to protect the data and prevent unauthorised access by anyone else. Passwords are encrypted in the database using an irreversible salted hash.

The servers are located in UK data centres. The data centre is provided by Microsoft Azure, all meeting the security standards of ISO27001.

8. Are you transferring personal data to a country or territory outside of the EEA?

No, the servers are located in UK data centres.

9. Who will have access to the information?

As outlined in detail in Annex 2, there are four different types of user:

- 'Local users' are individuals with access to the ROOT, as authorised by their organisation. They will have access to pseudonymised data and reports for service users under their care. They will also have access to aggregated data reports on outcomes at a team/service level and anonymised external benchmarking reports (i.e. organisations are not identifiable to other organisations).
- 'Local admins' are individuals with access to the ROOT who have been appointed by their organisation to monitor and validate access to the ROOT. They are responsible for ensuring that only persons within that organisation with valid reasons to access the system are issued a user log-in to view information stored there. 'Local admins' will have

access to the information about all 'local users' within the organisation in addition to the access described above.

- Employees of Different Class Solutions Ltd are able to access the pseudonymised data and reports for service users, but will only do so in order to support use of the system. This may be to correct or assess errors in system running or data itself. Moreover, checking the accuracy of screens and or reports will require tracking back to the individual records that are displayed or counted. Different Class Solutions Ltd comply with the standards of ISO 27001. They will also have access to aggregated data reports on outcomes at a team/service level and external benchmarking level.
- Administrative users at RCSLT are able to access the pseudonymised data and reports for service users to support use of the system. They are able to access anonymised service-level and national-level reports (which do not contain data for fewer than 6 service users) and user administration functions.

10. Under what circumstances will Different Class Solutions Ltd access the data?

Different Class Solutions Ltd, as the data processor, has no access to the physical servers where data is held. Access is granted to employees only as required. This would usually be for supporting users or for testing the system.

11. Why would Different Class Solutions Ltd need to access the data?

Access to the data will be required where there is technical support requirement i.e. where software engineers and support staff will need to see the data to understand a reported issue. For example, to be able to either instruct the user as to what they are seeing and why or ask questions of the user to ascertain the behaviour of the system and if a defect is responsible. They will also have to see the resultant data after a fix has been applied to see if the system is now behaving as expected.

12. Who will handle the information?

Each organisation's administrative user(s) will be responsible for ensuring that only persons with valid reasons can access the system and view information stored and shared there.

13. Our organisation is required to comply with NHS England's national data opt out policy. Is there anything we also need to consider before we start using the ROOT?

To be compliant with the national data opt out, you need to assess whether the sharing of data with the ROOT is in scope of the national data opt-out policy. More information about the national data opt out is provided on the [NHS England website](#).

Data that is anonymised in line with the ICO code of practice on anonymisation is not considered to be confidential patient information and the national data opt-out does not apply (NHS Digital 2019). It is therefore recommended that organisations consult best practice guidelines on anonymisation techniques detailed in “Anonymisation: managing data protection risk code of practice” (ICO, 2012) to ensure that the information that they are sharing is not confidential.

The Royal College of Speech and Language Therapists (RCSLT) is the professional body for speech and language therapists in the UK. As well as providing leadership and setting professional standards, the RCSLT facilitates and promotes research into the field of speech and language therapy, promotes better education and training of speech and language therapists, and provides its members and the public with information about speech and language therapy.

rcslt.org | info@rcslt.org | [@RCSLT](https://www.instagram.com/RCSLT)

