

Change Specification

Data Security and Protection Toolkit

Version 4

Published 19 May 2022

Information and technology
for better health and care

Data Alliance Partnership Board

Acting on behalf of the Data Alliance Partnership Board (DAPB), which holds delegated authority from the Secretary of State for Health and Social Care, the Data Alliance Partnership Sub Board (DAPSB) has approved a change to an existing information standard for publication under [section 250 of the Health and Social Care Act 2012](#).

Assurance that this information standard meets the requirements of the Act and is appropriate for the use specified in the specification document has been provided by the Data Standards Assurance Service (DSAS) and approved by the Data Alliance Partnership Board (DAPB).

This information standard comprises the following documents:

- Requirements Specification
- Implementation Guidance
- Change Specification.

An Information Standards Notice (DAPB0086 Amd 36/2021) has been issued as a notification of use and implementation timescales. Please read this alongside the documents for the standard.

The controlled copies of these documents can be found on the [NHS Digital website](#). Any copies held outside of that area, in whatever format (e.g. paper, email attachment), are considered to have passed out of control and should be checked for currency and validity.

Date of publication: 20 July 2021

Update: 19 May 2022

Following publication on 20 July 2021, the need for a minor correction to the standard was identified and [a Corrigendum has been issued](#). Note that there is no impact on either the published Requirements Specification or the Implementation Guide. However, an updated Change Specification (this document), Change Specification: Appendix A - DSP Toolkit 2020-21 (version 3.1) to 2021-22 (version 4.0) mapping document and Requirements Specification: Appendix 1 - Assertions and Evidence Statements document have been issued and should be read in conjunction with the Corrigendum.



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1. Overview

The proposed changes to the standard will see improved clarity of language and a reduction in the number of mandatory requirements.

This Change Specification outlines the key differences between the Data Security and Protection Toolkit (DSPT) version 3.1 (2020-21) and the updated DSPT version 4 (2021-22).

This document should be read in conjunction with the DSPT Requirements Specification (specifically Appendix 1 – Assertions and Evidence items) and Implementation Guidance.

2. Definition

The DSPT is an online tool that enables organisations to measure their performance against data security and information governance requirements set by the Department of Health and Social Care.

The Toolkit has been developed in response to The NDG Review (Review of Data Security, Consent and Opt-Outs)¹ published in July 2016 and the government response published in July 2017.

The Data Security and Protection Toolkit is the successor framework to the IG Toolkit.

3. Guidance by user group

In accordance with the requirements of the Government Digital Service, the design and content of the DSPT have been developed to ensure that the system is easy to use. The solution is designed to enable most users to be able to complete and publish an assessment without reference to detailed guidance documentation. The system has been developed in consultation with users and stakeholders.

Guidance materials are made available via the DSPT Help pages:

<https://www.dsptoolkit.nhs.uk/Help>. As far as reasonably possible sector specific guidance will be avoided but language which is suitable for all sectors has been included, tested with users and updated following consultation.

For more information, please refer to Implementation Guidance.

4. Statement of all changes to the published Requirements Specification

4.1 DSPT version 4 – overview of changes

The DSPT Standard is reviewed annually. The proposed 2021-22, version 4 standard sees a reduction in the total number of evidence items for all sectors. Changes have been made in order to:

¹ <https://www.gov.uk/government/consultations/new-data-security-standards-for-health-and-social-care>

- Incorporate NHSX “Information Governance simplification” feedback into the DSP Toolkit (see section 4.2).
- Rationalise evidence items where they are now considered “business as usual” or where there is overlap between evidence items.
- Update technical requirements to reflect the current threat landscape.
- Map requirements to the [Information Commissioner’s Office Data Protection Self Assessment](#).
- Reflect feedback from stakeholders.
- Specific Improvements on Unsupported Operating systems and asset criticality assessment.
- Move Commissioning Support Units (CSUs) from Category 2 to Category 1

4.2 DSPT changes – rationale and examples

Information governance simplification

The DSPT standard has been updated to reflect Information Governance simplification feedback from NHSX².

Simplifying Information Governance (IG) is fundamental to giving staff the confidence they need to share data in a timely and appropriate way. IG likewise has a pivotal role in improving the security of our data sets and building the public’s confidence in how we use data. The time has come to dispel some of the most pervasive IG myths and to change the culture in which IG is seen as an insurmountable barrier to data sharing; best avoided by playing safe even when this is to the detriment of care.

One reason this culture has arisen is because the IG landscape in England is complex and there is widespread confusion about the rules surrounding the use and sharing of data. This confusion is made worse by the number of different organisations that provide advice and guidance on the topic.

The aim is to empower staff in health and care organisations and IG professionals to make appropriate decisions about sharing information without getting tangled in a [complex web of IG guidance and advice](#).

For example: 2020-21 v3.1 Evidence item 1.6.4 (Data Protection by Design Audit) was as follows: “Provide the overall findings of the last data protection by design audit.” This is not required by the ICO Data Controller Checklist so has been removed from the 2021-22 v4 standard as part of the IG Simplification review

² The text below is adapted from: <https://www.nhsx.nhs.uk/blogs/simplifying-information-governance/>

CSUs have a higher level of requirements.

Commissioning Support Units (CSUs) provide CCGs with external support, specialist skills and knowledge to support them in their role as commissioners. Specifically, for the DSPT they provide information governance, information technology and cyber security support for CCGs and GPs.

Due to their key implementation role in information technology and cyber security across a large number of organisations, CSUs are key suppliers in the NHS.

As part of the annual review of DSP Toolkit requirements CSUs information risk profile was judged to be closer to an NHS Trust than a CCG therefore they have now been determined to be a Category 1 organisation, with greater obligations under this standard.

Annual review

The DSPT has been in place since April 2018. NHS Digital continues to review completed assessments, helpdesk queries and feedback submitted through the DSPT.

In response to this feedback and analysis, wording of many evidence items has been improved to ensure requirements are clear and explicit.

The proposed updates to the previous DSPT 2020-21 standard have led to a reduction in total number of evidence items³. Comparative breakdowns of both the total number of evidence items and total number of mandatory evidence items are provided in the tables below:

	Category 1 organisations	Category 2 organisations	Category 3 organisations	Category 4 organisations
Total number of evidence items 2019-20 v2	179	157	115	61
Total number of evidence items 2020-21 v3.1	149	146	92	46
Total number of evidence items 2021-22 v4	142	137	85	42

	Category 1 organisations	Category 2 organisations	Category 3 organisations	Category 4 organisations
Total number of mandatory evidence items 2019-20	116	106	56	42
Total number of mandatory evidence items 2020-21 v3.1	111	89	45	31
Total number of mandatory evidence items 2021-22 v4	109	88	42	28

³ Only the five Commissioning Support Units see an increase in the number of mandatory evidence items due to their recategorization from Category 2 to Category 1 organisations

4.3 DSPT version 3.1 and 4 comparison

Appendix 1 provides an overview of requirements of the previous iteration of the Data Security and Protection Toolkit (2020-21 version 3.1). The table identifies equivalent areas in the DSPT standard for 2021-22 (version 4) and any elements which will no longer fall within the scope of the DSPT.

5. Change control during 2021-22

System refinements and new functionality will be deployed throughout 2020-21. Details of these changes will be set out within the “System changes and release notes” page on the DSPT: <https://www.dsptoolkit.nhs.uk/News/1>. Material changes to the wording in the standards themselves will only be made in exceptional circumstances, such as where new legislation amends the requirement. This would be communicated to the users via email to those directly affected and set out within the “Standard changes and release notes” page on the DSPT help page.

Appendix A – DSPT 2020-21 (version 3.1) to 2021-22 (version 4) mapping

Please refer to separate file:

Appendix A DSP Toolkit 20-21v3.1 to 21-22v4 mapping.xlsx