

HSC-PBPP Form – Quick Guidance

Read the Guidance

The [guidance document](#) is very good, and explains what is needed in each question. **Read the guidance and look at the [website](#).**

The Whole Point

You are trying to provide the panel assurance that a) this work will benefit the public and b) there are appropriate safeguards protecting personal data in place – that is the whole point of HSC-PBPP. So be clear in what it is that you're trying to do and the steps taken to reduce/mitigate risks.

It is your responsibility to explain to the panel what you're doing. If things aren't clear, or they're not sure what you're doing, or they feel risks haven't been mitigated enough then they can't provide approval.

Be Thorough but Concise

Forms with too much information can often be counterproductive as it makes it difficult for panellists to understand what you're doing. Read the guidance, answer the questions and be concise. Bullet points are very useful to clearly list and mark things. If it's not noted in the form, then they don't know about it but the more concise you are the better. The panel sit in a room (pre COVID-19) and review your application with only the form and supporting documents to go by.

Remember your Audience

HSC-PBPP Tier 1 Panellists are Information Governance Leads and won't be experts in whatever field your project is. Your application has to be clear to those that don't work in your area, and if it's not then it won't get approved. Don't get too technical, don't assume they know what you're talking about and explain any non-common acronyms. Many applications are written in a way that you would have to be part of the project team to understand, which panellists are not.

Supporting Documents

Number any supporting documents and reference "supporting document X" throughout the form. The application form shows how to name the files e.g. SD1 protocol YYYY-1234 Surname
e.g. SD2 DPIA YYYY-1234 Surname – YYYY-1234 would be replaced with the reference number eDRIS gave you. The panellists have to review 5 applications at each meeting, often with over 20 supporting documents each so you want to make it as easy as possible for them to follow.

DPIAs

Data Protection Impact Assessment (DPIA) – the majority of projects using health data are being asked to complete a DPIA. Review your local guidance and also check the [ICO screening checklist](#) questions. If it comes out that you don't have to do one, provide the answers to the screening questions as a supporting document as evidence to show that you've thought about it.

Data Flow Diagram

Section 3.1.11 asks for a data flow diagram or description. For most projects, **I cannot stress highly enough that you should include a data flow diagram** as it helps panellists easily see what's happening to the data.

Training

There is a clear list in Appendix A of the guidance which states the approved training courses. The panel have been able to verify these are of an appropriate standard. **If the training you've undertaken is not on this list then it doesn't count – full stop.** If that's the case, the MRC course is the suggested one as it's the most accessible for everyone. But evidence of appropriate training (and providing coordinator with certificate) will be required before applications can be submitted to the panel as this is fundamental.

Stick to your Project

Many applications go on to talk about what they "may" do in the future or what the grand plans for the project are. That's great, but it often makes it confusing for reviewers to know what they're being asked to approve. If there are details that are outwith the part you're requesting approval for but you feel they are relevant then make it clear and **spell it out as clearly as you can what you are asking the panel to approve.** For example: "This application is for Phase 1 of this project only. Once completed we would look to do X in Phase 2, and further approval would be sought at the time"

Make it Easy for the Panel to Say Yes

If what you're doing is worthwhile and in the public benefit then the panel will want to be able to approve it. Follow the points above in order to give yourself the best chance.