

Are you happy to proceed?
I am happy to proceed.
1. Do you agree that this guidance clearly sets out what is required of health and care organisations to comply with the data protection transparency principle?
Agree
2(a). Do you agree that this guidance provides a clear definition of transparency and privacy information?
Agree
Please provide any comments you have: The definition is clear; however the practical side of how to demonstrate it is lacking in depth. There is also a proportionality element to this, which may require more emphasis and guidance.
2(b). Does the distinction between transparency information and privacy information make sense to you?
Yes
3. Do you agree that this guidance provides useful additional information to the Health & Social Care sector that is not part of our existing guidance on the principle of transparency and the right to be informed?
Agree
4. Do you agree that this guidance is balanced between the separate areas of health and social care?
Unsure / don't know
5. Do you agree that the use of the terms must, should and could in this guidance clearly defines the ICO's expectations in the legislative requirements section and that the terms are applied consistently throughout the guidance?
Agree
6. Do you agree with the definitions we have provided on openness and honesty? Are the examples of how you can demonstrate that you are being open and honest useful and accurate in the context of health and care?
Agree

7. Do you agree with that the section on harms is useful for organisations when considering the risks of failing to provide sufficient transparency material?
Agree
Please provide any comments you have: There is also a potential 'harm' in providing too much information - this in turn can cause anxiety (e.g. "big brother") and information overload, leading to confusion about how data is processed.
8. Do you agree that the section on patient engagement provides useful information to help organisations develop transparency information that responds to people's needs and priorities?
Agree
9. Do you agree that the section on providing transparency information sets out clearly how organisations should approach the delivery of transparency and privacy information?

Agree
10. Do you agree that the transparency checklist provides a useful summary of the guidance and a mechanism to assess an organisation's transparency level?
Disagree
Please provide any comments you have: This checklist could be a lot more interactive, to help organisations make informed decisions about their next steps.
11. Have you identified any aspects of the guidance that you feel are inaccurate or any areas we have missed or not covered sufficiently? If so, please provide further details.
Referenced above. The guide is useful to a point, but is perhaps lacking in some in-depth detail.
13. To what extent do you agree that the impact assessment summary table adequately scopes the main affected groups and associated impacts of the guidance?
Neither agree nor disagree
14. Can you provide us with any further evidence for us to consider in our impact assessment?
No
16. Are you acting on behalf of an organisation?
Yes
17. Are you answering as: (tick all that apply)
An organisation or person processing health data
19. How would you describe your organisation's size?
500 or more members of staff
20. If you work in a health or social care providing organisation, how many patients or care users is your organisation responsible for (approximately)?
Organisation is considered a data processor for the vast majority of its functions. The term 'responsible' therefore is ambiguous
21. Who in your organisation needs to read the guidance? Please provide job titles or roles, rather than names.
SIRO, PDG, IAOs
22. To what extent (if at all) do data protection issues affect strategic or business decisions within your organisation?
Data protection is a relatively minor feature in decision making
23. Do you think the guidance set out in this document presents additional:
unsure / don't know

