Cyres CINERGY Systems
Data Protection Impact Assessment (DPIA)
Guidance Notes

INTRODUCTION

- The completion of a DPIA in relation to software systems used for data processing is the responsibility of the NHS Trust utilising the system.
- The system described below is supplied by Cyres Limited ("Cyres") to enable NHS Trusts to undertake a specific type of Data Processing (as defined in the GDPR) in relation to data for which the Trust / NHS is the Data Controller.
- Cyres does not use this system to undertake any Data Processing on behalf of NHS Trusts.
- The guidance below is intended to assist Trusts' Information Governance teams to understand the nature and scope of the system and to enable them to complete the necessary DPIA documentation.
- For further information or assistance, please contact info@cyres.co.uk.
- ***Whilst Cyres has endeavoured to ensure that this guidance is as complete and accurate as possible, it remains the responsibility of the relevant Information Governance team to ensure that they are satisfied with the final DPIA.***

SYSTEM OVERVIEW

Software System:	Cyres Cinergy (including Cinergy Cytology, Cinergy Colposcopy and Cinergy Online) ("the System")
Brief Description:	The System is a software system which collects cervical screening data from existing cytology laboratory and colposcopy clinic systems for reporting purposes as required by the National Health Service Cervical Screening Programme (NHSCSP)
System Delivery:	Cyres supplies the System software for installation on customers IT systems.

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	The software supplied contains no data. The System itself does not store data.
Operation of the System:	The operation of the installed System is undertaken entirely by authorised users within the NHS.
Where is the Data Stored?	The basic System is hosted on a customer's own IT platform. In addition to the System software, Cyres supplies an empty Microsoft SQL Server Database for the local storage of data. The configuration and security of this database is the responsibility of the local IT team. For those customers licensed to use Cinergy Online, the online elements of the System are hosted on an N3 server by NHS England.
Who Can Access the Data?	Access to the system is controlled by local NHS system administrators and is limited to authorised NHS clinical staff with login credentials and a unique "Yubikey" two-stage authentication device. Cyres supplies initial login credentials to activate the product but has no control over the second stage of authentication, which is via "Yubikey." Cyres itself does not have this two-stage access and cannot bypass it independently. Cyres has no direct independent access to the System once it is operational and cannot access any of the data within the System either identifiable or pseudonymised.
Cyres' Role:	Cyres supplies the basic software for installation, together with general advice and support on implementation via phone or email. **Cyres is not a Data Processor:** it does not operate, or have access to, the live System or engage in data processing of personal data on behalf of customers. In particular, Cyres does not obtain, record, store, update or share personal data using the System. **Cyres is not a Data Controller:** it does not determine the purpose for which or the way in which the data is processed.

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Who is the Data Controller?	The NHS trust / NHS England act as Data Controller
Who is the Data Processor?	Authorised NHS trust staff utilise the System to review data and act as Data Processors.

CYRES LIMITED KEY INFORMATION

Company Name:	Cyres Limited
Company Registration No:	4321140
Registered Office:	10 Wellington Street, Cambridge, CB1 1HW
Trading Address:	33 Back Street, South Creake, Fakenham, Norfolk NR21 9PG
ICO Registration No:	Z8607789
Current Cyber Essentials Registration Expiry:	16/03/2027
Lead Contact:	Sebastian Brunt (CEO)
Contact Phone:	01223 655466
Contact Email:	s.brunt@cyres.co.uk
Online Security Trust Portal:	www.cyrescinergy.co.uk/TrustPortal.aspx
Telephone Support:	01223 655674

GENERAL GUIDANCE FOR COMPLETING DPIA QUESTIONNARIES

Important Note:

This information is intended to assist customers and Information Governance staff to complete DPIA questionnaires in relation to the use of the System.

Where the information does not match the user's specific Trust practices and procedures, users should rely on their own knowledge or obtain further guidance from appropriate IT, Clinical or Information Governance staff.

What is the reason / purpose for using the System for data processing?	The overall purpose is to facilitate accurate statutory reporting in relation to specific types of clinical data.
Does the System involve the use of artificial intelligence?	No
Are there any potential additional privacy impacts?	No
Are potential new purposes likely to be identified?	No.

Does the Use of the System Involve:

The collection, use or disclosure of personal or sensitive data?	Yes. Involves the use of such data.
The collection, use or disclosure of additional personal or sensitive data beyond existing systems?	No
A new use for personal data that is already held?	Yes. Collating existing data to allow statutory reporting in line with specific clinical data reporting requirements.

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Disclosing personal data to organisations or people who have not previously had access to the information?	No
The linking, matching or cross-referencing of personal data that is already held?	Yes. Use of the System involves linking, matching and cross-referencing patient data.
The creation of a new, or the adoption of an existing, identifier for individuals; for example, using a number or biometrics?	No
Establishing or amending a register or database containing personal data?	No
New or innovative use of technology or organisational solutions that might be perceived as being privacy intrusive?	No
Exchanging or transferring personal data outside the UK?	No
The use of personal data for research or statistics, whether de-identified or not?	Yes. The System generates high-level, statistical reports.
A new or changed system for handling personal data?	No

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Any other measures that may affect personal data protection or that could raise data protection concerns with the public?	No

What Data is Used?

Data Used:	Existing patient cytology / colposcopy test results.
Personal Data:	Essential personal data only, to enable clinicians to investigate further, if necessary, i.e. NHS No / DOB / Name
Sensitive Data:	Test results data used as above.

Justification for Data Processing

Legal Basis:	Consent – Patients will already have been seen by the Trust, and the Trust will therefore have already obtained patient consent for testing and processing of results in accordance with standard NHS procedures.
Is any information to be sold?	No
Is the processing likely to interfere with the 'right to privacy'?	No
Is there any access by third parties?	Access to information does not extend beyond authorised NHS clinical staff.
Is the information of good enough quality for the purposes for which it is used?	Yes, the System uses up-to-date test data.

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Can the System itself be used to amend or delete information?	No. That would require the use of other existing NHS data systems.
Is personal data obtained from individuals or other organisations accurate?	The System uses existing data. It does not involve obtaining new data.
What are the retention periods for the personal information and how will this be implemented?	In line with NHS Records Management Code of Practice.
Are there any exceptional circumstances for retaining certain data for longer than the normal period?	No
How are subject data access, rectification, erasure and related matters dealt with?	Patients can make a request in accordance with Trust policies.
What electronic security measures are in place for the operation of the system?	Data transfer from a local Cinergy system to the NHS England National Cinergy Server meets the highest possible standards of security in that (a) it uses the HTTPS 256 bit protocol (b) Cinergy also encrypts the data to 256 bit (so there is double encryption) and (c) the data remains on the N3 network so is only accessible to authorised N3 users, and in this case only those with a registered "Yubikey". The System is PEN tested every two years by the National Office using external security specialists to ensure the highest standards are maintained.
Will individual's personal information be disclosed internally/externally in identifiable form and if so to who, how and why?	No data in disclosed externally to non-NHS staff. The only people with access to personal information are NHS clinical staff authorised to use the System and who have been issued with usernames and a "Yubikey" device for secure access authentication.

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Will data be processed or stored outside the UK?	No

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Third Party Information Sharing

Does the use of the System involve any third-party information sharing?	No

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