

## Risk Register

Ref	Describe the source of risk and nature of potential impact on individuals.	Probability	Impact	Overall risk	Mitigation	Probability	Impact	Residual risk rating	Measure approved
	<i>Include associated compliance and corporate risks as necessary.</i>	1-5	1-5	<i>Probability x Impact</i>		1-5	1-5	<i>Probability x Impact</i>	<i>Back office only</i>
1	Personal data (limited to names and email addresses of users) is leaked or stolen from within GPitC platform	2	3	6	Apply Azure baseline security policies. Secure with MFA. Penetration test. Minimisation of dataset. Data encryption.	1	3	3	
2	Provisioning of an internet accessible route to patient data increases the security risk to that data	2	5	10	Secure with MFA. Penetration test. Access to patient data also requires authorised NHS Smartcard. Data encryption.	1	5	5	
3	Theft or unauthorised use of written down credentials, users mobile phone and smartcard would allow unauthorised access	2	5	10	Remind users not to write down access credentials and store secure access technologies (like smart cards) separately from devices	1	5	5	

4	Third party view of patient data on a screen	3	5	15	Clinicians are bound by local standard contractual terms and NDA's. Clinicians reminded of the risks of working in public view.	2	5	10	
5	Inappropriate use	1	5	5	Clinicians are bound by local standard contractual terms and NDA's.	1	5	5	
6	Authorised users take photos of patient data	2	5	10	Screen shot functionality disabled. Pop up reminder on each login that doing so using a camera is a breach of terms and conditions	1	5	5	
7	Inappropriate users gain patient records access	1	5	5	Authorised users are identified by CCGs/ICSs. In the unlikely event of an unauthorised user being granted GPitC access, there would be no access to patient data without a smartcard authorised by an individual GP Practice.	1	5	5	
8	Lack of availability GPintheCloud of (Azure failure, DOS attack, data corruption)	1	3	3	None required. The underlying GPintheCloud infrastructure is highly resilient. GPintheCloud is not a critical service but a	1	3	3	

					secondary access mechanism.				
9	The service is impacted by the end of the partnership between Delt Shared Services Ltd and Integy Limited.	3	3	9	End of partnership arrangements are documented in the Joint Venture Agreement.	3	1	3	
10.	Risk that GPIntheCloud users may not be aware that their information is being processed in this way which would result in a failure to adhere to the transparency principle and Article 13 and 14 under the UK GDPR.	2	1	2	Transparency Notice will be published on the GPIntheCloud website, signposted to subscribing organisations	1	1	1	

See table below for guide to assessing risk

Probability	Rating	Impact	Rating
1 - Rare	1	1 - Insignificant (Low - no business impact)	1
2 - Unlikely	2	2 - Minor (low - minor business impact, some loss of confidence)	2
3 - Moderate	3	3 - Moderate (medium - business is interrupted, loss of confidence)	3
4 - Likely	4	4 - Major (high, business is disrupted, major loss of confidence)	4
5 - Almost Certain	5	5 - Catastrophic (high - business cannot continue)	5

### Calculating Overall Risk and Risk Rating

Score	Rating	Action
15-25	High	Immediate action required to mitigate the risk or decide not to proceed
5-14	Medium	Action should be taken to compensate for the risk
1-4	Low	Risk should be monitored and tolerated