



Greater Manchester Shared Services

# GMSS IG Framework

Review: October 2018



Greater Manchester Shared Services

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### Document Location

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### Revision History

Revision date	Revision by	Summary of changes	Version
Sept 2017	IG Team	Split the IG Strategy & Policy into the IG Framework & IG Policy documents	0.1

### Approvals

Name	Role	Date	Version
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## 1 Introduction

The Information Governance Framework document aims to capture GMSS's approach to Information Governance (IG).

Robust IG requires clear and effective management and accountability structures, governance processes, documented policies and procedures, trained staff and adequate resources. The way that GMSS will deliver this is documented within this Information Governance Management Framework. This will be reviewed annually by GMSS SMT or by the IG sub committee.

The Information Governance Framework must be read in conjunction with the GMSS Information Governance Policy and associated procedures.

The framework provides a summary / overview of how GMSS is addressing the Information Governance agenda and adapted appropriately to the capacity and capability of the organisation.

There are many different standards and legislation that apply to IG and information handling, including, but not limited to:

General Data Protection Regulation (GDPR)	Health and Social Care Act 2012	Freedom of Information Act 2000
Common Law Duty of Confidentiality	Confidentiality: NHS Code of Practice	Human Rights Act 1998
International Information Security standard: ISO/IEC 27002: 2005	Access to Health Records Act 1990	Information Security NHS Code of Practice
Caldicott Guidance	Computer Misuse Act 1990	Mental Capacity Act 2005
Public Records Act 1958	Records Management Code of Practice for Health and Social Care 2016	Data Protection Act

IG is required to be adequately resourced with effective organisational and managerial structures and processes underpinned by documented policies and procedures, and regular and updated staff training.

The Department of Health has developed standards of IG requirements and compliance is measured by the Information Governance Toolkit (IG Toolkit). GMSS will complete this annual self-assessment tool. The requirements of the IG Toolkit cover all aspects of IG including:

- Information Governance Management;
- Confidentiality and Data Protection Assurance;
- Information Security Assurance;
- Clinical Information Assurance;

## **2 Strategic Aims**

The aim of this Framework is to set out how GMSS will effectively manage IG. The organisation will achieve compliance by:

- Establishing, implementing and maintaining local GMSS policies for the effective management of IG;
- Establishing robust IG processes that conforms to Department of Health standards and comply with all relevant legislation;
- Ensuring information is provided accordingly to service users, stakeholders and shareholders about how information is recorded, handled, stored and shared and managed;
- Providing clear advice, guidance and training to all staff to ensure that they understand and apply the principles of IG to their working practice;
- Sustaining an IG culture through increasing awareness and promoting IG, thus minimising the risk of breaches of personal data;
- Assessing GMSS performance using the IG Toolkit and Internal Audits, developing and implementing action plans to ensure continued improvement.

## **3 Key Roles and Responsibilities Senior Roles**

### **Managing Director**

The Managing Director has overall responsibility for Information Governance within GMSS. As Accountable Officer, they are responsible for the management of Information Governance and for ensuring appropriate mechanisms are in place to support service delivery and continuity. Information Governance provides a framework to ensure information is used appropriately and is held securely.

### **Senior Information Risk Owner (SIRO)**

The Senior Information Risk Owner (SIRO) is responsible for identifying and managing the information risks to GMSS. This includes oversight of the organisation's information security / governance incident reporting and response arrangements and the Registration Authority business process. The Deputy SIRO supports the work of the SIRO

### **Caldicott Guardian**

The Caldicott Guardian is a senior person responsible for protecting the confidentiality of the patient and service user information and enabling appropriate information sharing.. The Deputy Caldicott Guardian supports this work

### **Data Protection Officer (DPO)**

The DPO role is required as part of the General Data Protection Regulation. The DPO's role is to inform and advise GMSS and its staff about their obligations to comply with the GDPR and other data protection laws. They are required to monitor compliance with the GDPR and other data protection laws, including managing internal data protection activities, advise on data protection impact assessments; train staff and conduct internal

audits. In addition they are required to be the first point of contact for supervisory authorities and for individuals whose data is processed (employees, customers etc).

### **Information Security Role**

Provides the following Information Security support:

- Information Security (IS) qualifications as a qualified lead auditor for Information Security
- Undertake or commission IS Audits of a key information Asset process and generate a report for GMSS SIRO.

### **Information Governance Team**

The GMSS Information Governance Team are responsible for supporting the organisation and staff to ensure information is processed legally, securely, efficiently and effectively.

### **All staff**

All staff, whether permanent, temporary, contracted or contractors are responsible for ensuring that they are aware of their responsibilities in respect to Information Governance and undertake the mandatory IG training in a timely way.

## **4 Governance Framework**

Responsibility and accountability for Information Governance is cascaded through GMSS and is co-ordinated by the GMSS Head of Integrated Governance & GMSS IG Team via the following:

- IG Group
- Staff contracts of employment
- Information Sharing Agreement / Data Processor Agreement
- IG Questions for tender processes
- Privacy Impact Assessment Pro forma
- Information Asset Ownership – documented within the Information Asset Register
- IG Training (via IG Training Tool)
- IG Training Needs Analysis
- IG Updates in GMSS staff bulletins
- IG Policies and Procedures

## **5 Training and Guidance**

Staff receive clear guidelines on expected working practices and the consequences of failing to follow policies and procedures via the methods as outlined above in the Governance Framework section.

Information Governance training and the required software package for completion is outlined in the Training Needs Analysis.

All staff are mandated to undertake IG training on an annual basis.

Where relevant further training and education will be required of staff, staff will be informed via the Information Governance Training Needs Analysis.

All agency / temporary staff must have evidence of adequate Information Governance training and / or undertake the mandatory IG training programme via the IG Training Tool. This must be evidenced by managers.

GMSS Information Governance Staff are officially trained in Data Protection and Freedom of Information (ISEB qualification).

Training and advice is provided to staff on request.

## **6 Information Governance Incident Management**

All incidents are reported via the GMSS Incident Management policy and escalated via STEIS when required. Staff must report any IG incidents following GMSS's IG Incident Reporting Procedure.

An IG Incident Reporting Procedure informs staff of the extra reporting requirements regarding Information Governance incidents and is available on the GMSS Intranet

The IG Team are consulted regarding all IG incidents and co-ordinate scoring of the incident using the guidance stated in the GMSS IG Incident Management procedure.

Any Serious Incident Requiring Investigation (IG SIRI) scored at a level 2 will be reported on the IG Toolkit Reporting Tool. This will be done by the IG Team following consultation with the HoS. The SIRO and the Caldicott Guardian.

GMSS adheres to the Checklist for Reporting, Managing and Investigating Information Governance Serious Untoward Incidents document (DH, June 2013).

## **7 IG Relation Documents**

- Information Governance Policy
- Data Protection & Confidentiality Policy
- Acceptable Use Policy
- Records Management Policy
- Information Risk Policy
- Information Security Policy
- Information Governance & Cyber Security Incident Reporting Policy
- Confidentiality Audit Policy
- Secure Transfers of Information Policy
- Subject Access Procedure
- Privacy Impact Assessment Procedure & Template
- IG Training Needs Analysis

- IG Staff Handbook

## 8 Reporting Structure

GMSS Information Governance Group chaired by the Head of Integrated Governance, reports to GMSS Senior Management Team. The group focuses on the implementation and compliance of Information Governance principles. The responsibilities of the group include, but are not limited to:

- Recommending for approval and adoption all related policies, protocols, strategies and procedures within the Information Governance arena, having due regard to legislation and NHS requirements.
- Recommending for approval the annual submission of compliance with the requirements in the NHS IG Toolkit and related action plans.
- To co-ordinate and monitor the Information Governance Policy across the organisation.
- Make recommendations on the necessary resourcing to support requirements.
- Deliver the implementation of GDPR
- To address all issues surrounding information management and information security issues that may affect GMSS
- To identify and approve all necessary staff information and training as outlined in the NHS IG Toolkit.
- Ensure that risks are included on the corporate risk register.
- Scan the horizon for key emerging risks within the IG environment.

GMSS will monitor and co-ordinate with service suppliers the implementation and on-going management of the Information Governance framework and IG Toolkit requirements via the IG Group.

### Information Governance Organisational Structure

