

# Information Governance Policy and Strategy

November 2016



## Document Change History

Date	Ver.	Status	Author	Details of Change
November 2016	0.1	Reviewed from Oldham CCG to fit GMSS	IG Team	Amendments to fit with GMSS

## Document Tracking History

Date	Ver.	Person Presenting	Area Receiving	Comments
November 2016	0.1	IG Team	GMSS IG Group	Recommend Approval by the IG Group
17 <sup>th</sup> January 2017	0.2	G Coxon	FPG	Recommend Approval after some amendments
24 <sup>th</sup> January 2017	0.3	K Rigden	SMT	Amendments needed
31 <sup>st</sup> January 2017	0.4	K Rigden	SMT	HR assurance needed
14 <sup>th</sup> February 2017	0.5	G Coxon	SMT	HR Amendments made
28 <sup>th</sup> February 2017	1.0	G Coxon	SMT	Approved

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# 1 Purpose

Greater Manchester Shared Services recognises the role Information Governance plays in ensuring GMSS processes or handles its personal, sensitive and business information in accordance with UK laws and Department of Health Policy.

Information is a vital asset to GMSS, both in terms of the clinical management of individual patients and the efficient management of services and resources. It plays a key part in clinical governance, service planning and performance management.

It is of paramount importance to ensure that GMSS information is effectively managed, and all appropriate policies, procedures, guidance, management accountability and structures provide a robust governance framework.

Information Governance provides a framework to bring together all of the requirements, standards and best practice that apply to the handling of information ensuring:

- Compliance with the law;
- Information is available, secure and confidential at all times;
- High standard of education, influence, and advice on good practice;
- Audit, investigation, enforcement and supportive corrective action where required;
- Year on year improvement plans

Core to Information Governance is setting information handling standards and giving GMSS the tools to achieve those standards. Its purpose is to support GMSS and individuals to be consistent in the way they handle personal and corporate information and avoid duplication of effort, leading to improvement in:

- Information handling activities;
- Patient and service user confidence in care providers;
- Employee training and development

Information Governance operates under four fundamental aims:

- Support the provision of high quality care, by promoting the effective and appropriate use of information;
- Encourage responsible staff to work closely together, preventing duplication of effort and enabling more efficient use of resources;
- Develop support arrangements, provide staff with appropriate tools and support to enable them to discharge their responsibilities to consistently high standards;

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- Enable organisations to understand their own performance, and manage improvement in a systematic and effective way.

The Information Governance framework this policy sets out aims to ensure that information is used effectively, efficiently, securely and legally, in order to deliver the best possible care.

## **1.1 Scope**

This policy applies to all members of staff working for or on behalf of GMSS.

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## 2 Principles

GMSS recognises the need for an appropriate balance between openness and confidentiality in the management and use of information.

GMSS fully supports the principles of corporate governance and public accountability. It places importance on the confidentiality of and security arrangements to safeguard both personal information about patients and staff, as well as commercially sensitive information. GMSS also recognises the need to share patient information with other health organisations and other agencies in a controlled manner consistent with the interests of the patient and, in some circumstances, the public.

GMSS believes that accurate, timely and relevant information is essential to deliver the highest quality health care. As such it is the responsibility of all clinicians and managers to ensure and promote the quality of information and to actively use information in decision making processes.

The following key interlinked strands support the Information Governance Policy

- Openness;
- Legal Compliance;
- Information Security and Confidentiality;
- Information Risk Management
- Records Management
- Quality assurance
- Information Governance Management
- Training
- Audit

### 2.1 Openness

- GMSS will establish and maintain policies to ensure compliance with the:
  - Data Protection Act;
  - Environmental Information regulations;
  - Freedom of Information Act;
- GMSS will uphold the public's general right to know. Non-confidential information on GMSS and services should be proactively made available to the public through a variety of media, in line with GMSS's Freedom of Information Publication Scheme;
- Patients will have ready access to information relating to their own health care, their options for treatment and their rights as patients;

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- Where applicable, patients will be made aware of their choices regarding restrictions on access to their Health Care information.
- GMSS will have clear procedures and arrangements for liaison with the press and broadcasting media;
- GMSS will have clear procedures and arrangements for handling queries from the patients and the public

## **2.2 Legal and Department of Health Compliance**

- GMSS regards all personal identifiable information relating to patients as confidential. Health care related information will be regarded as sensitive along with certain other types of information (e.g. Child protection data).
- GMSS regards all personal identifiable information relating to staff as confidential except where national policy on accountability requires otherwise;
- GMSS regards all corporate information as confidential;
- GMSS will ensure all policies, procedures, protocols and guidance etc ensure compliance with the:
  - Common Law on Confidentiality;
  - Computer Misuse Act;
  - Data Protection Act;
  - DOH Code of Practices for:
    - Confidentiality;
    - Information Security;
    - Records Management;
  - Environmental Information Regulations;
  - Freedom of Information Act;
  - Human Rights Act;
  - Privacy and Electronic Communications; and
  - All other relevant legislation
- GMSS will regularly maintain policies for the controlled and appropriate sharing of patient information with other agencies, taking into account relevant legislation.

## **2.3 Information Security and Confidentiality**

- The Head of Service for Integrated Governance, provides the following Information Security support:
- Use of the Head of Service for Integrated Governance Information Security (IS) qualifications as a qualified lead auditor for Information Security

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- Undertake an IS Audit of a key information Asset process and generate a report for the CCG SIRO.
- GMSS will work towards attaining and maintaining compliance against the International / British Standard for Information Security Management ISO 27001.
- GMSS will have regularly maintained policies and procedures for the effective, secure and confidential management of its information assets;
- GMSS will promote effective security and confidentiality practice to its staff through policies, procedures and training;
- GMSS will have regularly maintained business continuity plans for all critical infrastructure components and core information systems;
- GMSS will have regularly maintained incident reporting procedures and will monitor and investigate all reported instances of actual or potential breaches of security and confidentiality

## **2.4 Information Governance / Risk Management**

- GMSS's Accountable Officer will be responsible for the organisations overall accordance with its statutory responsibilities regarding the processing of Personal Confidential Data and all other forms and type of business information.
- GMSS's SMT will have a nominated 'Senior Information Risk Owner (SIRO) who will be accountable for:
  - Fostering a culture for protecting and using information;
  - Identifying and managing the information risks to the organisation and its business partners;
  - The management of all information assets
- GMSS will have a nominated member of the senior level of management to act as the overall Information Governance Lead who will be accountable for:
  - Ensuring effective management, accountability, compliance and assurance for all aspects of IG
  - Ensuring top level awareness and support for IG resourcing and implementation of improvements;
  - Ensuring annual assessments using the IG toolkit and audits of IG policies and arrangements are carried out, documented and reported in line with the requirements of GMSS's Assurance Framework;
  - Ensuring that the annual assessment and improvement plans are prepared for approval by the Governing Body or relevant committee in a timely manner;
  - Liaising with other committees, working groups and programme SMTs in order to promote and integrate IG standards;

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- Ensure that members understand the need to support safe sharing of Personal Confidential Data (PCD) for direct care as well as the need to protect individual's confidentiality.
- GMSS will have a nominated Caldicott Guardian who will:
  - Be an advisor, the conscience of the organisation;
  - Primarily concerned with the sharing and justified needs of information sharing and patient confidentiality including the provision of advice, options for the lawful and ethical processing of PCD;
  - Oversee the arrangements for the management, use and sharing of PCD.
- GMSS's Information Governance function supports the work activities of the SIRO, GMSS IG lead, and Caldicott Guardian to ensure GMSS's business needs are met.
- All information assets owned or contracted by GMSS will be assigned to a GMSS Information Asset Owner (IAO) who will:
  - Lead and foster a culture that values, protects and uses information for the success of GMSS;
  - Be accountable to the SIRO and will provide assurance that information risk is being managed effectively for their assigned information assets;
  - Be aware of what information is held within their assigned assets and the nature of and justification for information flows to and from those assets including effectiveness of the access controls implemented;
  - Ensure all assigned information assets are sufficiently resourced and assigned an Information Asset Administrator to ensure operational effectiveness is maintained.
- All IAOs will be supported by one or more assigned Information Asset Administrators (IAA) who will:
  - Maintain respective entries in the Information Asset Register;
  - Ensure information handling procedures are fit for purposes, adhered to, and in compliance with any policies or sharing agreements;
  - Be the first port of call for managers and members seeking guidance on handling / managing information.
- GMSS will:
  - Ensure all IG related work across GMSS is co-ordinated;
  - Monitor its own performance against the Information Governance toolkit and submit an annual self-assessment.
  - Ensure level 2 compliance against the Information Governance Toolkit requirements;
  - Produce timely reports throughout the year on performance against the IG assurance plan, and IG related activity across GMSS;

- Report on IG events, incidents, actual or suspected for all breaches of confidentiality or Information Security, including analysing, investigating and escalation of events / incidents and any recommendations for remedial action;
- Establish and maintain an Information Asset register and will monitor and manage all identified risks;
- Report on information risks in statements of internal controls and include details of data loss and confidentiality breach incidents in annual reports.
- Support national initiatives and ensure providers or commissioned services, through contracts

## **2.5 Records Management**

- GMSS will:
  - Have regularly maintained policies and procedures for effectively managing all its records and for information quality assurance;
  - Promote effective records management and quality assurance through policies, procedures, protocols, training, and audits;
  - Will ensure managers take ownership of, and improve the management and quality of information within their respective services;
- Wherever possible, information quality should be assured at the point of collection;
- Data standards will be set through clear and consistent definition of data items, in accordance with national standards;

## **2.6 IG Training, Guidance and maintaining Awareness**

- GMSS will have mandated annual IG training for all staff and regularly monitor and review the effectiveness of training;
- Additional modules will be required for staff having a specific role within GMSS. These roles and their training requirements will be documented in the IG Training Needs Analysis (TNA);
- GMSS will ensure that all staff including temporary staff are sufficiently trained and capable of using the infrastructure and its systems, including national systems, to ensure competent, secure and confidential use;
- As appropriate, regular reminders, updates, guidance and advice will be made available to all staff and commissioned providers, utilising normal communication protocols, targeted email, intranet or a suitable combination of the above;
- All training will take into account any individual's specific needs.

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## 2.7 Overview of IG Governance Framework

