



Bolton Clinical Commissioning Group

# Information Governance Management Framework

<b>Policy Number</b>	<b>IG010</b>
<b>Target Audience</b>	<b>CCG Staff</b>
<b>Approving Committee</b>	<b>CCG Chief Officer</b>
<b>Date Approved</b>	<b>December 2017</b>
<b>Last Review Date</b>	<b>December 2017</b>
<b>Next Review Date</b>	<b>December 2018</b>
<b>Policy Author</b>	<b>GMSS IG Team</b>
<b>Version Number</b>	<b>V5.0</b>

The CCG is committed to an environment that promotes equality, embraces diversity and respects human rights both within our workforce and in service delivery. This document should be implemented with due regard to this commitment.

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Approved documents are valid for use after their approval date and remain in force beyond any expiry of their review date until a new version is available.



**Bolton Clinical Commissioning Group**

## Version Control Sheet

Version	Date	Reviewed By	Comment
0.1	September 2013	Suzanne Bell	Document development
0.1	September 2013	Mike Robinson, Annette Walker, Grace Birch, Dr Mercer, Diane Sankey	Document Review
1.0	September 2013	CCG Board	Approved
1.1	September 2014	NWCSU	Section 4, Training and Guidance updated
2.0	November 2014	IM&T Ops Board	
2.0	January 2015	CCG Board	Approved
2.1	June 2015	IG Team	Document Review
2.1	July 2015	IM&T Ops Board	Approved
3.0	June 2016	IG Team	Document Review, Section 3, Senior Roles updated to include Information Security Support. GMSS replacing NWCSU throughout document.
3.1	June 2016	IM&T Ops Board	Approved
4.0	May 2017	IG Team	Document Review
5.0	December 2017	CCG Chief Officer	Approved

Analysis of Effect completed	By: Suzanne Bell	Date: 19 <sup>th</sup> September 2013
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# 1 Introduction

The Information Governance Framework document aims to capture Bolton Clinical Commissioning Group's (CCG) 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 the CCG will deliver this is documented within this Information Governance Management Framework. This will be reviewed annually by the IM&T Operations Group.

The Information Governance Framework must be read in conjunction with the CCG's Information Governance Policy and associated procedures (for a list, refer to section 7).

The Framework provides a summary / overview of how the CCG 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:

Data Protection Act 1998	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 1
Public Records Act 1958	NHS Records Management Codes of Conduct	

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). The CCG 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 Bolton CCG will effectively manage IG. The organisation will achieve compliance by:

- Establishing, implementing and maintaining local CCG 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 CCG performance using the IG Toolkit and Internal Audits, developing and implementing action plans to ensure continued improvement.

## 3 Senior Roles

### **Accountable Officer**

The Chief Operational Officer (COO) has overall responsibility for Information Governance within Bolton CCG this is Susan Long. As Accountable Officer, Susan is 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 held by a member of the CCG Executive Board. They are responsible for identifying and managing the information risks to the CCG. This includes oversight of the organisation's information security / governance incident reporting and response arrangements and the Registration Authority business process. For Bolton CCG, the SIRO role will be the responsibility of Ian Boyle, Chief Financial Officer.

### **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. For Bolton CCG, this will be Dr Jane Bradford, CCG GP Lead.

### **CCG Information Governance Lead**

The Associate Director of Integrated Governance & Policy has been appointed to act as the overall CCG Information Governance lead for Bolton CCG. This role is the responsibility of Michael Robinson.

### **Information Security Support**

As Bolton CCG is a client of the Greater Manchester Shared Services (GMSS) IG service, 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;
- Undertake an IS Audit of a key information Asset process and generate a report for the CCG SIRO.

### **Greater Manchester Shared Services (GMSS) Information Governance Team Responsibilities**

From 1<sup>st</sup> April 2013 the CCG has contracted specialist IG support from the GMSS.

The CCG has been assigned a GMSS Information Governance Manager who will be the delegated IG Manager for the CCG's. IG support will also be provided by the GMSS Senior Information Governance Officer(s) and the GMSS-IG Central Team.

The GMSS Information Governance Manager will be responsible for ensuring all tasks delegated to GMSS meet the required standards in line with any formal undertaking between the parties.

The GMSS IG Team will be responsible for ensuring all tasks delegated to GMSS meet the required standards in line with any formal undertaking between the parties.

Key tasks are:

- Developing and maintaining the currency of comprehensive and appropriate documentation that demonstrates commitments to and ownership of IG responsibilities, for example, production of IG

Framework document supported by relevant policies and procedures

- Ensure that there is top level awareness and support for IG resourcing and implementation of improvements with the CCG clinical executive
- Establishing working groups, if necessary, to co-ordinate the activities of staff with IG responsibilities
- Ensuring annual assessments and audits of IG are implemented and reported
- Ensuring that annual assessment and regular improvement plans / progress reports are prepared for approval by the Chief Finance Officer
- Ensuring that the approach to information handling is communicated to all staff and made available to the public
- Ensuring that appropriate training is made available to staff and completed
- Liaising with other committees, working groups and programme boards in order to promote and integrate IG standards
- Monitoring information handling activities to ensure compliance with law and guidance
- Providing a focal point for the resolution and / or discussion of Information Governance issues

**All staff**

All staff, whether permanent, temporary, contracted or contractors are responsible for ensuring that they are aware of their responsibilities in respect to IG.

## **4 Governance Framework**

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

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

## **5 Training & 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 is outlined in the Training Needs Analysis.

All staff are mandated to undertake Information Governance Training by using the online IG Training Tool or using external accredited training providers. Information Governance training is required to be undertaken on an annual basis.

Staff will be informed via the Information Governance Training Needs Analysis (TNA) and Communications as to what training they need to complete.

All agency / temporary staff must have evidence of adequate Information Governance training and / or undertake the mandatory IG training programme via the agreed method set out in the TNA. 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 IG incidents are reported via the CCG IG Incident Reporting Procedure (IG007) and escalated via StEIS when required. Staff must report any IG incident to [BOLCCG.Incidents@nhs.net](mailto:BOLCCG.Incidents@nhs.net) or via the CCG's incident reporting system available on the intranet <http://sg01/safeguard/>. The IG Incident Reporting Procedure outlines the extra reporting requirements, guidance on the assessment of IG incidents and is available on the CCG Intranet.

GMSS IG Officers are consulted regarding all IG incidents and score the incident using the guidance stated in the IG Toolkit Incident Reporting Tool.

Any Serious Incident Requiring Investigation (SIRI) scored at a level 2 will be reported on the IG Toolkit Reporting Tool and automatically reported to the HSCIC, DoH and ICO. This will be completed by the GMSS IG Officer following consultation with the CCG Chief Officer, SIRO and Caldicott Guardian.

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

## **7 Key Information Governance Documentation**

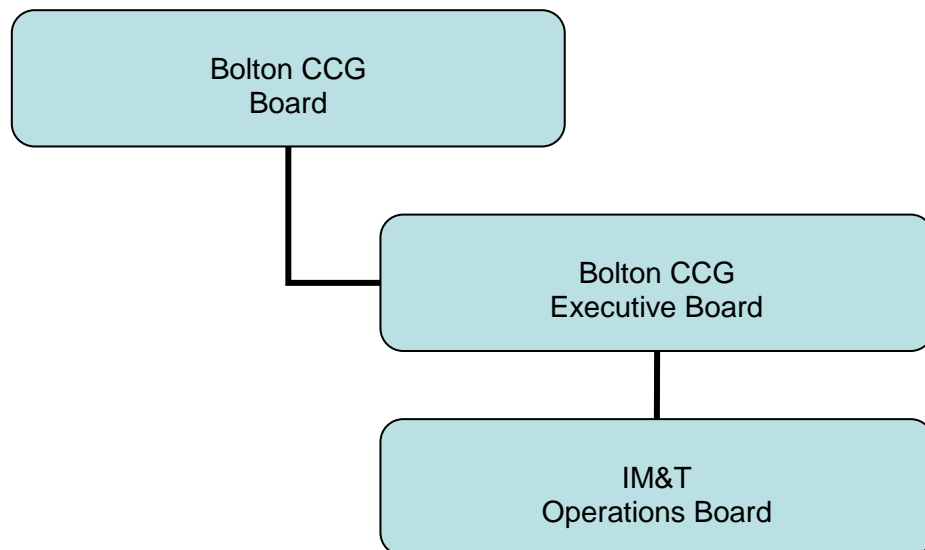
- IG001 Information Governance Policy
- IG002 Confidentiality and Data Protection Policy
- IG003 Corporate Information Security Policy
- IG004 Acceptable Use Policy (IT, Email and Internet)
- IG005 Records Management Policy
- IG006 Information Risk Policy
- IG007 Information Governance Incident Reporting Procedure
- IG008 IG Staff Handbook
- IG009 Confidentiality Audit Procedure
- IG010 Information Governance Management Framework
- IG011 Privacy Impact Assessment Procedure & Template
- IG012 Secure Transfer of Information Procedures
- IG013 Subject Access Procedures
- IG014 Remote Working Procedure
- IG Training Needs Analysis

## 8 Reporting Structure

The CCG's IM&T Operations Board which reports to the CCG Executive Team, controls 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 illegal 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.
- To address all issues surrounding information management and information security issues that may affect the CCG.
- 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.

The CCG 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 IM&T Operations Board.



## 9 Information Governance Organisational Structure

