

**Governing Body**  
**Paper Summary Sheet**  
**Date of Meeting: 23 July 2013**

For: Decision  Discussion  Noting

<b>Agenda item and title:</b>	<b>GOV/13/07/10 Information Governance Framework</b>
<b>Author:</b>	Barry Thorpe Information Governance Manager Central Southern Commissioning Support Service
<b>Lead Director:</b>	Simon Truelove Chief Financial Officer
<b>Responsible Director:</b>	Debbie Fielding, Accountable Officer
<b>Executive summary – (what is proposed and intended impact) and recommendation:</b>	The document sets out how the CCG should approach information governance across the organisation. The document sets out the key roles in respect to information governance and the responsibility that all staff have to safe guard information
<b>Evidence in support of arguments:</b>	National Guidance and national Acts set down in Law that guide the use of information
<b>Who has been involved/contributed:</b>	Senior Information Risk Owner and the Information Governance Manager at the Commissioning Support Unit (CSU)
<b>Cross Reference to Strategic Objectives:</b>	Safe guarding patients and commercial information
<b>Engagement &amp; Involvement:</b>	N/A
<b>Communications Issues:</b>	All staff are made aware of the importance of information governance through the induction process and annual refresher sessions
<b>Financial Implications:</b>	Risk of not complying with national law associated with information governance can result in significant penalties to the organisation
<b>Review arrangements:</b>	Annually
<b>Risk Management:</b>	N/A

<b>National Policy / Legislation:</b>	Follows national legislation as outlined in the document
<b>Equality &amp; Diversity:</b>	N/A
<b>Other External Assessment:</b>	
<b>Next Steps:</b>	

# INFORMATION GOVERNANCE FRAMEWORK

<b>Date of Approval</b>	
<b>Review Date</b>	
<b>Policy Number</b>	

## DOCUMENT CONTROL SUMMARY

<b>Title</b>	Information Governance Framework
<b>Lead Officer</b>	
<b>Purpose of document</b>	To outline the CCGs approach to Information Governance
<b>Status</b>	FINAL
<b>Version No.</b>	1.0
<b>Date</b>	June 2013
<b>Author(s)</b>	CSU Information Governance Team
<b>Date of approval by Governing Body</b>	
<b>Review Date</b>	

## VERSION CONTROL SUMMARY

<b>Version</b>	<b>Date</b>	<b>Status</b>	<b>Comment/Changes</b>
1.0	17/06/2013	FINAL	Finalised CSU Standard Policy

# Contents

<b>Section</b>	<b>Title</b>	<b>Page No.</b>
1	Introduction	1
2	Strategic Aims	2
3	Responsibilities	2
Appendices		
A	Useful Contacts	5
B	CCG IG Framework – Policy and Procedure	6

# INFORMATION GOVERNANCE FRAMEWORK

## 1. INTRODUCTION

This document sets out the Clinical Commissioning Group (CCG) approach to Information Governance.

Robust Information Governance (IG) requires clear and effective:

- Management and leadership
- Accountability structures
- Governance processes
- Documented policies and procedures

In addition:

- Trained staff
- Adequate resources

This framework is approved by the Governing Body and reviewed annually, or sooner should best practice or legislation require it.

This framework should be read in conjunction with the CCGs Information Governance Policy and related documents are shown in Appendix B.

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

- Data Protection Act 1998
- Freedom of Information Act 2000
- Caldicott Guidance
- Human Rights Act 1998
- Public Records Act 1958
- Records Management NHS Code of Practice
- Mental Capacity Act 2005
- Common Law Duty of Confidentiality
- Confidentiality NHS Code of Practice
- International information security standard: ISO/IEC 27002: 2005
- Information Security NHS Code of Practice
- NHS Information Governance Toolkit
- Computer Misuse Act 1990
- Copyright, Designs and Patents Act 1988

The Department of Health has developed standards of information governance requirements and compliance is measured by the Information Governance Toolkit (IGT). The CCG will submit an Information Governance Toolkit annually. The IGT covers all aspects of information governance 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 the CCG will effectively manage Information Governance. The organisation will achieve compliance by:

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

## 3. RESPONSIBILITIES

The Governing Body is also responsible for ensuring that sufficient resources are provided to support the requirements of this framework.

### **Chief Officer**

The Chief Officer as Accountable Officer of the CCG has overall accountability and responsibility for the implementation of Information Governance within the CCG and that all risks to the CCG and its partners, including those relating to information, are effectively managed and mitigated.

The Chief Officer is responsible for ensuring that appropriate mechanisms are in place to support service delivery and continuity.

### **Senior Information Risk Owner**

The Senior Information Risk Owner (SIRO) is the Chief Financial Officer of the CCG Governing Body. The SIRO is expected to understand how the strategic business goals of the CCG will be impacted by information risk. The SIRO acts as an advocate for information risk on the Governing Body and in internal discussions.

### **Information Asset Owners**

Information asset owners (IAOs) shall ensure that information risk assessments are performed at least six monthly intervals on all information assets where they have been

assigned “ownership”, following guidance from the SIRO. Mitigation plans shall include specific actions along with expected completion dates, as well as residual risks.

### **Caldicott Guardian**

The Caldicott Guardian will guide the CCG on matters of confidentiality relating to patient information and acts as a “conscience” on its use. The role is pivotal in ensuring the balance between maintaining confidentiality and the delivery of care. The Caldicott Guardian of the organisation is the Director of Quality and Patient Safety.

The Caldicott Guardian will “champion” Information Governance at all levels within the organisation and advise on all aspects of information sharing and both the lawful and ethical processing of information.

The Caldicott Guardian has responsibility for ensuring staff comply with the Caldicott Principles and the NHS Confidentiality Code of Practice.

The role will advise the Governing Body on progress and major issues that may arise.

### **The Information Governance Group**

The Information Governance Group is responsible for overseeing day to day information governance issues, developing and maintaining policies, standards, procedures and guidance, promoting information governance best practice across the CCG.

### **All Managers**

All Managers within the CCG are responsible for ensuring that policy and procedures are built into local processes to ensure compliance. Compliance will be regularly audited.

Managers are responsible for ensuring all staff attend mandatory awareness training and an induction programme. They are also responsible for addressing any training needs identified during process change or a change in duties.

Managers shall promote a culture of good information governance and will cooperate fully with any investigation into information governance breaches.

### **All Staff**

All staff, whether permanent, temporary or contracted, are responsible ensuring that they are aware of the requirements incumbent on them and for ensuring they comply with these on a day to day basis.

All staff are expected to alert their manager if they feel they need additional training or guidance and must alert the CCG should they encounter information risks, whilst undertaking their duties.

Managers within the CCG are responsible for ensuring that the appropriate elements of this framework are built into local processes and that there is on-going compliance. This compliance will be regularly audited.

### **Central South Commissioning Support Unit IG Team**

The IG Team within Central Southern Commissioning Support Unit (CSCSU) will act as the subject matter experts, with regards to Information Governance within the CCG.

The IG Team will be responsible for ensuring all tasks delegated to the CSCSU meet the required standards in line with the agreed service specification.

Key tasks delegated to the CSCSU include:-

- Developing and maintaining the currency of comprehensive and appropriate documentation that support this framework, including relevant policies and procedures.
- Ensuring that there is senior level awareness and support for IG resourcing and implementation of improvements within the CCG Governing Body.
- Establishing working groups, if necessary, to co-ordinate the activities of staff given IG responsibilities and progress initiatives.
- Ensuring annual assessments and audits of IG and other related policies are carried out, documented and reported.
- Ensuring that the annual assessment and improvement plans are prepared for approval by the Chief Officer and the Governing Body in a timely manner.
- Ensuring that the approach to information handling is communicated to all staff.
- Ensuring that appropriate training is made available to staff.
- Liaising with other committees, working groups and programme boards in order to promote and integrate Information Governance 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, including incident management and reporting.
- Establishing, implementing and maintaining policies for the effective management of information.

**USEFUL CONTACTS**

**Caldicott Guardian**

Jacqui Chidley-Clark  
Director of Quality and Patient Safety  
[Jacquichidley-clark@nhs.net](mailto:Jacquichidley-clark@nhs.net)

**Senior Information Risk Owner**

Simon Truelove  
Chief Financial Officer  
[simon.truelove@nhs.net](mailto:simon.truelove@nhs.net)

**Information Governance Manager**

Barry Thorp (Central Southern CSU)  
[barrythorp@nhs.net](mailto:barrythorp@nhs.net)  
01380 733793

# CCG IG Framework

## Policy and Procedure

### APPENDIX B

\*if purchasing Corporate Governance service  
 \*\* Using IT Providers Policy

