

Information Governance Management Framework

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Introduction

Robust Information Governance (IG) requires clear and effective management and accountability structures, governance processes, documented policies and procedures, trained staff and adequate resources. The way that Torbay and South Devon NHS Foundation Trust chooses to deliver against these requirements is referred to within the Data Security and Protection Toolkit as the organisation's Information Governance Management Framework.

This Framework must be documented, approved at the most appropriate senior management level in the organisation (e.g. the Board (or equivalent), senior management team) and reviewed annually.

The IG Management Framework provides a summary/overview of how the Trust is addressing the IG agenda.

Senior Roles

The Board has appointed the Director of Transformation and Partnerships as the Senior Information Risk Owner (SIRO); a Board level position accountable for information risk. The SIRO is required to report back to the Board on the Information Governance Steering Group's progress and agenda items which may need Board level approval. The SIRO is the Chair of the Information Governance Steering Group.

The Trust's Caldicott Guardian acts as the conscience of the organisation in relation to patient confidentiality.

The Chief Executive has overall accountability for ensuring that the organisation operates in accordance with the law with the support of her subordinates.

Key Policies, Procedures and Guidelines

- Information Governance Management Framework;
- Information Governance Strategy;
- Records Management Strategy;
- Data Quality Strategy;
- Information Assets Management Strategy
- Information Asset Policy;
- Information Governance Policy;
- Data Access and Disclosure Policy;
- Freedom of Information Policy;
- Information Assurance Policy;
- Record Management (Information Lifecycle) Policy;
- Secure Storage and Transportation of Health and Adult Social Care Records Policy;
- Data Quality Policy plus PAS/Referrals Index Data Quality Policy;
- Health and Adult Social Care Records Schedule;
- Policy for the Retention and Disposal of Health and Adult Social Care Records

- Guidelines for Management, Appraisal, and Preservation of Electronic Records;
- Confidentiality and Disclosure of Health Information;
- Code of Conduct for Employees in Respect of Confidentiality;
- IGA Records Management Code of Practice for Health and Social Care Records
- Information Security Incident Reporting Procedure;
- Information Governance Training Implementation Plan; and
- Information Governance Team Work Plan.

Key Governance Bodies

- Executive Team and Board of Directors – receive reports and direct strategy where appropriate;
- Audit Committee
- Information Governance Steering Group (reports to IM&IT);
- Risk Group – tasked with overseeing risk management.

Resources

The key staff involved in the IG agenda below Board of Directors members are as follows:

- Director of Health Informatics Services
- Head of Education
- Company/Corporate Secretary
- Data Protection, FOI, Clinical Coding
- Data Security and Protection Lead
- Data Protection Officer
- Health Records Governance Support
- Information Manager or deputy
- Registration Authority Manager
- Information Governance Team
- Information Asset Support Team Manager
- Head of Information Asset Owners / Administrators; and
- Internal Audit.

Governance Framework

The following list details how responsibility and accountability for IG is cascaded through the organisation:

- staff contracts;
- contracts with third parties;
- communications and awareness raising;
- identification of Information Asset Owners / Administrators and clarification of asset owner responsibilities;
- risk assessments and sharing results of assessments and learning from incidents;
- independent audits; and
- regular reporting to the Audit Committee, Executive Team and Trust

Board of Directors as appropriate

Training and Guidance

This shall be through an annual mandatory training programme for all staff, including contractors and temporary staff using an online (local and national) training tool. Formal training sessions will be available if gaining access to a computer proves too difficult or not appropriate for a member of staff. Training shall be informed by a training needs analysis that is informed by the priorities of the organisation. Training for specialist IG roles will be resourced where considered appropriate by the SIRO.

Incident Management

The Trust has approved the Information Security Incident Reporting Procedure which is available on the Trust's Intranet website. Raising awareness to staff will be communicated regularly via staff bulletins and Trust Intranet website. External contractors, bank and agency staff, locums and students etc. who do not receive information via the above communication methods will be made aware via the Estates, Procurement and Employment Plus departments

Data Protection

Torbay and South Devon NHS Foundation Trust (TSDFT) has a commitment to ensure that all policies and procedures developed act in accordance with all relevant data protection regulations and guidance. This policy has been designed with the UK's current data protection legislation in mind, and therefore provides the reader with assurance of effective information governance practice. The UK data protection regime has 6 principles that need following which require that personal data shall be:

1. Processed fairly, lawfully and in a transparent manner.
2. Collected for specified, explicit, and legitimate purposes and not further processed for other purposes, incompatibly with the original purpose.
3. Adequate, relevant and limited to what is necessary in relation to the purposes.
4. Accurate and kept up to date.
5. Kept in a form that permits identification no longer than is necessary.
6. Processed in a way that ensures appropriate security of that personal data.

Have all of the data protection principles been considered in the development or update of this policy? Yes No

For more information:

- Contact the Data Access and Disclosure Office on dataprotection.tsdf@nhs.net,
- See TSDFT's Data Protection & Access Policy,
- Visit our Data Protection site on the public internet.

Review

The Information Governance Management Framework will be reviewed annually by the Information Governance Steering Group.