



**South Sefton
Clinical Commissioning Group**

NHS South Sefton Clinical Commissioning Group

**Information Governance Strategy
2014-2015**

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NHS South Sefton CCG Information Governance Strategy				
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Department responsible for this document:	Cheshire and Merseyside Commissioning Support Unit (North West CSU)	Senior Governance Manager (Information Governance)	Corporate Governance Support Group	
DESIGNATION	NAME	SIGNATURE		DATE
Chief Finance Officer	Martin McDowell			

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1. INTRODUCTION AND PURPOSE

- 1.1. The purpose of this strategy is to set out the approach to be taken within the NHS South Sefton Clinical Commissioning Group (CCG) to provide a robust Information Governance framework for the future management of information assets.
- 1.2. There are two key components underpinning this strategy which are:
 - A focus on the risks associated with information assets; and
 - An annual action plan arising from a base line assessment against the requirements set out in the NHS Information Governance Toolkit.

2. INFORMATION GOVERNANCE DEFINITIONS

- 2.1. Information Governance is a framework concerning the way that information about patients, employees and contractors is handled. It is particularly concerned with personal and sensitive information, but it also incorporates corporate confidential information about the CCG.
- 2.2. The Information Governance Toolkit is an online system which allows NHS organisations and partners to assess themselves against Department of Health Information Governance policies and standards.

3. ACCOUNTABILITY

- 3.1. The Chief Operating Officer has overarching responsibility for the effective management of Information Governance within the CCG.
- 3.2. Information Governance support will be provided by the Cheshire and Merseyside Commissioning Support Unit (C&M CSU).
- 3.3. The CCG Audit Committee (hereafter referred to as the Committee) will receive regular reports on Information Governance compliance, and this committee will include Information Governance in its Terms of Reference.
- 3.4. The Committee members include both the Caldicott Guardian and the Senior Information Risk Owner (SIRO) for the CCG.
- 3.5. Information Governance forms part of the Corporate Governance Support Group. This Group reports to the CCG Audit Committee.

4. WIDER IMPLICATIONS OF INFORMATION GOVERNANCE

- 4.1. This Strategy cannot be seen in isolation as information plays a key part in corporate governance; strategic risk; clinical governance; commissioning; service planning, delivery and performance management. The Strategy therefore links into all of these aspects within the CCG.
- 4.2. The CCG also holds a Risk Register, where Information Governance risks can be captured. The continual implementation of this Strategy will undoubtedly reduce the level of risk.
- 4.3. The focus on the risks associated with the key information assets are captured on the Information Asset Register. This includes the identification of Information Assets and Information Asset Owners, Information Governance risk assessments, control measures, and where necessary the completion of Privacy Impact Assessments and the agreement of Information Sharing Protocols.
- 4.4. Inbound and outbound data flows are 'mapped', assessed and revised to mitigate risks of breaches to confidentiality and data security, as much as is physically and technically possible.

5. ASSOCIATED INFORMATION GOVERNANCE POLICIES

- 5.1. This strategy should be read in conjunction with:
 - Information Governance Policy
 - Confidentiality and Data Security Policy
 - Subject Access Request Policy
 - Freedom of Information Policy
 - Corporate Records Management and Retention Policy
 - The suite of ICT security policies

6. INFORMATION GOVERNANCE ACTION PLAN

- 6.1. The Information Governance Action Plan is agreed annually to achieve a target score with a named lead person, where new/refreshed evidence for each of the Information Governance Toolkit Requirements is needed, to be

made during each financial year. These are in effect 'improvement plans' and form part of this overall Information Governance Strategy.

- 6.2. Fundamental to the success of delivering the Information Governance Strategy is developing an Information Governance culture within the CCG. Awareness and training must be provided to all staff, who utilise information in their day-to-day work to promote this culture. In order to achieve this, a mandatory annual e-learning Information Governance training plan has been agreed across the CCG for all staff (including Governing Body members, temporary staff, secondees, work placed students and contract staff).
- 6.3. The Caldicott Guardian and the Senior Information Risk Owner will also complete specific e-learning modules for their individual roles.
- 6.4. Any associated resource implications incurred by the implementation of the Information Governance Strategy and Action Plan will be identified and actioned by the Committee.

7. KEY PERFORMANCE INDICATORS

- 7.1. The following key performance indicators have been identified to measure the effectiveness of this document:
 - Overall performance will be monitored by the Committee.
 - The Information Governance Toolkit scores will be submitted annually to the Department for Health, through the Health and Social Care Information Centre (HSCIC).
 - Information Governance Toolkit scores will be subject to external audit, before submission.
 - Staff will know who and where to direct Information Governance concerns to.
 - All staff will receive annual Information Governance training.
 - Percentage comparisons over time of incidents / complaints that contravene policy.

8. CONCLUSION

- 8.1. The implementation of the Information Governance Strategy, policies and improvement plan will ensure that information security and confidentiality is more effectively managed by the CCG. The Strategy will be reviewed

annually and further actions developed against the Information Governance Toolkit on an annual basis, to identify key areas for continuous improvement.

9. FURTHER INFORMATION

9.1. Detailed guidance on Information Governance management can be obtained from the Health and Social Care Information Centre website at:

<http://systems.hscic.gov.uk/infogov>

9.2. The Information Governance Toolkit, can be obtained from the Health and Social Care Information Centre website at:

<https://nww.igt.hscic.gov.uk/>

9.3. The NHS Codes of Practice and legal obligations can be found at:

[NHS Codes of Practice and legal obligations](#)

- **Confidentiality: NHS Code of Practice(November 2003)**

[Download the 'Confidentiality: NHS Code of Practice'](#) (PDF, 220Kb).

- **Information Security Management NHS Code of Practice (April 2007)**

[Download the 'Information Security Management: NHS Code of Practice'](#) (PDF, 340Kb).

- **NHS Records Management (April 2006)**

[Download a PDF version of the Records Management: NHS Code of Practice - Part 1 \(PDF, 222.4kB\)](#)

[Download a PDF version of the Records Management: NHS Code of Practice - Part 2 \(PDF, 583.6kB\)](#)

(All web links live as at 3rd October 2014)

