

Governing Body

26 July 2017

Details	Part 1	✓	Part 2		Agenda Item No.	11
Title of Paper:	Information Governance Update Report					
Board Member:	Mike Woodhead, Acting Chief Finance Officer					
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Presenter:	Mike Woodhead, Acting Chief Finance Officer					
Please indicate:	For Decision		For Information	X	For Discussion	

Executive Summary

Summary	This report provides the Governing Body with a background to compliance with NHS Information Governance Standards along with activity undertaken in 2016/17. The Governing Body is ultimately accountable for Information Governance standards within the CCG but delegates this responsibility to the IG Operational Group and Audit Committee. The report aims to provide assurance to the Governing Body that sound processes are in place for managing information and reacting to any incidents which occur.					
Risk	High		Medium		Low	✓
	The main risk associated with the report is that the Governing Body has never received updates on Information Governance on a regular basis. Since September 2016, the Audit Committee has been charged with overseeing the CCGs IG Framework. It is a regular item at the Committee and future chair's updates will include progress report and flag issues that Committee feel are noteworthy.					
Recommendations	The Governing Body is asked to: <ul style="list-style-type: none"> note the report and request further assurance if necessary 					

Strategic themes

To deliver improved outcomes and reduce health inequalities for patients through better preventative strategies	
To deliver service re-design in priority areas through innovation	
To develop primary care to become excellent and high performing commissioners	
To develop the CCG leadership to work with the Local Authority to be excellent integrated commissioners	
To develop robust and effective working relationships with all stakeholders and partners to drive integrated commissioning	
To deliver long term financial sustainability through effective commissioning and innovative investment across the wider system	
To develop and influence the provider landscape through development of a Locality Care Organisation (LCO)	
Equality Analysis Assessed?	Supports NHS Bury CCG Governance arrangements ✓

Information Governance Update Report

1. Introduction

- 1.1. The following report provides assurance to the Governing Body that Bury CCG continues to take appropriate steps to ensure compliance with Information Governance (IG) standards in relation to the management of information. This is measured through the IG Toolkit, the online system which allows NHS organisations and partners to assess themselves against Department of Health IG policies and standards.

2. Background

- 2.1. The IG Operational Group, which is a subcommittee of the Audit Committee, provides assurance on the CCG's statutory requirements in relation to IG, associated legislation and Department of Health requirements, including the annual completion and submission of the IG Toolkit. Therefore, the ultimate responsibility for Information Governance (IG) rests with the Governing Body of the organisation.
- 2.2. This report provides the Governing Body with an overview of the work undertaken in 2016/17 to establish systems and processes around IG and to give assurance of the controls in place.

3. The CCG's Information Governance Framework

- 3.1. The CCG has put in place appropriate resources and expertise to carry out key roles within the organisation to comply with IG requirements:
- Senior Information Risk Owner (SIRO) (Mike Woodhead, Interim Chief Finance Officer)
 - Caldicott Guardian (Dr Gordon Mackinnon, Clinical Lead)
 - CCG IG Lead (Deputy Director of Business Delivery)
 - IG Support (SLA with Greater Manchester Shared Service, GMSS)
- 3.2. Staff training and awareness of their responsibilities toward confidentiality and security, adequate capacity and capability to deliver the IG agenda are key requirements to achieving the mandated IG standards.
- 3.3. During 2016/17 the CCG's IG support has been delivered by the GM Shared Services (GMSS). This support includes:
- Resource to support and manage evidence gathering for IG Toolkit returns
 - Provide suite of generic IG documents - IG policies, procedures, guidance for staff, information sharing templates
 - Advice and guidance to support projects and general day to day queries
 - Monitoring of IG training, briefing sessions and publications to staff
 - Guidance in the management, and reporting of information incidents, through to resolution
- 3.4. The CCG's Senior Information Risk Owner (SIRO) is the Chief Finance Officer (CFO). The SIRO has executive responsibility for information risk and information assets. The SIRO is supported by the Deputy Director of Business Delivery who oversees the IG service.

4. Key IG Activities Undertaken in 2016/17

4.1. An outline of the key activities undertaken during 2016/17 is provided below:

- **IG Toolkit**

4.2 The Information Governance Toolkit is the mechanism through which NHS and related organisations demonstrate their compliance through a number of IG requirements. For 2016/17, CCGs were required to self-assess against 28 requirements. All CCGs are mandated to complete and submit evidence for this self-assessment. The Toolkit scores for each requirement ranges from 0 - 3, with a 0 score meaning that relevant processes / procedures are not in place as per toolkit requirement evidence required, and a 3 meaning that all processes/procedures are in place and are constantly monitored and reported in the CCG. The national requirement is to achieve Level 2 compliance in all requirements. Level 0 and 1 are classed as failures.

4.3 Submission of the Information Governance Toolkit (IGTK) assessment is annually on the 31st March. The IGTK assessments are scored as either 'Satisfactory' or 'Non-Satisfactory'. A satisfactory status is where all 28 requirements have attained a Level 2 or above. This is converted to a composite score requirement of 66%.

4.4 For the IG Toolkit submission in March 2017 Bury CCG met this requirement by achieving at least Level 2 in all of the standards and submitted a Level 3 against 16 of these standards. **The composite score for Bury CCG was 88%. This was an improvement on the previous years' submission of a score of 85%.** This is consistent with the other CCGs that GMSS support across Manchester.

4.5 The new version of the IG Toolkit will be released on the 5th July 2017 and the IG team have till March 2018 to submit. A detailed IG action plan for 2017-18 will be in place for the CCG's IG Toolkit, this will be produced by the GMSS and approved and overseen by the IG Operational Group and reported to the Audit Committee. It will map out the key tasks to be carried out from now until the IG Toolkit submission in March 2018 and aims to maintain the previous year's achievement on Information Governance.

- **Internal Audit**

4.6 To give further assurance of the self-assessment, in January 2017 the IG Toolkit was audited by the CCG's internal auditors, Mersey Internal Audit Agency (MIAA). **MIAA audited a random sample of ten requirements and agreed with the CCG's self-assessment scores. MIAA concluded 'significant assurance' to this audit**

- **Training**

4.7 Information Governance Mandatory Training was rolled out in November 2016 as part of the CCG's mandatory training calendar and IG Awareness Month. There is a requirement for NHS organisations to be at a 95% compliance level for mandatory Information Governance training throughout the year. All staff must complete this module. **Bury CCG achieved 100% compliance as at the end of March 2017.**

4.8 In addition specific groups of staff have to undertake additional modules:

- the SIRO and Caldicott Guardian have completed additional training modules using the Health and Social Care Information Centre Information Governance Training Tool and guidance on the IG Toolkit website; and
- Information Asset Owners attended a half a day course conducted by an external training provider.

- **Policies and Procedures**

4.9 The CCG has a suite of IG policies and procedures which are due for review in November 2017. The reviewed versions will be taken to the IG Operational Group and Audit Committee for approval and will then be disseminated to all CCG staff for their information.

- **Incidents and Risks**

4.10 Incidents of data loss continue to occur across the NHS and in some cases these can be significant and in breach of national guidance. All NHS organisations are required to report a Level 2 IG related Serious Incident Requiring Investigation (IG SIRI) on the Information Governance Toolkit incident reporting tool.

4.11 The Information Commissioners Office (ICO), Department of Health and NHS England (where appropriate) will be notified via the tool of the reported IG SIRI. All information recorded under a 'Closed' IG SIRI on the IG Toolkit Incident Reporting Tool will be published quarterly by NHS Digital.

4.12 The CCG has an IG Incident Reporting Procedure in place; it is due for a review this year. This procedure is to be used for staff for the recording, reporting and reviewing of information governance and information security incidents.

4.13 **Bury CCG did not have any IG SIRI during 2016/17** and no additional risks have been included on the CCG Risk Register for 2016/17 in relation to IG.

4.14 Should incidents and / or risks occur the SIRO, Caldicott Guardian and CCG IG lead will be informed and kept up to date with any investigations.

- **National Developments**

4.15 The European Union enacted a general regulation which applies to all member states of the EU to standardise data protection / information governance law, known as General Data Protection Regulation (GDPR). This will be the single largest change in Data Protection Regulation / Laws for twenty years and significantly boosts the rights of data subjects whilst strengthening the regulatory regime for data controllers including the ability to lobby larger fines for data breaches. The IG Team will monitor and update the IG Operational Group as more detail on GDPR is released. They will also ensure that the CCG conforms to the new regulation(s).

5. Recommendations

5.1 The Governing Body is asked to

- note the report and request further assurance if necessary

Camilla Bhondoo
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July 2017