

Reporting to:	Trust Board, 30 March 2017
Title	Information Governance Toolkit Annual Assessment and an overview of future changes
Sponsoring Director	Neil Nisbet – Finance Director and Deputy Chief Executive
Author(s)	Jill Stretton – Information Governance Manager
Previously considered by	
Executive Summary	<p>This report is to inform the Board of the levels of compliance with the Information Governance (IG) Toolkit Assessment. The IGT provides a consistent way for organisations to report to the Care Quality Commission and other governing bodies their statement of Compliance. IG enables organisations and their employees to deal with many different standards and legal rules that apply to information handling, including:</p> <ul style="list-style-type: none"> • Data protection and confidentiality • Information sharing for care and non-care purposes • Information security and information risk management • Information quality, and • Records management for both care and corporate information <p>Information Governance enables organisations and individuals to ensure that information is handled legally, securely, efficiently and effectively in order to support delivery of the best possible care.</p> <p>At its heart, Information Governance is about identifying a high standard for the handling of information and providing organisations with the tools to achieve that standard.</p>
Strategic Priorities	
1. Quality and Safety	<p>X Reduce harm, deliver best clinical outcomes and improve patient experience.</p> <p><input type="checkbox"/> Address the existing capacity shortfall and process issues to consistently deliver national healthcare standards</p> <p><input type="checkbox"/> Develop a clinical strategy that ensures the safety and short term sustainability of our clinical services pending the outcome of the Future Fit Programme</p> <p><input type="checkbox"/> To undertake a review of all current services at specialty level to inform future service and business decisions</p> <p>X Develop a sustainable long term clinical services strategy for the Trust to deliver our vision of future healthcare services through our Future Fit Programme</p>
2. People	<p>X Through our People Strategy develop, support and engage with our workforce to make our organisation a great place to work</p>
3. Innovation	<p>X Support service transformation and increased productivity through technology and continuous improvement strategies</p>
4. Community and Partnership	<p><input type="checkbox"/> Develop the principle of ‘agency’ in our community to support a prevention agenda and improve the health and well-being of the population</p> <p>X Embed a customer focussed approach and improve relationships through our stakeholder engagement strategies</p>
5. Financial Strength: Sustainable Future	<p><input type="checkbox"/> Develop a transition plan that ensures financial sustainability and addresses liquidity issues pending the outcome of the Future Fit Programme</p>

Board Assurance Framework (BAF) Risks	<p>X If we do not deliver safe care then patients may suffer avoidable harm and poor clinical outcomes and experience</p> <p><input type="checkbox"/> If we do not work with our partners to reduce the number of patients on the Delayed Transfer of Care (DTC) lists, and streamline our internal processes we will not improve our 'simple' discharges.</p> <p><input type="checkbox"/> Risk to sustainability of clinical services due to potential shortages of key clinical staff</p> <p>X If we do not achieve safe and efficient patient flow and improve our processes and capacity and demand planning then we will fail the national quality and performance standards</p> <p>X If we do not get good levels of staff engagement to get a culture of continuous improvement then staff morale and patient outcomes may not improve</p> <p>X If we do not have a clear clinical service vision then we may not deliver the best services to patients</p> <p><input type="checkbox"/> If we are unable to resolve our (historic) shortfall in liquidity and the structural imbalance in the Trust's Income & Expenditure position then we will not be able to fulfil our financial duties and address the modernisation of our ageing estate and equipment</p>
Care Quality Commission (CQC) Domains	<p>X Safe</p> <p>X Effective</p> <p>X Caring</p> <p>X Responsive</p> <p>X <input type="checkbox"/> Well led</p>
<input type="checkbox"/> Receive <input type="checkbox"/> Review <input type="checkbox"/> Note <input checked="" type="checkbox"/> Approve	<p>Recommendation</p> <p>The Board is asked to APPROVE the proposed submission to fulfil the regulatory requirements and to provide the Trust with a 'Satisfactory' statement of compliance.</p>

REPORT TO TRUST BOARD – INFORMATION GOVERNANCE 2017

The Information Governance Toolkit Assessment is due for final submission on the 31st March 2017. The overall result for the Trust is 82% (Satisfactory).

The Trust has achieved at least level 2 compliance in all 45 requirements. The assessment will be submitted to the Care Quality Commission (CQC) Health and Social Care Information Centre (HSCIC) for subsequent publication).

Which organisational information does Information Governance cover?

Any information that the organisation holds, whether it is corporate information such as minutes of meetings, contracts, policies or whether it's personal information about staff, or patient information e.g. health records.

Information Governance is the framework for handling information in a confidential and secure manner to the appropriate ethical and quality standards in a modern health service. It brings together interdependent requirements and standards of practice in relation to the following IG initiatives:

Initiative	Level 2 % 2017	Grade
Information Governance Management		satisfactory
Confidentiality and Data Protection Assurance		satisfactory
Information Security Assurance		satisfactory
Clinical Information Assurance		Satisfactory
Secondary Use Assurance		satisfactory
Corporate Information Assurance		satisfactory

The IG framework brings together all the rules, whether legal or simply best practice, that apply to the handling of information, supporting:

- High quality care
- Compliance with the law
- Implementation of central advice and guidance
- Year on year improvement

The following points are to inform the Board of **new** and **future** developments in respect of Information Governance.

2016 – Implementation of a new **Records Management Code of Practice** for Health and Social Care. Includes NHS Retention Schedules for all information.

2016 – The appointment of a **National Data Guardian (NDG)** – Dame Fiona Caldicott. The new standards for the whole health and social care system focussing specifically on:

- Data Security Standards

- Consent and – Opt-outs of information sharing in health and social care.

2016 – The NHS on-line **Information Governance Training Tool (IGTT)** was decommissioned on the 31st December 2016. NHS Digital are working with Health Education England on the development of a new home for awareness training via the e-Learning for Healthcare website. The new module will take into account the Data Security Standards within the Review of Data Security, Consent and OPT-Outs carried out by the NDG.

2018 - The 2016 EU **General Data Protection Regulation (GDPR)** (adopted 27 April 2016) replaces the 1995 data protection directive from which the DPA 1998 emerged. Compliance becomes mandatory on 25 May 2018.

GDPR – What it mean for our organisation

- substantial reforms have been made to encompass changes in technology and the extensive security challenges facilitated by the much easier and widespread sharing of personal information.
- The regulatory status of the new framework will ensure a consistent pan-EU approach to protection of data.
- Provides significant enhancements to address advances in technology and its usage, from the explosion in use of social media through to sharing of personal data for medical treatments and research.
- The rights of individual to control how their data is shared and to be made accessible are front and centre in the legislation. Examples: explicit informed consent supported by affirmative acknowledgement and data-portability are two.
- Common throughout the regulation is a risk-based approach to evidence-based compliance against the usual recognised standards and guidance as well as, from our health and care perspective, the IG Toolkit, cyber and NDG data security recommendations and related requirements.