

**NHS Southend Clinical Commissioning Group**  
**Governing Body Public Part 1**  
**27<sup>th</sup> March 2019**

**Agenda item 21**

**Quarterly Information Governance Report**

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**Status:** For Noting

<b>Appendices to this report</b>	
N/A	N/A
<b>Associated Papers</b>	
<b>Papers previously considered by this CCG</b>	N/A
<b>CCG Policy Documents</b>	<ul style="list-style-type: none"> <li>• Information Governance Policy</li> <li>• Data Protection Confidentiality Policy</li> <li>• Safehaven Policy</li> <li>• Information Lifecycle Management Policy</li> <li>• Information Sharing Policy</li> <li>• Forensic Readiness Policy</li> <li>• Privacy Impact Assessment Policy</li> <li>• Acceptable use of Electronic Communications</li> <li>• Information and Cyber Security Policy</li> <li>• Information Governance Framework</li> </ul>
<b>External Documents</b>	N/A

## Executive Summary

- The purpose of this report is to provide an update on;
  - the organisational compliance with legislative and regulatory requirements relating to the handling of information, including compliance with the Data Protection Act (2018), other relevant privacy laws and the Freedom of Information Act (2000),
  - compliance with the Information Governance toolkit and provide assurance of ongoing improvement in relation to managing risks to information, and
  - an update on any development plans, current projects or forthcoming projects the Information Governance Team are involved in or planning for during 2018/19.

Providing this report to the committee is part of the Information Governance Team's work plan to make sure the CCG is aware of any risks, decisions and/or actions needed to ensure compliance with the Information Governance agenda.

Information Governance (IG) support for NHS Castle Point & Rochford CCG and NHS Southend CCG is provided by the Essex CCG Information Governance (IG) Team who are currently hosted by Basildon & Brentwood CCG on behalf of all 7 CCG's in Essex. The IG team consists of staff with expertise in Data Protection, Confidentiality, Records Management, Information Security and Freedom of Information.

## 2. Freedom of Information Requests

The CCG receives requests for information under the Freedom of Information Act 2000 and is duty bound to provide the information requested, unless certain exception criteria *are met*. Requests are automatically sent to the FOI Team (hosted by Basildon & Brentwood CCG) to respond on behalf of the CCG. The following table provides a summary of compliance against the Freedom of Information Act 2000 for 2018/19.

### NHS Castle Point & Rochford CCG

	Q1	Q2	Q3	Q4
Total Requests	54	72	45	38
Total Questions	281	343	226	357
Total Responses	38	59	50	33
Av. Response (days)	13.7	13.1	12.6	10.
Breaches	0	1	1	1
Breach Rate	0%	0.7%	0.6%	0.5

### Total sources of requests:

	Q1	Q2	Q3	Q4
Media	8	13	4	4
Commercial	12	20	11	9
Individual	19	31	19	12
Research	6	9	2	3
Regulatory/Charity	3	9	2	5
NHS Body	4	2	5	5
MP	2	3	1	0

### NHS Southend CCG

	Q1	Q2	Q3	Q4
Total Requests	56	73	45	40
Total Questions	304	327	217	345
Total Responses	42	73	46	35
Av. Response (days)	13.8	13	12.4	11.7
Breaches	0	1	1	1
Breach Rate	0%	0.7%	0.6%	0.5%

### Total sources of requests:

	Q1	Q2	Q3	Q4
Media	7	14	4	4
Commercial	14	17	10	9
Individual	20	30	19	16
Research	6	11	3	2
Regulatory/Charity	3	9	3	5
NHS Body	4	1	4	4
MP	2	3	1	0

A summary of Freedom of Information requests is reported to the Information Governance Steering Committee as regular performance updates, and the team are liaising with the communications team to ensure that information is provided in time for the annual report.

### **3. Data Security and Protection Toolkit (Formerly Information Governance Toolkit)**

The Information Governance Toolkit has been replaced with a new system, the Data Security and Protection Toolkit. All organisations that have access to NHS patient data and systems must use this toolkit to provide assurance that they are practising good data security and that personal information is handled correctly.

There are 130 assertions for which the CCG needs to provide evidence, 70 of these are currently mandatory and must be answered to achieve a satisfactory score in the toolkit. We have been working to obtain all the required evidence in order to answer the mandatory assertions and submit the toolkit.

Of those 70, there is only one outstanding left to answer, which is in relation to training, and addressed further below

### **4. Information Asset Registers (IARs) and Data Flow Mapping (DFM)**

We held many meetings with various teams in the CCG to complete the Information Asset Registers and Data Flow Mapping. The consolidated register has been compiled and sent to the Senior Information Risk Officer for sign off.

There are still some teams whose registers were not returned in time for inclusion in this years consolidated register, and some missing information in those that were. We will be working with these teams next year to ensure the registers are as fully populated as possible.

### **5. IG Training**

There have been some issues with accessing training as the module that NHS Digital have produced was not included on the Skills for Health training suite that the CCGs use.

Despite this the CCGs is currently sitting at 74% (CPR) and 55% (Southend) completion (with 95% being the target that must be met before that assertion in the toolkit can be marked complete). We are continuing to work with the IG champion to ensure that the target is met and the toolkit can be submitted.

Training for staff who handle PID is currently being provided face to face to the necessary staff groups. We are not as stringently measured on this training, so any staff who do not receive training in this financial year will be invited to any sessions that are arranged in 2019 / 20.

### **6. Policies**

Our suite of IG policies are valid until the end of March, these will be used for evidence in our toolkit submission. With our new policies we are combining many of those we already have, this will hopefully reduce the number to 4 in total. These new policies will be available early next financial year, and will go through the Information Governance Steering Group for amendments and approval before going into the CCGs approval process.

### **7. GP Information Governance**

Due to further changes to what is expected of CCGs in relation to the provision of GP Information Governance, and Data Protection Officers for GP, further discussions are taking place at the Steering Group, and a delivery plan is being developed. This will be communicated in due course.

## **8. Recommendation**

- The committee is asked to note the content of this report and
- support all the upcoming projects or initiatives that requires the CCG and IG team's participation and/or approval

<b>Monitoring and Assurance Summary</b>	
This report links to the following Assurance Domains	<ul style="list-style-type: none"> <li>• Quality</li> <li>• Governance</li> <li>• Leadership</li> </ul>
<b>Internal governance</b>	
N/A.	
<b>Stakeholder and community engagement</b>	
None.	