



# INFORMATION GOVERNANCE STRATEGY

Author:	Isobel Brown, Information Governance Manager
Responsible Director:	Richard Copland, Health Information & Technology Director
Approved by:	Information Governance Steering Group
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## **1. Introduction**

This strategy sets out the approach to be taken within NHS Greater Glasgow & Clyde to provide a robust Information Governance Strategy for the future management of information.

## **2. Scope**

- 2.1 This policy applies to all staff employed by NHS Greater Glasgow & Clyde. It also applies to contractors, partnership organisations and visitors not employed by NHS Greater Glasgow & Clyde but engaged to work with, or who have access to, confidential, sensitive or identifiable information.
- 2.2 There are two key components underpinning this Strategy:
  - 2.2.1 NHS Greater Glasgow & Clyde's Information Governance and IT Security Framework and the Information Governance Policy (along with supporting policies and procedures), which outline the objectives for information governance; and
  - 2.2.2 Information Governance Workplan - arising from a base line assessment against the standards set out within NHS Quality Improvement Scotland's Clinical Governance and Risk Management Standards and the Information Governance Toolkit.
- 2.3 All Information Governance related issues will be considered by the Information Governance Steering Group, as a sub group of the Performance, Planning and Policy Group.
- 2.4 The Information Governance Steering Group will have overall responsibility for overseeing the implementation of this Strategy, the Information Governance and IT Security Framework, the Information Governance Policy and the Information Governance Workplan. These documents will be subject to periodic review, and progress will be reported to the Board via the Information Governance Steering Group.
- 2.5 The Director of Health, Information & Technology is the Caldicott Guardian and named Director on the Board with responsibility for Information Governance.
- 2.6 The senior manager for Information Governance is the Head of Information, Knowledge Management and Health Records, with operational responsibility being delegated to the Information Governance Manager.
- 2.7 This Strategy cannot be seen in isolation as information plays a key part in Governance, Strategic Risk, Clinical Governance, service planning and performance management. The Strategy therefore links into all of these aspects of the organisation and is reflected in the Clinical Governance Strategy.
- 2.8 Any associated resource implications incurred by the implementation of the Information Governance Policy and Workplan will be identified by the Information Governance Manager and reported to the Information Governance Steering Group.

2.9 Performance will be monitored by the Information Governance Steering Group and submitted to ISD on a quarterly basis via the reporting mechanisms available within the Information Governance Toolkit

### **3. Purpose**

3.1 Information Governance has four fundamental aims:

- 3.1.1. To support the provision of high quality care by promoting the effective and appropriate use of information.
- 3.1.2. To encourage staff to work closely together, preventing duplication of effort and enabling more efficient use of resources.
- 3.1.3. To develop support arrangements and provide staff with appropriate tools and support to enable them to carry out their responsibilities to consistently high standards.
- 3.1.4. To enable organisations to understand their own performance and manage improvement in a systematic and effective way.

3.2 Information Governance encompasses the following initiatives and legislation:

- Data Protection Act 1998
- Freedom of Information (Scotland) Act 2002 (FOISA)
- NHS Code of Practice on Protecting Patient Confidentiality
- Information Security Management – ISO 27001
- FOISA Records Management Code of Practice
- NHS Scotland Information Governance Standards
- NHS Quality Improvement Standards
- Information Governance Toolkit

Others may be included as Information Governance develops.

### **4. Vision**

NHS Greater Glasgow & Clyde will:

- 4.1 Establish and maintain policies for the effective and secure management of its information assets and resources;
- 4.2 Comply with best practice and the highest standards of information governance;
- 4.3 Recognise the need for an appropriate balance between openness and confidentiality in the management and use of information;
- 4.4 Treat patient, staff and commercial information as confidential to the limits allowed by law;

- 4.5 Ensure records are processed securely;
- 4.6 Ensure all staff have a good understanding of the relevant policies and be able to comply with and implement them.

## **5. Key Objectives**

This Strategy is designed to ensure NHS Greater Glasgow & Clyde deliver a number of key objectives. These include:

- 5.1 To meet its requirements under the annual Information Governance Toolkit assessment, improving performance year on year.
- 5.2 To ensure that Information Governance accountabilities, principles, processes and systems are embedded within the organisation. Key performance indicators will be developed at corporate and local levels to demonstrate Information Governance is embedded or to inform further action.
- 5.3 To establish a robust infrastructure through the Information Governance Steering Group to develop and monitor the delivery of Information Governance as it relates to Caldicott, eHealth, Data Quality, Data Protection, Corporate and Health Records Management, Freedom of Information and Confidentiality.
- 5.4 To facilitate compliance with other Information Governance standards.
- 5.5 To implement a programme of Information Governance activities across all parts of the organisation. These programmes will include key targets for activities such as Freedom of Information, Data Protection, Confidentiality and Information Security, Corporate and Health Records and Data Quality.
- 5.6 To explore the development of a shared services approach to the development of enhanced Information Governance across the local health economy. This will include co-operation with and sharing of information with partner agencies where it is allowed within the legal framework to improve service delivery.
- 5.7 To ensure that all relevant stakeholders, including staff, are kept informed and, where appropriate, consulted on the management of Information Governance faced by the organisation.
- 5.8 To produce an Annual Report for the Information Governance Steering Group on behalf of the Board at the beginning of each financial year, to demonstrate the Information Governance system's continuing suitability and effectiveness.
- 5.9 To undertake a regular training and awareness needs analysis for the organisation, ensuring that comprehensive programmes are delivered at all levels. This will include basic Information Governance training in the induction sessions for new starters.

## **6. Delivery of the Strategy:**

- 6.1 All aspects of the Strategy will be delivered through an annual Information Governance Work Plan, detailing how the requirements outlined in the Information Governance Toolkit will be met. This annual plan will be produced by the Information Governance Manager who will coordinate meeting these strategic aims.

The Information Governance Strategy will also be delivered through related Strategies, Policy and Procedures, (e.g. Data Protection Policy, Freedom of Information Policy) and through the quarterly assessment of Information Governance attainment level standards through the Information Governance Toolkit.

- 6.2 NHS Greater Glasgow & Clyde will adopt a structured approach to Information Governance training and will provide a comprehensive programme of Information Governance training to all staff. Individual Departments e.g. Health Records Management will be responsible for providing specific training in their areas of expertise. Information Governance training programmes will coordinate all these specific training programmes.

NHS Greater Glasgow & Clyde will ensure that training programmes are accessible to all relevant staff across the organisation and will implement systems to record and monitor attendance on Information Governance courses. NHS Greater Glasgow & Clyde will assess the effectiveness of its Information Governance training programmes through the setting of clear objectives for each course and seeking staff feedback. Training programmes will be reviewed on an annual basis.

## **7. Performance Review**

NHS Greater Glasgow & Clyde will evaluate the effectiveness of the Information Governance programme against the Information Governance Action Plan and the Information Governance Toolkit on an annual basis.

NHS Greater Glasgow & Clyde will utilize the following tools to support performance review:

- Audit Reviews
- Benchmarking activity
- Compliance with mandatory induction and training standards
- Complaints
- Health Care standards
- Information Governance Toolkit
- Internal policies and guidelines
- NHS high-level performance indicators

The Information Governance Steering Group may develop and use additional indicators to monitor Information Governance performance, as considered necessary.

The overall progress in achieving the Strategy will be reported in the NHS Greater Glasgow & Clyde Annual Information Governance Report. Progress will also be reported as part of the national QIS Clinical Governance and Risk Management Standards Report.

Effective monitoring plays a key role in the successful delivery of the strategy and will be open and subject to scrutiny at all levels by internal and external stakeholders.

Progress with the NHS Greater Glasgow & Clyde Information Governance Strategy and related work programmes, will be monitored by the Information Governance Steering Group on a quarterly basis.