Information Governance Strategy

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Contents

1.0   Introduction

1.1   Robust information governance supports delivery of high quality care and helps provide confidence that personal, confidential or sensitive information is handled legally, securely, effectively and efficiently.

1.2   Information governance is the framework that brings together all the standards, requirements and best practice that apply to the handling of information and includes:

- ➢ Information governance management
- ➢ Confidentiality and data protection assurance
- ➢ Information security assurance
- ➢ Clinical information assurance
- ➢ Assurance for secondary uses of information
- ➢ Corporate information assurance

1.3   Information governance ensures information is:

- ➢ Held securely and confidentially
- ➢ Obtained fairly and efficiently
- ➢ Recorded accurately and reliably
- ➢ Used effectively and ethically
- ➢ Shared appropriately and lawfully

1.4   An information governance strategy provides clarity, vision and a framework for the long term delivery of high quality information governance.

2.0   Objectives

2.1   This strategy sets out the vision and framework for robust information governance and has eight main objectives:

- ➢ To underpin the Trust's strategic goals and ensure the information needed to support and deliver their implementation is available, reliable, accurate and understandable
- ➢ To achieve a high standard of excellence for information governance

- ➢ To ensure individuals take personal responsibility for all aspects of information governance
- ➢ To ensure policies, procedures, guidelines, monitoring, audits and training enable high quality information governance
- ➢ To minimise and manage key information governance risks
- ➢ To ensure information governance complies with statutory and regulatory requirements and compliance frameworks including the Information Governance Toolkit, NHSLA and CQC
- ➢ To routinely improve information governance standards whilst responding to the changing needs of the Trust, legislation, compliance frameworks and any other initiatives where information governance is a key element
- ➢ To embed information governance seamlessly into the governance of the Trust

3.0 Implementation

3.1 This strategy is a long term vision for information governance. The NHS is currently going through a period of radical change. As a result, this long term strategy will be supported by an annual improvement workplan focussing on changing compliance framework requirements, new legislation and areas specifically identified for improvement by the Trust.

3.2 The annual Information Governance Toolkit Compliance Report to the Board will include the annual high level workplan. Detailed planning will be included in the Information Governance Toolkit working documents and plans. Interim updates on progress will be reported to the Information Governance Steering Group.

4.0 Key roles and responsibilities

4.1 The Trust Board has ultimate responsibility for information governance. The Quality Committee is the executive committee that oversees the Information Governance Steering Group.

4.2 The Information Governance Steering Group is responsible for information governance in the Trust and is chaired by The Trust's Medical Director, who acts as the Caldicott Guardian. There is one representative per Directorate and also includes key members of the information governance, records

management, Registration Authority, ICT and information management teams.

4.3   The Director of Nursing and Quality acts as the Trust's Senior Information Risk Owner (SIRO) and as such is the Executive Director accountable to the Board for information risk.

4.4   The Head of Information Governance is the Trust's Data Protection Officer.

5.0   <u>Long term strategy</u>

5.1   The Trust will:

- ➢ Strengthen existing information governance policy and practice and establish new policy and practice to conform to legislation, Department Health, Monitor, Care Quality Commission, NHSLA and other standards
- ➢ As a result, assess its own performance against compliance frameworks such as the Information Governance Toolkit and develop and implement action plans for improvement
- ➢ Work to instil an information governance culture in the Trust through the provision of clear advice that helps staff understand and apply information governance standards and principles
- ➢ Ensure all staff routinely receive information governance training, tailored to their needs
- ➢ Undertake regular reviews and audits of how information and its supporting assets is recorded, held and used, particularly for information relating to service users
- ➢ Ensure there are robust procedures for investigating confidentiality incidents, take appropriate action and act on lessons learned
- ➢ Take appropriate action against individuals who fail to comply with Trust information governance policy
- ➢ Ensure service developments or modifications and new processes or systems, including software and hardware developments are reviewed to ensure they meet information governance standards
- ➢ Ensure all contractors understand and comply with robust information governance obligations
- ➢ Ensure the Trust's approach to records management uses cost effective electronic systems for managing, scanning and retaining records
- ➢ Proactively identify, manage and mitigate information governance risks

- Ensure information asset owners are identified and take responsibility for systems, software, information, knowledge and IT assets
- Ensure personal information is appropriately identified, used and shared, including where necessary, the effective use of pseudonymisation and information sharing agreements
- Ensure clear advice is given to service users, their families and carers about how their personal information is recorded, handled and shared by the Trust and its partners

6.0   Further information

6.1   All Trusts are required to develop information governance strategy to comply with the Information Governance Toolkit. Further information can be found on Connecting for Health's Information Governance Toolkit website