



MAYDEN Health
Policies and Procedures

IG01

Information Governance

Information Governance

August 2010

IG Policy Index	
IG01 Information Governance	
IG02	Information Security
IG03	Personal Information Handling
IG04	Confidentiality Code of Practice
IG05	Data Quality Policy
IG06	Risk Management
IG07	Security Incident Policy
IG08	Lifecycle Management
IG09	Business Continuity Plan

Current Version

Responsibility of	Information Governance Lead
Reviewed by	
First Issued	November 2009
Last Review Date	August 2010
Next Review Date	August 2011

Version History

Version	Date	Comment	Initials	Signature
1.0	3/12/09	Initial version following wide comment	CM	
1.1	23/8/10	Update to reflect latest position and practices	CM	

Roles and Responsibilities

Information Governance Lead	Chris May
Information Security Lead	Chris Eldridge

CONTENTS

1	Introduction	1
2	Policy Statement	1
3	Principles.....	2
3.1	Openness	2
3.2	Legal Compliance	3
3.3	Information Security	3
3.4	Information Quality Assurance	3
3.5	Year on Year Improvement Plan and Assessment	4
3.6	Responsibilities	4
3.7	Training	4

1 Introduction

Information is a vital asset, both in terms of the clinical management of individual patients and the efficient management of services and resources. It plays a key role in clinical governance, service planning and performance management.

It is therefore of paramount importance to ensure that information is efficiently managed, and that appropriate policies, procedures and management accountabilities and structures provide a robust governance framework for information management.

Information Governance provides a consistent way for employees to deal with the many different information handling requirements initially including:

- Data accreditation and data quality
- Caldicott sharing of patient identifiable information
- Consent to sharing of personal information
- ISO/IEC 17799 (BS7799) – Information Security Management
- Common law duty of confidentiality
- The Data Protection Act 1998
- Lifecycle Management - Records

Information Governance is a framework.

Information Governance will help ensure that all employees comply with law and best practice when handling personal/patient information. It will also allow staff to ensure that personal and confidential information is dealt with legally, securely, efficiently and effectively in order to deliver the best possible care.

2 Policy Statement

Mayden Health will adopt and follow Information Governance principles, policies, procedures and guidance as defined as:

- Openness
- Legal compliance
- Information security
- Quality assurance

Mayden Health will adopt the processes set out in the NHS Information Governance Toolkit to achieve these principles including:

- Year on Year Improvement Plan and Assessment
- Information Governance Management
- Training

Mayden Health expects that all staff will work to and within the principles of Information Governance.

3 Principles

3.1 Openness

Mayden Health recognises the need for an appropriate balance between openness and confidentiality in the management and use of information. Mayden Health fully supports the principles of corporate governance and recognises its public accountability. It places equal importance on the confidentiality of, and the security arrangements to safeguard, both personal information about patients and staff and commercially sensitive information.

Mayden Health recognises the need to share patient information with other health organisations and other agencies in a controlled manner consistent with the interests of the patient and, in some circumstances, the public interest.

Mayden Health believes that accurate, timely and relevant information is essential to deliver the highest quality health care. As such it is the responsibility of all clinicians, managers and staff to ensure and promote the quality of information and to actively use information in decision making processes.

In addition, Mayden Health recognises the importance of communicating effectively and openly with service users and the public at large, in relation to internal Information Governance protocols and personal data usage. Mayden Health supports an active campaign for informing service users about how their information is used and the importance of providing complete and accurate information. Information relating to Information Governance will be included in public facing documentation as appropriate, and random surveys will be undertaken to assess service user's awareness and satisfaction.

- Information will be defined and where appropriate kept confidential, underpinning the principles of Caldicott and the regulations outlined in the Data Protection Act 1998.
- Non-confidential information on Mayden Health and its services will be available to the public through a variety of media.
- Mayden Health will have clear procedures and arrangements for liaison with the press and broadcasting media.
- Integrity of information will be developed, monitored and maintained to ensure that it is appropriate for the purposes intended.
- Availability of information for operational purposes will be maintained within set parameters relating to its importance via appropriate policies, procedures and computer systems' resilience.
- Mayden Health will undertake or commission annual assessments and audits of its policies and arrangements for openness.
- Mayden Health will ensure that information produced complies with readability and the comprehension level of its audience by using the Simplified Measure of Gobbledygook (SMOG) test – see www.literacytrust.org.uk/campaign/SMOG.html

- Mayden Health will, whenever practicable, publish information on its website.
- Mayden Health will undertake or commission assessments and audits, on instruction from the Managing Director, of its policies and arrangements of openness.

3.2 Legal Compliance

- Mayden Health regards all identifiable personal information relating to patients as confidential. Compliance with legal and regulatory framework will be achieved, monitored and maintained.
- Mayden Health will undertake or commission assessments and audits, on instruction from the Managing Director, of its compliance with legal requirements.
- Mayden Health regards all identifiable personal information relating to staff as confidential except where national policy on accountability and openness requires otherwise.
- Mayden Health will establish and maintain policies to ensure compliance with the Data Protection Act 1998, Human Rights Act and the common law of confidentiality.
- Mayden Health will establish and maintain policies for the controlled and appropriate sharing of patient information with other agencies, taking account of relevant legislation (eg Health and Social Care Act, Crime and Disorder Act, Protection of Children Act.)
- Awareness and understanding of all staff, with regard to responsibilities, will be routinely assessed and appropriate training and awareness provided.
- Risk assessment, in conjunction with overall priority planning of organisational activity will be undertaken to determine that appropriate effective and affordable Information Governance controls are in place.

3.3 Information Security

- Mayden Health will establish and maintain policies for the effective and secure management of its information assets and resources.
- Mayden Health will undertake or commission assessments and audits, on instruction from the Managing Director, of its information and IT security arrangements.
- Mayden Health will promote effective confidentiality and security practice to its staff through policies, procedures and training.
- Mayden Health will establish and maintain incident reporting procedures and will monitor and investigate all reported instances of actual or potential breaches of confidentiality and security.

3.4 Information Quality Assurance

- Mayden Health will establish and maintain policies and procedures for information quality assurance and the effective management of records / lifecycle management.
- Mayden Health will undertake or commission assessments and audits, on instruction from the Managing Director, of its information quality and records management arrangements.
- Managers are expected to take ownership of, and seek to improve, the quality of information within their services.

- When possible, information quality will be assured at the point of collection.
- Data standards will be set through clear and consistent standards and definition of data items, in accordance with national guidelines, definitions, policies, procedures and training.
- Mayden Health will promote information quality and effective records management through policies, procedures/user manuals and training.

3.5 Year on Year Improvement Plan and Assessment

An assessment of compliance with requirements, within the Information Governance Toolkit (IGT), will be undertaken each year. Annual reports and proposed action/development plans will be presented to the organisation's Managing Director for approval. These plans will be routinely monitored and reviewed through the appropriate sub committees, including the Information Governance steering group.

3.6 Responsibilities

It is the role of Mayden Health as a whole to define its policy in respect of Information Governance, taking into account legal and NHS requirements. The organisation is responsible for ensuring that sufficient resources are provided to support the requirements of the Information Governance Policy.

Directors and Managers within Mayden Health, led by the Information Governance lead, are responsible for ensuring that this policy and its supporting standards and guidelines are built into local processes and that there is ongoing compliance.

The Information Governance lead is responsible for overseeing day to day Information Governance issues; developing and maintaining policies, standards, procedures and guidance, coordinating Information Governance in Mayden Health and raising awareness of Information Governance.

All staff, whether permanent, temporary or contracted are responsible for ensuring that they are aware of the requirements incumbent upon them and for ensuring that they comply with these on a day to day basis.

3.7 Training

Mayden Health will incorporate Information Governance into staff training programmes. Top-up training will be provided upon request as part of an individual's Personal Development Plan at the discretion of their line manager.