

HELBY & ELTON PRACTICE
INFORMATION GOVERNANCE POLICY

Staff Impacted :	All surgery clinical and admin staff
Responsibility to manage :	Practice Manager, Reception Manager
Date of Implementation :	01 January 2015
Date of Last Review :	01 January 2019
Date of Next Review :	01 January 2022

Summary

- Allocate the necessary responsible individuals to ensure that the freedom of information policy is adhered to by all staff
- Develop a system whereby responsible individuals collate evidence of how they are fulfilling their responsibility
- Agree a system of governance around the role of responsible individuals
- Record date of last policy review and organise date of next review of policy
- Policy to be included in the induction training and annual updates of all staff and written into their work objectives
- Staff must read the policy and demonstrate that they have done this and understood the content.

Information Governance Policy

DEFINING INFORMATION GOVERNANCE – UNDERPINNING PHILOSOPHY

The Caldicott Guardian for the Practice is: Brian Yorke, Practice Manager

- *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 part 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 accountability provide a robust governance framework for information management*
- *The Information Governance performance process allows The Helsby and Elton Practice and individuals to ensure that personal and corporate information is managed legally, securely and efficiently in order to assist in the delivery of the best possible health care.*
- *Information Governance is a framework that integrates previously separated but interrelated initiatives within a single transparent package which represents Department of Health policy*
- *The focus of Information Governance is that via corporate teamwork, there is a systematic management of the range of interrelated initiatives and work streams to raise standards that underpin the provision of high quality healthcare*
- *Information Governance performance is a measure of quality.*

PRINCIPLES

- The Helsby and Elton Practice recognises the need for an appropriate balance between openness and confidentiality in the management and use of information
- The Helsby and Elton Practice fully supports the principles of corporate governance and recognises its public accountability, but equally places

importance on the confidentiality of, and the security arrangements to safeguard, both personal information about patients and staff and commercially sensitive information

- The Helsby and Elton Practice also 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
- The Helsby and Elton Practice 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 and managers to ensure and promote the quality of information and to actively use information in decision making processes.

There are 4 key interlinked strands to the information governance policy:

- Openness
- Legal compliance
- Information security & confidentiality
- Quality assurance.

Openness

- Non-confidential information about The Helsby and Elton Practice and its services is available to the public through a variety of media, in line with The Helsby and Elton Practice's Freedom of Information Policy. The Helsby and Elton Practice has established and will maintain policies to ensure compliance with the Freedom of Information Act 2000
- Patients should have ready access to information relating to their own health care, their options for treatment and their rights as patients. The Helsby and Elton Practice provides literature and leaflets for patients to explain this
- The Helsby and Elton Practice has clear procedures and arrangements for handling queries from patients and the public.

Legal Compliance

- The Helsby and Elton Practice regards all identifiable personal information relating to patients as confidential
- The Helsby and Elton Practice regards all identifiable personal information relating to staff as confidential except where national policy on accountability and openness requires otherwise
- The Helsby and Elton Practice has policies to comply with GDPR (2018), the Freedom of Information Act 2000 and the common law of confidentiality and commissions audits to ensure this
- The Helsby and Elton Practice has established and maintains information sharing protocols for the controlled and appropriate sharing of patient information with other agencies, taking account of relevant legislation (e.g. Health and Social Care Act 2001, Crime and Disorder Act 1998, Children's Act 2004).

Information Security and confidentiality

- The Helsby and Elton Practice has established and maintains an Information Security policy for the effective and secure management of its information assets and resources
- The Helsby and Elton Practice promotes effective confidentiality and security practice to its staff through policies, procedures and training. Information Governance training is mandatory The Helsby and Elton Practice has established and maintains incident reporting procedures and will monitor and investigate all reported instances of actual or potential breaches of confidentiality and security in accordance with the Information Security Policy.

Information Quality Assurance

- The Helsby and Elton Practice has established and maintains a policy for the effective management of records in its Records Management Strategy and Policy
- Managers are expected to take ownership of, and seek to improve, the quality of information within their services.
- Data standards are set through clear and consistent definition of data items, in accordance with national standards.
- The Helsby and Elton Practice promotes information quality and effective records management through policies, procedures, user manuals and training.

RESPONSIBILITIES

- The Helsby and Elton Practice is responsible for coordinating Information Governance; developing and maintaining Information Governance policies, standards, procedures and guidance and raising awareness of Information Governance generally.
- Managers within The Helsby and Elton Practice are responsible for ensuring Information Governance policies and their supporting standards and guidelines are built into local processes and that there is on-going compliance.
- All staff, whether permanent, temporary or contracted, and contractors 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.

INFORMATION GOVERNANCE TOOLKIT AND PERFORMANCE REPORTING

- Compliance with Information Governance requires that The Helsby and Elton Practice formally report its performance annually, via the NHS Connecting for Health Information Governance Toolkit, against a range of standards and core components.
- Information Governance performance is measured using 'Red', 'Amber', 'Green' performance indicators. The web based toolkit requires formal co-ordination and management and is a single source document for external audit, i.e. the Healthcare Commission.

STRATEGIC DIRECTION AND WORK STREAMS

- The Helsby and Elton Practice is committed to progress the Information Governance Agenda and develop work streams and improvement programmes to provide the organisation with a clear set of objectives. Information Governance is a corporate and multi-professional issue involving all healthcare professionals, managers and service users.
- The Information Governance Strategy (Appendix One) will define and develop work-streams to address areas of risk and limitation, which have been identified via the baseline and continual assessment for 2007/08 and beyond.

Appendix One

INFORMATION GOVERNANCE STRATEGY

This strategy sets out the approach to be taken within The Helsby and Elton Practice to provide a robust Information Governance framework for the future management of information.

THE SCOPE OF THE STRATEGY

There are two key components underpinning this strategy which are:

- The Helsby and Elton Practice's Information Governance Policy, which outlines the objectives for information governance, and
- An action plan arising from a base line assessment against the standards set out in the NHS Information Governance Toolkit.

STRATEGIC OBJECTIVES

Through implementing this strategy The Helsby and Elton Practice will establish robust information governance processes conforming to the Department of Health standards, and ensure that all practices and procedures relating to handling and holding personal and corporate information are legal and conform to best and/or recommended practice.

ACTION PLAN

The implementation of the action plan will ensure that clear advice is given to patients, service users, families and carers about how their personal information is recorded, handled, stored and shared by The Helsby and Elton Practice.

- Service users will be provided with guidance to explain their rights, how their personal information is handled, how they can seek further information and how they can raise concerns
- Clear advice and guidance will be given to staff and they will be given training to ensure that they understand and apply the principles of Information Governance to their working practice in relation to protecting the confidentiality and security of personal information. Advice and guidance will be given to staff to ensure the safe keeping and handling of The Helsby and Elton Practice corporate information, ensuring compliance with appropriate legislation.
- Policies and procedures will be reviewed to monitor their effectiveness so that improvements or deterioration in information handling standards can be recognised and addressed.
- When service developments or modifications are undertaken, a review will be undertaken of all aspects of information governance arrangements to ensure that they are robust and effective.
- Work to encourage an Information Governance culture in The Helsby and Elton Practice through increasing awareness and providing training on the key issues.
- Ensure there are robust procedures for notifying and learning from IG breaches and incidents.
- Assess The Helsby and Elton Practice's performance using the Information Governance Toolkit and develop and implement action plans to ensure continued improvement.