Information Governance Toolkit

Getting Started for Commercial Third Party Organisations
Getting Started for Commercial Third Party Organisations

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Guidance on Completing an Information Governance Assessment to Support Applications for NHS Connecting for Health systems and services (IG Statement of Compliance)

All organisations gather and hold information, much of which needs to be handled in a sensitive and confidential manner. The NHS, by the very nature of its business, has an increased duty of care to safeguard the information it holds, particularly about the users of its services and needs to ensure that any third party it contracts with exercises the same duty of care in handling or dealing with sensitive information.

Commercial third parties can be any individuals or organisations contracting or doing business with, but not directly employed by, the NHS. They can range from large-scale, complex organisations to small businesses or individuals providing bespoke services. Whether large or small, simple or complex, all third parties wishing to access NHS Connecting for Health (NHS CFH) provided infrastructure and services (including the N3 network) are expected to provide assurance to NHS CFH that they have robust and effective systems in place for handling information securely and confidentially.

The process for the provision of assurances for the purpose of the IG Statement of Compliance is:

- Define the business need for connection to NHS CFH systems and/or services
- Provide a sponsorship letter from an NHS organisation
- Complete the IGSoC application form
- Complete a satisfactory level of attainment on the IG toolkit
- Provide your logical connection architecture
- Where appropriate provide information about off-shoring proposals (i.e. outside England)

This document is concerned with the IG toolkit completion stage of the process. The toolkit is an online assessment tool containing requirements for good practice covering management, security and confidentiality of information. To complete the assessment, users are asked to rate themselves at one of four levels of compliance with each of the standards; 0 being the lowest and 3 the highest, and provide evidence of the stated attainment level.
All third parties are required to reach a minimum level of attainment on each of the standards before they can sign up to the IG Statement of Compliance. Where compliance falls below the required level NHS CFH will contact the third party to advise them of this and to discuss any action required to improve processes before their application can proceed.

Carrying out an IG Assessment
The following three steps need to be performed to evidence use of the IG Toolkit:

- Registration of the organisation
- Completion of the assessment
- Submission of the assessment

1. Registering your organisation
An organisation must be registered to complete the on-line IG assessment

PLEASE NOTE: registration only needs to be carried out once. Therefore if you have carried out an IG assessment for the same organisation in previous years, you will not need to be registered again.

The Digital Information Policy team will register the organisation on your behalf. The team receive information regarding your organisation, organisation code and the person that should be registered to use the IG Toolkit via the IGSoC application process.

A login name and password will be sent by email to the contact named on the IGSoC application. Once the login and default password has been received, log into the Toolkit - login will be successful if your name and organisation appears in the horizontal toolbar at the top right of the screen - see Figure 1
Select the “My Password” facility on the menu to change the password. The screen in Figure 2 will be displayed. Complete the required fields in compliance with the “Rules for entering passwords” detailed on screen, then click “Change Password”. A message will be displayed informing you that your password has been changed. Log out of the Toolkit and log back in using the new password.

2. Completing your assessment

Click the “View requirements” link from your created assessment or select “Assessments” from the menu. A list of requirements will be displayed similar to that in Figure 3.
Click on one of the requirements to display to open the requirement and a screen similar to Figure 4 will be displayed.

**Figure 3**

<table>
<thead>
<tr>
<th>Seq No</th>
<th>Description</th>
<th>Status</th>
<th>Attainment Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>1C</td>
<td>Does the Trust have adequate governance in place to support the current and evolving Information Governance agenda?</td>
<td>Not Answered</td>
<td></td>
</tr>
<tr>
<td>1D</td>
<td>How would you assess your Trust's ability to access expertise across the Confidentiality &amp; Data Protection Assurance agenda?</td>
<td>Not Answered</td>
<td></td>
</tr>
<tr>
<td>1E</td>
<td>How would you assess your Trust's ability to access expertise across the Information Security agenda?</td>
<td>Not Answered</td>
<td></td>
</tr>
<tr>
<td>1F</td>
<td>How would you assess your Trust's ability to access expertise across the Information Quality and Security Management Agenda?</td>
<td>Not Answered</td>
<td></td>
</tr>
<tr>
<td>1G</td>
<td>Does the Trust have in place an intranet and extranet strategy?</td>
<td>Not Answered</td>
<td></td>
</tr>
<tr>
<td>1H</td>
<td>Does the Trust have an up to date and coherent business continuity plan for all critical infrastructure components and core information systems?</td>
<td>Not Answered</td>
<td></td>
</tr>
</tbody>
</table>

**Figure 4**

**IMPORTANT NOTE:** Before starting the assessment, you are strongly advised to look at the **Screen Version** of each requirement and the supporting **Guidance Document**.

The **Screen Version** provides detailed criteria and evidence requirements for each attainment level. These criteria can be printed as required (via the **Printable Version** hyperlink) and provide a general guide that help the user to assess the organisation’s attainment level. The **Guidance Document** provides information on how to achieve each attainment level and provides links to legislation, Government and national guidance, and exemplars and templates from organisations.
You should carry out the assessment by clicking on each of the requirements in turn and assessing your organisation against the attainment levels described. For each requirement, enter a “Current rating”, enter a “Target rating” for improvement (where necessary) and set a date in “Estimated Date for Achieving Target Rating”. Also on this page you should add a comment - for example, you can use this field to indicate where evidence for the attainment level is held or to record actions for improvement. Once you have scored a requirement, click the “Save Rating” button.

3. Submitting your assessment

Once you have scored all the requirements select “Assessments” from the menu and click the “Submit Assessment” button on screen as in Figure 5 below.

![Figure 5](image)

You will also need to send a confirmatory email to the NHS Connecting for Health helpdesk at exeter.helpdesk@nhs.net. Failure to submit or confirm submission could result in unnecessary delays in the process.

Your assessment will be reviewed and you will be advised of the outcomes, including any action required where your organisation does not meet the necessary attainment levels. Once your IG toolkit assessment has been approved, your local connection architecture will be reviewed and where appropriate any off-shoring proposal.
Next steps

4. Creating an Implementation Plan

Log into the toolkit as usual and select “Assessments” from the menu. The Assessment screen with a table similar to that in Figure 6 will be displayed. Click on the blue text that reads "Implementation Plan".

Figure 6

This automatically generates an implementation plan, similar to Figure 7, for each requirement, based on the current ratings and target ratings you entered whilst scoring the requirements.

Figure 7

If you require assistance on any aspect of the IG toolkit, contact the NHS Connecting for Health helpdesk on 01392 251289 or email exeter.helpdesk@nhs.net. If the IGT support team are unable to resolve your query, they will forward it to a member of the Digital Information Policy Team who will get back to you.

If your IG Statement of Compliance application is successful, you will be required, as a user of NHS CFH services, to maintain an acceptable level of compliance with the Information Governance Standards. As such, you will be required to complete an annual assessment using the NHS IG Toolkit.
5. Viewing the Assessment and Requirements
The assessment and requirements can still be viewed from the assessment screen whilst a user is logged into the Toolkit. Once the assessments have been approved, anyone with Internet access can view any organisation’s completed assessment. Only the scores can be seen, not the comments entered into the text boxes. To view reports: select “Reports” from the menu and either put in a query or press the search button.

6. Creating subsequent annual assessments
New assessment sets are generally released at the end of June in each year. Information about when a new assessment can be created is posted on the “What’s New” page of the IG Toolkit at the appropriate time. At this time you should log into the toolkit select the “Assessments” button on the menu. This will display a screen similar to Figure 8.

**Figure 8**

Enter some meaningful text in the text box, e.g. IG Assessment for Somewhere Company 20xx / 20xx.

Click the “Create new assessment” button and the screen will change to a status screen similar to Figure 9 below. Your account will enable you to create, complete and save the assessment on-line.

**Figure 9**