

Information Governance Considerations for NHS Board Members

Information Governance (IG) supports the delivery of high quality care by promoting the effective and appropriate use of information. Whilst an important aspect of IG is the use of information about service users, it also applies to information processing in its broadest sense and underpins both clinical and corporate governance. Whilst every member of staff must follow their organisation's policies and procedures, the ultimate responsibility for IG in the NHS rests with the Board of each organisation.

Key points for NHS Boards to note are that:

- An annual IG performance assessment¹ using the IG Toolkit (IGT) must be published for review by commissioners and care partners, citizens, CQC and the Information Commissioner. Used appropriately the IGT is a proven change management tool that can be used to monitor performance and drive improvements in policy and practice.
- A Senior Information Risk Owner (SIRO) must be appointed to take responsibility for managing the organisation's approach to information risks and to update the Board regularly on information risk issues.
- A Caldicott Guardian, a senior clinician, must be appointed to advise the Board and the organisation on confidentiality and information sharing issues.
- Appropriate annual IG training² is mandatory for all staff who have access to personal data with additional training for all those in key roles.
- Details of incidents involving cyber security, loss of personal data or breach of confidentiality must be published in annual reports and reported through the HSCIC Serious Incident Requiring Investigation (SIRI) reporting tool³.

NHS Board members should seek assurance on the following:

1. Is the duty to share information for care introduced by the Health and Social Care (Safety and Quality) Act 2015 and promoted by the National Data Guardian⁴ being effectively addressed? Are arrangements for integrated care working effectively?
2. Is the organisation's IG Toolkit assessment satisfactory? Is it a true reflection of performance? Has it been independently audited? Are there any known weaknesses or auditor recommendations and if so, how are they being addressed? Does the organisation have the capacity and capability to guarantee that plans for improved IG can be implemented?
3. Are the Board satisfied with the indicators of IG performance reported to it, e.g. are key roles filled? Are all staff trained in the basics? Are levels of missing or untraceable case notes acceptable etc?
4. Are IG staff - IG managers, SIRO, Caldicott Guardian - trained appropriately? Are IG staff encouraged to participate in regional Strategic IG Network (SIGN)⁵ meetings, contributing to and receiving support from the IGA⁶?
5. Are all significant IG Risks being managed effectively and considered at an appropriate level? Have there been any serious incidents requiring investigation reported? How confident is the organisation that all such incidents are reported? How many cyber-attacks have occurred and were they all successfully prevented?
6. Do the organisation's IG arrangements adequately encompass all teams and work areas, including hosted activity and contracted work that the organisation is legally accountable for?

¹ This must be provided via the [Information Governance Toolkit](#) (IG Toolkit),

² This may be provided through the [Information Governance Training Tool](#) (IGTT) or equivalent local resource, supplemented where appropriate by additional role specific local training

³ The SIRI reporting tool is accessed from within the IG Toolkit

⁴ Dame Fiona Caldicott, the National Data Guardian conducted a review of care sector information governance available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/192572/2900774_InfoGovernance_accv2.pdf

⁵ SIGN groups meet regionally with their chairs meeting bi-monthly in a national meeting chaired by the IGA.

⁶ The Information Governance Alliance (IGA) was established in July 2014 at the request of the National Data Guardian to support the Care Sector with authoritative advice and guidance on information governance issues, more details at IGA@nhs.net