

Cambridgeshire and Peterborough
Clinical Commissioning Group (CCG)

INFORMATION GOVERNANCE STRATEGY 2017 - 2019

Approval Process

Lead Author:	Information Governance Manager
Reviewed by:	CCG IG, BI and IM&T Group
Approved by:	CCG IG, BI and IM&T Group
Ratified by:	Clinical Executive Committee
Date ratified:	May 2017
Version:	3.0
Review date:	April 2019 (or earlier if significant change to local or national requirements)
Valid on:	April 2017

Document Control Sheet

Development and Consultation:	Strategy developed in consultation with the Information Governance Steering Group and endorsed by the Clinical and Management Executive Team.
Dissemination	This strategy will be available to all staff within the CCG
Implementation	The Director of Corporate Affairs is responsible for monitoring the application of the strategy by ensuring that:- <ul style="list-style-type: none"> • It is brought to the attention of all employees • Managers are aware of their responsibilities for ensuring that staff under their control are aware of the strategy • Staff are informed and consulted as appropriate • Appropriate training and guidance is provided to staff • Corporate business processes support the implementation of the strategy.
Training	Training will be undertaken as part of the CCG's induction processes.
Audit	Implementation of the Policy will be monitored in line with Information Governance Toolkit requirements.
Review	This policy will be reviewed two yearly, or earlier if there are changes in procedures or legislation.
Care Quality Commission	This policy supports the CCG in its compliance with the Care Quality Commission Registration Requirements.
Links with other relevant guidance	The Strategy should be read in conjunction with: The Information Governance Policy
Equality and Diversity	The Corporate Services Support Manager with responsibility for E&D has carried out an Equality & Diversity Impact Assessment and concluded the policy is compliant with the CCG Equality and Diversity Policy. No negative impacts were found.

Revisions

Version	Page/ Para No	Description of change	Date approved
1		CCG policy endorsed by Information Governance and IM&T Steering Group and approved by Clinical and Management Executive Team.	April 2013
2		Review and ratified by CMET	July 2015
3		Reviewed prior to ratification by CEC	April 2017

Information Governance Strategy

Table of Contents

	Page
1 Purpose	4
2 Scope	4
3 Roles and responsibilities	5
4 Review	6

Information Governance Strategy

1. Purpose

1.1 This strategy sets out the approach to be taken within the CCG to provide a robust Information Governance framework for the management and sharing of information.

1.2 Information Governance currently encompasses the following initiatives or work areas:

- Information Governance Management
- Confidentiality and Data Protection Assurance
- Information Security Assurance – including Cyber Security
- Clinical Information Assurance
- Secondary Use Assurance
- Corporate Information Assurance

Others initiatives will be included as the Information Governance agenda develops.

Information Governance has the following fundamental aims:

- To support the provision of high quality care by promoting the effective and appropriate use of information.
- To encourage responsible staff to work closely together, preventing duplication of effort and enabling more efficient use of resources.
- To develop supporting arrangements to provide staff with the appropriate tools and support to enable them to discharge their responsibilities to consistently high standards.
- To enable organisations to understand their own performance and manage improvement in a systematic and effective way.

The CCG has a statutory responsibility to patients and the public to ensure that the services it provides have effective policies, processes and people in place to deliver objectives in relation to holding and using confidential and personal information. As a commissioner, Cambridgeshire and Peterborough CCG will need to be assured that the services it commissions from other organisations also comply with the elements of the Care Quality Commission Registration that relate to information governance. Information Governance Toolkit completion must be embedded in the contracting process.

This Strategy outlines the approach the CCG will take to ensure that it develops effective information governance processes throughout the organisation, which will enable it to deliver its objectives and meet its statutory requirements.

2. Scope of the Strategy

There are two key components underpinning this strategy, which are: -

- The CCG Information Governance Policy, which outlines the objectives for information governance; and
- An annual action plan arising from a baseline assessment against the standards set out in the NHS Digital Information Governance Toolkit.

The IG, BI and IM&T Group have overall responsibility for overseeing the implementation of this strategy, the Information Governance (IG) policy and the CCG Information Governance Strategy v3.0 April 2017

IG action plan. All will be subject to periodic review and progress reported to the Governing Body via the Clinical Executive Committee (CEC). There is sufficient representation on the Steering Group to ensure that IG is embedded within the organisational structure.

A key function of the IG, BI and IM&T Group is to monitor and review untoward occurrences and incidents relating to IG and to ensure that effective remedial and preventative action is taken.

An IG Action Plan, identifying lead officers, will be agreed each year to ensure compliance against each of the IG Toolkit requirements. This Action and Improvement Plan forms part of this overall Governing Body endorsed IG Strategy, which includes established links to the CCG Assurance Framework and Risk Registers.

The membership of the IG, BI and IM&T Steering Group includes the following:

- Director of Corporate Affairs (Chair and SIRO)
- Associate Director of Corporate Affairs and CCG Secretary (Corporate Governance, FOI Lead and Deputy SIRO and Chair)
- Chief Nurse (Caldicott Guardian)
- Deputy Chief Nurse (Deputy Caldicott Guardian)
- Corporate Services Manager (Data Protection and IG Lead and Privacy Officer)
- Corporate Services Support Manager (IG SME)
- Associate Director of Business Intelligence (Data Quality Lead)
- Senior Information Manager
- Senior ICT Service Development Manager
- Strategic Clinical Services IM&T Consultant
- Primary Care IT Manager
- Head of PMO
- GP Clinical Lead for IG, BI and IM&T *(to Provide ad hoc Clinical Leadership when appointed)*

The Steering Group can invite people whose attendance is relevant to matters to be discussed. All other attendance will be at specific invitation of the Group, including attendance as an observer.

The principle of arranging a 'deputy' to attend the Steering Group meetings on behalf of members who are unable to attend will apply. Attendance will be monitored.

3. Role responsibilities

The Director of Corporate Affairs is the named Executive Director on the Governing Body with responsibility for Information Governance.

The Chief Nurse is the CCG's Caldicott Guardian.

The SIRO is an Executive Senior Manager on the CCG Governing Body who will oversee the organisation's response to risk and to provide support to the Governing Body and to the Accountable Officer. The Accountable Officer is the CCG's Chief Officer.

The Director of Corporate Affairs is the senior manager for IG, supported by the IG team, who will oversee the project management of the IG, BI and IM&T Steering Group.

This strategy cannot be seen in isolation as information plays a key part in Governance, Strategic Risk, Clinical and Corporate Governance, quality and service planning and performance management. The strategy therefore links into all of these aspects of the organisation and is reflected in the Governance Strategy. In addition the Governing Body has identified Information Governance as a significant risk within the CCG Assurance Framework.

The IG, BI and IM&T Group will identify any associated resource implications incurred by the implementation of the national IG agenda.

CCG performance will be monitored by the IG, BI and IM&T Group and submitted officially via the Information Governance Toolkit on an annual basis. Internal reporting will be done quarterly through the IG, BI and IM&T Group with exception reporting escalated to the Clinical Executive Committee.

Fundamental to the success of delivering the Information Governance Strategy is developing an Information Governance culture within the CCG. Awareness and training will be provided to all CCG staff that utilise information in their day-to-day work to promote this culture. In order to achieve this, the IG, BI and IM&T Group will continue with the confidentiality awareness campaign and the use of the successor replacement to the NHS Digital Information Governance Training Tool (IGTT).

4. Review

The implementation of the Information Governance Strategy, Policy and Action Plan will ensure that information is more effectively managed in the CCG. The policy and strategy will be reviewed every other year or before if new legislation or national guidance requires it. A revised action plan will be developed annually to reflect the most recent version of the IG Toolkit, to identify key areas for continuous improvement.

**Approved by: IG, BI and IM&T Group
April 2017**

Endorsed by: Clinical Executive Committee

**Author: Amanda Holloway
Corporate Services Manager
April 2017**