NHS Nottingham North and East Clinical Commissioning Group   NHS Nottingham West Clinical Commissioning Group   NHS Rushcliffe Clinical Commissioning Group   NHS Nottingham City Clinical Commissioning Group

NHS Mansfield and Ashfield Clinical Commissioning Group   NHS Newark and Sherwood Clinical Commissioning Group

Information Governance, Management and Technology Committee
RATIFIED Minutes of the meeting held on
Friday 20 July 2018, 14:00 – 16:30
Committee Room, Gedling Civic Centre, Arnot Hill Park

Present:	
Andy Hall	Director of Performance and Information, Greater Nottingham Clinical Commissioning Partnership (Chair)
Loretta Bradley	Head of Information Governance, Greater Nottingham Clinical Commissioning Partnership
Mick Cawley	Chief Finance Officer (SIRO), Mid Nottinghamshire Clinical Commissioning Groups
Ruth Lloyd	Head of Corporate Governance, Mid Nottinghamshire Clinical Commissioning Groups
Dr Mike O'Neil	General Practitioner, NHS Nottingham West Clinical Commissioning Group
Jaki Taylor	Director of Health Informatics, Nottinghamshire Health Informatics Service
In attendance:	
Terry Allen	Lay Member, NHS Nottingham North and East Clinical Commissioning Group
Lucy Branson	Corporate Director, Greater Nottingham Clinical Commissioning Partnership
Helen Clark (minutes)	Information Governance Coordinator, Greater Nottingham Clinical Commissioning Partnership
Alexis Farrow	Digital Transformation Lead, Connected Nottinghamshire (deputising for Andy Evans)
Jason Mather	Primary Care Commissioning Manager, Greater Nottingham Clinical Commissioning Partnership
Apologies:	
Nichola Bramhall	Chief Nurse/Director of Quality (Caldicott Guardian), Greater Nottingham Clinical Commissioning Partnership
Andy Evans	Programme Director, Connected Nottinghamshire
Elaine Moss	Chief Nurse/Director of Quality (Caldicott Guardian), Mid Nottinghamshire Clinical Commissioning Groups
Gary Thompson	Chief Operating Officer (SIRO), Greater Nottingham Clinical Commissioning Partnership

Cumulative Record of Members Attendance (2018/19)

Name	Possible	Actual	Name	Possible	Actual
Nichola Bramhall	2	0	Elaine Moss	2	0
Loretta Bradley	2	2	Mike O'Neil	2	2
Mick Cawley	2	2	Jaki Taylor	2	2
Andy Hall	2	2	Gary Thompson	1	0
Ruth Lloyd	2	2			

Item
Introductory Items

The order of the agenda items was changed to take into account the availability of meeting members and the priority of the agenda items. The minutes reflect the discussions of each item as they were discussed, with the paper reference numbers remaining unchanged.

IGMT 18 066   **Welcome and apologies for absence**

Dr Mike O'Neil welcomed everyone to the Information Governance, Management and Technology Committee ('the Committee') meeting. Mike explained that he would be chairing the meeting until Andy Hall arrived.

Apologies were noted from Nichola Bramhall, Andy Evans, Elaine Moss and Gary Thompson.

IGMT 18 067   **Confirmation of quoracy**

It was confirmed that the meeting was quorate.

IGMT 18 068   **Declarations of interest for any item on the agenda**

No areas of interest were declared in relation to any item on the agenda.

IGMT 18 069   **Management of any real or perceived conflicts of interest**

As no conflicts of interest had been identified, this was not necessary for the meeting.

IGMT 18 070   **Minutes of the meeting held on 25 May 2018**

The minutes of the previous meeting held on 25 May 2018 were reviewed and it was noted that the following amendments were required:
- Item IGMT/18/042, page 3 – The Mid-Nottinghamshire Clinical Commissioning Groups report into the Cyber Security Programme Board, and as such, do not have a separate local cyber security action plan. Therefore, there was no action outstanding.
- Item IGMT/18/046, page 6 – The Data Protection Officer for the Mid-Nottinghamshire Clinical Commissioning Groups is David Ainsworth, Director of Primary Care. Ruth Lloyd, Head of Corporate Governance, supports the Data Protection Officer at an operational level.

The minutes were confirmed as an accurate record, pending the changes identified.

IGMT 18 071   **Matters arising from the meeting held on 25 May 2018**

The following items were noted as outstanding, the status of which is summarised as follows:
- Action: IGMT/18/042 – Emergency planning and business continuity for the Greater Nottingham Clinical Commissioning Partnership continues to sit within Hazel Buchanan's portfolio. Hazel is currently recruiting to her team and will test the new business and incident plans once she has the required level of staffing resource.
- Action: IGMT/18/042 – Hazel has confirmed that she will review the existing assigned Smart Card Policy sponsors once she has received the information from NHIS.

All other actions were noted as completed.

A matter arising from the minutes was highlighted in relation to item IGMT/18/051 General Practice System of Choice (GPSoC). It was noted that

the GPSoC is a mechanism to procure GP Systems; the contract renewal is managed at a national level and the extension to mid-year 2019 had been granted to allow the new contract to be finalised and implemented.

Items for Approval

IGMT 18 073   **Removable Media Policy**
Loretta Bradley and Ruth Lloyd presented the Removable Media Policy, highlighting the following key points:

a) The Policy has been developed as part of the Nottinghamshire Health Informatics Service (NHIS) and partner commitments to maintaining a secure network as part of the Cyber Security Assurance Programme.
b) This is a technical NHIS policy that is proposed for adoption by the six Nottinghamshire CCGs.
c) The NHIS version of the policy has been aligned with existing information governance policies and procedures and additional amendments have been made to ensure staff have a clear understanding of the principles and working practices they are required to adopt to maintain the safe storage and transfer of data on removable media devices.
d) The version presented to the Committee needs to be amended to include reference to the Mid-Nottinghamshire CCGs.

At this point Andy Hall joined the meeting and took over as Chair.

Discussion ensued and the following points were raised:
e) It was agreed that minimal changes should be made to NHIS policies and any steps required to implement the policy at a local level should be documented separately.
f) Committee members were reminded that the finer details within the policy were in support of the Cyber Security Assurance Programme of work.
g) It was noted that in some instances the NHIS Policy didn't correlate with what had been agreed at the Cyber Security Assurance Programme Board. For example, the Policy advised that the purchasing of USB sticks was a NHIS controlled activity, but NHIS members at the Board had since informed the CCGs that staff could purchase their own.

The Committee:
*   **ENDORSED**: the policy direction and requested that an updated version of the policy be resubmitted for approval at a future meeting.

ACTION:
*   Loretta Bradley and Ruth Lloyd to further discuss and update the Removable Media Policy with NHIS colleagues to ensure its accuracy.

Items for Discussion

IGMT 18 072   **IGMT Governance Framework**
Andy Hall introduced this item and explained that the IGMT Committee was currently a joint committee of the five Nottinghamshire County CCGs' Governing Bodies. The Committee has a responsibility for receiving assurance around the key areas of information governance, information management and information technology. Due to the Greater Nottingham Clinical Commissioning Partnership being formed, there was now a need for NHS Nottingham City to also be part of this joint committee arrangement. As a result, the Committee's terms of reference have been reviewed and are presented for consideration prior to being submitted to the Governing Bodies for approval.

Item

A detailed discussion ensued and the following key points were highlighted:

a) It was explained that there had been a desire not to make too many changes to the terms of reference until members had reviewed them. Therefore, the main changes currently related to the Committee's membership and frequency of meetings.

b) It was agreed that the duties section of the terms of reference needed further work in order to refine them and ensure clarity of responsibilities. There needs to be an increased emphasis on assurance.

c) The Lay Membership of the Committee was welcomed, in particular the move to the committee being Lay Chaired. It was agreed that a Lay Member form Greater Nottingham will chair the Committee in line with the existing MoU arrangements.

d) Other elements of the membership were questioned, and as a result, it was agreed that NHIS should not be included in the membership of a Governing Body Committee. Similarly, it was felt that the Connected Nottinghamshire Programme Director should not be a member.

e) The quoracy section of the terms of reference made it clear that deputies can attend and count towards the quorum.

f) The Governance Framework Diagram appended to the terms of reference was reviewed by members and it was agreed that there is a lack of clarity on the differing roles and responsibilities of each of the forums illustrated. It was agreed that the expectation is that organisational representatives bring relevant updates from the different forums to the IGMT Committee, rather than the forums being formal sub-groups of the IGMT Committee.

g) It was acknowledged that a review of CCG attendance at each of the forums is required in order to remove duplication and reduce the burden of meetings.

h) It is proposed that an Operational Delivery Group be established to discuss the operational delivery details regarding each key area in a granular way. The Group will not be a sub-committee of the IGMT Committee, but it will support the assurances able to be provided for the Committee's consideration.

The Committee:

- **ENDORSED**: the direction of travel in relation to the developing terms of reference for the Committee, noting that further amendments are required prior to presentation for Governing Body approval.

ACTION:
- Lucy Branson and Mick Cawley to work together on updating the IGMT Committee terms of reference in line with feedback from members.
- Mick Cawley and Ruth Lloyd to work together to identify a GP Representative and Lay Member for Mid-Nottinghamshire.
- Lucy Branson and Andy Hall to arrange a meeting to further define the different IGMT forums and explore the establishment of an Operational Delivery Group.

Items for Assurance

IGMT 18 077   **Risk Management Process**
Lucy presented the first iteration of the Information Governance risk paper that provided the Committee with an update against current information governance and information technology risks across the six Nottinghamshire CCGs. It was highlighted that the format and content of the report is currently in development and an exercise is required to ensure that all current risks have been identified and documented.

The following points were noted in discussion:
a) The risks discussed at the Cyber Security Assurance Programme Board had not been fully reviewed to identify if there are risks to the CCGs that required escalation. Consideration also needs to be given as to whether cyber security should be documented as one risk or whether the individual elements of cyber security needed to be extrapolated and managed separately. Currently the risk of a cyber security attack (GN021) is rated as 20 (high risk), but members agreed this required review as the risk score was likely to have decreased.
b) It was agreed that the IGMT Committee should routinely review all medium and high rated risks.
c) It was clarified that the risks included within the register were relevant to both Greater Nottingham and Mid-Nottinghamshire CCGs, but that the documented risks needed to be pulled onto the Mid-Nottinghamshire CCGs' risk register.
d) Further work is required to provide assurance that all relevant risks from the various IGMT forums are being appropriately pulled through into the CCGs' risk registers.
e) It was emphasised that the greatest risk was a project not identifying issues and risks and it was noted that it would be helpful if the IGMT Committee could receive some assurance in this area in future.
f) It was confirmed that there were no obvious risks that were missing from the register, but assurance was needed that the risk profile was robust.
g) It was noted that the following additions would be helpful for future reports:
   • Date that the risk was last scored; and
   • Clarification of what the risk to the organisation is.

The Committee:
• **NOTED**: the information governance risk register.

ACTION:
• Lucy Branson to submit a paper to the next Committee meeting to provide a further update on the ongoing work to align risk management arrangements.

At this point Lucy Branson left the meeting.

IGMT 18 074a **Cyber Security Update – 360 Assurance Cyber Resilience Report**
Andy Hall introduced this item and explained that the 360 Assurance Report provided a perspective on whether the action plans implemented by the Mid-Nottinghamshire CCGs, Greater Nottingham CCGs and NHIS following the May 2017 WannaCry cyber-attack were fit for purpose.

It was highlighted that the audit report had already been received by the Mid-Nottinghamshire CCGs' Audit Committees, which had generated a lack of confidence in how cyber security is being managed. As a result of this, Mick Cawley had attended the Cyber Security Assurance Programme Board and felt assured that the key issues are being addressed.

Discussion ensued and the following points were made:
a) The report was commissioned as an independent review, not an audit, therefore a management response wasn't required.
b) The report was accurate at the time it was produced, but not all identified shortcomings were incorporated into the NHIS/CCGs action plan as some had been mitigated by the time the action plan was produced.

    c) As a result of the national WannaCry review a number of actions were identified as the responsibility of Boards/Governing Bodies.

    d) Members supported a repeat of the independent review carried out by 360 Assurance.

The Committee:
- **RECEIVED**: the 360 Assurance Cyber Resilience Report.

IGMT 18 074b   **Cyber Security Update – Cyber Security Action Plan**

Andy Hall introduced this item and explained that the action plan being presented related to the Greater Nottingham CCGs only. Mick Cawley reiterated that the Mid-Nottinghamshire CCGs reported their updates via the NHIS Cyber Security Assurance Programme Board, and as such, have not produced a separate action plan for the IGMT Committee.

Following discussion, it was acknowledged that it is a responsibility of the IGMT Committee to update the Governing Bodies on progress against cyber security actions. Therefore, assurance that cyber security is being effectively managed is required by the Committee.

Members referred back to the cyber security risk (GN021) and agreed that the mitigating actions that had taken place across the health community had lowered this risk score. It was agreed that the risk should be reworded to refer to the possibility of a successful cyber-attack, with a risk score of likelihood 3 and impact 4, lowering it to a risk score of 12 (amber/red).

The Committee:
- **NOTED**: the update.

ACTION:
- Risk GN021 to be reworded to refer to the possibility of a successful cyber-attack and the risk score to be updated to likelihood 3 and impact 4, lowering it to a risk score of 12.

IGMT 18 075   **Information Governance Assurance Report**

Loretta Bradley and Ruth Lloyd presented the Information Governance Assurance Report for quarter one of 2018/19, highlighting the following points to members:

a) The report had been restructured.

b) The report provides an update in four key areas; cyber security, the Data Security and Protection Toolkit, the EU General Data Protection Regulation and aligned working practices.

c) There has been a low number of Subject Access Requests.

d) Not all of the Greater Nottingham Clinical Commissioning Groups have achieved 100% Freedom of Information Request compliance rate, due to resourcing issues.

e) The 2017/18 Caldicott Guardian logs for NHS Nottingham North and East, NHS Nottingham West, NHS Rushcliffe, NHS Newark and Sherwood and NHS Mansfield Ashfield Clinical Commissioning Groups are presented for noting by the Committee.

The following points were highlighted in discussion:

f) The report will need to be amended to align with the requirements of the revised IGMT Committee terms of reference, once finalised.

g) Routine updates on Data Protection Impact Assessments (DPIAs) should be considered for inclusion in future reports to either the IGMT

Committee or the Operational Delivery Group.

h) In future, the Caldicott Guardian logs will be received by the Operational Delivery Group, as required.

The Committee:
- **NOTED**: Information Governance Assurance Report.

IGMT 18 076   **Data Quality Report**

Andy Hall presented the Data Quality Report for quarter one of 2018/19. Andy explained that its purpose is to provide assurance to members of the Committee regarding the overall data quality of SUS data reports submitted by Trusts. The validity of a number of key data items is presented at national, North Midlands Area Team and provider level.

Andy highlighted the following points:
a) The report no longer includes Derby Healthcare NHS Foundation Trust.
b) Acute Trusts within Nottinghamshire had benchmarked well in terms of data quality.
c) Nottinghamshire Healthcare NHS Foundation Trust had also benchmarked well, but was not yet at the same level as the Acute Trusts.

The Committee:
- **NOTED**: the Data Quality Report.

IGMT 18 078   **NHIS Partnership Board Update**

This item was deferred to the September 2018 IGMT Committee as the NHIS Partnership Board was not due to meet until week commencing 23 July 2018.

IGMT 18 079   **IT Management Board**

Alexis gave a verbal update and summarised the following key points:
a) NHS Improvement and NHS England are aligning, which would hopefully improve assurance reporting;
b) There will be a refresh of the Local Digital Roadmap;
c) Provider digitisation funds are due to be released; this is estimated to be £8 to10 million over a two year period. Outline Business Cases will be drawn up to support digitisation;
d) Discussion are taking place regarding Population Health Management and the alignment of requests for data;
e) There is an IT Director leading on the Sustainable Transformation Partnership work stream.

IGMT 18 080   **National Updates/Horizon Scanning**

The following updates were received by the Committee:
a) Matt Hancock had been appointed as the Secretary of State for Health and Social Care; it was anticipated that this would lead to an increased use of technology to streamline patient pathways.
b) Citizen Identity was being developed which would enable patients to verify their identity electronically when requesting access to online health records.

Closing Items

IGMT 18 081   **Any other business**

Members were reminded of their responsibility to highlight any interests should they transpire as a result of discussions during the meeting. It was noted that all relevant individuals will be contacted in the coming weeks regarding any real or perceived conflicts of interest, at which point they will be

reviewed, articulated, and documented as required.

There was no other business to be discussed.

IGMT 18 182   **Date of next meeting:**
Friday 28 September 2018
Clumber Meeting Room, Easthorpe House, 165 Loughborough Road,
Ruddington, Nottingham, NG11 6LQ