

GOVERNING BODY PAPER

Meeting Date:	Tuesday 23 January 2018		
Title of Paper:	IG Management Framework and IG Toolkit		
Sponsor:	Hazel Buchanan, Director of Operations and SIRO		
Agenda Item No:		Allocated Time:	mins

(Please tick relevance)

Acknowledge	<input checked="" type="checkbox"/>	Approve	<input checked="" type="checkbox"/>	Consider	<input type="checkbox"/>	Review	<input type="checkbox"/>	Support	<input type="checkbox"/>
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Purpose of the report/document

1. To acknowledge the existing Information Governance (IG) arrangements as set out in the **Information Governance Management Framework** reviewed and approved by the Information Governance Management & Technology (IGM&T) Committee in September 2017.
2. To ask the Governing Body for delegated authority to approve and sign off the whole 2017/18 IG Toolkit (Version 14.1) prior to submission by 31 March 2018 and any relevant documents required as part of the submission (e.g. Data Flow Mapping Risk Assessment Report).

Key Points *(Provide full context of agenda item)*

IG Management Framework

Robust information governance (IG) requires clear and effective management and accountability structures, governance processes, documented policies and procedures, trained staff and adequate resources.

The IG Framework is a standalone document and provides a summary/overview of how the CCG is addressing the IG agenda and reflects the capacity and capability of the CCGs. The purpose of this framework is to establish employee responsibility and the rules of conduct for all members of staff regarding the CCG's information governance framework and assurance process.

The IG Framework has been reviewed and approved by the **IGM&T Committee in September 2017**. The IG Toolkit, however, requires the Governing Body to review annually the IG Framework to ensure that it remains fit for purpose. (Requirement 14.1-130).

IG Toolkit

The IG Toolkit is an online tool with specific sets of requirements for NHS and Social Care organisations, including CCGs. The Toolkit has four levels of compliance for each criterion, which are used to determine the overall strength of Information Governance Arrangements for each NHS organisation. The expectation is that the organisation will achieve a minimum level 2 score for each criterion.

CCGs are required to have a current IG Toolkit self-assessment at a minimum of level 2 and have an independent audit of the IG Toolkit submission on an annual basis. HSCIC requires that IG Toolkit assessments will be subject to an Internal Audit review before CCG submission by 31st March 2018. NHS Digital (formerly HSCIC) confirmed that decisions regarding the criteria to be audited should be made locally and be risk-driven.

The Toolkit contains 28 standards for CCGs and the audit approach taken by 360 Assurance (CCG external auditor) is to review a sample of 6 standards each year. In selecting the standards for review, 360 Assurance have taken account of those areas subject to review in previous years, those areas which are new or have changed, and local risks/requests from clients.

The internal audit will be carried out by 360 Assurance in **February 2018** and will cover the following criteria:

130	There is an adequate Information Governance Management Framework to support the current and evolving Information Governance agenda.
132	Formal contractual arrangements, that include compliance with information governance requirements, are in place with all contractors and support organisations.
134	Information Governance awareness and mandatory training procedures are in place and all staff are appropriately trained.
341	A formal information security risk assessment and management programme for key Information Assets has been documented, implemented and reviewed.
346	Business continuity plans are up to date and tested for all critical information assets (data processing facilities, communications services and data) and service-specific measures are in place.
350	All transfers of hardcopy and digital personal and sensitive information have been identified, mapped and risk assessed; technical and organisational measures adequately secure these transfers.

Work is underway to complete the IGT and achieve at least level 2 in each indicator. Major in-year programmes of work have been already completed or are in the process of being completed (e.g. Information Asset Management, Data Flow Mapping, and Confidentiality Audits).

The submission date for the IG Toolkit for 2016/17 is **31st March 2018** and the CCG's Toolkit needs to be approved by the Governing Body prior to submission. Where the Governing Body is not expected to meet near the submission date, there should be formal delegation of responsibility for approval of the Toolkit to an appropriate committee or senior person.

The Governing Body is asked to give Hazel Buchanan, NNE CCG Senior Information Risk Officer (SIRO) **delegated authority to approve and sign-off** the whole IG Toolkit self-assessment prior to submission and any relevant documentation that forms part of the evidence required.

Document links

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Implications: <i>(please tick where relevant)</i>			
Commissioning (Inc. Integration & Reducing inequality)		Patient & Public Involvement	
Constitution		Quality of Services	
Governance	√	QIPP	
Innovation		Research	
Learning and Development		Sustainability	

Patient Choice			
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Finance checked by:
(initials)