

# Information Governance statement

Healthwatch Havering



May 2018

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# Information Governance statement

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## 1. Introduction

- 1.1 This statement describes the development and implementation of a robust Information Governance (IG) framework needed for the effective management and protection of Healthwatch Havering and personal information.
- 1.2 IG describes the approach within which accountability, standards, policies and procedures are developed, implemented and maintained to ensure that all types of information used by Healthwatch Havering are sourced, held and used appropriately, securely and legally.
- 1.3 Information is a vital asset for Healthwatch Havering supporting its effective function. Therefore, it is essential in order to meet requirements that Healthwatch Havering's information is managed effectively within a robust governance framework.
- 1.4 Healthwatch Havering requires accurate, timely and relevant information to enable it to operate effectively as a Healthwatch organisation. It is the responsibility of all staff to ensure that information is accurate and up to date and that it is used proactively in its business. Having accurate relevant information available at the time and place where it is needed, is critical in all areas of Healthwatch Havering's business and plays a key part in governance, strategic risk, Healthwatch Havering's planning and performance management.
- 1.5 Healthwatch Havering carries a responsibility for handling and protecting information of many types:
  - 1.5.1 Some information is confidential because it contains personal details of service users or staff. Healthwatch Havering complies with legislation which regulates the holding and sharing of confidential personal information. It is important that relevant, timely and accurate information is available to those who are involved in the provision of information or care to service users, but it is also important that personal identifiable information is

not shared more widely than is necessary, and deleted when no longer required for the purpose.

- 1.5.2 Some information is non-confidential and is for the benefit of the general public. Examples include information about Healthwatch Havering's services, annual reports etc. Healthwatch Havering and its employees share responsibility for ensuring that this type of information is accurate, up to date and easily accessible to the public.
- 1.5.3 The majority of information about Healthwatch Havering and its business should be open for public scrutiny via the website although some, which is commercially sensitive, may need to be safeguarded.

## 2. Background

- 2.1 IG is one of the main governance arrangements within Healthwatch Havering, i.e.
  - 2.1.1 Integrated Governance
  - 2.1.2 Risk Management
  - 2.1.3 Research Governance
  - 2.1.4 Financial Governance
  - 2.1.5 Information Governance
- 2.2 This statement must be read in conjunction with the Privacy statement.
- 2.3 IG covers all information held by Healthwatch Havering (for example; clinical, staff, financial, minutes, e-mails) and all information systems used to hold that information. These systems may be purely paper based or partially or totally electronic. The information concerned may be owned or required for use by Healthwatch Havering and so may be internal, e.g. created within Healthwatch Havering such as staff communications, or external e.g. created by external organisations such as contract tender submissions.
- 2.4 The governance requirements are intended to ensure that there is a robust framework concerning the obtaining, recording, holding, using, sharing and destruction of all data

and records held or used by Healthwatch Havering and ensuring that relevant information is available where and when it is needed.

2.5 IG is considered under 7 themes:

2.5.1 Information Governance Management

2.5.2 Data Protection

2.5.3 Confidentiality Code of Conduct

2.5.4 Service User Records Management

2.5.5 Corporate Records Management

2.5.6 Information Quality Assurance

2.5.7 Information Security.

2.6 IG contributes to ensure people who use services can be confident that:

2.6.1 Their personal records, applications, records of advice given are accurate, fit for purpose, held securely and remain confidential

2.6.2 Other records required to be kept to protect their safety and wellbeing are maintained and held securely where required.

2.7 The IG arrangements will underpin Healthwatch Havering's strategic goals and ensure that the information needed to support Healthwatch Havering is readily available, accurate and understandable.

2.8 Implementation of robust IG arrangements will deliver improvements in information handling ensuring information is:

2.8.1 Held securely and confidentially

2.8.2 Obtained fairly and efficiently.

2.8.3 Recorded accurately and reliably.

2.8.4 Used effectively and ethically.

2.8.5 Shared appropriately and lawfully.

### 3. Guiding Principles

3.1 There are five interlinked principles which guide this statement:

- 3.1.1 Openness.
  - 3.1.2 Legal Compliance.
  - 3.1.3 Information Security.
  - 3.1.4 Quality Assurance.
  - 3.1.5 Proactive Use of Information.
- 3.2 In developing this IG statement, Healthwatch Havering recognises and supports:
- 3.2.1 The need for an appropriate balance between openness and confidentiality in the management and use of information.
  - 3.2.2 The principles of corporate governance and public accountability and equally places importance on the confidentiality of, and the security arrangements to safeguard, both personal information about Healthwatch Havering and people using our services, staff and commercially sensitive information.
  - 3.2.3 The need to share service user information with other agencies in a controlled manner consistent with the interests of the service user and, in some circumstances, the public interest.
  - 3.2.4 The principle that accurate, timely and relevant information is essential to deliver a high-quality service and that it is the responsibility of all staff to ensure and promote the quality of information and to actively use information in decision-making processes.
  - 3.2.5 That robust IG processes are essential for sustained public and Healthwatch Havering confidence in the way Healthwatch Havering handles its data.

## 4 Strategic Objectives

- 4.1 To ensure openness, Healthwatch Havering will:
  - 4.1.1 Ensure non-confidential information about Healthwatch Havering and its services is readily and easily available through a variety of media
  - 4.1.2 Review policies in line with pre-agreed review dates and review arrangements for openness regularly
  - 4.1.3 Ensure that the public have readily and easily available access to information relating to services available

- 4.1.4 Have clear procedures and arrangements for liaison with the press and broadcasting media.
- 4.1.5 Have clear procedures and arrangements for handling queries from service users and general public.
  
- 4.2 To ensure legal compliance, Healthwatch Havering will:
  - 4.2.1 Regard all identifiable personal information relating to Healthwatch Havering and people using our service and public as confidential.
  - 4.2.2 Review compliance with legal requirements regularly.
  - 4.2.3 Regard all identifiable personal information relating to staff as confidential, except where national statement on accountability and openness requires otherwise.
  - 4.2.4 Establish and maintain policies to ensure compliance with the Data Protection Act, Human Rights Act, Equality and Common Law Duty of Confidentiality and all associated guidance.
  - 4.2.5 Establish and maintain policies for the controlled and appropriate sharing of service user information with other agencies taking account of relevant legislation.
  
- 4.3 To ensure that appropriate and legally compliant Information Systems Security exists, Healthwatch Havering will:
  - 4.3.1 Establish and maintain the Top Level IM&T Security Policy along with respective procedures for effective policing and secure management of all information assets, resources and IT systems.
  - 4.3.2 Regularly review its information and IT security arrangements in line with the IT security statement.
  - 4.3.3 Promote effective confidentiality and security practice to ensure all permanent/temporary contracted staff and third party associates of Healthwatch Havering adhere to this via appropriate policies, procedures, training and documentation.
  - 4.3.4 Establish and maintain appropriate policing, incident reporting procedures and investigations of all instances (actual and/or potential), along with any reported breaches of confidentiality and security.
  
- 4.4 To ensure Information Quality Assurance, Healthwatch Havering will:

- 4.4.1 Establish and maintain policies and procedures for information quality assurance and the effective management of service user, staff and Healthwatch Havering records.
  - 4.4.2 Regularly review its information quality and records management arrangements.
  - 4.4.3 Ensure that key data is accurately recorded and maintained, including regular cross checking against source data.
  - 4.4.4 Ensure that all staff are required to take ownership of and seek to improve the quality of information within their area and that information quality is assured at the point of collection.
  - 4.4.5 Promote information quality and effective records management through policies, procedures, user manuals and training.
- 4.5 To ensure proactive use of information, Healthwatch Havering will:
- 4.5.1 Ensure information systems hold the information required to support effective provision of services.
  - 4.5.2 Develop information systems and reporting processes which support effective performance management and monitoring.
  - 4.5.3 Develop information management awareness and training programmes to support staff.
  - 4.5.4 Support integrated governance requirements including financial, corporate, and research governance.
  - 4.5.5 Promote an information culture and expectation of informed, evidence-based decision making.
  - 4.5.6 Ensure that, where appropriate and subject to confidentiality constraints, information is shared with other organisations in order to support Healthwatch Havering and people using our service and staff.
- 4.6 Implementation of this IG Strategy will ensure that Healthwatch Havering and its staff (including contractors and temporary staff) handle and manage information in a consistent way. This is anticipated to lead to:
- 4.6.1 Improvements in information handling activities.
  - 4.6.2 Reduction in numbers of IG incidents and complaints.

4.6.3 Increased public confidence in the way Healthwatch Havering handles information.

4.7 IG provides a framework to bring together all of the requirements, standards and best practice that apply to the handling of personal and Healthwatch Havering information, ensuring:

4.7.1 Compliance with the law and professional standards.

4.7.2 Implementation of relevant advice and guidance.

4.7.3 Year on year improvements.

4.8 Through implementing this statement, Healthwatch Havering will:

4.8.1 Establish robust information governance processes

4.8.2 Ensure that all practices and procedures relating to handling and holding personal information are legal and confirm to best practice.

4.8.3 Ensure that clear advice is given to organisations and people using our service and staff about how their personal information is recorded, handled, stored and shared by Healthwatch Havering. Guidance will be made available to explain individual's rights, how they can seek further information and how they can raise any concerns. This guidance will be made available in alternative formats should it be required.

4.8.4 Provide clear advice and guidance to staff and ensure they understand and apply the principles of IG to their working practices in relation to protecting the confidentiality and security of personal information and to ensuring the safe keeping and handling of business information, ensuring compliance with appropriate legislation.

4.8.5 Maintain a clear reporting structure and ensure through management action and training that all staff understand IG requirements.

4.8.6 Undertake regular reviews of how information is recorded, held and used. The audits will be used to identify good practice and opportunities for improvement.

4.8.7 Ensure procedures are reviewed to monitor their effectiveness so that improvements or deterioration in

information handling standards can be recognised and addressed.

- 4.8.8 Ensure that when service developments or modifications are undertaken/new services offered, a review of all aspects of IG arrangements is undertaken to ensure they are robust and effective.
- 4.8.9 Work to instil an IG culture in Healthwatch Havering through increasing awareness and providing training on key issues.
- 4.8.10 Ensure there are robust procedures for notifying and learning from IG incidents in line with Healthwatch Havering's risk management statement.
- 4.8.11 Assess Healthwatch Havering's performance using the IG Toolkit and develop and implement action plans to ensure continued improvement.
- 4.8.12 Ensure that the IG improvement programme is integrated with Board, Chairman of the Board and/or Company Secretary

## 5 Information Governance Roles and Responsibilities

- 5.1 The IG structure consists of:
  - 5.1.1 The Company Secretary as IG Lead incorporating Risk.
  - 5.1.2 The Chairman of the Board has overall responsibility for IG.
- 5.2 Operational IG responsibilities are performed as they arise and in accordance with any pre-planned schedule by the Company Secretary
- 5.3 Healthwatch Havering's Board is responsible for:
  - 5.3.1 Approval of IG policies and procedures.
  - 5.3.2 Signing off of the IG Toolkit Assessment.
  - 5.3.3 Receive progress reports on IG work plan.

## 6 Strategy Implementation

- 6.1 To complete the IG Toolkit. This is an on-line self-assessment tool based on information governance standards. The

information governance standards are based on generally accepted definitions of good practice in relation to information governance and inter-link with other recommendations and standards such as those in the Data Protection Act etc.

**6.2 The Company Secretary will:**

6.2.1 Undertake annual assessment of Healthwatch Havering's current position in relation to IG standards, using the self-assessment toolkit.

6.2.2 Agree an annual work plan / programme to ensure a year on year improvement in performance.

6.2.3 Ensure regular review of strategies, policies, procedures etc. required for IG.

6.2.4 Identify resources required for implementation.

6.2.5 Monitor progress made.

6.2.6 Report on progress, incidents and issues.

6.2.7 Regularly assess performance and progress on information governance standards based on the IG Improvement plan against the IG Toolkit on a quarterly basis.

## **7. Conclusion**

7.1 The implementation of the IG statement, infrastructure and action plans will ensure that all types of information is more effectively managed and proactively utilised by Healthwatch Havering.

## **8. Amendments / Validity of Policy**

8.1 The Company Secretary will review this statement annually or in response to any significant changes to mandatory requirements or as a result of significant information governance breaches or incidents.