

**Agenda Item 05**

Report to: (Governing Body/Committee): Governing Body

Date of Meeting: 14 November 2019

Subject: Approval of NELCCG Information Governance Framework

Presented by: Jan Haxby

**STATUS OF THE REPORT *(auto check relevant box****)*

For Information [ ]

For Discussion [ ]

For Approval / Ratification [x]

Report Exempt from Public Disclosure [x]  No [ ]  Yes

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| **PURPOSE OF REPORT:** | There have been changes to some aspects of the Data Security Protection Toolkit (DSPT) and the requirement for more assurance on ownership of Information Governance/Data Security at Governing Body Level and clear lines of accountability and responsibility throughout the organisation. Whilst it is in order for CCG Governing Bodies to delegate responsibilities for most issues relating to IG and policy management, (which is delegated to Integrated Governance & Audit Committee). It is a recommendation that the Governing body approves the IG Framework in order to fulfil the more strict requirements.It is a requirement of the DSPT that the framework is reviewed annually. The review has taken place by our Information Governance Specialist with minor changes and updated Annex B to reflect the 2018 Act principles. Consultation has taken place with the CCG’s Information Governance Steering Group members (SIRO/Caldicott Guardian and Data Protection Officer (DPO).The CCG are now seeking approval of the Information Governance Framework. Please refer to appendices / attachments section of this report for copy of the framework.  |
| **Recommendations:** | Members are asked …* To approval the Information Governance Framework
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| **Committee Process and Assurance:** | The Information Governance Steering Group and Integrated Governance & Audit Committee monitor information Governance in year. |
| ***Implications:*** |  |
| **Risk Assurance Framework Implications:** | The management of Information Risk forms an important part of the IG Assurance and DSPT submission. The SIRO leads on Information Risk and makes the Governing Body aware of any significant risks throughout the year.The CCG has robust governance arrangements in place, managed and monitored by the Integrated Governance and Audit Committee.Any associated risks are included on the CCG Board Assurance Framework or Risk Register. |
| **Legal Implications:** | Failure to maintain the highest standards of information governance could lead to restrictions in the CCG’s ability to handle patient and corporate information.The CCG could be open to legal challenge if policies/procedures are not up to date. |
| **Data Protection Impact Assessment implications (DPIA):** | Are you implementing a new system, data sharing arrangement, project, and service redesign or changing the way you work? | **No** |
|  | Does this project involve the processing of personally identifiable or other high-risk data? | **No** |
| **Equality Impact Assessment implications:** | An Equality Impact Analysis/Assessment has been considered as a neutral impact as the content does not have any adverse or detrimental impact on a particular group As a result of performing the analysis/assessment there are no actions [x]   |
| **Finance Implications:** | The Finance/HR team through their processes will follow up any financial implications in relation to policies/procedures. |
| **Quality Implications:** | This report details a neutral impact on quality. [x] The report will not make any impact on experience, safety or effectiveness.  |
| **Procurement Decisions/Implications *(Care Contracting Committee):*** | None relevant for this report. This report provides internal assurances against Information Governance standards and legislation. |
| **Engagement Implications:** | The Framework has under gone consultation with the information governance steering group members. (SIRO/Caldicott Guardian and DPO).  |
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| **Conflicts of Interest**  | *Have all conflicts and potential conflicts of interest been appropriately declared and entered in registers, which are publicly available?* [x]  Yes [ ]  NoNo conflicts identified Any interests, declared at a meeting, will be included on the CCG’s Declaration of interest Register. |
| **Links to CCG’s Strategic Objectives** | [ ]  Sustainable services [ ]  Empowering people[ ]  Supporting communities [x]  Delivering a fit for purpose organisation |
| **NHS Constitution:** | <https://www.gov.uk/government/publications/the-nhs-constitution-for-england> |
| **Appendices / attachments** |  |