



# Information Governance

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<b>Area:</b>	Organisational
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<a href="#"><u>Versions</u></a>	





# Information Governance

## ➤ Policy Statement

- Information Governance stipulates the way in which information should be handled, particularly personal and/or sensitive information such as patient and staff data. It enables St Martins to ensure that all confidential information is dealt with legally, securely, efficiently and effectively, in order to deliver the best possible care for the people we support.
- A range of components fall under Information Governance as it combines both Corporate Governance and Clinical Governance. Key areas of Information Governance:
  - Records Management
  - Information Risk
  - Information Security
  - Data Protection Act 2018 (DPA)

## ➤ Information Sharing Commitment

- St Martins recognise that there is a responsibility to work with partners to minimise the burden of data collection, and to ensure that data is used effectively to support the overall aims of public sector and voluntary organisations. We are committed to principles that:
  - Personal data on individuals should be properly protected
  - Personal data should be processed in compliance with the DPA.
  - Data should be collected once and only shared appropriately
  - Collection and sharing of data should be fully automated in order to guarantee security wherever achievable
  - Data should only be shared when there is an identified need to do so

## ➤ Purpose

- This policy plays a key part in supporting the delivery of the best possible care and support for clients and residents of St Martins. It will also assist with service planning and performance management. It gives assurance to the organisation and to individuals that personal information is dealt with legally, securely, efficiently and effectively.
- It is of paramount importance to ensure that information is efficiently managed and that appropriate policies, procedures and management accountability and structures provide a robust governance framework for information management.



## ➤ Principles

- St Martins recognise the need for an appropriate balance between openness and confidentiality in the management and use of information. The organisation fully supports the principles of corporate governance and recognises its public accountability, but equally places importance on the confidentiality of, and the security arrangements to safeguard, both personal information about clients, residents and staff. The organisation also recognises the need to share information with other organisations and agencies in a controlled manner consistent with the interests of the person receiving care and support and, in some circumstances, the public interest.
- St Martins believe that accurate, timely and relevant information is essential to deliver the highest quality health care and support. As such it is the responsibility of all managers to ensure and promote the quality of information and to actively use information in decision making processes.
- There are 4 key interlinked strands to information governance policy, starting with Openness:
  - Non – confidential information on the organisation and its services should be available to the public through a variety of media, in lines with the organisations code of openness.
  - The organisation will undertake annual assessments and audits of its policies and arrangements for openness
  - Clients/residents of St Martins should have access to information relating to their own care and support, their options for treatment and their rights.
  - The organisation will have clear procedures and arrangements for liaison with press and broadcasting media.
  - The organisation will have clear procedures and arrangements for handling queries from clients and residents and the public.
- Legal Compliance. St Martins will:
  - regard all identified personal information relating to clients and residents as confidential.
  - undertake annual assessments and audits of its compliance with legal requirements.
  - regard all identifiable information relating to staff as confidential except where national policy on accountability and openness requires otherwise.
  - establish and maintain policies to ensure compliance with the DPA, Human Rights Act and the common law confidentiality.
  - establish and maintain policies for the controlled and appropriate sharing of information with other agencies, taking account of relevant legislation ( e.g. Health and Social Care Act, Crime and Disorder Act, Protection of Children Act).
  - respond to all Subject Access Requests within the legal time frame.

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- Information Security. St Martins will:
  - establish and maintain policies for the effective and secure management of its information assets and resources.
  - undertake annual assessments and audits of its information and IT security arrangements.
  - promote effective confidentiality and security practice to its staff through policies, procedures and training.
  - establish and maintain incidents reporting procedures and will monitor and investigate all reported instances of actual or potential breaches of confidentiality and security.
  
- Information Quality Assurance. St Martins will:
  - establish and maintain policies and procedures for information quality assurance and the effective management of records.
  - undertake annual assessment and audits of its information quality and records management arrangements.
  - undertake an annual review of its compliance with Information Governance requirements using the NHS Data Security Protection Toolkit assessment process.
  - ensure that managers take ownership of, and seek to improve, the quality of information within their service.
  - ensure that wherever possible information quality should be assured at the point of collection.
  - will promote information quality and effective records management through policies, procedures/user manuals and training.

## ➤ Policies, procedures and plans

- This Information Governance policy is underpinned by the following policies, procedures and plans:
  - **Confidentiality policy** which set outs how client/resident records will be created, used, stored and disposed of, what rights Individuals' have in relation to data
  - **Confidentiality policy** which sets out procedures for the management of access to computer-based information systems
  - **Confidentiality policy** which sets out procedures around the transfer of confidential information
  - **Data Protection policy** which sets out the procedures for managing and reporting information incidents/breaches
  - **Business continuity plan** that sets out the procedures in the event of a security failure or disaster affecting computer systems

## ➤ Staff guidance in use

- Staff compliance with the procedures is supported by the following guidance information:
  - **Records management:** guidelines on good record keeping.



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- **Staff confidentiality code of conduct:** sets out the required standards to maintain the confidentiality of patient information; obligations around the disclosure of information and appropriately obtaining client/resident consent
- **Information handling (within Confidentiality policy):** guidelines on the secure use of clients/resident information
- **Using mobile computing devices:** guidelines on maintaining confidentiality and security when working with portable or removable computer equipment

## ➤ New processes

- Any new policies, procedures or processes will need to be approved by SMT to ensure that any changes take into account the requirements of Information Governance in relation to information security, confidentiality and data protection, and information quality.

## ➤ Responsibilities

- It is the role of St Martins to define the organisation's policy in respect of Information Governance, taking into account legal and NHS requirements.
- St Martins Senior Management Team (SMT) **is** responsible for overseeing the day to day Information Governance issues; developing and maintaining policies, standards, procedures and guidance, coordinating Information Governance in the organisation and raising awareness of Information Governance.
- SMT members are responsible for ensuring that the policy and its supporting standards and guidelines are built into local processes and that there is ongoing compliance.
- All staff, whether permanent, temporary or contracted, and contractors are responsible for ensuring that they are aware of the requirements incumbent upon them and for ensuring that they comply with these on a day to day basis.





## Versions

Version	Changes	Date Changes made	Who signed off
1.0	Developed in 2018 by SMT.		
1.1	Updated draft including changes for GDPR and DPA 2018.	9 March 2021	
2.0	Removal of data breach section (as now covered by Records Management policy).	7 May 2024	Director Operations (Internal)

### Associated Policies:

**Records Management**

**Confidentiality**

**Data protection**

**Business Continuity Plan**

