

Information Governance Workplan – Issues prioritised for action in 2008/9 and 2009/10

| Item | Category/description  | End date   | Status  | Responsibility   |
|------|---|--|---|--|
| 1    | <p><b>Information Governance Policy and Strategy</b></p> <ul style="list-style-type: none"> <li>Establishment of an appropriately appointed Information Governance Committee accountable to the Health and Clinical Governance Committee</li> <li>Development, approval and implementation of an Information Governance Policy/Strategy that provides a broad framework for the ongoing agenda around Information Governance</li> <li>Disseminate key messages relating to the Information Governance Strategy, ensuring that a culture develops which recognises and responds to individual and corporate responsibility related to Information Governance</li> </ul>  | <p>April 2008</p> <p>Dec 2008</p> <p>Ongoing</p> | <p>Complete</p> <p>Approved by IG Committee – to be approved by NHS Board</p> <p>Communication campaign commenced and will feature as an ongoing activity</p>   | <p>Alan Lawrie</p> <p>Alistair Stewart</p> <p>Alistair Stewart/Marysia Morkis</p>  |
| 2    | <p><b>Communication, Awareness and Training</b></p> <ul style="list-style-type: none"> <li>Review and revise staff induction programmes as they relate to staff responsibilities and obligations with regard to Information Governance</li> <li>Ensure that all staff are aware of their legal and professional responsibilities with respect to Information Governance</li> <li>Develop and deliver a targeted communications programme ensuring that staff are aware, and continue to be aware of their responsibilities in respect of Information Governance and specific activities related to its maintenance</li> <li>Ensure that the training and development needs of staff are recognised and appropriate programmes are in place to support and maintain an environment in which Information Governance is recognised as important and enacted in the delivery of operational services</li> </ul> | <p>Feb 2009</p> <p>Ongoing</p> <p>March 2009</p> | <p>Documentation and presentation material under revision to reflect current policy</p> <p>Communication campaign commenced and will feature as an ongoing activity</p> <p>Online training packages are being assessed with a view to adoption nationally</p> | <p>Alistair Stewart/Organisational Development</p> <p>Alistair Stewart/Marysia Morkis</p> <p>Alistair Stewart/Organisational Development</p> |
| 3    | <p><b>Incident Reporting</b></p> <ul style="list-style-type: none"> <li>Develop a 'learning culture' with regard to Information</li> </ul>  | <p>Feb 2009</p>                                  | <p>The need to report breaches</p>  | <p>Carol McGhee</p>  |

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|             | <p>Governance through the establishment and maintenance of an Incident Reporting System consistent with, and linked to the NHS Lanarkshire agreed approach to Incident and Risk Management</p> <ul style="list-style-type: none"> <li>Encourage and support staff in the reporting of information security breaches and establish systems that support the assessment of risk and the development of mitigation measures</li> </ul>   |  | and near misses through the Datix management system will be formally launched in February 2009 – briefings to date have highlighted the need to report   |  |
| <b>Item</b> | <b>Category/description</b>   | <b>End date</b>  | <b>Status</b>  | <b>Responsibility</b>  |
| 4           | <p><b>Confidentiality</b></p> <ul style="list-style-type: none"> <li>Establish clauses in all staff and contractor contracts stating responsibilities with regard to prevailing laws related to the need to preserve person confidentiality</li> <li>Critically review all information flows within NHS Lanarkshire and between NHS Lanarkshire and its partners ensuring that they are compliant with law and best practice with regard to person confidentiality</li> <li>Critically review all literature related to confidentiality, ensuring that staff and patients have a mutual understanding of their rights and responsibilities</li> <li>Develop and disseminate clear guidance to staff setting out their responsibilities to maintain confidentiality in gathering, storing, distributing and disposal of person identifiable data</li> <li>Review and revise policy related to the display of person identifiable data in clinical areas including the storage of patient records, notes, white boards and miscellaneous documentation – ensuring that confidentiality of the individual is maintained</li> <li>Review and revise where appropriate ‘safe haven’ environments for the safe and secure exchange of person identifiable data</li> </ul> | <p>April 2009</p> <p>April 2009</p> <p>April 2009</p> <p>April 2009</p> <p>February 2009</p> | <p>Work commenced and on schedule</p> <p>Systematic review underway and new documentation being introduced</p> <p>Interim guidance has been issued in various briefings and systematic review commenced</p> <p>Interim guidance has been issued in various briefings and new guidance will be incorporated in Records Management Policies that are under development<br/>Work underway and on schedule</p> | <p>John McNeil</p> <p>Robin Wright</p> <p>Alistair Stewart</p> <p>Alistair Stewart</p> <p>Alistair Stewart/John Duncan</p> <p>Alistair Stewart</p> |
| 5           | <p><b>Records Management</b></p> <ul style="list-style-type: none"> <li>Critically review and revise Records Management Procedures</li> </ul>   | April 2009   | Revised Records Management   | John Duncan  |

|      | <p>and Policies to ensure that the content, security, transportation, distribution, storage and disposal of records is conducted in accordance with prevailing law and best practice</p> <ul style="list-style-type: none"> <li>• Implement the recommendations emerging from the Strathmartine Report as they relate to NHS Lanarkshire with specific regard to the guidance related to the vacation and disposal of premises</li> <li>• Critically review the physical environment for the storage of patient and person records ensuring that they are physically secure and conducive to good practice</li> </ul>   | <p>December 2008</p> <p>February 2009</p>  | <p>Policies are under development taking account of recent guidance</p> <p>Local action plan agreed and in implementation – revised procedures for premises management issues are in place and Records Management Policy will fully support recommendations</p> <p>Risk assessment has commenced together with plans for secure secondary store</p> | <p>Ian Ross/David Browning/John Duncan</p> <p>John Duncan</p> |
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| 6    | <p><b>IT and Data Security</b></p> <ul style="list-style-type: none"> <li>• Implement revised policies, procedures, hardware and software related to the restricted access to/use of fixed and mobile devices in accordance with agreed standards within NHS Scotland, including but not restricted to: <ul style="list-style-type: none"> <li>◦ Encryption of all mobile devices including laptop, handheld and portable media devices</li> <li>◦ The removal of all person identifiable data from desktop computers and relocated in a central secure storage facility</li> </ul> </li> <li>• Review and revise procedures for the disposal of data and equipment</li> <li>• Review all IT and Data Management Policies ensuring currency and appropriateness to known risks</li> </ul> | <p>December 2008</p> <p>June 2009</p> <p>Complete, June 2008</p> <p>April 2009</p> | <p>Revised policy in place and procedures being implemented during December 2008 to support change</p> <p>12 month programme of work is on schedule</p> <p>Participating in nationally coordinated activity and taking local action where necessary</p>   | <p>Robin Wright</p> <p>Robin Wright</p> <p>Robin Wright</p>   |

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| 7 | <p><b>Audit of Systems use and data monitoring</b></p> <ul style="list-style-type: none"> <li>• Ensure that systems in use within NHS Lanarkshire are subject to regular audit to confirm the appropriate use of these systems</li> <li>• Establish systems that ensure the auditability of requests for person identifiable information is necessary and justified</li> <li>• review and revise NHS Lanarkshire policies and procedures related to the use of eMail for patient identifiable data ensuring that such use is restricted to circumstances agreed by the Health and Clinical Governance Committee – linked to nationally coordinated policy work</li> </ul> | December 2008 | Communication to all system leads will commence in December 2008 to reinforce good practice – specific work underway in Emergency Care Summary as 'model' approach | Robin Wright |
|   |   | June 2009     | Work commenced   | Robin Wright |
|   |   | March 2009    | Work commenced   | Robin Wright |