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Community
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Help Point



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**“Working to Empower the Community”
in Lancashire and Cumbria**

Pamela Beswick - Chief Executive Officer

INFORMATION GOVERNANCE POLICY

1. Summary

Signposts Multi Agency Resource Centre Limited believes that information is a vital asset, both in terms of the management of individual client records and the efficient management of services and resources. It plays a key part in governance, service planning and performance management with Signposts.

It also gives assurance to partner agencies and to individuals that personal information is dealt with legally, securely, efficiently and effectively, in order to deliver the best possible service.

Signposts makes this assurance about Information Governance because we wish to ensure that one of our most important assets, information, in both casework and management terms, is respected and held in a secure and manageable conditions. It is therefore of paramount importance to ensure that information is efficiently managed on the basis of the Department of Health **HORUS** categorisation;

- Held safely and confidentially
- Obtained fairly and effectively
- Recorded accurately and reliably
- Used effectively and ethically
- Shared appropriately and lawfully

It is therefore 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.

2. Scope

This policy applies to those members of staff that are directly employed by Signposts and for whom Signposts has legal responsibility. This policy applies to all employees of the Signposts and covers all aspects of information within the organisation, including but not limited to:-

- Client/Service User information
- Personnel/Staff information
- Organisational information

Charity Registration Number: 1117645

Member of AdviceUK (previously FIAC)

Company Limited by Guarantee: 5990592

Registered in England and Wales



North Lancashire
Teaching Primary Care Trust



INVESTOR IN PEOPLE

Additional major funding from Preston City Council, the FC Scott Charitable Trust and Tudor Trust

- All aspects of handling information, including (but not limited to):
- Structured record systems - paper and electronic
- Transmission of information – fax, e-mail, post and telephone
- All information systems purchased, developed and managed by/or on behalf of the organisation. It must be followed by all staff employed on a permanent, temporary or voluntary placement or undertaking work on behalf of Signposts

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- Structured record systems-paper and electronic
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3. Guidance

3.1 Principles of Information Governance

There are 4 key interlinked strands to the information governance policy:

- Openness
- Legal compliance
- Information security
- Quality assurance

Signposts recognises the need for an appropriate balance between openness and confidentiality in the management and use of information. Signposts 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 patients and staff and commercially sensitive information. Signposts also recognises the need to share information with other organisations in a controlled manner consistent with the interests of the patient and, in some circumstances, the public interest.

Signposts believes that accurate, timely and relevant information is essential to deliver work of the highest quality. As such it is the responsibility of the whole team to ensure and promote the quality of information and to actively use information in decision making processes.

It also gives assurance that personal information is dealt with legally, securely, efficiently and effectively, in order to deliver the best possible care.

Signposts will establish and maintain policies and procedures to ensure compliance with requirements contained in the Connecting for Health Information Governance Toolkit.

It is therefore of paramount importance to ensure that information is efficiently managed, and that appropriate policies, procedures and management accountability provide a robust governance framework for information management. Information Governance is the means of providing this governance framework, and currently includes the following legislation and work areas:

- Data Protection Act 1998
- Freedom of Information Act 2000
- NHS Connecting for Health Information Governance Toolkit

3.2 Aims and Objectives

This document sets out the requirement to maintain policies and procedures in order to be compliant with the criteria of the National Information Governance Toolkit

Openness

- Non-confidential information on Signposts and its services should be available to the public through a variety of media
- Signposts will establish and maintain policies to ensure compliance with the Freedom of Information Act
- Clients should have ready access to information relating to their own case, their options and their rights
- Signposts will have clear procedures and arrangements for liaison with the press and broadcasting media
- Signposts will have clear procedures and arrangements for handling queries from clients and the public

3.1. Legal Compliance

- Signposts regards all identifiable personal information relating to clients and staff as confidential and as such takes steps to ensure that the handling of such information complies with the Data Protection Act 1998 except where there is a legal requirement to override the Act.
- Signposts will establish and maintain policies to ensure compliance with the Data Protection Act, Freedom of Information Act, Human Rights Act and the common law confidentiality
- Signposts will establish and maintain policies for the controlled and appropriate sharing of patient information with other agencies, taking account of relevant legislation (e.g. Health and Social Care Act, Crime and Disorder Act, Protection of Children Act)

3.2. Information Security

- Signposts will establish and maintain policies for the effective and secure management of its information assets and resources
- Signposts will promote effective confidentiality and security practice to its staff through policies, procedures and training
- Signposts will establish and maintain incident reporting procedures and will monitor and investigate all reported instances of actual or potential breaches of confidentiality and security

3.3. Information Quality Assurance

- Signposts will establish and maintain policies and procedures for information quality assurance and the effective management of records
- Managers are expected to take ownership of, and seek to improve, the quality of information within their services
- Wherever possible, information quality should be assured at the point of collection
- Data standards will be set through clear and consistent definition of data items, in accordance with national standards.
- Signposts will promote information quality and effective records management through policies, procedures/user manuals and training

4. Specific Responsibilities

The Board

It is the role of Signposts Board to define the policy in respect of Information Governance, taking into account legal and other requirements. The Board is also responsible for ensuring that sufficient resources are provided to support the requirements of the policy.

Chief Executive

The Chief Executive, as Accountable Officer of Signposts, has overall accountability and responsibility for Information Governance and will provide assurance, through the Annual Risk Assessment, that all information risks are effectively managed and mitigated.

The Chief Executive also acts as Caldicott Guardian and is responsible for ensuring that the Signposts processes satisfy the highest practical standards for handling information. The Caldicott Guardian will be responsible for ensuring the safe recording, storing and retention of all personal data and ensuring all information flows are mapped to exclude any leaks of information. The Caldicott Guardian will carry any investigations required and negotiate all information sharing agreements on the behalf of Signposts.

The Senior Management Team

The Senior Management Team is responsible for overseeing day to day Information Governance issues; developing and maintaining policies, standards, procedures and guidance, coordinating Information Governance in Signposts, ensuring compliance and raising awareness of Information Governance.

The Operational Management Team

All managers within Signposts are responsible for ensuring that the policy and its supporting standards and guidelines are built into local processes and that there is on-going compliance.

The team as a whole

All staff, whether paid or voluntary, 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.

5. Governance Arrangements

Review

Signposts will undertake or commission annual assessments and audits of its compliance with these arrangements.

Information toolkit and annual performance

An assessment of compliance with requirements, within the Connecting for Health Information Governance Toolkit (IGT), is undertaken each year. Annual reports and proposed work programmes are required prior to submission.

An action plan to ensure continued compliance and improvement with the Toolkit will be maintained by the Chief Executive. Progress towards the Action plan will be reported to the Board on a quarterly basis.

Training and communications

In order for Information Governance policies and procedures to be effective, it is essential that all staff are aware of their obligations in this area. The following will ensure that this occurs:

- Corporate induction to educate new starters about information governance issues.
- Regular communications to staff on Information Governance policies and procedures.
- Guidance and access to policies and procedures on the staff Intranet and through policy folders in staff bases.
- Inclusion of Information Governance topics in monthly team bulletin for staff.

6.0 Associated Documents

- Data Protection Policy including record management
- Confidentiality Policy
- Information and IT Security Policy

Chief Executive
September 2011

Signposts acknowledges that this policy is based upon an exemplar policy from the Connecting for Health Information Governance knowledgebase