



NOT PROTECTIVELY MARKED

Public Board Meeting

**July 2018
Item No 07**

THIS PAPER IS FOR APPROVAL

INFORMATION GOVERNANCE STRATEGY

Lead Director	Dr Patricia O'Connor, Director of Care Quality & Strategic Development
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Action required	The Board is asked to approve the Service's Information Governance Strategy.
Key points	<p>The Service's Information Governance Strategy has been developed. The strategic objectives and associated work plan will be the direction of travel for Information Governance in the future. The work plan will be reviewed on an annual basis and presented to the Information Governance Group and Audit Committee.</p> <p>Sign off has been obtained by the Service's Information Governance Group, Executive Team and Audit Committee.</p> <p>The strategy has an anticipated launch date of 1 October 2018.</p>
Timing	Progress against the strategy and the updated work plan will be presented annually to the Audit Committee in the Information Governance Annual Report.
Link to Corporate Objectives	<p>The Corporate Objectives this paper relates to are:-</p> <p>1.2 Engaging with patients, carers and other providers of health and care services to deliver outcomes that matter to people.</p> <p>6.2 Use continuous improvement methodologies to ensure we work smarter to improve quality, efficiency and effectiveness.</p>
Contribution to the 2020 vision for Health and Social Care	<p>The governance of information is key to the Service's 2020 vision in terms of:</p> <ul style="list-style-type: none">• Appropriate sharing of information across health and other sectors.• Assessment of the privacy impacts of new initiatives and projects.• Protection of personal information held by the Service.
Benefit to Patients	Information Governance ensures patient's information is handled appropriately.
Equality and Diversity	No implications identified.

Information Governance Strategy

Vision 2022/23 SAS is a trusted Data Controller in the way data is gathered, held, used and shared.



GAP Analysis shows need to have

- Staff IG awareness immature, increased staff engagement
- IAOs awareness and acceptance of responsibilities
- IS & IG policies & processes that meet SG ehealth framework & legislation
- IG capability and capacity attuned to business need
- The capacity to deliver the Service's commitments set out in the RMP
- Ability to safely make best use of new technologies.

Current Situation:

Strategic level of awareness within limited areas of the Service which affects the pace of delivery.

Building foundations for consistent IG compliance

Building staff awareness and capability

Compliance with governance and processes

Consolidation of IG strategic delivery

Review of the IG delivery model

Actions in 2018/19:

- Prepare the Service to meet the requirements of new General Data Protection Regulation (GDPR)
- Implementing the Service's IG policy framework
- Develop and roll out an internal IG Communications and Engagement Plan
- Develop an IG Measurement Framework
- Recruit Records Manager to take forward implementation of Records Management Plan
- Develop and begin implementation of Cyber Security Management Plan

Actions in 2019/20:

- Fully implement the Service's IG measurement framework
- First phase of information assets register completed.
- IG staff training reviewed and first phase of training & awareness programme implemented.
- Full compliance with the Service's IG policy framework.
- Initiate the development of the Service's Business Classification Scheme and Electronic Records Management System
- Full implementation of Cyber Security Management Plan

Actions in 2020/21

- IS National Framework and information assets register implementation completed
- Full implementation of IG training and awareness programme.
- Full review of Information Governance delivery plan.
- Sign off the Service's Business Classification Scheme (BCS) and Electronic Records Management System (ERMS).

Actions in 2021/22

- Full implementation of BCS and ERMS
- Evidence of the effectiveness of the implementation of the IG strategy
- Review and consolidate the benefits of an IG shared service solution
- IG fully embedded in all processes & supporting innovation

Actions in 2022/23

- Refresh of IG Strategy
- Review SAS model of IG delivery
- Review of outcomes from the IG improvement programme

Information Governance Strategic Workplan				
2018/19				
ACTIONS	OUTCOMES	RESPONSIBLE	ANTICIPATED DELIVERY DATE	Complete
Prepare the Service to meet the requirements of new General Data Protection Regulation (GDPR)	All contracts with Data Processors reviewed to bring in line with GDPR	Head of Procurement	Sep-18	On track
	Review and update Data Protection Notices	Info Gov Officer	May-18	Complete
	Develop and implement GDPR communications plan	Info Serv & Gov Mgr	Dec-18	On track
	Review and update Subject Access form	Info Serv & Gov Mgr	May-18	Complete
	Identify Data Protection Officer	Director of Care Quality & Strat Dev	Apr-18	Complete
	Data Protection Impact Assessment Template	Info Gov Officer	May-18	Complete
Implementing the Service's IG policy framework	Carry out a IG policy gap analysis	Info Gov Officer	Jun-18	Complete
	Review and update priority 1 policies	Info Gov Officer	Nov-18	On track
	Review and update priority 2 policies	Info Gov Officer	Feb-19	On track
	Review and update priority 3 policies	Info Gov Officer	May-19	On track
	Move to annual IG policy framework (2019/20)	Info Serv & Gov Mgr	Jun-19	On track
	Develop formal policy compliance reviews (2019/20)	Info Serv & Gov Mgr	Jun-19	On track
Develop and roll out an internal IG Communications and Engagement Plan	Comms and Engagement Plan Developed	Info Serv & Gov Mgr/ Head of Comms	Apr-18	Complete
	IG and Comms to agree Plan	Info Serv & Gov Mgr/ Head of Comms	May-18	Complete
	Comms and Engagement Plan - IGG	Information Governance Group	May-18	Complete
	Measurement Framework Developed	Info Serv & Gov Mgr	Aug-18	On track
Develop an IG Measurement Framework	Measurement Framework - IGG	Info Serv & Gov Mgr	Sep-18	On track
	Measurement Framework - Sign Off IGG	Information Governance Group	Dec-18	On track
	Implementation of Framework (2019/20)	Info Serv & Gov Mgr	Oct-19	On track
	Approval for recruitment of Records Manager	Info Serv & Gov Mgr	May-18	Complete
Recruit Records Manager to take forward implementation of Records Management Plan	Recruitment of Records Manager	Info Serv & Gov Mgr	Jul-18	On track
	Records Manager in Post	Info Serv & Gov Mgr	Aug-18	On track
	Records Management Workplan Developed	Info Serv & Gov Mgr	Aug-18	On track
	Scottish Public sector Cyber Resilience Framework	ICT General Manager	N/A	N/A
Develop and Begin Implementation of Cyber Security Management Plan	Develop and implement Cyber Security Governance	ICT General Manager	Jun-18	Complete
	Become an active member of Cyber Security Information Sharing Partnership (CISP)	ICT General Manager	Jun-18	Complete
	Appropriate independent assurance of the five critical controls (Cyber Essentials certification)	ICT General Manager	Oct-18	On track
	Active Cyber Defence (ACD) measures reviewed and updated	ICT General Manager	Aug-18	In progress
	Cyber Security training and awareness raising	ICT General Manager	Mar-19	In progress / perpetual
	Develop and implement Cyber Security incident response plan template	ICT General Manager/Info Serv & Gov Mgr	Aug-18	In progress