Information Governance Policy

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INFORMATION GOVERNANCE POLICY

1. BACKGROUND

Information governance is the framework of law and best practice that regulates the manner in which information, including information relating to and identifying individuals, is managed (i.e. obtained, handled, used and disclosed). It is a complex and rapidly developing area and one of utmost importance since information lies at the heart of Frailty Care services and underpins everything it does.

2. SUMMARY

Information is a vital asset in Frailty Care of the clinical management of individual patients and the efficient management of services and resources. It plays a key part in clinical governance, service planning and performance management. Information Governance is concerned with the way in which NHS organisations and associated third parties handle information about patients/clients (business data) and employees, in particular, personal and sensitive information. It allows organisations and individuals to ensure that personal information is dealt with legally, securely, efficiently and effectively in order to deliver the best possible care and service.

Information Governance is a framework that brings together all of the requirements, standards and best practice that apply to the handling of personal information. It is therefore of paramount importance to ensure that information is efficiently managed, and that appropriate policies and procedures, management accountability and structures provide a robust governance framework for information management.

3 POLICY STATEMENT

Frailty Care Ltd is committed to meeting the information needs of patients, healthcare professionals, policy makers and managers and members of the public.

3.1 Patients

Patients and their carers have a right to know information about their condition, the treatments they are undergoing and the likely outcomes. It is the responsibility of Frailty Care Ltd to ensure this information is accurate and easily available to patients upon request.

3.2 Healthcare Professionals
Healthcare Professionals will receive fast, reliable and accurate information about the patients within their care. Information should be available to support them in evaluation of the care they give, underpinning clinical governance, planning and research and helping with their continual professional development.

3.3 Policy makers and managers
Good quality information should be available to policy makers and managers to help them better target and use the resources deployed in Frailty Care Ltd to improve the quality of life of patients and local communities.

3.4 The public
Information available to the clients of Frailty Care Ltd should be as accurate and up to date as possible.

4 LEGISLATION AND NHS GUIDANCE
Recent legislation is having a significant effect on Information Governance. Frailty Care Ltd must ensure that all policies and procedures are fully compliant with legislation.

5 PRINCIPLES
Frailty Care Ltd recognises the need for an appropriate balance between openness and confidentiality in the management and use of information. It 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. Frailty Care Ltd also recognises the need to share patient information with other health organisations and other agencies in a controlled manner consistent with the interests of the patient, of the business and, where appropriate, the public interest.

Frailty Care Ltd believes that accurate, timely and relevant information is essential to deliver the highest quality health care. As such, it is the responsibility of all clinicians and managers to ensure and promote the quality of information and to actively use information in decision-making processes.

5.1 Openness
- Non-confidential information on Frailty Care Ltd and its services should be available to the public through a variety of media, in the spirit of openness.
- Frailty Care will establish and maintain policies to ensure compliance with the Freedom of Information Act.
- Frailty Care will undertake or commission annual assessments and audits of its policies and arrangements for openness.

- Patients should have ready access to information relating to their own health care, their options for treatment and their rights as patients.
- Frailty Care will follow clear procedures and arrangements for liaison with the press and broadcasting media.
- Frailty Care will follow clear procedures and arrangements for handling queries from patients and the public.

5.2 Legal Compliance

- Frailty Care Ltd regards all identifiable personal information relating to patients as confidential.
- Frailty Care will undertake or commission annual assessments and audits of its compliance with legal requirements.
- Frailty Care Ltd regards all personally identifiable information relating to staff as confidential except where national policy on accountability and openness requires otherwise.
- Frailty Care Ltd will establish and maintain policies to ensure compliance with the Data Protection Act, Human Rights Act and the common law of confidentiality.
- Frailty Care Ltd 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).

5.3 Information Security

- Frailty Care Ltd will establish and maintain policies for the effective and secure management of its information assets and resources.
- Frailty Care Ltd will undertake or commission annual assessments and audits of its information and IT security arrangements.
- Frailty Care Ltd will promote effective confidentiality and security practice to its staff through policies, procedures and regular training.
- Frailty Care Ltd will establish and maintain incident reporting procedures and will monitor and investigate all reported instances of actual or potential breaches of confidentiality and security.

5.4 Information Quality Assurance

- Frailty Care Ltd will establish and maintain policies and procedures for information quality assurance and the effective management of records.
- Frailty Care Ltd will undertake or commission annual assessments and audits of its information quality and records management arrangements.
- Managers shall be 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.

- Frailty Care Ltd will promote information quality and effective records management through policies, procedures, user manuals and regular training.

5.5   Communication principles
Frailty Care Ltd commits to the following principles:
- Frailty Care will underpin all communications to make a significant contribution to the health and wellbeing of the people that receive services from the organisation.
- Effective communication, at all levels of Frailty Care, that is systematic and consistent.
- Will demonstrate that Frailty Care values and respects staff expertise and contributions, respects confidentiality, focuses on strengths and provides appropriate, balanced supervision, appraisal and evaluation.
- Communications that are clear and unambiguous, involving, receiving and giving information in a language that all parties understand.
- Communications that are two-way and participative, involving staff at all levels of the organisation, commissioned services and the public in a meaningful dialogue. Illustrating that Frailty Care Ltd is a learning organisation, by listening to what others say, embracing best practice, involving staff, seeking experience, learning from comments and complaints, and challenging the 'status quo'.
- Provide support to all staff in all their communications which in turn should empower people by providing a clear framework, supporting staff and users with offers of advice, guidance and recognition, providing education and training and guide on the sharing of responsibility.

5.6 Training principles
- It is mandatory for all staff, including permanent, part-time, full-time, bank staff and contractors, to complete information governance training and update it annually. This includes the Information Governance agenda, Freedom of Information, Data Protection, Caldicott, and other current legislation.
- Training may be completed face to face or online. Records of completion will be maintained. Managers and staff should include a review of information governance understanding and training as part of the appraisal and personal development planning process.
- Aspects of information governance will also be included in training sessions on other topics.

6   RESPONSIBILITIES AND ACCOUNTABILITIES
Every member of staff, whether employed, consultant, locum, contractor or agency, has individual responsibility for compliance with this strategy and policy. Failure to adhere to the Policy and its associated procedures/guidelines may result in disciplinary action.

The following roles have additional responsibilities and accountabilities, as follows:

The development, implementation of, and compliance with this policy is delegated to the Caldicott Guardian, and the Information Governance Lead, whose details are set out below.

6.1   Caldicott Guardian

The Caldicott Guardian is the CEO of Frailty Care Ltd, with responsibility for safeguarding the confidentiality of patient information. They will oversee all disclosures of individual personal information with particular attention being paid to extraordinary disclosures.

6.2   Information Governance Lead

The role of the Information Governance Lead:
- Overseeing the policies and procedures required by the Data Protection Act and subsequent regulations, NHS requirements and the Caldicott Principles.
- Reviewing the organisation's Data Protection registration with the Information Commissioner's Office.
- Acting as first point of contact for training, advice and support for all staff on matters relating to Information Governance and Data Protection which may arise within the organisation.

6.3   Staff

Every member of staff (including agency, bank, locums, volunteers, contractors, noncontract and student placements) will, in the course of their work, handle and/or be privy to confidential personal information whether relating to staff, patients or their careers, business, family or friends or any other individuals connected to Frailty Care Ltd in some way.

Staff shall be required to:
- Adhere to this Policy, associated procedures/guidelines and all related systems and processes.
- Attend data protection training as appropriate.
- Ensure that all personally identifiable information is accurate, relevant, up to date and used appropriately, both electronic and manual records including the use of databases and in accordance with relevant legislation.
- Ensure that all individual identifiable information is kept safe and secure at all times in accordance with relevant legislation and guidance.
- Have signed a contract that includes Confidentiality, Information Security and data protection clauses.
- Understand that breaches of policy will be investigated by formal disciplinary procedures which may lead to dismissal and/or legal action.

7. Training needs assessment

The information governance training needs of all staff who have access to personal data will be assessed. This will be completed on implementation of the policy for existing staff and at the Corporate Induction for new staff.

The training needs assessment form will be reviewed when there is a change in the role and responsibilities of a member of staff or an organisational or system change.