



AGENDA ITEM

3.5

Digital & Data Committee

NHS WALES TOOLKIT SUBMISSION REPORT

Date of meeting	12 th July 2021
FOI Status	Open/Public
If closed please indicate reason	Choose an item.
Prepared by	Claire Northwell- Head of Information Governance
Presented by	Claire Northwell – Head of Information Governance
Approving Executive Sponsor	Director of Corporate Governance
Report purpose	FOR NOTING

Engagement (internal/external) undertaken to date (including receipt/consideration at Committee/group)

Committee/Group/Individuals	Date	Outcome
Chief Information Officer / SIRO	May 2021	SUPPORTED
Information Governance Group	June 2021	SUPPORTED

ACRONYMS

ICO	Information Commissioner's Office
SIRO	Senior Information Risk Owner



1. SITUATION/BACKGROUND

The Health Board is required to demonstrate compliance with data protection and Caldicott principles. This used to be assessed by the organisation undertaking an annual Caldicott Principles into Practice (C-PIP) assessment however this has now been replaced with a Toolkit.

Further to this, NHS Wales have now introduced a scoring matrix which supports us in completing the IG Toolkit submission. The Matrix enables Digital Health & Care Wales (DHCW), formerly NHS Wales Informatics Service (NWIS) to report for each organisation based on each assessment within the seven sections of the toolkit, together with an overall view of our own submission. The aim is that this breakdown will enable the organisation to easily identify areas for improvement which in turn helps us to inform our own IG Improvement Plan.

Please find attached our individual report (attachment 4.5a), along with supporting information on the scoring matrix and the assessment levels to be read alongside (attachment 4.5b).

2. SPECIFIC MATTERS FOR CONSIDERATION BY THIS MEETING (ASSESSMENT)

- 2.1 Members are informed that the IG Toolkit is a self-assessment, and as such these responses have not been verified by DHCW however they do provide us with an indication of compliance along with areas of improvement. The scoring matrix works by recognising if an answer has been inputted for each question.
- 2.2 Whilst members will note some encouraging scores, this report does highlight some areas where compliance is much less than others. These have been discussed with the SIRO and Director of Corporate Governance and will be raised with the Director of Digital when they are recruited, particularly as they will hold responsibility for records management. In addition to the other gaps, the IG team are currently compiling a work plan which will address the areas that require attention, with clear leads and timescales (such as PECR) and accountability. All updates will be presented to this Information Governance Group and this committee for scrutiny, monitoring and assurance.



3. KEY RISKS/MATTERS FOR ESCALATION TO BOARD/COMMITTEE

3.1 We are currently working through the outcomes to understand how many of the gaps present significant risk and how those risks may be mitigated. Although we have been provided with the All Wales report, we intend to use this as a benchmark. The Head of Information Governance will be raised these outcomes at the All Wales Information Governance Advisory Group (IGMAG) and we will be working as part of the policy sub group to establish whether there are common areas where we could address issues collectively via policies/ procedures or learn lessons where some work has already been undertaken to reduce duplication if possible and adopt best practice.

Our focus areas initially will be required around:

- Data quality
- Privacy and Electronic Communication Regulations (PECR)
- The reconvening of spot checks
- Training

4. IMPACT ASSESSMENT

Quality/Safety/Patient Experience implications	Yes (Please see detail below)
	Failure to comply with GDPR / Caldicott principles may affect the confidence of patients in the care they receive.
Related Health and Care standard(s)	Governance, Leadership and Accountability
	If more than one Healthcare Standard applies please list below:
Equality impact assessment completed	Not required



Legal implications / impact	Yes (Include further detail below)
	Requirements are covered by the GDPR 2016 and the Data Protection Act 2018 alongside the principles of Caldicott.
Resource (Capital/Revenue £/Workforce) implications / Impact	There is no direct impact on resources as a result of the activity outlined in this report.
Link to Main Strategic Objective	To Improve Quality, Safety & Patient Experience
Link to Main WCFG Act Objective	Provide high quality care as locally as possible wherever it is safe and sustainable

5. RECOMMENDATION

5.1 The **COMMITTEE** is asked to **NOTE** the content of the report.