



AGENDA ITEM

4.2

DIGITAL AND DATA COMMITTEE

**HIGHLIGHT REPORT FROM INFORMATION GOVERNANCE GROUP
MEETING ON 12TH APRIL 2021**

DATE OF MEETING

12/07/2021

PUBLIC OR PRIVATE REPORT

Public

**IF PRIVATE PLEASE
INDICATE REASON**

Not Applicable - Public Report

PREPARED BY

Rebecca Walsh

PRESENTED BY

Georgina Galletly, Director of Corporate
Governance

**EXECUTIVE SPONSOR
APPROVED**

Georgina Galletly, Director of Corporate
Governance

REPORT PURPOSE

FOR NOTING

ACRONYMS

CTM

Cwm Taf Morgannwg

FAQs

Frequently Asked Questions

GDPR

General Data Protection Regulations

ICO

Information Commissioners Office

ICT

Information, Communication and Technology

IG

Information Governance

IGG

Information Governance Group

ILG

Integrated Locality Group

SAR

Subject Access Request

CAMHS

Child & Adolescent Mental Health Services

FOIA	Freedom of Information Act
DPIA	Data Protection Impact Assessments
SAR	Subject Access Requests
WHSSC	Welsh Health Specialised Services Committee
SBUHB	Swansea Bay University Health Board
SLA	Service Level Agreement

1. PURPOSE

- 1.1 This report had been prepared to provide the Board with details of the key issues considered by the IGG at its meeting on 12th April 2021.
- 1.2 Key highlights from the meeting are reported in section 2.
- 1.3 The Committee is requested to **NOTE** the report.

2. HIGHLIGHT REPORT

ALERT / ESCALATE	<p>Positive Escalation - the IG Team continue to maintain high compliance with Data Protection and FOIA legislation during a period of increased demand in addition to general operations queries. They continue their commitment to ensuring training and awareness is rolled-out across the organisation.</p>
ADVISE	<p>Policy Development – The IG team have finalised for approval the following procedures and policies this period:</p> <ul style="list-style-type: none"> • DPIA Procedure (approved by Management Board in May 2021) • Records Management Policy - endorsed for approval by IGG ahead of submission to the Digital and Data Committee. • Records Management supporting Procedure (approved by Management Board in May 2021) ahead of submission to the Digital and Data Committee <p>The IG and Digital Risk Register was reviewed by the IGG.</p> <p>Information Governance Activity – the IG Team have seen increased demand in activity and requests for support over the past few months.</p>



This activity is listed below:

FOIAs:

Freedom of Information CTMUHB	Oct	Nov	Dec
Number of Requests	52	54	44
% responded within timescales	91%	91%	94%
Actual number of questions	254	245	148

Freedom of Information WHSSC	Oct	Nov	Dec
Number of Requests	2	0	0
% responded within timescales	100	0	0
Actual number of questions	7	0	0

SARs:

Data Protection – SARs for 2020	Oct	Nov	Dec
Medical Records (These inc. all 3rd party requests, i.e. police, etc.)	204	234	180
Mental Health (for CTM inc police req for Bridgend)	54	47	36
Mental Health SARs for Princess of Wales Hospital Acute and Mental Health (completed under SLA with SBUHB)	83	69	103
CAMHS	19	26	13
Corporate	1	0	0
Workforce and Organisational Development	0	0	0

Incidents:

The Team have received and investigated 73 incidents since the beginning of October 2020 to the end of December 2020. A breakdown is follows:

Category	October	November	December	Total
Breach of Confidentiality / Information Security	27	20	14	61
Health Records / Documentation	5	1	6	12
Total	32	21	20	73

	DPIAs: 11 Data Protection Impact Assessments (DPIA) requested / completed since October 2020.																								
ASSURE	<p>Members are asked to note that out of these incidents, three have been reported to the ICO. One of the incidents have been closed by the ICO with actions recommended. These have been implemented as a matter of urgency. The other two incidents are awaiting investigation/decision by the ICO.</p> <table border="1" data-bbox="395 611 1485 1254"> <thead> <tr> <th>Breach Category</th> <th>Date reported to ICO</th> <th>Incident Summary</th> <th>Comments / Current Status</th> <th>Closed</th> <th>Datix ref</th> </tr> </thead> <tbody> <tr> <td>Breach of confidentiality</td> <td>11/11/2020</td> <td>Misfiled maternity documents in handheld notes</td> <td>Recommendations issued to the relevant directorates. Systems to be reviewed / training to be provided</td> <td style="text-align: center;">✓</td> <td>W154436</td> </tr> <tr> <td>Breach of confidentiality</td> <td>15/02/2021</td> <td>Misdirected email outside of NHS Wales</td> <td>Reported to the ICO and awaiting outcome</td> <td></td> <td>W160905</td> </tr> <tr> <td>Breach of confidentiality</td> <td>30/03/2021</td> <td>Letter sent to wrong address</td> <td>Reported to the ICO and awaiting outcome</td> <td></td> <td>W162450</td> </tr> </tbody> </table>	Breach Category	Date reported to ICO	Incident Summary	Comments / Current Status	Closed	Datix ref	Breach of confidentiality	11/11/2020	Misfiled maternity documents in handheld notes	Recommendations issued to the relevant directorates. Systems to be reviewed / training to be provided	✓	W154436	Breach of confidentiality	15/02/2021	Misdirected email outside of NHS Wales	Reported to the ICO and awaiting outcome		W160905	Breach of confidentiality	30/03/2021	Letter sent to wrong address	Reported to the ICO and awaiting outcome		W162450
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INFORM	<p>The following All-Wales policies were also noted at the meeting and have now been added to the Corporate Policies SharePoint page:</p> <p>All-Wales Information Governance Policy All-Wales Information Security Policy All-Wales Internet Use Policy</p>																								
APPENDICES	NOT APPLICABLE																								