 <p>GIG CYMRU NHS WALES</p>	<p>Iechyd Cyhoeddus Cymru Public Health Wales</p>	<p>Name of Meeting Audit and Corporate Governance Committee Date of Meeting 10 September 2024 Agenda item: 4.2</p>
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<p>Integrated Governance Division: Information Governance Performance Report Q1 2024/2025</p>	
Executive lead:	Claire Birchall, Executive Director of Quality, Nursing and Allied Health Professionals
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Approval/Scrutiny route:	Stuart Silcox, Assistant Director, Integrated Governance

Purpose
<p>To provide assurance and updates from the Integrated Governance Division for Q1 2024-2025, specifically the following:</p> <ul style="list-style-type: none"> - Information Governance Performance Report for Q1 2024-2025, including an update from the Information Governance Working Group - Update on the progress of the Records Management SharePoint Implementation Programme

Recommendation:				
APPROVE <input type="checkbox"/>	CONSIDER <input checked="" type="checkbox"/>	RECOMMEND <input type="checkbox"/>	ADOPT <input type="checkbox"/>	ASSURANCE <input checked="" type="checkbox"/>
<p>The Committee is asked to:</p> <ul style="list-style-type: none"> • Receive and Consider the Information Governance Performance Report. • Take assurance that the Records Management SharePoint Implementation Programme is on track with the plan. 				

Link to Public Health Wales [Strategic Plan](#)

Public Health Wales has an agreed strategic plan, which has identified seven strategic priorities and well-being objectives.

This report contributes to the following:

Strategic Priority/Well-being Objective	All Strategic Priorities/Well-being Objectives
Strategic Priority/Well-being Objective	Choose an item.
Strategic Priority/Well-being Objective	Choose an item.

Summary impact analysis

Equality and Health Impact Assessment	No Equality and Health Impact Assessment is required.
Risk and Assurance	<p>This report will provide assurance that:</p> <p>The Information Governance Management System is operating effectively. The risks associated with Information Governance are included in the Information Governance Risk Register.</p> <p>The Records Management Sharepoint Implementation Programme is on track. Reference to: Datix Risk 1453 - There is a risk that PHW will run ineffective and inefficient services through poor record keeping. This will be caused by a lack of a coherent, organisation wide records management system and process.</p>
Health and Social Care (Quality and Engagement) (Wales) Act	This report supports and/or takes into account the <u>Health and Care Standards for NHS Wales Quality Themes</u> .
Financial implications	<p>The Information Governance Performance report outlines the performance of the Information Governance Management System to further reduce the risk of breaches of data protection legislation with the associated risk of significant fines and sanctions from the Information Commissioner.</p> <p>Progression of a corporate approach to Records Management has required financial investment.</p>

People implications	Progression of a corporate approach to Records Management will continue to require significant levels of training across the organisation. The full people implications are addressed in the paper below.
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1. Purpose / situation

To provide assurance and progress updates from the Integrated Governance Division for Q1 2024-2025, specifically the following:

- Information Governance Performance Report for Q1 2024-2025
- Provide an update from the work of the Information Governance Group
- Updates on the Records Management SharePoint Implementation Project

2. Information Governance Update

Background

The Information Governance Performance Report provides assurance that Public Health Wales maintains an Information Governance System in order to:

- discharge its responsibilities to ensure the security and appropriate use of personal information; and
- demonstrate compliance with data protection legislation.

Executive Director accountability and greater assurance that information risks are addressed is provided by Public Health Wales's designated Senior Information Risk Owner (SIRO), the National Director for Public Health Knowledge and Research.

Information Governance is also supported by an operational level organisation wide risk register which is available on request.

Freedom Of Information Act (FOI)

Under the Freedom of Information Act 2000, the organisation is required to comply with the appropriate release of information within the legislative timeframe.

In quarter 1, the number of missed deadlines has slightly increased the average response to 19 days from quarter 4 which was 17 days. This is over the Key Risk Indicator (KRI) of 15 days but is within the 20-working day deadline. Eighteen responses during Q1 were over the 20-working-day threshold, mostly due to the complexity of the requests, requiring significant time and resource to address from both the Directorate / Division concerned, and the Information Governance Service. Two requests remain outstanding at the time of producing this report which are both overdue. These include one which has been partly completed and one Environmental Information Regulation request.

The Information Governance Service's Information Governance Support Officer, whose duties include the administration of the FOI system, has been continuing to update and streamline the SharePoint based FOI administration system and processes. We have seen an increase in quicker responses across Directorates and an increase in requests for information that are complex to complete. Also, an additional approval process (at Executive Director / Chief Executive level) has been put into place towards the end of this quarter. The Information Governance Service is continuing to work with the SIRO and Deputy SIRO across Directorates to improve response efficiency.

Subject Access Requests (SAR)

The organisation has a responsibility to provide personal information if it is requested by an individual in form of a SAR. The number of requests has declined since the previous quarter, no deadlines were missed with an average of 11 days taken to respond and therefore well within the target 30-day timescale.

Personal data breaches

There is a requirement under the General Data Protection Regulation 2016 (GDPR), in which we are required to risk assess all personal data breaches and under certain circumstances to report them to the Information Commissioners Office (ICO), and the data subjects involved.

All personal data breaches are reported on Datix and are automatically flagged to the Information Governance Service. A risk assessment is then carried out through a Standard Operating Procedure and if the risk assessment suggests that the breach is either ICO or data subject reportable, the breach is referred to the SIRO for a decision.

There were 11 data breaches reported, with three incidents reported to the ICO during quarter 1. One incident was reported to the data subject.

Further information on these personal data breaches has been provided to the Committee in private session.

ICO decision – no further action

Work is ongoing to reduce the number of data breaches across the organisation following an extensive piece of work with support from the Improvement and Innovation Hub. Work is progressing on the new policy framework and revised data breach assessment and reporting procedure.

Mandatory Information Governance Training

Organisational wide compliance is at 89% up from 88% in the previous quarter, this is still above the NHS target of 85%. Corporate services are no longer out of compliance and are now 89% up from 69% in Q4.

Directorates are regularly reminded to ensure that staff maintain complete and up to date Mandatory Information Governance Training as there is a risk that reportable data breaches may occur where staff are not compliant with their mandatory training.

The Information Governance Group (IGG) Update

The IGG has been re-constituted as an Information Governance Forum for the benefit of Information Asset Owners (IAO) across both the wider PHW organisation and the NHS Wales Executive. As a discussion and learning forum, these meetings are subject to Terms of Reference and an agenda, but no formal minutes are recorded. The Information Governance Service is working with the SIRO to establish the most appropriate forum to formally consider and approve Information Governance related decisions, e.g. the Digital and Data Design Authority (DDDA).

Assurance can be taken that;

The IG work of PHW continues to progress in line with the revised focus and relationship with the new SIRO.

3. Records Management Project update

The continued transition to SharePoint as a document store is currently on track, with the following Directorates now moved over to SharePoint: (new Directorates since last update in red)

- QNAHPS*
- Board Business Unit
- People and Organisational Development
- Data, Knowledge, and Research
- **Policy and International Health, WHO Collaborating Centre**
- **Operations and Finance**

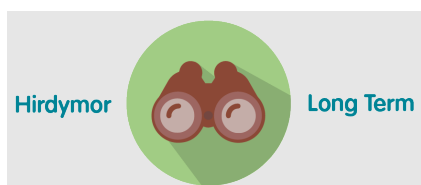
An assurance report around the Records Management (RM) project conducted by the PMO has been received by Business Executive Team (BET) and has reflected favourably on the progress so far. This review found that the level Delivery Confidence Assessment for this project is **Amber/Green** and that successful delivery (i.e. rollout of SharePoint to Directorates as an electronic document and records management system by 31/3/25) appears probable.

There are currently no significant delays to delivery and the project plan still has 3 months built in for slippage. The team continue to engage with staff around the organisation for the development of their SharePoint sites and infrastructure, with particular emphasis on ensuring tools and support are in place prior to migration.

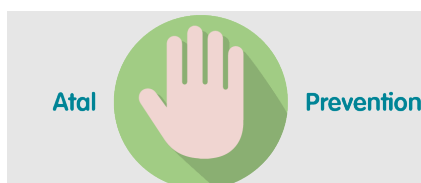
Organisational wide communications are improving, with more detailed updates and information being cascaded by the Communications Team as well as the development of a Records Management Intranet Page for staff to be able to access easily for updates and transition support.

Assurance can be received that the Records Management programme is progressing to the planned implementation timetable, with improving levels of engagement and communication with key stakeholders. The assurance report undertaken by the PMO will give additional detail and assurance and will form part of the next update to Committee.

4. Well-being of Future Generations (Wales) Act 2015



Analysis of trends the Information Governance team deal with and a proactive approach to FOI administration alongside a streamlined Records Management is essential to ensure the long-term viability and effectiveness of the organisation.



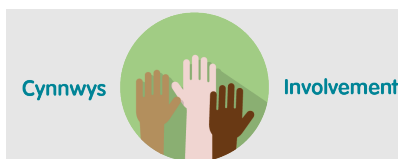
Training and guidance on best practice plus adherence to Records Management policies will proactively prevent the organisation from failing to comply with legislation including the requirements of the Freedom of Information Act 2000 and the Public Records Act 1958.



Integrated Governance's work is designed to integrate efficient processes and procedures for the benefit of all areas across the organisation.



Integrated Governance works regularly in collaboration with all PHW Directorates, and the Office for National Statistics have shared organisational learning from the recent implementation of a Records Management system.



All parts of the business will be involved in developing the Records Management system to ensure its proper integration across all business areas and all staff are encouraged to provide feedback on the Integrated Governance products they would like to see or any assistance needed.

5. Recommendation

The Committee is asked to:

- **Receive** and **Consider** the Information Governance Performance Report.
- **Take assurance** that the Records Management SharePoint Implementation Programme is on track with the plan.

