

Information Governance – Overview of Scope

1. Data Protection

Key policies

Data Protection Policy

Information Handling Guidance

Security Incident Management Policy

Information Security Classification Policy

Guidance for Handling Information Requests

Data Protection Impact Assessment

Areas of Work	Summary	Lead
Information Asset Register	List of software, hardware and paper assets, their properties, personal data held and risk assessment	IG & Complaints & Team Directorate Lead Officers
Privacy Notices	Sets out to data subjects what data is collected, for what purpose, who it is shared with and how long held for.	IG & Complaints & Team Directorate Lead Officers
ICO Notification	Registration of categories of data processing with Information Commissioner	IG & Complaints & Team
Handling Security Incidents	Potential and actual data breaches – investigation, mitigation and reporting to ICO	IG & Complaints & Team ICT Client Team
Data Sharing Agreements	Required for external contractors, partners and some internal sharing	IG & Complaints & Team Legal Directorate Lead Officers
Data Processing Agreements	Contractual agreement with external contractors and partners defining how and when personal data should be processed	IG & Complaints & Team Legal Directorate Lead Officers

Contract Clauses	Contractual agreement with external contractors and partners to cover DP and FOI	Legal IG & Complaints & Team
Subject Information Rights Including Subject Access Requests	Data subjects rights under DPA to <ul style="list-style-type: none"> To access a copy of their data held Be forgotten Stop automated processing of their data 	IG & Complaints & Team
Privacy by design	New and revised services (and processes) to be designed with data protection built-in and maximised from the outset.	IG & Complaints & Team ICT Client Team

2. Information Security matters

Key policies

Information Security Policy

Security Incident Management Policy

ICT Acceptable Use Policy

Protective Marking Scheme

Third Party Access Agreements

ICT Hardware Asset Management

ICT Software Asset Management

Areas of Work	Summary	Lead
Technical Measures for Security	Applications Infrastructure Existing systems and prospective applications	ICT Client Team
Security Incidents	Potential and actual data breaches – investigation, mitigation and reporting to ICO	ICT Client Team & Complaints and Information Team
Secure Email		ICT Client Team

PSN	Public Service Network accreditation	ICT Client Team
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3. Records Management matters

Key policies

Records Management Policy

Directorate Retention Schedules

Information Handling Guidance

Guidance for Handling Information Requests

Areas of Work	Summary	Lead
Retention and deletion of data	Retention schedules by directorate and service Ensure data held according to business and statutory timeframe and Delete from electronic systems / hard copy when no longer required	IG & Complaints & Team Directorate Lead Officers
Records audits	Archive Contract management Quality audits on software systems and manual files Transfer mapping	Facilities Management Directorate Lead Officers Audit
Security Classification Marking	Classification of documents by sensitivity, with associated measures for protection when handling and transferring	IG & Complaints Team ICT Client Team
Archiving and permanent preservation	Paper and electronic record archives Permanent preservation of data at Local History Library	Facilities Management Local History Library IG & Complaints & Team
FOI Act requirements including FOI Requests	Response to FOI and EIR requests Maintenance of Publication Scheme	IG & Complaints & Team

Transparency Code Compliance	Government Code for Transparency – periodic publishing of required and recommended data sets	IG & Complaints & Team Directorate Leads
Audits	To demonstrate compliance with service requirements and good practice	Audit IG & Complaints & Team
Data Quality	Maintain accurate and up-to-date records Proactive publication of data sets	Directorate Lead Officers

4. Regulatory and internal quality audits and accreditations

Key Requirements (externally set)

<https://www.igt.hscic.gov.uk/>

<https://www.gov.uk/government/groups/public-services-network>

<https://ico.org.uk/>

Areas of Work	Summary	Lead
NHS Data Protection and Security Toolkit	Annual Self-assessment with external review. Vital for PSN link to NHS	IG & Complaints & Team
PSN accreditation	Public Services Network - External review	ICT Client Team
ICO	Notify and register all processing activity Must notify of significant data breaches Rights to impose sanctions and fine if data protection breaches Will monitor if FOI requests and Subject Access Requests not answered in target	IG & Complaints & Team

Internal Audit	To demonstrate compliance with legislative, regulatory and service requirements and good practice	Audit
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5. Risk Management in relation to Information Governance Matters

Key policies

Corporate Risk Policy Statement

Data Protection Impact Assessment

Paper based information asset risk assessment

Electronic information asset risk assessment

Areas of Work	Summary	Lead
IG risk on JCAD	'IG Framework is not fit for purpose'	IG & Complaints & Team
Information Asset Register	List of software hardware and paper assets, their properties, personal data held and risk assessment	IG & Complaints & Team Directorate Lead Officers
Paper based information asset risk assessment	Risk assessment on each paper asset with detailed evaluation for any medium to high risk	IG & Complaints & Team Information Asset Owners Audit / Risk
Electronic information asset risk assessment	Risk assessment on each electronic asset with detailed evaluation for any medium to high risk	IG & Complaints & Team Information Asset Owners Audit / Risk
Privacy by design	New and revised services (and processes) to be designed with data protection built-in and maximised from the outset.	IG & Complaints Team ICT Client Team

6. Staff training and awareness around Information Governance

Areas of Work	Summary	Lead
Information Governance Framework	Hierarchy of policies, procedures and guidance to support the IG function, available for all staff on the intranet.	IG & Complaints & Team
Annual Training	DPA requires appropriate organisational and technical measures to be in place. This includes mandatory staff training <ul style="list-style-type: none">• DPA• Data Security• FOI• Records Management• Subject Access Requests	IG & Complaints & Team
Ad-hoc Training	Courses in FOI Act, EIR, Data Protection and Information Security.	IG & Complaints & Team