

**ANNUAL SELF ASSESSMENT
HEALTH AND CARE STANDARDS**

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| <p align="center">S Situation</p> | <p>Standard: 3.4 Corporate Assessment</p> |
| <p align="center">B Background</p> | <p>Please Confirm the rating from the following definitions:</p> <p>Information Governance (IG) – Getting There Information – Getting There</p> |
| <p align="center">A Assessment</p> | <p>Provide 250 words (<u>maximum</u>) to give necessary contextual narrative</p> <p>IG</p> <p>Progress in response to the ICO's assessment of compliance with the Data Protection Act (DPA) 1998 and in preparation for the implementation of the General Data Protection Regulation (GDPR) on 25 May 2018 has focussed on having the infrastructure in place to minimise non compliance in greatest areas. The following documents are attached in substantiation of the above statements:</p> <p>DPA – key action plan developments (submitted to the Information Technology and Governance - (ITGSC Sub-Committee meeting on 6 March 2018). GDPR –report of Information Governance Executive Team i.e. operational arm of the ITGSC re IG matters to ITGSC on 6 March 2018).</p> <p>The following give insights into the above</p> <ul style="list-style-type: none"> • Current level of mandatory IG training = 70% • Corporate Information Asset Register including all systems and servers held by UHB in place, and departmental IARs available in approx. third of settings • Information Asset Owner and Administrator model (central pillar of ICO DPA audit action plan) exists |

in Clinical Boards/Corporate Depts to varying degrees. The absence of a focal point for the dissemination of IG related information places these areas at a significant disadvantage in terms of keeping up to date in an area where change is occurring rapidly.

- Whilst there have been some examples of poor practice and lack of knowledge of IG requirements across the organisation (use of What's App and entry into data processing agreements with third party organisations that do not provide adequate safeguards to the UHB), more requests for support and sign off are going through corporate IG and actions are taken when lessons can be learnt, including publication of "12 Commandments" (see "Recommendation" below and release of a new DPA.
- There have been several instances of non-compliance with Section 55 of the DPA (i.e. inappropriate access to personal data) by staff despite the requirement to attend mandatory IG training that required notification to the ICO.

Information

- The level of use of the UHB's Business Intelligent (BI) system and associated dashboards continue to be both improving and encouraging, with increasing functionality for, and consequently uptake by clinicians. We now have 31 information sources feeding into the warehouse and much enhance functionality by upgrading our business intelligence solution.
- IT department have built a natural language toolkit for coding unstructured clinical text into Snomed-CT codes, this has been validated by coding department and is being rolled out, with referrals already completed.
- Coding has maintained levels above 95% completion and came top in the NWIS audit of accuracy.
- The depth, coverage and use of information and analysis has greatly improved and is becoming ingrained across directorates.

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| <p style="text-align: center;">R</p> <p>Recommendation</p> | <p>The following improvement actions have been identified as key deliverables for 18/19</p> <p>IG</p> <p>Awareness of key IG issues needs to be strengthened and continued to be mainstreamed at all levels. This includes to the development of a podcast to promote awareness of the “12 Commandments” designed to promote awareness of key issues relating to IG (re GDPR) and IT Security (re the implementation of the EU Directive on security of Networks and Information Systems (NIS) which also comes into effect in May 2018). The aim is to present this information in a visually compelling way in operational settings that users can relate to.</p> <p>Information</p> <ul style="list-style-type: none">• Continue to grow the availability of accessible live dashboards containing clinical information• Strengthen the support for primary and community care services and the transformation programme including data acquisition, BI reporting and analysis• Development and roll out of digitised clinical information model• Coding of mental health and outpatient activity |
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