INFORMATION GOVERNANCE COMMUNICATION STRATEGY 2015 - 2017

Summary

This document sets out the steps to be taken during the next two years to maintain and improve communication of the strategic Information Governance agenda in the Business Services Organisation (BSO). In particular, this plan looks at the key tasks to be undertaken by the Information Governance Management Group (IGMG) throughout the calendar year and the various methods to be used to maintain effective communication.

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0.8	10 Dec 15	Draft	Scott Stevenson	Inclusion of ICO
1.0	17 Dec 15	Live	Scott Stevenson	Approved by BSO Board

INFORMATION GOVERNANCE COMMUNICATION STRATEGY

INTRODUCTION

An effective communications strategy is vital to ensure all staff and the public are kept accurately informed of the key messages in Information Governance (IG).

Objective of the Strategy

- To communicate the key facts about the BSO IG agenda to all stakeholders in a simple straightforward manner.

Key Principles

- To consult with stakeholders

- To use most appropriate and effective means of communication that takes into account the differing needs of stakeholders

- To engage in communications

- To evaluate the effectiveness of our communications

There are five distinct groups with whom the BSO needs to communicate with in regards to IG:

1. DEPARTMENT OF HEALTH, SOCIAL SERVICES AND PUBLIC SAFETY (NI)

2. BSO STAFF

3. MEMBERS OF THE PUBLIC

4. CUSTOMERS, SERVICE USERS AND CONTRACTORS

5. THE INFORMATION COMMISIONERS OFFICE

In this communications strategy we have set out how we will meet the needs of communicating effectively with these stakeholders.

The BSO aims to use the most appropriate communication medium for the audiences receiving the information. This may involve using more than one method of communication and providing information in accessible formats as appropriate.

If you require this document in an alternative format (such as large print, Braille, disk, audio file, audio cassette, Easy Read or in minority languages to meet the needs of those not fluent in English) please contact –

Corporate Services
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Tel: 028 95 363746

Web Site: www.hscbusiness.hscni.net/services/1965
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We are committed to developing our communications strategy on an ongoing basis. Comments on this document are very welcome and can be sent by contacting us by any of the methods listed above.

DHSSPSNI

Current Communication Mechanisms

Information Governance Advisory Group

The BSO maintains attendance at the regional Information Governance Advisory Group (IGAG) with minutes, papers and agendas shared at the local BSO Information Governance Management Group (IGMG). Attendance is normally the Administrative Services Manager (ASM) and the ITS Security Operation Manager.

Information Management Controls Assurance Standard

The BSO reports on our adherence to the standard as part of our yearly governance report. The report contains a detailed breakdown of our scores against the relevant criteria together with information as to why scores have increased or decreased year on year.

Good Management Good Records (GMGR) Review Group

The BSO currently maintains a nominated GMGR representative who formally represents the BSO during this review process. Copies of all findings and review decisions are copied to the IGMG and can be located on the IG SharePoint site viewable by all IG members and IG leads. Important findings are shared by corporate communication via the BSO wide SharePoint site.

Proposed Communication Mechanisms

No new mechanisms proposed.

BSO STAFF

Current Communication Mechanisms

Information Governance Management Group

This group is comprised of key members from across the BSO who are the IG Leads for each directorate. The group meets fortnightly under the direction of DHRCS and provides strategic guidance and direction to all staff in the BSO. Additionally it is the primary method of assurance for DHRCS that the IG assurance framework is being enforced across the BSO.

BSO Intranet Website

This is the primary source of information for all staff members on the Information Governance agenda within the BSO. The site contains all relevant BSO policy and procedure in relation to IG as well as extensive staff guides on all aspects of IG. Additionally it has detailed sections on our requirements under the Data Protection Act and the Freedom of Information Act. Finally the staff pages contain contact details of all IG Leads and a link to the BSO IG SharePoint site.

Corporate Communication and Desk Alerts

Corporate Communications is an email based user group which allows corporate services to correspond directly with all BSO email users or by targeted use of user groups/locations. Information is either provided directly in the body of the mail or hosted on the BSO SharePoint site.

Desk Alerts are a software system which allows certain users such as the ASM to directly send messages to all workstations hosted on the BSO network.

Corporate Services makes use of both methods of electronic communication to deliver key messages to staff. Line managers are always instructed to ensure all communications are shared with staff that do not have access to a workstation.

Mandatory IG training

BSO conducts mandatory face to face class room training once every 2 years coordinated by the ASM. This is bolstered by additional lessons for specific BSO areas if required.

Corporate Induction Training

All new starts attend this blend of face to face and e learning training. The course contains specific information on IG and what is expected of staff with

regards to confidentiality and the security of personal data they come into contact with in their day to day responsibilities

Poster Campaigns

The BSO make use of a number of different visual aids in order to highlight the IG agenda. These have covered such topics as subject access requests, data security, clear desk policy, disposal of personal data and the transport of personal data.

SharePoint

An IG SharePoint site is available for use by all staff who have a specific IG related responsibility to fulfil. It is currently used by all IG Leads, Information Asset Officer (IAO), Information Asset Assistant (IAA) and members of the IGMG.

Bespoke Training Sessions

The ASM also delivers specific tailored training to individuals and groups as and when required to assist in the accurate completion of all control assurance related activity within IG and to assist departments to build high levels of assurance into their procedures during periods of change.

Records Management Audits by IGMG

Currently all sub units within the BSO will be selected for a Records Management Audit once every 3 years by members of the IGMG. All audit findings are shared with the IGMG and action plans prepared to initiate any improvements required. Shared learning is then communicated every quarter by the IGMG to Senior Management Team and BSO Board.

Service Area Team Meetings

Information governance is required as a standing item on team meetings within BSO. Teams discuss issues pertinent to Information Governance at their monthly team meetings.

Proposed Communication Mechanisms

Quarterly IG Newsletter/entry for Business Matters

Consideration is given to producing either a standalone newsletter or a set of articles for Business Matters. The articles are intended to highlight changes, top tips or best practice and shared learning for staff.

Site Visits

It is proposed that a member of the Corporate Services IG team will conduct a site visit to all BSO departments in order to reinforce and promote the IG agenda and carry out a light touch review of compliance with the assurance framework. It is currently envisaged that this will occur at the midpoint of the three year records management cycle.

MEMBERS OF THE PUBLIC

The BSO interacts and engages with members of the public both directly and indirectly to varying degrees across the range of services we provide.

Current Communication Mechanisms

BSO Internet Website

This is the primary source of information for members of the public on the Information Governance agenda within the BSO. The site contains all relevant BSO policy and procedure in relation to IG as well as extensive help and guidance sections for the public on our services.

Additionally it has detailed sections on our requirements under the Data Protection Act and the Freedom of Information Act and how the public can make requests under these acts.

We maintain a Publication Scheme in accordance with direction from the Information Commissioners Office and the website has clearly marked public information sections where all relevant information is published.

Telephone Calls

All information on the BSO website directs members of the public to the Admin Office telephone line during working hours.

E Mail

The BSO currently maintains three separate E Mail inboxes for general enquiries, FOI and DPA requests which are maintained by the corporate services team.

Proposed Communication Mechanisms

Public Information Leaflets

The development of a number of public information leaflets which can be hosted on the BSO website and provided at point of contact across our various services. These simple informative leaflets will cover the BSO's commitment to treating personal data with respect at all times and ensuring it is safeguarded appropriately. It is envisaged that these will primarily be focused at FPS contractors and sites or services who have direct public interaction.

CUSTOMERS, SERVICE USERS AND CONTRACTORS

With the creation of the Shared Services Centres and the delivery of regional support services within ITS and PaLS the BSO now has an extensive interaction with a wide range of customers, service users and independent contractors.

Current Communication Mechanisms

BSO Internet Website

This is the primary source of information for members of these groupings on the Information Governance agenda within the BSO. This is primarily achieved by the individual business areas sections of the website where any relevant information should be readily accessible.

Posters and Information Leaflets

A number of service areas make use of various media to deliver key messages including IG to these groupings.

Honest Broker Service (HBS)

The BSO operates an Honest Broker Service which enables the provision of anonymised, aggregated and in some cases pseudonymised data from the Regional Data Warehouse, (held within Business Services Organisation BSO), to the Department of Health Social Services and Public Safety (DHSSPS) and HSC organisations (listed below). It will also provide a service to researchers carrying out approved health and social care related research.

The Honest Broker Service will only provide data in anonymised, aggregated and, where necessary, pseudonymised formats, in line with Data Protection Act 1994, confidentiality requirements and the ICO's Codes of Practice for Data Sharing. The service will never provide patient identifiable information.

THE INFORMATION COMISSIONERS OFFICE (ICO)

The ICO is the UK's independent body set up to uphold information rights. The BSO is required to report all serious information breaches to the ICO. Additionally the ICO provides expert advice and guidance in the application of FOI and DPA regulations

Current Communication Mechanisms

ICO Breach reports

The BSO reports all serious reportable breaches to the ICO via Data Breach Notification Forms which contain full details of any incidents.

Ad Hoc Advice and Guidance

The BSO will regularly interact with the ICO with regards to our application of both the Data Protection Act and the Freedom of Information Act. This may be by phone, email or face to face meetings.