

POLICY DOCUMENT

Information Governance Strategy

Policy Review Schedule

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Amendment Overview

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Role of the Northern Ireland Medical and Dental Training Agency

The Northern Ireland Medical and Dental Training Agency (NIMDTA) is an Arm's Length Body sponsored by the Department of Health, Social Services and Public Safety (DHSSPS) to train postgraduate medical and dental professionals for Northern Ireland. NIMDTA seeks to serve the government, public and patients of Northern Ireland by providing specialist advice, listening to local needs and having the agility to respond to regional requirements.

NIMDTA commissions, promotes and oversees postgraduate medical and dental education and training throughout Northern Ireland. Its role is to attract and appoint individuals of the highest calibre to recognised training posts and programmes to ensure the provision of a highly competent medical and dental workforce with the essential skills to meet the changing needs of the population and health and social care in Northern Ireland.

NIMDTA organises and delivers the recruitment, selection and allocation of doctors and dentists to foundation, core and specialty training programmes and rigorously assesses their performance through annual review and appraisal. NIMDTA manages the quality of postgraduate medical and dental education in HSC Trusts and in general medical and dental practices through learning and development agreements, the receipt of reports, regular meetings, trainee surveys and inspection visits. It works in close partnership with local education providers to ensure that the training and supervision of trainees support the delivery of high quality safe patient care.

NIMDTA recognises and trains clinical and educational supervisors and selects, appoints, trains and develops educational leaders for foundation, core and specialty medical and dental training programmes throughout NI.

NIMDTA is accountable to the General Medical Council (GMC) for ensuring that the standards set by the GMC for medical training, educational structures and processes are achieved. The Postgraduate Medical Dean, as the 'Responsible Officer' for doctors in training, has a statutory role in making recommendations to the GMC to support the revalidation of trainees. Revalidation is the process by which the GMC confirms that doctors are up to date and fit to practice. NIMDTA also works to the standards in the COPDEND framework for the quality development of postgraduate Dental training in the UK.

NIMDTA enhances the standard and safety of patient care through the organisation and delivery of relevant and valued career development for general medical and dental practitioners and dental care professionals. It also supports the career development of general medical practitioners and the requirements for revalidation through the management and delivery of GP appraisal.

NIMDTA aims to use the resources provided to it efficiently, effectively and innovatively. NIMDTA's approach to training is that trainees, trainers and educators should put patients first, should strive for excellence and should be strongly supported in their roles.

Policy Impact or Influence

Changes to this policy may have an impact or an influence on the following:

- Data Protection Policy
- Freedom of Information Charging Policy
- Freedom of Information Procedures Manual
- Freedom of Information Publication Scheme
- IT Policy
- Information Governance Policy
- Information Governance Framework
- Records Management Disposal Schedule
- Records Management Policy
- Records Management Strategy
- Security and Premises Management Policy
- Subject Access Request Manual

Legislative Influence

This policy has been influenced by the following:

- Data Protection Act 1998
- Freedom of Information Act 2000

1. Introduction

This strategy sets out the approach to be taken within the Northern Ireland Medical & Dental Training Agency to support the Information Governance Policy and provide a robust Information Governance (IG) framework for the management of information.

Good quality information underpins sound decision making at every level in the HSC. With penalties for failure to comply with the laws and regulations on information handling on the increase, NIMDTA must make certain that it has a plan to ensure that its business and person related information is being properly managed. This strategy provides a framework to bring together all of the requirements, standards and best practice that apply to the handling of personal information, allowing:

- Implementation of DHSSPS advice and guidance
- Compliance with the law
- Year on year improvement plans

Information Governance is the mechanism by which NIMDTA handles information about patients and employees, in particular personal and sensitive information.

2. Aims & Objectives

NIMDTA aims to achieve a standard of excellence in information governance by ensuring information is dealt with legally, securely, efficiently and effectively in the course of NIMDTA business, in order to support the functions of NIMDTA.

All information processing will be undertaken in accordance with relevant legislation and best practice. NIMDTA will set policies and procedures to ensure that appropriate standards are defined, implemented and maintained.

NIMDTA aims to minimise the risks arising from information handling processes, these are:

- Legal action due to non-compliance with statutory and regulatory requirements
- Loss of public confidence in NIMDTA
- Damage or stress to an individual or group

NIMDTA aims to provide support to its staff to be consistent in the way they handle personal information and to avoid duplication of effort. This will reduce risks and lead to improvements in:

- Information handling activities
- Confidence in NIMDTA
- Staff training and development

3. The Scope of the Strategy

Information Governance provides a consistent way for staff to deal with the many different information-handling requirements and is a framework for the following processes and duties:

- Information Governance Management (management, accountability and responsibility)
- Confidentiality & Data Protection Assurance (person related/identifiable information)
- Information Security Assurance (manual and electronic information /records management)
- Corporate Information Assurance

4. Strategy Context

Information plays a key part in governance, strategic risk, planning and performance management. The strategy links into all of these aspects and sets out the approach to be taken within NIMDTA to provide a robust information governance framework for the management of information.

Information Governance has been identified as a risk; therefore the implementation of this strategy will facilitate and maintain a reduction in the level of this current risk.

Accurate, timely and relevant information is essential to deliver the highest quality service. As such it is the responsibility of all staff to ensure that information is accurate and up to date, kept confidential and secure and that it is used proactively in NIMDTA's decision-making process.

5. Information Governance Deliverables

All staff must understand and apply best practice and the data protection principles to manage all information to support the functions of NIMDTA

- All staff involved in the administration of information governance must receive senior management backing, training and encouragement to be aware of developments in information governance and any relevant information handling issues that will affect them.
- Delivery of mandatory information governance training for all staff.
- Regular communications to staff using intranet
- All staff signing confidentiality clauses within all staff contracts
- Publication of IG policies, procedures and guidance on NIMDTA intranet
- Agreement and sign up by staff to key IG related policies

NIMDTA will undertake regular reviews and audits of how information is used through:

- Mapping of data flows
- Review of reported information incidents
- Data quality checks
- Ad-hoc spot checks on compliance with best practice

NIMDTA will develop and maintain a robust management and responsibility reporting structure to ensure that information governance and associated risks are appropriately managed to support the overall risk management function within NIMDTA.

- Continuing role of the Governance & Risk Committee
- Appointment of the key roles and responsibilities
- Informing staff of the key personnel and their responsibility
- Provision of clear advice and guidance throughout NIMDTA
- Implementation of defined information incident reporting and investigating procedures linked to the risk management process.
- Information Governance and Information Technology policies and procedures will be reviewed regularly to reflect current standards

Identifying where there are common areas of work will help all employees to work in a cohesive fashion towards a common goal, to the benefit of the service user.

- Encouraging teams to work more closely together will lead to a reduction in repetitive practices by seamlessly sharing relevant information and standardising practices and procedures

NIMDTA will involve service users in the development of information that is used to improve services.

- Service users will be involved in relevant surveys, forums and groups in order to seek opinions and where appropriate will act on those opinions.

NIMDTA will ensure that clear advice and guidance are made available through NIMDTA website, in relation to how personal information is used.

- Information will be made available in various formats explaining how information is recorded and shared and how any concerns may be raised. Information will also be provided on Subject Access requests (SAR) under the Data Protection Act 1998.
- Service users will be made aware of the importance of providing accurate and up to date information about themselves

6. Strategy Implementation and Improvement Plans

The Governance & Risk Committee will monitor implementation of this strategy and its associated work programmes through regular quarterly meetings.

The Governance & Risk Committee will:

- Agree an annual work programme to ensure a year on year improvement in performance
- Ensure the development and implementation of information governance strategies, policies and procedures.
- Identify resources for implementation
- Monitor progress against action plans
- Report on progress, incidents and issues to NIMDTA Board

The Governance & Risk Committee will formally review this strategy every two years however the content will be reviewed annually to include any significant changes to mandatory requirements, national guidance or as a result of significant information governance breaches or incidents in order to ensure that all types of information are more effectively managed within NIMDTA.

7. Resources

The Strategy shall be implemented by the Chief Executive (Personal Data Guardian), Administrative Director (Senior Information Risk Owner), Governance, IT & Facilities Manager and the IT & Records Management Officer (Information Asset Owners).

8. Training

Fundamental to the success of delivering the Information Governance Strategy is developing an information governance culture within NIMDTA, providing training and promoting awareness for all staff.

9. Risks

Information Governance risks shall be documented within the Information Governance Risk Register.

Possible risks in relation to the implementation of this strategy are:

- Managers and staff do not engage in the implementation
- Resources for the implementation are not sufficient

10. Monitoring the Strategy

The Governance & Risk Committee will monitor the implementation of this strategy and will receive regular reports from the Corporate Governance Manager and IT & Records Management Officer on improvements, risks and issues.