

Integration Joint Board

Agenda item:

Date of Meeting: 25 November 2020

Title of Report: Information Governance Policy

Presented by: Judy Orr, Head of Finance and Transformation

The Integration Joint Board is asked to:

- **Approve** the attached Information Governance Policy
- **Agree** that this Policy should be next reviewed on or before 31 October 2022.

1. EXECUTIVE SUMMARY

1.1 This report proposes a new Information Management Policy for the Integration Joint Board. This follows an Internal Audit review of Information Governance in November 2019 which identified that the IJB would benefit from an overarching Information Governance policy framework that outlines the roles, responsibilities and processes for key areas of Information Governance including GDPR, Freedom of Information, Subject Access Requests along with the existing policies of Record Management and Complaints Handling.

1.2 All of the IJB's information assets are held by its partner organisations, NHS Highland and Argyll and Bute Council. The IJB has a relatively small set of information assets belonging to itself and these are held by Argyll and Bute Council on behalf of the IJB as set out in the Records Management Policy.

1.3 To inform this policy, an assurance mapping exercise has been carried out to confirm how ongoing assurance is obtained from our key partner organisations with regards to the operational effectiveness of their information governance controls and processes. The draft policy was reviewed by Audit & Risk Committee on 20 October 2020 and is now recommended for approval by the IJB.

2. INTRODUCTION

2.1 Information represents one of the major assets held by any organisation. As such, it is essential that appropriate measures are put in place to ensure that information is appropriately managed and secured. Information Governance is a set of policies, procedures, processes and controls implemented to manage information on all media in such a way that it supports an

organisation's immediate and future regulatory, legal, risk, environmental and operational requirements.

2.2 This reports seeks approval of an Information Governance Policy for the Argyll and Bute Integration Joint Board.

3. DETAIL OF REPORT

3.1 Argyll & Bute Integration Joint Board (ABIJB) Records Management Plan covers Record Management only for records created as part of the business of the ABIJB, which is separate from the records management plans attached to each of the employing partners. Although this exists, there is no overarching Information Governance Policy in place at the ABIJB, or a policy document that identifies the areas of responsibility for ABIJB compared to the partner organisations for the components of Information Governance. This was highlighted in the Information Management audit which reported in November 2019, and we now seek to address this gap.

3.2 An Information Governance Policy was presented to the Audit & Risk Committee for consideration and comment. Audit & Risk recommended that the policy should next be reviewed by 31 October 2022. This is now coming to the Integration Joint Board for approval.

3.3 The document contains the following key sections:

- background,
- vision,
- principles,
- governance,
- resourcing, and
- action plan.

3.4 The majority of the responsibilities lie with our partner bodies as they hold our information assets.

4. RELEVANT DATA AND INDICATORS

4.1 The Information Governance Policy refers to data assets held by the IJB's parent bodies.

5. CONTRIBUTION TO STRATEGIC PRIORITIES

5.1 The Integration Joint Board has a responsibility to assure itself that its information is appropriately managed and that adequate arrangements are in place for information governance. This policy seeks to deliver that assurance.

6. GOVERNANCE IMPLICATIONS

6.1 Financial Impact – no impact.

6.2 Staff Governance – None directly from this report but it should be noted that staff handle all our information and need to follow the relevant procedures

and policies of their employing body, NHS Highland or Argyll and Bute Council in doing this.

6.3 Clinical Governance - None

7. PROFESSIONAL ADVISORY

7.1 There are no recommendations from this report which require to be consulted on with Professional Advisory leads.

8. EQUALITY AND DIVERSITY IMPLICATIONS

8.1 None directly from this report.

9. GENERAL DATA PROTECTION PRINCIPLES COMPLIANCE

9.1 This report assists with GDPR compliance.

10 RISK ASSESSMENT

10.1 The proposed policy mitigates the risk that information is not properly managed and controlled.

11. PUBLIC AND USER INVOLVEMENT AND ENGAGEMENT

11.1 None directly from this report.

12. CONCLUSIONS

12.1 The Integration Joint Board is asked to approve the draft Information Governance Policy attached.

13. DIRECTIONS

Directions required to Council, NHS Board or both.	Directions to:	tick
	No Directions required	
	Argyll & Bute Council	
	NHS Highland Health Board	
	Argyll & Bute Council and NHS Highland Health Board	√

A direction shall be issued to Argyll and Bute Council and NHS Highland requiring them to observe the terms of the Argyll and Bute Integration Joint board's Information Governance Policy whilst handling and safeguarding Information assets belonging to the IJB.

APPENDICES:

Appendix 1 – Information Governance Policy

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