

TO: West Gloucestershire Primary Care Trust

FROM: Information Governance Group

DATE: 19th May 2005

SUBJECT: Information Governance Baseline Assessment

1.0 PURPOSE

1.1 To inform the Board on the PCT's baseline position against national requirements for Information Governance compliance, this encompasses:

- Data Protection
- Freedom of Information Act 2000
- The Confidentiality Code of Practice (Caldicott Principles)
- Information Security Management (BS7799)
- Records Management including HSC 1999/053 'For the Record'
- Information Quality Assurance
- Controls Assurance – IM&T and Records Management

2.0 BACKGROUND

2.1 As a key part of the Information Governance agenda, the Department of Health and the NHS Information Authority have jointly produced an Information Governance Toolkit. This web-based tool was launched in late 2003.

2.2 All Primary Care Trusts were required to submit a baseline assessment against the requirements within the toolkit by 31st March 2005.

2.3 The completed baseline assessment has been considered and approved by the PCT Information Governance Group.

2.4 The PCT Information Governance Group was formed to establish a managerial framework for the implementation of Information Governance throughout the PCT. The annual completion of the Information Governance baseline is a key responsibility of this group identified in its terms of reference.

2.5 In order to complete the assessment leads were identified for each of the main requirement areas:

- Information Governance Management – Information Manager
- Code of Confidentiality – Caldicott Guardian
- Freedom of Information – Freedom of Information Manager
- Data Protection – Data Protection Manager
- Information Security – baseline completed by internal auditors
- Health Records – Health Records Subgroup
- National Programme – Director of Finance/IT Support
- Information Quality Assurance – Information Manager

2.6 The assessment is completed by awarding attainment levels for each requirement, the attainment levels are Level 0 = No compliance through to Level 3 = Full compliance. The assessment levels were recorded by the assessment leads and audited by the Information Governance Group before submission.

3.0 ASSESSMENT RESULTS

3.1 As this is the first Information Governance assessment undertaken by the PCT there is no comparative data available to reflect the considerable advances made during 2004/5 in increasing the profile of Information Governance throughout the PCT. Within 2004/5 policies and guidelines were implemented within Data Protection, Code of Confidentiality and Freedom of Information to ensure compliance to national guidance.

3.2 The results of the assessment are calculated as a percentage, the percentage is derived from converting the level into points and taking the number of points scored as a percentage of the total number of points which could be attained. See table below.

| Main Requirement Area | Score as a % | Key Action Points |
|-----------------------------------|--------------|--|
| Information Governance Management | 33.3% | <ul style="list-style-type: none"> • Development of Strategy • Continuing awareness training for all staff • Implementation of CETIS (e-learning software for Information Governance) |

| Main Requirement Area | Score as a % | Key Action Points |
|----------------------------------|---------------------|--|
| Confidentiality Code of Practice | 9.5% | <ul style="list-style-type: none"> • Review current policies • Mapping of information flows throughout the PCT • Staff training (programme to be developed using CETIS) |
| Freedom of Information (FOI) | 13.9% | <ul style="list-style-type: none"> • Review of records management systems • Review of FOI policy |
| Data Protection | 15.2% | <ul style="list-style-type: none"> • A short term subgroup to be established to review data flows within the PCT • Staff Training |
| Information Quality Assurance | 27.3% | <ul style="list-style-type: none"> • Formal documented procedures |
| Information Security | 59.4% | <ul style="list-style-type: none"> • Risk Management policy to be revised to include separate section of information risks. • Staff Training • Establishment of the PCTs business continuity plan |
| National Programme | 33.3% | <ul style="list-style-type: none"> • Actions encompassed in other areas of the toolkit |
| Health Records | 2.2% | <ul style="list-style-type: none"> • Establishment of the PCT Health Records Sub-Group • Baseline assessment undertaken of all records |

3.3 It should be noted that the scores do not fully reflect the position of the PCT's performance within certain areas of the toolkit. A 'best practice approach' has already been adopted within the PCT within certain such as Freedom of Information, Data Protection and Confidentiality Code of Practice but to achieve a higher attainment level further policies and

procedural documentation need to be put in place; these actions will be included within the Information Governance Group work plan in 2005/6.

- 3.4 Full details of the Information Governance toolkit assessments will be made available on the PCT's intranet site.

4.0 REPORTING

- 4.1 The reports within the toolkit are intended for use at a local and national level. The main report will be a RAG (red, amber and green) report which will show an organisation's performance against the various component initiatives as a series of percentage scores. This is intended to provide a holistic view of the Trust's performance against the entire Information Governance agenda. These reports will be available shortly but the anticipated scores are forecast in 3.2. of this report.

5.0 SUMMARY

- 5.1 Within 2005/6 the priority area for improvement will be Health Records. A sub-group is to be established by June 2005 which will include both administrative and operational staff. This group will be responsible for reviewing the PCT Health Records Strategy and for reviewing the baseline assessment of records within the PCT.

6.0 RECOMMENDATION

- 6.1 Members are asked to note the contents of this report.