

NHS Information Governance Assurance Framework

The Information Governance Framework for health and social care is formed by those elements of law and policy from which applicable information governance standards are derived, and the activities and roles which individually and collectively ensure that these standards are clearly defined and met.

Whilst a key focus of information governance is the use of information about service users, it applies to information and information processing in its broadest sense and underpins both clinical and corporate governance. Accordingly it should be afforded appropriate priority.

In recent months, concerns about public sector data protection have resulted in the Cabinet Office mandating a range of standards for managing information risk, an important element of information governance. These standards are reflected within the **NHS Information Governance Toolkit**¹.

In his communications to NHS Chief Executives, the NHS Chief Executive has made it clear that ultimate responsibility for information governance in the NHS rests with the board of each organisation, who should note that:

- From 2008/9 information governance must be explicitly referenced within each organisation's statement of internal controls.
- A board-level Senior Information Risk Owner (SIRO) is required in each organisation and a senior Information Asset Owner should be designated for every separate database or other major information asset.
- Appropriate information governance training is mandatory for all users of personal data and for all those in key roles. (On-line training is available through NHS CFH).
- The annual information governance assessment, via the Information Governance Toolkit, will continue with performance assessments submitted on 31 March each year shared with the Care Quality Commission, Audit Commission, Monitor and a new National Information Governance Board.
- **However, from 2009/10 onwards the major NHS organisations must baseline their performance within the Toolkit by the end of July each year and should update the assessment with improvements at end of October to enable performance and actions to be tracked by SHAs, commissioners and other monitoring bodies.**
- The NHS Operating Framework for 2009/10 requires organisations to achieve level 2 performance against all key requirements identified in the Information Governance Toolkit. Organisations must sign the **Information Governance Statement of Compliance (IGSoC)**² to provide assurance that they are meeting these key requirements and must have robust improvement plans to address any shortfalls against other requirements.
- Details of serious untoward incidents involving actual or potential loss of personal data or breach of confidentiality must be published in annual reports and reported to the SHA and to the Information Commissioner.
- Foundation Trusts are subject to the same requirements, set out by Monitor. The contractual arrangements with independent sector NHS providers also contain strengthened information governance requirements.

¹ Information Governance Toolkit; <https://www.igt.connectingforhealth.nhs.uk/>

² Information Governance Statement of Compliance;
<http://www.connectingforhealth.nhs.uk/systemsandservices/infogov/igsoc/links/IG-Statement-of.pdf>