

**Information Governance Statement of Compliance (IG SoC)  
Frequently Asked Questions (FAQs)**

**Contents**

1. General Practices.....	2
2. NHS organisations.....	3
3. Non- NHS organisations.....	5
4. Services .....	9
5. Change.....	9
6. History .....	11
7. IGSoc maintenance .....	11
8. Interpretation.....	12
9. Information Governance Toolkit (IGT) .....	13
10. Privacy policy.....	14
11. General Enquiries .....	14
12. Tracking Database .....	15
13. Filter Change request .....	16
14. Prisons.....	16
15. Offshoring.....	16
16. Definitions .....	17

# 1. General Practices

## Does my General Practice need to complete the IGSoC?

Yes, every organisation receiving any NHS Connecting for Health services, including N3 network connection, must complete an IGSoC.

## How do I submit the IGSoC?

- Ensure your practice & a nominated administrator is registered on the IGT via the link below: <https://www.igt.connectingforhealth.nhs.uk/registration.aspx>. Once you have received your login details (via the email address you provided upon registration) login to the IGT & complete the IG SoC signatory & key contacts fields
- Read the 'Getting Started' tab materials for instructions on how to complete the IGT assessment.
- Once you are satisfied with your scores, submit the assessment. Please note that once the assessment has been submitted, the scores cannot be altered.
- For purposes of the IGSoC submission, GPs need to achieve level 2 on all the 8 requirements listed in the 118 guidance sheet.
  - If a level 2 is *not achieved* on any of the 8 requirements, the automatic IG SoC submission will not go through. GPs are then required to agree an 'Improvement plan' with their local PCT in order to reach level 2 compliance in a reasonable time frame. When the PCT is satisfied with the improvement plan, they can trigger the IG SoC approval email to the signatory. The improvement plan template can be found at <http://www.connectingforhealth.nhs.uk/systemsandservices/infogov/igsoc/links>
  - If a level 2 *is achieved* for all 8 requirements by the practice, the IG SoC declaration will be sent through to the signatory automatically.
- All queries should in the first instance be directed to the Information Governance representative of the PCT.

## Who can submit the IGSoC?

The IGSoC should be submitted by the practice partner responsible for Information Governance compliance or their delegated authority. Once the IG Toolkit is submitted, an email will be sent to the address entered in the IGSoC signatory box. The email contains a link and unique code, used to confirm compliance with, and acceptance of, the terms of the IGSoC declaration. If you have any problems with this process, please contact the Information Governance representative at the PCT.

## Why does the IGSoC have to be submitted by a practice partner?

The IGSoC creates commitments across the whole organisation, it is therefore important that it is signed by someone whose responsibility reflects this. There are extensive information governance implications in the IGSoC and this is why NHS CFH requires contact details of the partner responsible for information governance.

## Do General Practices managed by PCTs have to complete an IGSoC?

No, an IGSoC is required only from individual legal entities that determine their own IG policies and procedures. Where these are set by a separate 'host', e.g. a PCT, that host is responsible for signing an IGSoC that covers the Practice and for monitoring compliance with the policies and procedures it has set.

**Do General Practices have to complete the Information Governance Toolkit (IG Toolkit)?**

*Informatics Planning 2009/10*, published with the *NHS Operating Framework* by the Department of Health, requires that all bodies that provide or support the provision of NHS services work within the NHS Information Governance Assurance Framework and demonstrate compliance with all key information governance requirements. Both documents can be downloaded from the DH website at:

[http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH\\_091445](http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_091445)

**Can PCTs view General Practices' IG Toolkit progress?**

Yes, PCTs are able to view IG Toolkit scores and work in progress of General Practices in their area via the Tracking Database, which takes a daily data feed from IG Toolkit.

**Are PCTs responsible for providing IG training to General Practices?**

No, although many do. Additionally there are free training materials available on the IG Training Tool website specifically for GP staff.

A guest tour is available at:

<http://www.igte-learning.connectingforhealth.nhs.uk/igte/index.cfm?communityid=4>

For IG training registration: [www.connectingforhealth.nhs.uk/igtrainingtool](http://www.connectingforhealth.nhs.uk/igtrainingtool)

**I am a General Practice (GP) who owns a pharmacy. Would the pharmacy need its own IGSoc?**

No, an IGSoc is required only from individual legal entities that determine their own IG policies and procedures. In this case, as the pharmacy is owned by the general practice and it would therefore be covered by the general practices' IGSoc.

**Do General Practices have to use NHSmail?**

This is not obligatory, although it is preferred, as it is more secure when emails are sent between NHS email accounts. It is also easier to clarify who the sender/signatory is, as the IGSoc must come from the senior partner's inbox. NHSmail is classed as a digital service, so organisations that access NHSmail via a N3 connection require an IG SoC.

**Where can I go for help?**

- 1) All queries should in the first instance be directed to the Information Governance representative of the PCT
- 2) Any unresolved or specific queries relating to the interpretation or content of IGT requirements should be directed to [Exeter.helpdesk@nhs.net](mailto:Exeter.helpdesk@nhs.net) or 01392 251289

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## 2. NHS organisations

**If I am a newly formed NHS organisation, how do I submit the Information Governance Statement of Compliance (IGSoC)?**

- New NHS Organisations need to complete and submit the Application form at

- <http://www.connectingforhealth.nhs.uk/systemsandservices/infogov/igsoc/nhs>
- When you submit your application form, NHS CFH will set you up with an IGT account and send you your login details via the email address you provided on the application form. You will then be able to login and complete the IGT submission as per “Getting started”. Please note “Self-registration” is only for GPs.
- The only prerequisite to completing the IG SoC for NHS organisations is to have completed an acceptable IGT submission or to have an agreed improvement plan in place to achieve this standard. The Improvement plan template can be found at: <http://www.connectingforhealth.nhs.uk/systemsandservices/infogov/igsoc/links>
- For IGT submission timescales please see: <https://www.igt.connectingforhealth.nhs.uk/whatsnew.aspx> and scroll to heading ‘IG Toolkit Version 7 Release (01/07/2009)’
- The IG SoC terms & declaration can be found on the downloads and links page at:
- <http://www.connectingforhealth.nhs.uk/systemsandservices/infogov/igsoc/links>
- NHS organisations need to complete the IGSoc declaration & cut and paste this into an email. The email should then be sent to [exeter.helpdesk@nhs.net](mailto:exeter.helpdesk@nhs.net) from the mailbox of the Authorised Signatory. In the email subject field enter “IG SoC Application for <enter your organisation name> - <enter your SHA Region>”
- The email confirms that the organisation has understood its obligations in the IGSoc and will adhere to them. The email will be stored by NHS Connecting for Health as a record of the organisation’s commitment to compliance with the standards and requirements of the IGSoc.

#### **Who can submit the IGSoc declaration?**

The IGSoc declaration should be returned by email from the person that holds legal responsibility for the organisation, the Authorised Signatory. In an NHS Trust this will be the Chief Executive.

#### **Why does the IGSoc declaration have to be submitted by the Chief Executive?**

The IGSoc creates commitments across the whole organisation, it is therefore important that it is signed by someone whose responsibility reflects this. There are extensive information governance implications in the IGSoc and this is why contact details of the organisation’s information guardian are also required.

#### **Do I need to complete and submit an IGSoc declaration every year?**

No, the IGSoc declaration is submitted once, unless your organisation merges or becomes a new legal entity. However, to comply with the terms of your IGSoc you must submit IG Toolkit Assessments in line with Department of Health/NHS Connecting for Health requirements.

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#### **Our organisation operates on several sites, which address should we use for the IGSoc?**

The address entered on the IGSoc should be your registered UK business address, for example, the address which was used on your Data Protection registration. You must also enter the address of your place of business address (if different). Only one IGSoc is required per organisation.

**I am an NHS organisation who owns a pharmacy. Would the pharmacy need its own IGSoc?**

No, an IGSoC is required only from individual legal entities that determine their own IG policies and procedures. In this case, as the pharmacy is owned by the NHS Organisation, it would therefore be covered by the NHS organisation's IGSoC.

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### 3. Non- NHS organisations

#### How do I complete the Information Governance Statement of Compliance (IGSoC) process?

- Application Form including Sponsorship Letter
  - Firstly, complete and submit an application form including the sponsorship letter at: <http://www.connectingforhealth.nhs.uk/systemsandservices/infogov/igsoc/links/application> and submit it to [exeter.helpdesk@nhs.net](mailto:exeter.helpdesk@nhs.net)
  - Once your application has been validated, you will be provided with an IG Toolkit login and a possibly request for additional documentation (see below).
  
- Information Governance Toolkit (IGT) submission
  - Once you have received your login details (via the email address you provided upon registration) login to the IGT & read the 'Getting Started' tab materials for instructions on how to complete the IGT assessment.
  - For purposes of the IGSoC submission, organisations need to achieve level 2 on the requirements listed in IGT standard 108 or 3 (where applicable.)
    - If a level 2 is *not achieved* on any of the requirements listed within these standards, the organisation is required to agree an 'improvement plan\*' with NHS Connecting for Health (via the [Exeter.helpdesk@nhs.net](mailto:Exeter.helpdesk@nhs.net)) in order to reach level 2 compliance in a reasonable time frame. When NHS Connecting for Health are satisfied with the improvement plan, they can approve the IGT assessment submission and inform you via email.
      - \*The improvement plan template can be found at <http://www.connectingforhealth.nhs.uk/systemsandservices/infogov/igsoc/links>
  - Once you are satisfied with your IGT scores & signed off the IG SoC declaration, submit the assessment. Please note that once the assessment has been submitted, the contents cannot be altered.
  - Please notify the [Exeter.helpdesk@nhs.net](mailto:Exeter.helpdesk@nhs.net) upon submission of your IGT assessment
  
- Information Governance Statement of Compliance (IGSoC) Declaration
  - The IG SoC terms & declaration can be found on the relevant page at: <http://www.connectingforhealth.nhs.uk/systemsandservices/infogov/igsoc>
  - Non-NHS organisations need to complete the IGSoC declaration & cut and paste this into an email. The email should then be sent to [exeter.helpdesk@nhs.net](mailto:exeter.helpdesk@nhs.net) from the mailbox of the Authorised Signatory.

The email confirms that the organisation has understood its obligations in the IGSoC and will adhere to them. The email will be stored by NHS Connecting for Health as a record of the organisation's commitment to compliance with the standards and requirements of the IGSoC.

➤ Additional Documentation

- Logical Connection Architecture (LCA) - a technical proposal document describing the location of the connection and the security configuration. **Only non-NHS organisations who purchase an N3 link for direct connection to N3 need to submit an LCA**
- If required, you may be asked to complete an Offshore Support Policy. You will be notified of this requirement when NHS Connecting for Health are reviewing your LCA.
- All template documents are available for download at:  
<http://www.connectingforhealth.nhs.uk/systemsandservices/infogov/igsoc/links>
- All documents must be submitted to [Exeter.helpdesk@nhs.net](mailto:Exeter.helpdesk@nhs.net) & are subject to NHS Connecting for Health reviews and approvals
- *Please note the IGSoc process will not be complete until all the above referenced documentation has been approved by NHS Connecting for Health. Upon approval, an 'Authority to Proceed' (ATP) email will then be sent to BT N3 from NHS Connecting for Health to commence with the ordering process. You will be copied into the ATP email.*

**Who can submit the IGSoc declaration?**

The IGSoc declaration should be returned by email from the person that holds legal responsibility for the organisation, the Authorised Signatory. Typically, this person may hold one of the following job titles, but this is not an exhaustive list:

- Chief Executive
- Senior Responsible Officer
- Principle/Senior Partner – especially for GP Practices
- Legal Counsel
- A Duly Authorised Executive
- Chief UK Representative – especially for international organisations

**Why does the IGSoc declaration have to be submitted by the most senior person in our organisation?**

The IGSoc declaration creates commitments across the whole organisation, it is therefore important that it is signed by someone whose responsibility reflects this. There are extensive information governance implications in the IGSoc and this is why contact details of the organisation's information guardian are also required.

**Do we need to complete a BT N3 Expression of Interest (EOI)?**

The process for connection to N3 through BT N3SP begins with the completion of their EOI form. See [www.n3.nhs.uk](http://www.n3.nhs.uk) for details. Other provider details are available at [www.connectingforhealth.nhs.uk/igsoc](http://www.connectingforhealth.nhs.uk/igsoc)

**Why do non-NHS organisations need to have NHS sponsorship?**

N3 is a private network for the NHS; other organisations demonstrate their legitimate need for access through being sponsored by an NHS organisation. Organisations that provide services to multiple NHS organisations may provide only one letter to complete their IGSoc

**Which organisations can complete the sponsorship part of the application form?**

Only an NHS organisation or the Dept of Health can act as a sponsor.



**Do I need more than 1 sponsor for my IG SoC application?**

1 valid sponsorship from an NHS organisation (part of the application form) is needed. Access to other NHS organisations is granted through the 3<sup>rd</sup> Party Filter Process. See 'Filter Change Request' section.

**Why do non-NHS organisations have to provide IP addresses as part of their sponsorship?**

Non-NHS organisations are connected to N3 with N3SP-managed outbound access-control, limiting their access to only the IP addresses specified in their sponsorship (part of the application form). Access to other destinations on N3 can be requested via the 3<sup>rd</sup> Party Filter process. See 'Filter Change Request' section.

**Are the IP address fields mandatory in the sponsorship part of the application form?**

Yes. These are needed by your service provider for routing and configuration.

**How detailed should the Logical Connection Architecture (LCA) be?**

The LCA should be documented at the conceptual level to include all networks and device types. It would not show each individual device. Guidance on the detail required is contained within the LCA template.

**If the N3 network connection is completely segregated from the corporate network, should the topology of the corporate network be represented in the LCA as well?**

The topology of the corporate network is not required in the LCA, only the means of segregation.

**If my N3 connection is being 'hosted' by another 3<sup>rd</sup> party on our behalf, is an LCA still needed?**

The hosting supplier that you are employing may need to resubmit a revised LCA to take account of any changes to the configuration and security surrounding their own N3 connection. It is the responsibility of the owners of the direct N3 connections to submit any revised LCA's in the case of changes to their agreed N3 security provisions and configurations.

**Does the LCA cover the non-NHS organisation's infrastructure or that of its NHS clients too?**

Only the non-NHS organisation's network that will be connected to N3 needs to be described. Guidance on the detail required is contained within the LCA template. It would not be expected to cover the NHS Trusts' architecture

**What about other companies / suppliers that support our business and may access N3?**

The IGSoc applicant is totally responsible for the conduct and associated risk of any suppliers or contractors who may access N3 via your link. NHS CFH strongly advise that you carry out the relevant risk assessments, penetration tests and subsequent information & physical security related practices, policies and procedures before allowing any supplier or contractor to connect to your N3 link. Information Security compliance activities should be regularly monitored maintained & updated accordingly.

**I am a non –NHS organisation. Another company / supplier are going to access NHS CFH digital services via my N3 link. Do they need to complete the IGSOC?**

Yes, if the company / supplier is going to access or is accessing NHS CFH digital services via your N3 link, they will have to complete the IG SoC process, but they will not have to submit an LCA (because an LCA only needs to be completed by Non –NHS organisations who are connecting DIRECTLY to the N3 network.)

**Can the technical lead return the LCA or must it be the most senior person in the organisation?**

Yes the technical lead can return the LCA. It is only the IGSOC declaration that must be signed by the most senior person.

**Can a standalone device connect to the N3 to obtain virus updates?**

N3 is not to be used for maintenance purposes. Any updating of products such as anti virus must be via your own internet connection

**Is the IGSOC only applicable to organisations requiring an N3 connection?**

No, the IGSOC must also be submitted by those organisations using NHS Services such as NHSmail which does not require an N3 connection.

**Can the IGSOC application form be used to request access to other NHS CFH services such as Choose and Book?**

No, access to specific services would need to be agreed with the specific service teams.

**As a non-NHS organisation am I allowed Internet access via N3?**

Currently non-NHS organisations are not allowed Internet access via N3, and are expected to provide their own access.

**What is the elapsed time from starting the IGSOC process to it being authorised to receive services?**

This is dependent on a number of factors, including:

- The size of the organisation
- The complexity of the organisation
- The activities which will be taking place
- The maturity of the organisation in terms of Information Security and Governance.
- Co-operation

Each assessment is judged on its own virtues, and therefore, giving an estimated completion time is highly subjective.

**What happens if there is a problem with my IGSOC submission?**

If there are any problems with the processing of your IGSOC, you will be contacted by the Exeter.helpdesk@nhs.net by email using the address you supplied in your application. The email will clearly state what you need to do to get your application back on track.

## 4. Services

### What services will the organisation have access to once the IGSoC has been approved?

Every 'approved' organisation (Authorised Service Recipient) is authorised to receive a connection to the N3 network and/or NHS Connecting for Health services through their chosen supplier.

➤ **NHS organisations** additionally receive access to:

- Domain Name Service (DNS);
- National Care Record Services;
- NHS Mail; and
- Internet access as part of the 'baseline' offering.

➤ **Non NHS organisations** will only receive access to those I.P Addresses listed on their Letter of Sponsorship & those services they have chosen to procure from their service provider

*It should be noted that access to Person Identifiable Data is controlled by NHS Information Governance controls and National Standards required for these services, e.g. Access Control through smartcard authentication.*

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## 5. Change

### What is an ODS code?

The ODS (Organisation Data Service) code is issued as a unique site and organisation identifier. It was formally called the NACS (National Administration Code service) but officially changed its name in 2008. Further information on the Organisation Data Service can be found at <http://nww.connectingforhealth.nhs.uk/ods> (this URL is only accessible by NHS organisations.)

### Our organisation is in the process of merging with another, which name and address should we use on our IGSoC?

- The new organisation should register for & complete the Information Governance Toolkit using the organisation's new ODS code (formerly NACs).
- The newly created organisation needs to sign the IGSoC
- If organisations are not due to merge for several weeks, and both want/are using NHS Connecting for Health services, then both need to sign an IGSoC and complete the Information Governance Toolkit Self Assessment using their existing ODS code (formerly NACs)..

### We are a non-NHS organisation and are moving to new premises/moving our N3 connection, do we need to complete the IGSoC?

- If an IGSoC has not been completed, the first stage is to complete one.

- If the connection is being moved within the same building, inform the [exeter.helpdesk@nhs.net](mailto:exeter.helpdesk@nhs.net) and your N3 connection provider (if N3SP - [crm.mailbox@bt.com](mailto:crm.mailbox@bt.com)) even if the IGSoC has already been completed
- Additionally, for non-NHS organisations, a revised LCA should be submitted for approval *if there is a proposed change to the agreed architecture or security around it*

**We are a non-NHS organisation moving our existing N3 connection to a ‘hosting’ supplier or aggregator - what do we need to do?**

- If you already have completed the IGSoC Process and the connection is being moved within the same building, simply inform NHS CFH helpdesk [exeter.helpdesk@nhs.net](mailto:exeter.helpdesk@nhs.net) and the N3 connection provider (if N3SP [crm.mailbox@bt.com](mailto:crm.mailbox@bt.com)).
- For non-NHS organisations, a revised LCA should be submitted for approval if there is a proposed change to the agreed architecture or security around it, which would be the case if moving to a hosting supplier.
- If moving to an aggregated network you will need to contact your aggregator for instructions.

**We are a non-NHS organisation and we would like an additional N3 connection (to a different site), what do we need to do?**

- If an IGSoC has been completed, a new application form (which includes the sponsorship letter) and LCA should be submitted to [Exeter.helpdesk@nhs.net](mailto:Exeter.helpdesk@nhs.net). In the email subject heading please state “Additional N3 connection request for <Organisation Name> <ODS Code> *Please note* you will have to request a new ODS code (formerly NACS code) for the site of the additional connection by emailing [Exeter.helpdesk@nhs.net](mailto:Exeter.helpdesk@nhs.net) (ODS codes are issued on a per site basis.)
- Once the revised LCA and sponsorship letter have been approved, an ‘Authority to Proceed’ (ATP) email will be sent to your service provider from NHS Connecting for Health. You will be copied into this ATP.
- Additionally, please contact your N3 connection provider to proceed with your request.

**We are a non-NHS organisation and we would like to change our N3 link type, what do we need to do?**

You need to contact your service provider. There are no IGSoC changes required.

**My organisation is making changes to the resources named on its IGSoC, who do we have to inform?**

Any changes should be notified to [Exeter.helpdesk@nhs.net](mailto:Exeter.helpdesk@nhs.net) so that we may update our records.

**If two connected organisations merge, does the new organisation have to complete the IGSoC process?**

New organisations are required to complete the IGSoC process for all requests for services before connection or service will be provided.

**If the IGSoC agreement is terminated, will we stop receiving NHS Connecting for Health services?**

Having a current Information Governance Statement of Compliance (IGSoC) is a condition for all organisations receiving services from NHS Connecting for Health. The IGSoC can be terminated at any time by either party. In the event that the IGSoC is terminated, all services will be withdrawn.

## 6. History

### What are the differences between the IGSoc and the Code of Connection?

- The IGSoc replaces the Code of Connection. It applies to all organisations that use the N3 and/or NHS Connecting for Health services
  - The Code of Connection was based around the network connection. The IGSoc is broader and covers all services which NHS Connecting for Health provide.
  - The Code of Connection was developed before the National Programme for IT, taking into account the NHS requirements at that time. With the changing environment of the National Programme for IT, a review of the Code of Connection was needed and this resulted in the development and introduction of the IGSoc.
  - The Code of Connection was suitable protection for the old environment. The IGSoc has been designed and adapted to suit the new NHS Connecting for Health environment.
  - The Code of Connection was an agreement with the NHS Information Authority. The IGSoc is an agreement with NHS Connecting for Health.
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## 7. IGSoc maintenance

### Do we have to submit an IGSoc annually?

You are not required to submit an IGSoc annually, however to comply with the terms of your IGSoc you must submit IG Toolkit assessments annually in line with Department of Health/NHS Connecting for Health requirements. It is possible that the IGSoc will be periodically updated to reflect changes in standards and legislation. This will be notified in advance.

### I am a NON NHS organisation. How do I maintain my IGSoc?

If there are any major changes to your network architecture then you must submit an updated Logical Connection Architecture & application form (which includes the sponsorship letter) to reflect the changes.

Please note, you are not required to submit an IGSoc annually, however to comply with the terms of your IGSoc you must submit IG Toolkit assessments annually in line with Department of Health/NHS Connecting for Health requirements. It is possible that the IGSoc will be periodically updated to reflect changes in standards and legislation. This will be notified in advance.

### I am a General Practice. There is a new senior partner (or equivalent) in my Practice. How do I update the Practices' IGSoc?

The IGT Administrator must amend the signatory details within the IGT assessment profile. This will trigger an approval notification for sign off. If the signatory does not receive an IGSoc approval notification, you are advised to contact your local PCT.

### I have received notification that my application is going through Quality Assurance, what does this mean?

Applications are assessed against a standard set of criteria, including IG Toolkit results. A random sample of applications is selected and examined in greater depth. This may result in calls to people nominated on the IGSoc application form and requests for further information.

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## 8. Interpretation

### **What is the definition of the 'inappropriate browsing' statement in the IGSoc?**

Inappropriate browsing of the Internet is defined by the Authorised Service Recipient, through an Acceptable Usage Policy (AUP) made available to all local authorised users. Policies should indicate the scope and extent to which users may make use of these network services, including specific guidance on access to the Internet.

Inappropriate browsing of internal systems shall be defined as anyone attempting unauthorised access to any system connected to the N3 environment without permission from that system owner. Unauthorised access may be considered for appropriate legal action by the system owner.

Organisations are strongly advised to provide network management facilities (e.g. caching and filtering) that permit or prohibit and log internet usage for the purposes of providing auditing and appropriate reporting to line management as defined in the local AUP. Action against such reporting is a matter for local organisations.

### **Do we have to employ an IG Specialist?**

It is not necessary to employ an IG specialist; what is required is a level of information governance appropriate and adequate for the organisation, how this is achieved is not pre-determined. For example, in large organisations ensuring good information governance is likely to be a fulltime task and it would be appropriate to have an IG specialist to ensure implementation and compliance; whilst it may be inappropriate for a General Practice to directly employ an IG specialist if they can obtain support from their PCT.

### **What is an "appropriate Information Governance framework"?**

The IGSoc states 'The Authorised Service Recipient undertakes to ensure that the activities of its authorised users are overseen by an appropriate Information Governance framework.' NHS organisations are required to complete the IG Toolkit as part of the NHS Information Governance Framework. Non-NHS organisations are also required to complete the IG Toolkit as part of the IGSoc process before they send in their IGSoc application. This ensures IG standards and requirements are met by each organisation and can be assessed and audited annually. The IG Toolkit can be accessed at: [www.igt.connectingforhealth.nhs.uk](http://www.igt.connectingforhealth.nhs.uk)

### **What is the Airwave Code of Connection?**

The Airwave Code of Connection applies to organisations that utilise the O2 Airwave service, which is a secure digital radio network for the exclusive use of UK emergency and public safety services. Further information on this service can be found at <http://www.airwavesolutions.co.uk/health/ambulance/Pages/default.aspx>. The accreditation documentation set is being issued to connecting Ambulance Trusts directly by the Airwave project team. These are not published documents as some are protectively marked to government standards.

### **What are the restrictions on 'through connections'?**

The IGSoc states 'Connections to other systems or networks that are not covered by this IGSoc must either be disconnected or comply with a security mechanism specifically approved by the NHS Connecting for Health IGSoc team.' This means that those organisations connecting to N3 must ensure that there is no possibility of an onward connection existing, for example, to the Internet or another organisation's network, through their network infrastructure.

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## **9. Information Governance Toolkit (IGT)**

### **If my organisation changes its name, but retains the same ODS code (formerly NACS), do we need to submit a new IG Toolkit assessment?**

A change to an organisation's ODS code (formerly NACS) would require the resubmission of the IGSoc. Other changes will be collected through the annual submission process.

### **I am not a registered user for the Information Governance Toolkit, how can I get access?**

Once you have completed the application form on the IGSoc website ([www.connectingforhealth.nhs.uk/igsoc](http://www.connectingforhealth.nhs.uk/igsoc)), a user name and password will be emailed to you.

### **Can I just complete 'requirement 108' of the IG Toolkit in order to submit my IGSoc?**

The whole of the IG Toolkit must be completed in order for your IGSoc submission to be processed.

### **Which parts of the IG Toolkit do General Practices need to complete for the IGSoc?**

For purposes of their IGSoc, GPs need to achieve level 2 (or have an improvement plan in place to reach level 2 in a reasonable time frame) for each of the 8 requirements listed in the 118 guidance sheet. However, all requirements should be completed to enable you to submit your IG Toolkit assessment. For further advice please contact the IGT team at [exeter.helpdesk@nhs.net](mailto:exeter.helpdesk@nhs.net). The improvement plan template can be found at <http://www.connectingforhealth.nhs.uk/systemsandservices/infogov/igsoc/links>

### **What is an Improvement Plan?**

All organisations undergoing the IGSoc process must commit to achieving attainment level 2 in all "key" IG Toolkit Requirements (as appropriate for their organisation type – specified in either Requirement 108 or Requirement 3 – click [here](#) to view the requirements). If an organisation submits its IG Toolkit assessment and has not achieved attainment level 2 in all key requirements, it must complete an Improvement Plan which demonstrates how it intends to achieve the necessary level. An Improvement Plan template is available to assist you which can be downloaded at <http://www.connectingforhealth.nhs.uk/systemsandservices/infogov/igsoc/links>. Once complete, submit the Improvement Plan to [exeter.helpdesk@nhs.net](mailto:exeter.helpdesk@nhs.net) for approval.

### **What should I do if I believe a requirement on the IG Toolkit is not applicable to my organisation?**

You should score the requirement at level 3 and enter text into the comments section of the requirements setting out your reasons explaining why you believe the requirement is not applicable. It is likely that you will be contacted to discuss the issue further once you have submitted your IG Toolkit assessment.

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## 10. Privacy policy

### **What will NHS Connecting for Health do with the contact details given in our IGSoc submission?**

The information you provide will be used by NHS CFH for purposes of the management and administration of the IGSoc. It will not be disclosed to any third parties or used for any other purpose without your permission, which would be sought prior to any such use or disclosure. NHS CFH undertakes to keep your information secure until the time when it is no longer required, when it will be destroyed by secure means. If you require further information, NHS CFH can be contacted via [exeter.helpdesk@nhs.net](mailto:exeter.helpdesk@nhs.net)

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## 11. General Enquiries

### **What happens if an organisation is part of a consortium?**

There need only be one IGT and one IGSoc filled out per legal entity, even if the organisation manages different practices with different ODS codes (formerly NACS codes.) This is assuming that each consortium member follows the same policies and procedures.

### **Do organisations that are being set up on NHSmail need to sign the IGSoc?**

If organisations use the service via the internet (i.e. access web mail) and do not have a physical N3 connection an IGSoc is not required. In these instances, the PCT takes responsibility for maintaining IG standards.

### **Do organisations that operate within an IGSoc approved provider (e.g. specialist software development) require an IGSoc of their own?**

If the organisation performs all tasks pertaining to NHS CFH Digital Services or Information with the IGSoc accredited organisation, no, they will not require an IGSoc of their own. It is assumed that the relationship is managed commercially and the service provider subscribes to the policies and procedures of the client organisation

### **How does the IGSoc tie in with the Data Protection Act 1998?**

Information about your organisation may be held by NHS Connecting for Health for the purposes of administering the NHS Connecting for Health IGSoc and requirements associated with it. Your information will not be used for any other purpose without your prior permission. If you have any queries you can contact [Exeter.helpdesk@nhs.net](mailto:Exeter.helpdesk@nhs.net)

### **Are connected organisations required to obtain ISO27001 certification?**

ISO27001 certification is not required for any organisation to sign an IGSoc. However, this standard is the benchmark for much compliance and it is a requirement that organisations be working towards achieving it and basing its security practices and processes on it.

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### **What are the differences between the IGSoc and its predecessor the Code of Connection?**

- The IGSoc replaces the Code of Connection. It applies to all organisations that use the N3

- The Code of Connection was based around the network connection. The IGSoc is broader and covers all services which NHS Connecting for Health provide.
  - The Code of Connection was developed before the National Programme for IT, taking into account the NHS requirements at that time. With the changing environment of the National Programme for IT, a review of the Code of Connection was needed and this resulted in the development and introduction of the IGSoc.
  - The Code of Connection was suitable protection for the old environment. The IGSoc has been designed and adapted to suit the new NHS Connecting for Health environment.
  - The Code of Connection was an agreement with the NHS Information Authority. The IGSoc is an agreement with NHS Connecting for Health.
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## 12. Tracking Database

### **GP - Where do I enter signatory/contact information?**

IGSoC signatory and contact information can only be entered by the General Practice in the IG Toolkit. It is then transferred in an overnight download to the Tracking Database (TDB), where it is visible to the PCT and national IGSoc team, but is read-only there.

### **GP – PCT - How do I create an improvement plan?**

An improvement plan is created when a practice has not reached level 2 in the requirements in their IG Toolkit submission. The improvement plan is created by the practice and the PCT and is approved by the PCT. The PCT can upload the improvement plan into the record for the practice using the Associated Documents tab. Once the improvement plan has been approved, the PCT can tick the improvement Plan Approved? Field in the practice's IGSoc details record. The improvement plan template can be found at

<http://www.connectingforhealth.nhs.uk/systemsandservices/infogov/igsoc/links>

### **GP – I've lost my IGT verification email?**

If you have received the verification email that contains the code to accept your IGSoc and have deleted or lost it, speak to your PCT IG/IGSoC representative and they can resend it to you.

### **GP – I've entered my verification code, what do I need to do now?**

Once you have entered your verification code to accept the IGSoc, you should receive an email to say the process is complete. You now need take no further action.

### **GP – My practice manager received the same verification email as me but it doesn't contain the code?**

Your practice manager can accept the IGSoc on your behalf, but you must explicitly give them the code to do this, this means you are giving delegated authority for them to sign the IGSoc.

### **PCT – What can I use the comments box for?**

Use the comments box to keep a record of any additional useful information that you want to record in relation to the practice's IGSoc application. The comments box remains editable even after the IGSoc is approved.

### **PCT – How can I tell if the verification emails were resent when I clicked the re-send button?**

The 'emails sent' box contains a history of all of the emails that have been sent along with the dates. If you have clicked the re-send button, there should be a record of the emails to the contact and the signatory in this box.

**PCT – What documents can I upload into the Associated Documents screen?**

The Associated Documents screen is used to keep a record of any files, emails or documents relating to the practice's IGSoC application. It is a useful way of keeping an audit trail of communications and is a logical place to store an IGT improvement plan. The improvement plan template can be found at

<http://www.connectingforhealth.nhs.uk/systemsandservices/infogov/igsoc/links>

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## 13. Filter Change request

**What is a filter change request?**

The filter change request is a process by which an organisation requests changes to their access control lists. The filter change request form can be obtained, on request, from the BT N3 helpdesk. (All details can be found at <http://www.n3.nhs.uk/>)

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## 14. Prisons

**Do Prison Health Units need to engage in the IGSoC Process?**

Prison Health Units are not required to complete IGSoC by NHS CFH as their healthcare is provided by PCTs, and the PCT covers the prison's IGSoC. However, PCTs are required to complete an IG Toolkit assessment for each of the prison health units in their area.

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## 15. Offshoring

**When does an organisation have to engage the Offshore Policy piece of the IGSoC Process?**

If any of the below preconditions are applicable:

- 1) Are Patient Identifiable Data (PID) viewed, stored or processed outside of England?
- 2) Can the N3 or any other NHS CFH Digital service be accessed directly, or indirectly, from outside of England?
- 3) Are personal data (as defined by the Data Protection Act 1998) viewed, stored or processed outside of the European Economic Area (EEA)?

**What documents are required to support an offshore application?**

There are two parts to the offshore process

- 1) The Offshore Policy which address's specifics to the proposed solution being proposed

- 2) The Information Security Management System (ISMS) template document which describes the overall maturity of Information Security within the organisation.

**My organisation is ISO 27001 certified does this help?**

If your organisation is certified to the ISO27001/2 standard, and the scope covers all activities that support the proposed service or solution, then a copy of the certificate can be submitted in place of the ISMS

**Where do we get the offshore documents?**

The documents are available at:

<http://www.connectingforhealth.nhs.uk/systemsandservices/infogov/igsoc/links>

**We are a non-NHS organisation based in one of the Home Countries (Scotland, Northern Ireland, Wales, and Isle of Man) and we wish to have access to the Home Country specific services, do we contact the central IGSoc team?**

NHS CFH is responsible for accrediting organisations with specific reference to NHS England services and information. Each of the Home Country NHS organisations will have their own process for service accreditation and should be contacted independently

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## 16. Definitions

**What type of organisation are we?**

**NHS organisations are:**

- Department of Health
- Strategic Health Authorities
- Primary Care Trusts including Prison Health services
- Acute Trusts
- Ambulance Trusts
- Mental Health Trusts
- Foundation Trusts
- Special Health Trusts
- Public health laboratories and observatories
- Communities of Interest (COINS)

**Public Sector providers of care**

- Local district, borough and county councils social services

**Special categories:**



- General Practices
- Pharmacies

**Non-NHS organisations are:**

- Contractors and providers of services to NHS organisations
- Hospices and voluntary organisations
- Universities and deaneries i.e. Academia
- Other types of organisation

Further information on organisation types can be found at:

[www.connectingforhealth.nhs.uk/igsoc](http://www.connectingforhealth.nhs.uk/igsoc)

