

Information Governance Bulletin

Spring 2018

IG Policies and Procedures

Message from Gary Armstrong, Senior Information Risk Owner (SIRO)

Once a year I am required to remind everyone of our Information Governance (IG) policies. For those of you who work at Queens Park, a hard copy of all policies can be found on the table at the end of the desks where our quality and governance and business information team sit. There have been some minor amendments to the policies since last year, so you may wish to read them to remind yourself of the content and ensure you are aware of your responsibilities. Anyone working in the CBC offices who has not seen them should take the time to read the policies to ensure they are aware of the content. I am happy to answer any questions or clarify any points.

In the near future all our policies will be available online via SharePoint. Further details on this will be sent out when the new intranet site is available. In the meantime, if you require a copy of a specific policy please contact the governance team on cbchealth.governance@nhs.net. A list of IG policies is attached.

In addition to this I would like to remind everyone of a few housekeeping rules:

- Operate a clear desk policy and ensure confidential information is kept out of sight.
- Ensure your PC is locked when your workstation is left unattended or turned completely off at the end of your working day.
- Do not open links or attachments from unsolicited emails or those which appear to be from a known source, but the content is in a format or style not consistent with past communications from the individual or organisation.
- Keep passwords secure – change them regularly.
- Dispose of confidential paper securely e.g. shred it.
- Collect only information that is needed.
- Ensure you are aware of the legal basis for processing and sharing data.
- Operate a sign in procedure for visitors and accompany where necessary.



Pseudonymisation and Anonymisation of Data

Aim of the policy

To enable the legal, safe and secure use of patient data for secondary (non-direct care) purposes by the NHS and other organisations involved in the commissioning and provision of NHS commissioned care.



The process replaces 'real life' identifiers, such as NHS Number and data of birth, with unique codes (pseudonyms) which do not reveal the original identity of the individual (unless access is given to the 'key' to reverse the pseudonymisation process).

Under General Data Protection Regulation (GDPR), personal data which have been pseudonymised but 'which could be attributable' to an individual by the use of additional information should be considered to be identifiable information.

Pseudonymised data may be identifiable depending on how difficult it is to attribute the pseudonym to an individual.

Measures must be taken to ensure that the key is held separately from the pseudonymised data, and before sharing you must ensure that data are anonymised in line with the Information Commissioner's Office (ICO) code of practice on anonymisation.

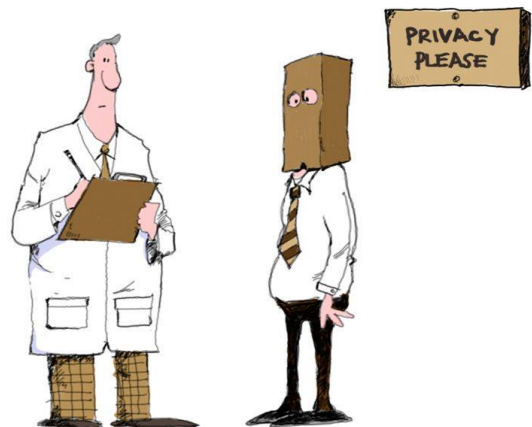
Data protection and confidentiality

We need to ensure you understand the importance of data protection and confidentiality and that **where there is no legal basis for sharing information, patient data cannot be shared without patient consent.**

This is a very important issue for any organisation that processes patient data, and with the introduction of the GDPR on 25 May 2018 we need to ensure you are aware of the implications of any data breaches. Fines issued by the ICO will be higher under the new regulation and significant incident reporting is mandatory.

If you are in any doubt about what you can share, please contact the Quality and Governance Team: cbchealth.governance@nhs.net. CBC's Data Protection Officer is Kate Watson, and she will be happy to answer your queries. Any complex patient data sharing queries can be directed to our Caldicott Guardian, Bill Westwood. Gary Armstrong is CBC's Senior Information Risk Owner (SIRO) and should be consulted on any information security risks that are identified.

This policy should be used in conjunction with other information governance policies and procedures.



Door Entry System – Queens Park

The door entry system to Queens Park has changed. From 21 March 2018 staff will not be able to enter using their fingerprint. If you require a card or fob please contact Sue Hall: suzannehall@cbchealth.co.uk, 0191 497 7710.

We would like to take this opportunity to assure you that your fingerprint will be permanently deleted with immediate effect.



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