

INFORMATION GOVERNANCE BULLETIN

DECEMBER 2009

Welcome to our special IG bulletin, in which we highlight some of the things that are under way in the world of information governance within the Scottish Government.

Please see the IG pages on the [eHealth website](#) for more information on our 3 year programme of work.

We hope that you enjoy the festive season and would like to wish you all a happy, healthy and prosperous New Year.

Caldicott Guardian Workshop and Training Day

NHSScotland Caldicott Guardians attended a national workshop on 22nd October. Dr Harry Burns, the Chief Medical Officer for Scotland, emphasised the importance of the Caldicott Guardian role at Board level, discussed emerging guidance on a consensus to requests to opt-out of electronic recording and CHI governance.

The Caldicott Guardians have agreed to:

- Establish a national forum for Caldicott Guardians, to meet bi-annually. Terms of Reference are being developed and a chair will be elected. The purpose will include networking, sharing of best practice, progressing collaborative work, etc. In addition, ongoing CPD will be integral to these meetings. The first forum meeting will be held in Edinburgh on 28th April 2010.
- Evaluate the Welsh Caldicott manual and website to consider its suitability to be adapted for use in Scotland as a replacement for the current Scottish Caldicott Manual.
- Support development of a national foundation IG training package for all NHSScotland employees as part of a comprehensive approach to IG training and awareness raising

The NHSS Information Governance Team based in ISD, hosted a well attended and favourably received CPD event on 29th October for NHSScotland Caldicott Guardians. This means that just over half of Caldicott Guardians have attended a formal training day during 2009.

A final training opportunity will be available to remaining Guardians in either February or March 2010.

Please contact the NHSS IG Team at: NSS.infogov@nhs.net for more information

Training

We are in the process of agreeing a commission with NSS for the NHSS IG Team to undertake a 2 year programme of work to develop and publish information governance training and awareness material for use by all NHSScotland employees.

The programme takes into consideration requests from the service for central support and a desire for greater consistency across the NHS Boards as to what information is provided to staff regarding both individual and organisational IG obligations. It will be progressed through close collaboration with Boards and NHS Education Scotland.

The main aspects of the two phased programme of work are:

Phase 1:

- To develop IG material setting out the “rules of the game” for all NHSS employees. Some of this will be new material, but in many cases an extension of existing IG Material.
- Training for Caldicott Guardians, including core training, ongoing CPD and redevelopment of the NHSS Caldicott Manual.

Phase 2

- Foundation level online training package development for all NHSS employees.
- Training materials developed for Health Records Services staff including the development of a reference handbook tool and training course material.
- Inclusion of IG modules within existing wider training packages for healthcare professionals who are newly qualified/ in training, namely DOTS and Flying Start facilitated by NES.
- Develop a comprehensive suite of training materials for a course covering all aspects of Information Governance and Records Management to be completed over a 10 week period, leading to an Institute of Health Records Management (IHRIM) Certificate of Technical Competence (CTC). We hope to run a pilot programme with 150 staff from across the Boards and will evaluate the effectiveness of the pilot prior to rolling it out further.

Further details will be sent out once the commission has been agreed with NSS.

The programme builds on the NHSS Information Governance Competency Framework. The Framework is a set of national competencies describing what healthcare staff should know and be able to do in relation to information governance. The competences are arranged in five 'domains' (holding, obtaining, recording, using and sharing information) and four levels ('Foundation' to 'Advanced'). The Framework is available [here](#).

National Access Protocol

Patients and staff have a right to privacy. They need to be assured that their personal data is held securely by NHS Scotland and accessed appropriately only for legitimate and justifiable purposes.

One tool in the information governance armoury is an Access Protocol that sets out the terms and conditions under which a system will be used. For example:

- What the organisation and individual responsibilities and obligations are
- Who can access it and the limits of that access.
- What the data can be used for.
- How privacy / security will be achieved.

There has already been a lot of work done to produce access protocols for individual national systems but there is a desire for a more standardised approach. With the help of Rhona Jack, Management Consultant and NISG, a template has been developed that can be used as a checklist to review existing system protocols to ensure they comply with legal requirements and take account of good practice; it can equally be used as a prompt for those specifying and implementing new systems so that security and confidentiality is built in from the outset.

The draft protocol will now be considered by the eHealth Programme Board. If approved the protocol will be available via our eHealth website.

Audit

A number of NHS Boards staff have asked us what are we doing to ensure that the audit and monitoring of national systems takes place. We are working with John Gillespie, who is currently working on the IAM project to undertake a short piece of work to develop policy guidance around audit of access, along with helpful tips on core analyses of logs. We will

take into account the experiences of existing portal and a number of Boards about their emerging experience with audit log tools. John will be in touch with some of you in the forthcoming weeks for your views and information on the current landscape. We also hope that this work will be capable of being utilised by the Clinical Portal programme and build on the work of IAM. We would encourage you to support John in his work.

Single NHSScotland Records Management Code of Practice

Work is underway to amalgamate the Records Management Code of Practice and NHS HDL (2006) 28 Management, Retention and Disposal of Administrative Records.

We have taken the opportunity to add in good records management practice during the closure of a hospital site, as recommended in the NHS QIS expert group's report on the closure of the Strathmartine Hospital in Tayside.

In addition, we have made a number of the current appendices into a separate set of Records Management Guidance Notes, facilitating easier and better access.

We are currently consulting with Health Records Managers and Archivists, on these changes and hope to make the revised Code available on the Scottish Government website from the end of January 2010.

Records Inventory and Guidance on the transportation of records

Two workshops were held at the Health Records Forum Meeting on 2nd December to define the:

- Dataset required for compiling a Records Inventory.
- Requirements for developing guidance on the operational physical security and transportation of manual records.

We hope this work will be complete by end of February 2010.

Health Informatics National Occupational Standards

Skills for Health, the Sector Skills Council for the Health Sector, are undertaking a major project to review and improve the Health Informatics National Occupational Standards.

National Occupational Standards (NOS) define what a competent person should be able to do when they carry out a particular work activity. NOS

can be used for training needs analysis, training and development, performance review, personal development planning, governance, quality assurance and reviewing service delivery decisions.

A number of Health Records, Information Governance and Information staff attended a regional work shop on 17 November in Glasgow to review the new and revised National Occupational Standards for Health Informatics. This work stream followed an earlier reference group meeting in October where the standards were reviewed by a number of professions from each of the home countries.

As a result of the Glasgow workshop a number of new National Occupational Standards for Records Management were identified. These will be reviewed by Skills for Health and considered for drafting and inclusion when the new NOS are published in the second quarter of 2010.

Informing You.....

Latest NHSS IG Bulletin

The IG Bulletin is a quarterly newsletter of the NHSS Information Governance Team. The aim is to keep you up to date with ongoing developments in the NHSS IG programme. The final edition for 2009 is now available at:

<http://www.isdscotland.org/e-publications/ig/December09.html>

Finally, don't forget to visit [eHealth Link](#) for the latest on the wider eHealth agenda.

Want more information?

If you would like further detail about any of the things mentioned in the bulletin, please contact:

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Please pass this bulletin to any of your colleagues who are involved with, or have an interest in Information Governance. Alternatively, get them to email us at ehhealthcommunications@scotland.gsi.gov.uk so we can add them to our mailing list and send information directly.