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Enw y Grŵp/Is-Bwyllgor: **Name of Group:**	**Information Governance Sub-Committee (IGSC)**
Cadeirydd y Grŵp/Is-Bwyllgor: **Chair of Group:**	**Huw Thomas, Director of Finance**
Cyfnod Adrodd: **Reporting Period:**	**7th June 2022**

Y Penderfyniadau a'r Materion a Ystyriodd y Grŵp/Is-Bwyllgor:
Key Decisions and Matters Considered by the Group:

Clinical Coding Update
The Sub-Committee noted that Hywel Dda University Health Board (HDdUHB) clinical coding activity continued to improve for February 2022 and surpassed the 95% target with 96.2%. This is the 5th month in a row where the Health Board has achieved the target. The Health Board over the past 6 months is above the all Wales average for the first time in a number of years. HDdUHB has ranked third of the Welsh health boards for December 2021 performance, with only Powys Teaching Health Board and Velindre Trust also achieving the 95% target for February 2022 activity.

The Sub-Committee noted the current clinical coding performance being above the Welsh average and that the clinical coding team are ahead of the planned trajectory.
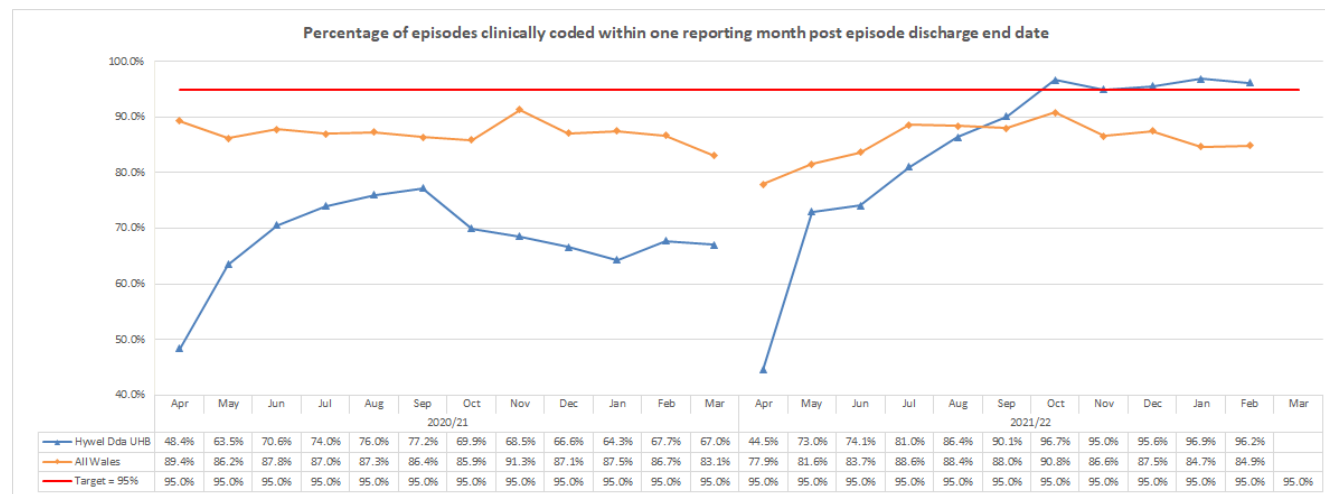
Provisional performance for March 2022 for the Health Board is around 96.3%.

The Sub-Committee noted the development of an internal audit programme of work to provide further assurance regarding the accuracy of the information being coded. In addition to commencing the internal audit programme with Senior Clinical coders, Digital Health and Care Wales (DHCW) will be attending the Health Board in August / September 2022 to undertake their yearly national audit.

Information Governance Documents
- **Unauthorised Access Procedure:** The Sub-Committee noted the document and the updates. The document includes the correct procedure for the use of the National

Integrated Intelligence Audit Solution (NIIAS) to identify potentially inappropriate access to clinical records and how to escalate this through an agreed process.

- **Information Rights:** The Sub-Committee noted the document and the updates. The document provides clear guidance to patients, staff and the Information Governance team about the process for managing an individual's information rights under the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR).

HDdUHB's Corporate and Medical Records Storage Assurance
The Sub-Committee received an update on the records storage audits undertaken by the Information Governance team. There has been one audit since the last IGSC, which took place at a garage located at Bronglais General Hospital (BGH) where Accident & Emergency records requiring scanning were placed. Unfortunately, the records have not been scanned due to workload and the COVID-19 pandemic. These records will be transferred to DHCW for scanning.

Information Governance Activity Report
The Sub-Committee received the Quarter 4 report of 2021/22, noting the following highlights:

- **Enquiries on Data Protection Framework –** the number of enquiries (**87**) received during **Q4** remains significantly lower than the same period of the previous year 2020/21 (**110**).

- **Information Sharing –** the number of information sharing requests (**20**) received during **Q4** decreased in comparison with the previous quarter (**30** requests), with increased activity (33.3%) compared **to the same period of Q4** of the previous year 2020/21 (**15**).

- **Personal Data Breaches –** the number of personal data breaches reported to IG during **Q4** equated to **39,** compared to **Q3** (**43**).
  It is important to note that of these **39** breaches, **8** were Near Misses.
  The majority of incidents fall within the following categories:
    - Lost or stolen paperwork / hardware (**3**);
    - Disclosed in error (**22**); and
    - Unauthorised Access/Disclosure (**8**)

- **Data Subject Requests** – Quarter 4 Health Subject Access Requests (SARs) are being reported differently. Information Governance is now authorising the third-party requests made by solicitors, insurance companies, Legal Power of Attorney's etc. on behalf of the patients, in order to ensure that the Health Board complies with the DPA 2018 / UK GDPR.

  The number of Health SARs received totaled at **331** during **Q4**, whereas the number of Data Subject Rights: Subject Access Requests equated to **306**. The data collated shows that almost all enquiries to the Access to Health Records Team are now validated by IG team.

  There were **10** Corporate SARs received in **Q4**, an increase compared with **Q3** (**7**).

- **Training Compliance** – The IG training compliance has decreased slightly during **Q4,** recording on average **77.94%** in comparison to the previous quarter (on average **79.25%**)

- **National Intelligent Integrated Audit Solution (NIIAS) Monitoring** – Alerts received; During **Q4, 36** Own Access Notifications were received, in comparison to the previous **Q3** (**64**). The numbers reported relate to the number of staff triggered during the quarter, with a number of staff having more than one NIIAS trigger (including accessing on more than one date within the calendar month).

  During **Q4, 28** Potential Family Access Notifications received (although **1** notification was found not to be a relation). **8** of the triggers have been confirmed as legitimate accesses, and these have been verified as legitimate by the Line Manager of the service. Of the **19 remaining** triggers, **4** Staff have attended the Virtual Training, **4** have booked onto future training sessions, **5** staff were incorrectly triggered to HDdUHB and **6** staff member notifications remain outstanding (of which 4 are with managers). Some staff had more than one NIIAS trigger. The above figures have increased as a result of NIIAS now monitoring additional systems.

Information Commissioner Office (ICO) Notifications
Since April 2021, there have been 13 occurrences when a notification to the ICO has been required. The following table highlights the current notifications:

	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Total
Open	1	0	0	1	1	1	1	1	1	0	0	0	7
Closed	2	0	2	1	0	0	0	0	0	1	0	0	6
Total	3	0	2	2	1	1	1	1	1	1	0	0	13

Cyber Security and Network and Information Systems (NIS) Directive Update
A separate report has been prepared for presentation to the Sustainable Resources Committee to provide an update on progress of Cyber Security. However, the Sub-Committee noted the following:
- Cyber Security threat facing HDdUHB as a result of the war in Ukraine remains high however, direct attacks targeting NHS Wales are yet to be seen. Hywel Dda Cyber Security team continue to follow National Cyber Security Centre (NCSC) guidance and utilise shared threat intelligence from NCSC Cyber Security Information Sharing Partnership (CISP), NHS Digital, DHCW, Dyfed Powys Local Resilience Forum (DPLRF), and Local Authority Warning, Advice and Reporting Points (WARP) to identify any alerts that may be linked to Cyber Criminals linked to the Ukraine war.
- The Microsoft E5 security suite of products has provided new functionality and increased visibility.
- Microsoft Defender for Identity, which is part of the Microsoft E5 Security suite, has been enabled and is now **fully** functional after being in learning mode during April and May 2022.
- In order to improve incident response, the Cyber Security team is currently organising a tabletop exercise to be run in June / July 2022, which will simulate and test responses to an attack that directly affects the Radiology department.

- A phishing exercise has recently been undertaken within the Digital department. The aim of the exercise is to raise awareness and educate users of the latest phishing technique, which in turn will provide another layer of defence for a successful cyber-attack via phishing emails. The exercise was successful and initial indications suggest there are areas for improvement. A total of 173 emails were sent out from the phishing platform which targeted members of the Digital Services department, with a total of 10 staff who clicked on the phishing link and 3 members of staff inputting their credentials.

Materion y Mae Angen Ystyriaeth neu Gymeradwyaeth Lefel y Pwyllgor Adnoddau Cynaliadwy:
Matters Requiring Sustainable Resources Committee Level Consideration or Approval:

- No matters requiring consideration or approval.

Risgiau Allweddol a Materion Pryder:
Key Risks and Issues / Matters of Concern:

- The wider strategic issue of the storage of records and boxes within external storage companies.

Busnes Cynlluniedig y Grŵp/Is-Bwyllgor ar Gyfer y Cyfnod Adrodd Nesaf:
Planned Group/Sub-Committee Business for the Next Reporting Period:

Adrodd yn y Dyfodol:
Future Reporting:

- Information Asset Owners and Information Asset Mapping Update
- Data Quality and Clinical Coding
- Information Governance Risk Register
- Information Governance Toolkit
- Update on Cyber Security / NISR
- Caldicott Register to be returned to the IGSC meetings
- Digital / IG Policies and Procedures

Dyddiad y Cyfarfod Nesaf:
Date of Next Meeting:

25th July 2022