

Name of Sub-Committee:	Information Governance Sub-Committee (IGSC)
Chair of Sub-Committee:	Huw Thomas, Director of Finance
Reporting Period:	10th August 2021
Key Decisions and Matters Considered by the Sub-Committee:	
<p>Scope of the Sub-Committee</p> <p>The scope of the Information Governance Sub-Committee (IGSC) is to provide assurance to the Sustainability Resources Committee on compliance with information governance and cyber security legislation, guidance and best practice.</p> <p>In discharging this role, the Sub-Committee is required to oversee and monitor the information governance agenda for the Sustainable Resources Committee in respect of its provision of advice to the Board, and ensure the implementation of the information governance agenda against the following areas of responsibility:</p> <ul style="list-style-type: none"> • Provide evidence based and timely advice to assist the University Health Board (UHB) in discharging its functions and meeting its responsibilities with regard to the quality and integrity; safety and security; and appropriate access and use of information (including patient and personal information) to support its provision of high quality healthcare. • Provide assurance in relation to the Board’s arrangements for creating, collecting, storing, safeguarding, disseminating, sharing, using and disposing of information in accordance with its stated objectives; legislative responsibilities, e.g., the Data Protection Act 2018, General Data Protection Regulations (May 2018) and Freedom of Information Act 2000; and any relevant requirements, standards and codes of practice. • Provide assurance that risks relating to information governance are being effectively managed across the whole of the UHB’s activities (including for hosted and contracted services, through shared services, partnerships, independent contractors and Joint Committees as appropriate). <p>Clinical Coding Update (including a Recovery Plan)</p> <p>The Information Governance Sub-Committee (IGSC) noted the Hywel Dda University Health Board (HDdUHB) performance for clinical coding for Q1, 2021/22 as 66.2%, which is considerably below the 95% requirement. The IGSC Chair queried the reason behind coding non-compliance and the response given was the high levels of sickness and self isolation as a result of the COVID-19 pandemic, which has affected the number of coders able to be in the office.</p> <p>IGSC noted that the procurement of contract coders is underway and that the tender process is due to conclude shortly, with an anticipated start date of September 2021. The contract coders will be prioritised on ensuring 2019/20 and 2020/21 reach a minimum of 95% completeness. IGSC received the plan for ensuring achievement of the 95% target for 2021/2022. With the additional coders undertaking further training, the clinical coding team anticipate that the necessary 95% target for coding completeness within month will be achieved by December 2021.</p> <p>Digital Services/Information Governance (IG) Document Review</p>	

As the documents were not available for the Sub-Committee to review and discuss at its meeting on 10th August 2021, the Chair requested that this work is prioritised to enable submission to the October 2021 meeting.

Information Asset Registers

The IGSC was asked to approve four Information Asset Registers (IARs), following assurance by the Information Asset Owners Group (IAOG) meeting and the services' lead Directors:

- Unscheduled Care Glangwili General Hospital (GGH)
- Cardiology
- Safeguarding
- Community Paediatricians

Both the Cardiology and Safeguarding IARs were agreed in principle, subject to the completion of further actions required.

Information Governance Audit Inspection

The IGSC received a report regarding the off-site storage facility, Lloyd & Pawlett Removals, following an Information Governance and Information Security Risk Assessment. IGSC noted that there were several issues of concern and requested that a new risk be raised on the risk register. IGSC also tasked the IG team to work with departments within the Health Board to fully understand those records that are stored within this facility.

Information Governance Activity Report Q1 (April - June 2021)

The IGSC received the IG activity report, with the following elements highlighted for the Sub-Committee's information:

- **Training Compliance** – The IG training compliance has increased slightly with Q1 2021/22 recording 78%, which is a marginal decrease to the previous quarter (79%) and a 0.2% increase compared to Q1 of the previous year 2020/21 (78%). It was noted that the booking onto ESR Weekly IG virtual training (Microsoft Teams) had been rolled out during late February 2021 in order to encourage staff to complete their IG ESR compliance.

Estates and Ancillary compliance has continued to increase (by 7%) during Q1 2021/22 (72%) compared to the previous quarter (65%). However, this is a considerable decrease compared to March-October 2019 where the service compliance plateaued around 90% – 92%. Nonetheless, there has been an increase compared with Q1 of the previous year 2020/21 (56%).

The IG Compliance classroom training via Teams is now available to book via ESR. In addition, the new virtual training video is in development providing staff with options on how they wish to complete their IG compliance.

Managers of services have been invited to attend one of three IG Awareness Training sessions for Managers during July and August 2021. Secretaries have also been invited to attend one of three IG Awareness Training sessions taking place during September 2021.

- **National Intelligent Integrated Audit Solution (NIIAS) Monitoring** – Alerts received;

During Q1 2021/22, 43 Own Access Notifications were received in comparison to the previous quarter (29); this increase has arisen following the implementation of the new NIIAS system which monitors accesses to additional systems i.e. Welsh Immunisation System (WIS) and Cancer Network Information System Cymru (CANSIC). Having considered the individual alerts, it was identified that 3 of the triggers had been confirmed as legitimate accesses and verified as such by the Line Manager of the service. Of the remaining 40 triggers, 20 staff have attended the Virtual Training, 9 staff had more than one NIIAS trigger, 1 has booked onto future training sessions, and 13 are still to book onto the training.

- **Information Commissioner's Office (ICO) Notifications**

IGSC noted that there has been an increase in the number of staff access breaches in recent months, which have required notification to the ICO. The Information Governance team will reinforce the importance of confidentiality and accessing patient records on a need to know basis within the IG Newsletter.

Caldicott Guardian Register

The IGSC received the latest Caldicott Guardian Register and noted the processes that the Information Governance team undertake in support of the Caldicott Guardian's function. The Sub-Committee agreed that officers would undertake a review of the current register to ascertain whether it is still current and remove previously approved documents. The Chair requested that a new register be available for the October 2021 Sub-Committee meeting.

Cyber Security and Network and Information Systems (NIS Directive) Update

The IGSC noted the update, referencing the positive work undertaken to date around the commencement of the vulnerability scanning against servers classified as Infrastructure Standard and Infrastructure Critical. The Sub-Committee was assured that no service interruption was caused by the vulnerability scanning; vulnerability scanning will now be automated on a monthly schedule to assist with remediation tracking and to identify new vulnerabilities. The vulnerability scanning scoping work has commenced for servers identified as Administration Standard and Critical and scanning is scheduled to commence in August 2021, with a full report being presented at the October 2021 Sub-Committee meeting.

The Security Information and Event Management (SIEM) platform implementation and data onboarding is scheduled for week commencing 6th September 2021, which will provide the required visibility for security monitoring.

Data Protection: Adequacy decisions for UK adopted by European Commission

The IGSC received a paper with an update on the European Commission's Adequacy Decision. The paper outlined the key elements of the adequacy decision's and the impact upon the General Data Protection Regulation (GDPR) and how personal data can flow freely from the European Union to the United Kingdom.

Digital Inclusion

The IGSC received a report outlining the concept of Digital Inclusion and its importance to the Health Board and the wider Health Communities. Digital Inclusion is where everyone in Wales has the skills, access and motivation to be a confident user of digital technology. The report summarised the importance of digital inclusion to not only the Digital Response, but also the wider Health & Care Strategy, 'A Healthier Mid and West Wales: Our future generations living well'

approved by the Health Board in November 2018. IGSC agreed that the Health Board will need to adopt action to ensure staff have the digital skills and aptitude, and that patients and their families, and communities are equipped and able to access health and other services in a digital environment should they wish to do so.

IGSC noted that the digital team has been working with representatives from Digital Communities Wales to review the pledge requirements and consider those actions that are in hand, those actions that are in development, and any gaps. However, it was emphasised that the adoption of Digital Inclusion is wider than the digital team.

The IGSC agreed that this is an essential piece of work and noted the further work required to develop a strategy and associated actions to take this forward. The Chair of the Sub-Committee was requested to develop additional papers to be considered through the governance arrangements within the Health Board.

Matters Requiring Sustainable Resources Committee Level Consideration or Approval:

- No matters to be considered

Risks / Matters of Concern:

- Following the audit of one of the external off-site storage facilities, several issues have been raised following the assessment undertaken and will be included as a new risk on the Information Governance risk register.

Planned Sub-Committee Business for the Next Reporting Period:

Future Reporting:

- Information Asset Owners and Information Asset Mapping Update
- Data Quality and Clinical Coding
- Information Governance Risk Register
- Information Governance Toolkit
- IG Training Strategy
- Update on Cyber Security
- Caldicott Register to be returned to the IGSC meetings
- Digital / IG Policies and Procedures
- Audit of Network Communications Rooms
- Digital Communications

Date of Next Meeting:

Tuesday, 12th October 2021