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| <b>Enw y Grŵp/Is-Bwyllgor:</b><br><b>Name of Group:</b>   | <b>Information Governance Sub-Committee (IGSC)</b> |
| <b>Cadeirydd y Grŵp/Is-Bwyllgor:</b><br><b>Chair of Group:</b>  | <b>Huw Thomas, Executive Director of Finance</b>   |
| <b>Cyfnod Adrodd:</b><br><b>Reporting Period:</b>   | <b>8<sup>th</sup> August 2023</b>                  |
| <b>Y Penderfyniadau a'r Materion a Ystyriodd y Grŵp/Is-Bwyllgor:</b><br><b>Key Decisions and Matters Considered by the Group:</b> |  |

**Policy Extension**

The Sub-Committee received an update on the Access to Health Records Policy (249), and the future amendments to reflect any changes within the Health Board, Nationally or legislative alterations. The reporting officer requested a 6-month extension to reflect all-Wales and local developments. The Sub-Committee recommended approval of the extension.

**Information Quality Assurance (IQA) Data Quality**

The IQA team have carried out a deep dive audit into A&E activity. There were a number of recommendations/actions contained within the presented report with the expectation that these are actioned by the relevant departments within the timescales provided, with the objective of ensuring that each department is recording all patient interactions in a consistent manner not just within their own departments but across sites as well. The Sub-Committee welcome the report and requested that the reporting officer provide regular updates on the progress of the recommendations.

**HDdUHB's Corporate and Medical Records Storage Assurance Report – Update**

The Sub-Committee received an update on the current audit of storage facilities across the Health Board. The IG team have completed audits in Withybush and Glangwili General Hospitals. The initial findings of the audits undertaken in Withybush and Glangwili is that all the staff interviewed were very aware of data protection, privacy and patient confidentiality and there was evidence of very good practice in all areas visited. It is also noted that staff had a strong commitment to improving any gaps found in compliance as a result of the audit work. The Sub-Committee were also informed of areas demonstrating best practice such as informative posters about patient mobile use in place at Withybush A&E and Glangwili Outpatients have developed a small information pack that staff can provide to patients with guidance on how to access their medical records and their rights in respect of their personal information. The Sub-Committee requested that a tracker be developed to ensure that we record the lessons learned and feed this learning into the Information Governance Training Plan.

**Welsh Information Governance (IG) Toolkit (Submission for 2022 – 2023)**

The Sub-Committee noted that the IG Toolkit was submitted within the required timescales. The objective of the toolkit is to provide reassurance to staff and patients that their information is processed securely and appropriately, and assure other organisations where sharing is made that appropriate IG arrangement are in place. Following the assessment there were a number of areas that required further work, namely;

- To improve the overall IG compliance within HDUHB to 85%.
- Review of business continuity plans (such as Cyber Security, Information Governance, and Medical Records)

- Review of the Data Protection Impact Assessment (DPIA) process and also the publication schema

All of the recommendations have been added to an action plan which the Sub-Committee will monitor on a quarterly basis.

### **Welsh Information Governance (IG) Toolkit – Managed Practices**

The Sub-Committee were informed that the submission date for the IG toolkit for managed practices has been extended until 31<sup>st</sup> March 2024, allowing more time to liaise with the managed practices to ensure that they are able to comply with the submission.

### **Information Commissioner Office (ICO) Notifications**

Since April 2023, there has been 1 occurrence 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         | 0        | 0        | 1        | 0        | 0        | -        | -        | -        | -        | -        | -        | -        | 1        |
| Closed       | -        | -        | -        | -        | -        | -        | -        | -        | -        | -        | -        | -        | 0        |
| <b>Total</b> | <b>1</b> | <b>0</b> | <b>1</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>1</b> |

All the above cases are still in progress and are awaiting responses from the Information Commissioners Office (ICO).

### **Data Protection Impact Assessments (DPIA)**

The Sub-Committee received assurances on the update on the DPIA requests, noting that there were 102 requests in 2022/23. To date there have been 59 new entries on the DPIA register for Q1. The Sub-Committee noted the increase and requested that a review is undertaken to ascertain whether there is sufficient support in the Information Governance Team to facilitate the increased workload.

### **Caldicott Guardian Register**

The Sub-Committee received assurances on the update on the Caldicott Gaudian register, noting that there have been 52 new entries on the register for Q1.

### **Retention and Destruction of Patient Records**

The Sub-Committee received an update on the retention and destruction of patient records following the removal of the 2 embargo's that were imposed on the Health Board for the destruction of patient records. Unfortunately, due to the newly implemented National Records Management Code of Practice for Health and Social Care we are currently unable to destroy records for patients who have been diagnosed with a "Long Term Health Condition". These records have a 20-year retention period. However, the situation and the retention guidance are further complicated by the fact that currently there is no agreed or designated list available to Health Boards, in terms of what qualifies as a "Long Term Health Condition". The Sub-Committee asked the reporting officer to ensure that the Caldicott Gaudian and SIRO are kept informed of the developments as this could have a significant impact upon the storage of records within the Health Board.

**Hywel Dda Health Board Privacy Notice Review**

The Sub-Committee noted and approved the proposed changes to the Health Boards privacy notice. The changes specifically refer to the section 'Why we collect, use and keep your personal information'.

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

A separate report has been prepared for presentation to the In-Committee meeting of the Sustainable Resources Committee to provide an update on progress of Cyber Security.

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

Approval for the extension to the following policy:

- 249 – Access to Health Records Policy

Note the change to the **Hywel Dda Health Board Privacy Notice**

**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 improvement plan
- 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:**

3<sup>rd</sup> October 2023