



WELCOME to the January 2022 edition of the **IG Support Service for Primary Care** **Newsletter**

We publish these newsletters on a bi-monthly basis, providing you with updates on support and guidance developed by the Support Service, progress and developments with the IG Toolkit for GMPs, and related IG training and resources which will include 'Lessons Learnt' scenarios.

CYMORTH LLYWODRAETHU GWYBODAETH AR GYFER GOFAL SYLFAENOL INFORMATION GOVERNANCE SUPPORT FOR PRIMARY CARE

Welsh GP Record (WGPR)

As mentioned in our previous newsletter, the WGPR webpages and supporting information have been reviewed by the Support Service. We can confirm the pages went live on the DHCW website in November and can be found here:

[Welsh GP Record - Digital Health and Care Wales.](#)

Cofnod Meddyg Teulu Cymru Welsh GP Record

My Health Online (MHOL)

The MHOL pages have also been recently updated on the DHCW website. Patients are able to find Registration Forms, Information Leaflets, and a range of Frequently Asked Questions for the MHOL service here: [My Health Online -](#)

[Digital Health and Care Wales](#)



We suggest GP practices direct their patients to these pages, and the other patient and public facing pages for details of national services and applications, from their own practice websites. This will ensure the most current information is available, and previous outdated version are not incorrectly referred to.

For more information, contact the Information Governance Support Service for Primary Care via DHCWInformationGovernance@wales.nhs.uk



Welsh Information Governance Toolkit

The [2021-22 edition of the IG Toolkit](#) is now available via the [Information Governance Website](#).

We are pleased to inform you that this year's edition of the Welsh IG Toolkit launched on the 1st December 2021, with a submission date of 30th September 2022 in line with QAIF.

We encourage practices to work through the Toolkit throughout the year to avoid last minute pressure leading up to the submission date. We are pleased to see that a handful of practices have already started to make progress in populating the assessments.

No updates have been made to the questions in this edition, although where required, some Tool Tips have been updated to reflect the now UK GDPR and relevant ICO guidance.

A range of supporting resources to assist you with completing the toolkit are available in the [Support and Resources for GMPs](#) section of the [IG Website](#) including the updated [IG Toolkit User Guide](#) and a range of [Frequently Asked Questions](#).

Despite our best efforts and substantial involvement from the Software Development Team, we regret that it has not been possible to carry over and pre-populate previously uploaded evidence. [Guidance on carrying over evidence from previous submissions](#), [Guidance on how to delete evidence](#) and an [offline copy of the questions contained within this year's edition of the IG Toolkit](#) are available in the Supporting Resources section of the [IG website](#).

To enable the IG Toolkit to be an extremely useful IG knowledge base and training resource, the toolkit should be followed appropriately and methodically. By

working through the assessments in this way, whilst referring to the supporting resources on the IG Website and your Practice's IG Improvement Plan, will help you determine the level of your IG compliance. If used as a 'Tick Box' exercise, the Practice will gain little from the process.

Should you have any further questions, comments or feedback about the IG Toolkit, please contact the Team via WelshIGToolkit@wales.nhs.uk

Information Governance Website

As well as extensive support for the toolkit requirements, the [IG website](#) hosts a wealth of resources, templates, and IG guidance. These include:

Information Governance Fundamentals

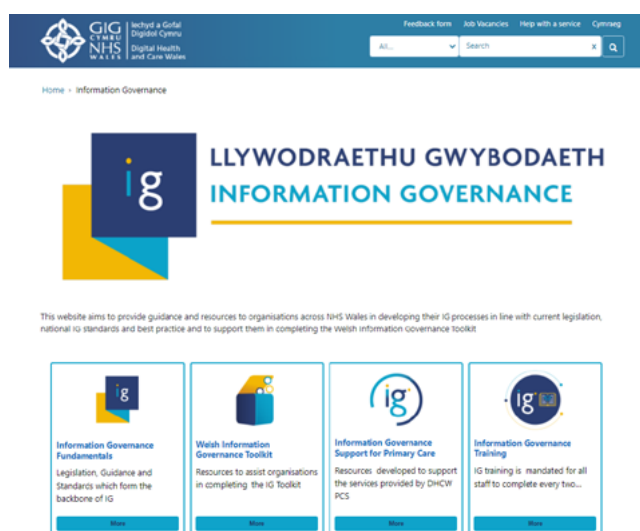
– Here you will find details on legislation, guidance and standards and

All Wales Information Governance Policies. A set of All Wales Information Governance Policies for Primary Care Service Providers have been developed for Practices to adopt.

Welsh Information Governance Toolkit – You can access the IG Toolkit from this section. You will also find a specific section designed to support GMPs in completing the IG Toolkit, including detailed information on each of the requirements, supporting resources including templates, exemplars and guidance, the user guide and a set of frequently asked questions.

Information Governance Support for Primary Care – You will find resources developed for Primary Care here that fall outside of the remit of the IG Toolkit, including frequently asked questions and a range of guidance documents.

Information Governance Training – This section details how to access



mandatory IG Training, any additional training sessions offered throughout the year will also be advertised under this header;

National Information Governance Structure – Details on the structure of Information Governance in Wales, including details of DPO and FOI contacts in Health Boards and Trusts can be found here;

Data Protection Officer Support Service – This includes information on the DPO Support Service, as well as a link to their dedicated support service website (password required);

Information Governance News and Events – Here you will find the latest news on the IG Toolkit, new guidance and resources developed by the IG Support for Primary Care Team and links to the ICO Newsletters and other useful information.

Information Governance eAlerts – Here you can sign up to receive a weekly IG eAlert produced by the DHCW IG Team on the latest IG news, relevant articles, and information. Access to the previous eAlerts are also available under this header.

We hope you find the IG website useful as an extensive IG knowledge base and a helpful resource in completing the IG Toolkit. Should you have any further questions, comments or feedback about the IG Website, please contact the Team via DHCWInformationGovernance@wales.nhs.uk

Lessons Learnt

Sometimes things go wrong; when this happens, it is important that lessons are learnt. In each edition of the newsletter, we look at a real-life scenario, incident or audit finding, and reflect to see if this could happen in your organisation or if there are lessons which can be learnt, including any changes which can be implemented in your organisation to prevent a similar situation occurring.

Serious consequences of personal curiosity; it's a criminal offence for staff to pry into patients' medical records without good reason.

"Patients are entitled to have their privacy protected and those who work with sensitive personal data need to know that they can't just access it or share it with others when they feel like it. The law is clear and the consequences of breaking it can be severe."

Steve Eckersley, Head of Enforcement, ICO

A few examples of staff deliberately accessing patients' records resulting in data breaches and resulting outcomes:

A radiographer who accessed records of more than 200 female patients before stalking them, used his position to look up the records of women he'd treated and made a note of their contact details. He pestered the women, some of whom were domestic abuse victims, with a string of messages on Facebook and WhatsApp in a bid to have relationships with them. He was sentenced to 200 hours' unpaid work and three years of supervision, fined £600 and put on the sex offenders' register for three years and also banned from the profession.

An NHS administrator was fined for repeatedly accessing patients' medical records without a valid legal reason. The employee accessed health records of a patient 279 times over a three-week period, viewing the files up to 50 times in a day. The patient was known to the employee, but she had no lawful basis to access the records. She was fined £300 and also ordered to pay prosecution costs of £364.08 and a victim surcharge of £30.

A midwifery assistant was ordered to pay £1715 in fines and costs after pleading guilty to offences of unlawfully obtaining and unlawfully disclosing personal data over a two-year period. She had accessed the information of twenty-nine men and women, including family members, colleagues and some with no connection with the defendant, with only two of these were pregnant. Some of the information was subsequently shared with others.

Staff who access patient information without good reason or authorisation are not only breaching confidentiality but are also considered to be committing a data breach under UK data protection legislation. Staff must only access patient information if it is in line with their work.

Accessing records without having valid justification or being authorised to do so could lead to:

- Disciplinary action
- Loss of employment
- Loss of professional registration
- Fines

“NHS staff have access to a great deal of personal sensitive data, so organisations must ensure they have the appropriate measures and training in place to ensure people’s information is handled responsibly”

Information Commissioner’s Office.

ICO Newsletter

The Information Commissioner’s Office (ICO) have re-instated their e-newsletter. They are published monthly and bring you the latest developments, blogs, guidance, codes of practice, etc. in a range of legislation such as data protection, freedom of information and electronic communications and marketing, to name but a few. To sign up to receive the e-newsletter, [please complete the form](#). You can also [sign up to subscribe](#) to the ICO’s ‘action we’ve taken’ e-newsletter.



A look back on 2021

As we reach the end of another year, we are looking back over the last 12 months and reflecting some of the major activities and events from across the office and beyond.

We hope you enjoy looking back with us and we wish you all a happy new year.

[The latest edition of the ICO e-newsletter](#) is now available to view.



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WALES

Iechyd a Gofal
Digidol Cymru
Digital Health
and Care Wales

IG eAlert

The Digital Health and Care Wales (DHCW) IG Department produce a weekly [eAlert](#) intended for staff who have an interest in Information Governance issues that affect the NHS in Wales. These eAlert's include news items from around the world on topics such as data breaches, IG news articles and fines issued by the Information Commissioners Office.

If you have any articles which you feel would also be useful to colleagues, please feel free to forward them for inclusion in our next edition.

[Historic editions of the eAlert](#) can be accessed through the IG Website.

If you would like to receive the weekly eAlert direct to your inbox, please contact DHCWInformationGovernance@wales.nhs.uk