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INFORMATION GOVERNANCE SUPPORT FOR PRIMARY CARE
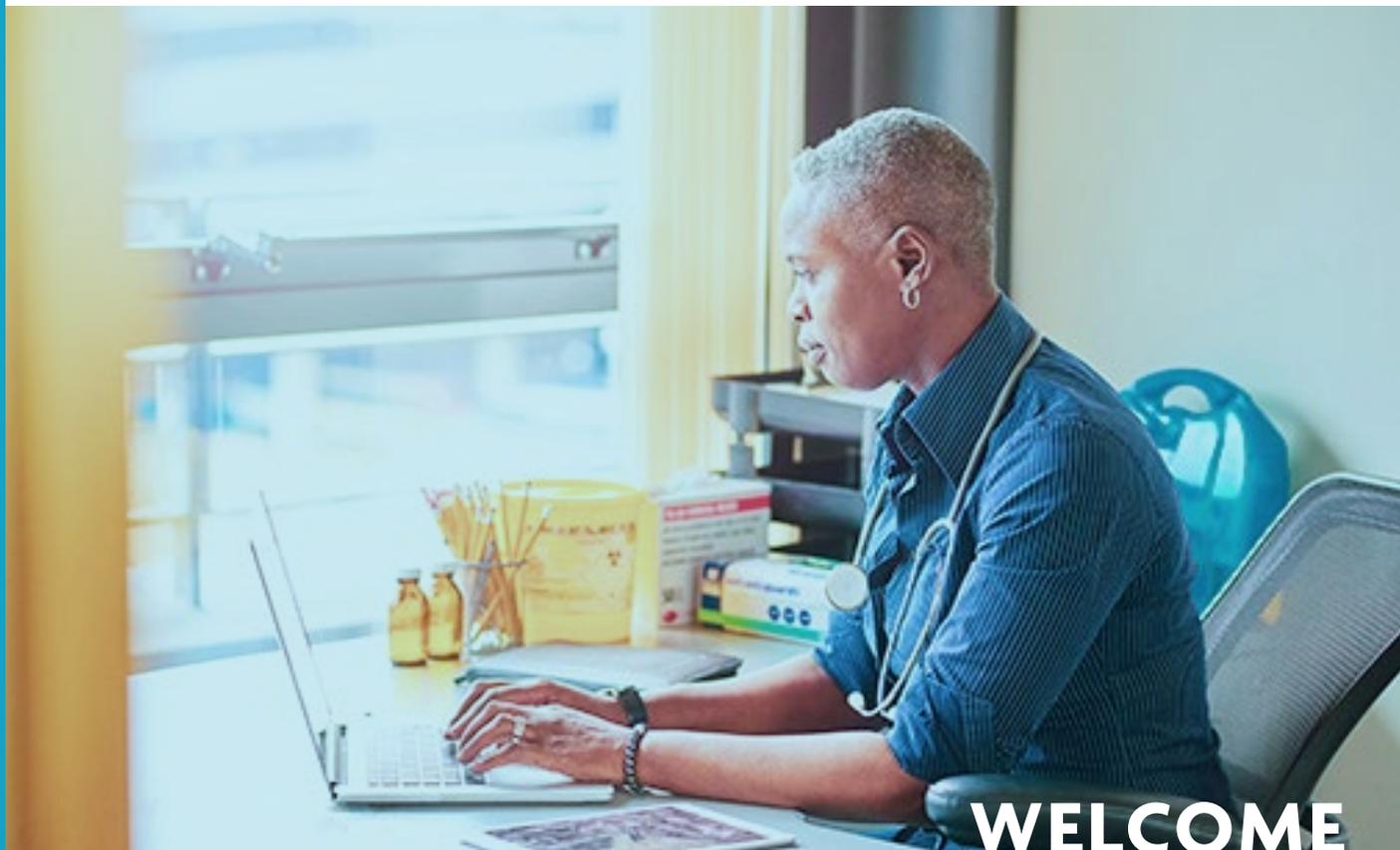
WELCOME

to the July 2023 edition of the
IG Support Service for Primary Care
Newsletter

As you will be aware we were publishing these newsletters on a bi-monthly basis. It has been some time since the last newsletter, but we are back! Our newsletters aim to provide you with updates on support and guidance developed by the Primary Care Support Service, progress and developments with the Welsh IG Toolkit and relevant IG training and resources.

Medical Examiner Service

The team are currently working with the DHCW Primary Care Services Team regarding the new Medical Examiners Service, due to be fully established in Wales by April 2024. Processes are currently being developed around the provision of access to the deceased patient record by the Medical Examiner's Office. Guidance will be developed and made available over the coming months.

Contact the Information Governance Support Service for Primary Care via **DHCWInformationGovernance@wales.nhs.uk**

Primary Care Services 'How Do I session - IG Best Practice'

In their last 'How Do I' session, the DHCW Primary Care Services team reflected on how to improve IG Best Practice for several regular processes within the practice. If you missed this session and would like to watch the recording, please find the link here – **DHCW Primary Care Training Library.**

In brief the session included:

Authorised Requesters

The Authorised Requester process was set up by
DHCW to strengthen information security for practices.
It ensures that the DHCW Service Desk is actioning
genuine and appropriate requests from the practice.
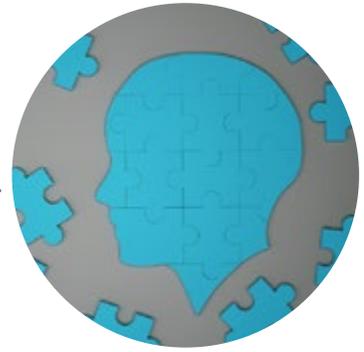
It is important that the Service Desk are informed of any changes to the
Authorised Requesters, as soon as practically possible, to prevent delays in
actioning any practice requests for relevant support.

It is recommended that each practice nominate two Authorised Requesters.
These are usually the Practice Manager and one nominated deputy,
such as a GP Partner or senior member of staff.

DHCW maintain a record of the Authorised Requester's nominated by each practice.
Only calls logged by those on the list, with the Service Desk will be actioned.
If the practice hasn't updated their list in the last 12 months and wish to make any
changes, you can do so by completing the **Authorised Requester List** and forwarding
it to the **DHCW Service Desk.** Only those nominated members of staff can make
changes to the list (add or remove staff members and their rights of authorisation).

As it currently stands there are 59 practices that have yet to complete an
up-to-date Authorised Requester List. If you are one of these practices,
you may want to think about updating yours.

For further information, please see **the Authorised Service Requester Process.**

Old IG Toolkit Platform – FormBuilder Two

The **previous edition of the IG Toolkit** will continue to be available to practices to retrieve/ download previous evidence and pull off reports via the Formbuilder Two platform. There are plans by the Corporate Application Team to de-commission Formbuilder Two later this year.

New IG Toolkit Platform - Caforb

As detailed in our recent communication, unfortunately we are having to delay the implementation of the new IG Toolkit until the end of July, on the recommendation of our software developers. Recently discovered issues in the testing environment have identified the requirement to make some necessary updates prior to publication. These updates are crucial in ensuring users have a positive experience when introduced to the new Toolkit and that organisations do not encounter any technical issues whilst completing their submission.

The new IG Toolkit will be available via the IG Website for the end of July. In-line with the latest GP contract, General Practices have until the end of March 2024 to submit the Toolkit.

The new platform will consist of just one IG Toolkit form for all its stakeholders. It will be divided into 'core' questions that target all organisations, with additional questions relevant to specific organisation types. Therefore, you will find some questions are written with terminology to encompass the wide range of users.

There are lots of new, exciting, and useful features to the Caforb platform, making the IG Toolkit more seamless to the user. The Toolkit will be available all year round, closing on the submission date and re-opening the following day, giving organisations more time to populate/update the assessments.

All answers and evidence will remain in the platform until users delete or update it. Therefore, the first year will require time populating the assessments however, future years will only require a check over to determine if any answers or evidence have changed. If evidence has changed, an update will be necessary. For example, deleting existing evidence and re-loading new. If no updates are required a simple click of the Declaration to confirm everything remains the same and is still current, the user can then move onto the next assessment and repeat the process.

A selection of some to the new features include:

- Individual log in rather than generic access – enables more than one user at a time to access and populate the assessments, with section locking if more than one user is logged in
- A range of access permissions - Organisation Administrator, User or Read Only
- The ability to re-set password within the system - no longer required to log a call with the Service Desk
- An 'Alert' facility- ability for Users to view messages from the IG Toolkit Team
- A 'Dashboard' - displaying organisation progress
- An 'Action Plan' - ability for Users to record required actions, update progress on actions and pull off reports, etc
- The introduction of Minimum Expectation and Expectations Exceeded rather than the previous three levels

The Support and Resources section is currently being updated to support the requirements in the new IG Toolkit. A set of **Frequently Asked Questions** will be available following the pilot phase.

A range of video user guides are being developed to support users in navigating the new platform, they are expected to be made available on our **eLearning section** by the end of July. A written **User Guide for the New Welsh IG Toolkit** is also available.

Following publication of the new platform the team have planned several drop-in sessions, over lunchtime hours, where we will be on hand to answer your questions and guide you through the platform. During each session we are also looking to include a 15-to-20-minute slot from 1.15pm focusing on specific areas of the Toolkit.

They will be held every other week following publication, then moving to monthly. The link to the sessions will be made available via each future Newsletter, on the IG Website and within the IG Toolkit itself, on the new Alerts section.

The initial planned dates for noting are:

Wednesday 2nd August: 1-2pm -
Registration, Logging in, and setting up additional users (1.15 pm)

Wednesday 16th August: 1-2pm -
Navigating Caforb – Form Launch, Alerts, Dashboard, Progress and Reports (1.15pm)

Wednesday 30th August: 1-2pm -
Minimum Expectations and Expectations Exceeded (1.15pm)

Wednesday 13th September: 1-2pm –
Information Governance Action Plan and Action Plan Report (1.15pm)

Wednesday 27th September: 1-2pm –
Tool Tips and Supporting Resources (1.15pm)

Mail Marshal Breaches

All emails in and out of NHS Wales Email Service pass through Mail Marshal. Emails are monitored to:

- reduce the risk of patient identifiable information being breached
- reduce the risk of business sensitive information being breached
- ensure that the language used by staff does not contain profanities
- reduce the risks to NHS Wales organisations from malicious file attachments

Below are the last 12-months figures for Mail Marshall Breaches. As you can see from the graph there has been a slight increase in the last couple of months.

Please see below the link for further information regarding Mail Marshall Breaches along with Cyber Security Training videos and other useful resources.

Mail Marshal.

Also below is the link for Move IT; an alternative and safe way to send personal and business sensitive information to third parties.

Mail Marshal Breaches
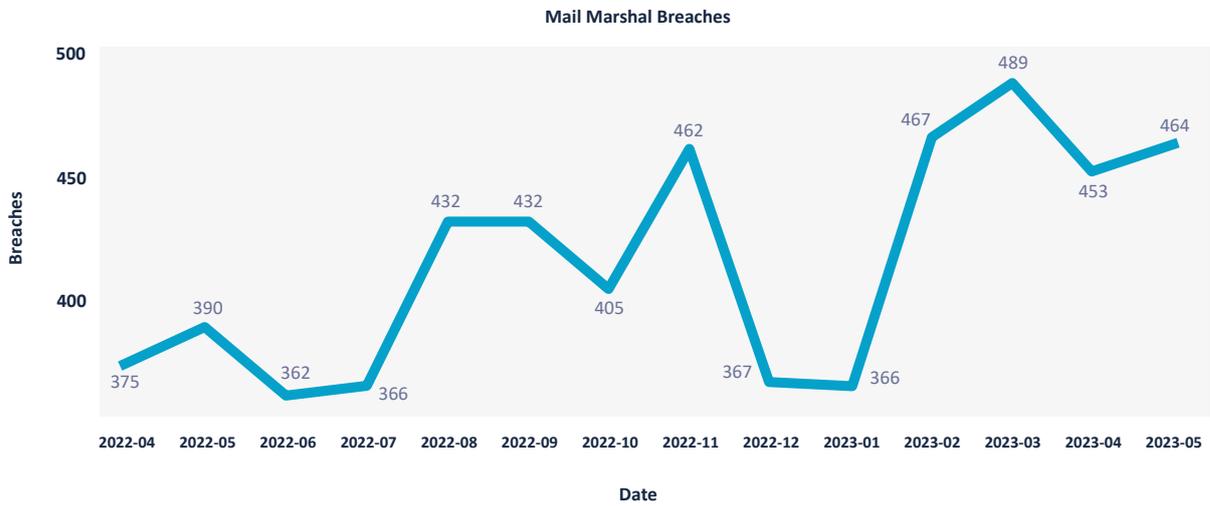
NHS Wales Secure File Share Service (MoveIT)

Leavers Process

When staff leave the organisation there is a process that should be undertaken to ensure that all relevant access to premises and systems have been removed. A Staff Leavers Form has been developed to support practices alongside any internal processes that are in place. This is to ensure that all staff members access is removed from the networks and systems to avoid any information breaches. The Staff Leavers Form and Guidance Checklist can be found here - **Staff Starters and Leavers.**

Active Directory

Practice Managers can review the NHS Wales Global Address List to ensure it is up to date and only reflects staff working at the practice, with active NADEX accounts.

In August 2022 Primary Care Services invited practices to carry out an exercise to review all staff detailed on the Active Directory, against a current staff list, to establish if any staff detailed had in fact left the practice; the results were disturbing. The process continued with many more practices volunteering to undertake a comparison. During a period of seven month, almost 4,000 NADEX accounts have been removed, with an equally concerning figure of 273 former staff members who still had access the practice via the BOMGAR application.

Information Governance Training

Data Protection legislation requires individuals who process personal information to undertake regular data protection training. In NHS Wales refresher training in data protection is included in the Information Governance (IG) eLearning course, which is mandated for ALL staff who provide NHS Wales services to complete every two years as a minimum. This includes ALL staff in General Practices, from reception and administration staff, to nurses, locums, pharmacists, and practice partners. This is not an exhaustive list.

The course aims to inform on how information governance should be applied in Wales and includes:

- An introduction to IG training
- Definition of IG
- Confidentiality
- Security of personal Information
- IG Breaches
- Access to information

The course has been updated to reflect the recent changes in data protection legislation and has been approved by the Information Governance Management Advisory Group (IGMAG).

General Practice staff can access the Information Governance eLearning package through the following link **Learning@wales**

An IG eLearning Step by Step User Guide for GMPs is available. It takes staff through how to find the course, requesting an Enrolment Key, Accessing the Course, The Assessments, Getting your Certificates, and How to Access Learning and IT Support.

If there are staff members who are not IT literate or do not have readily available access to a computer then support should be provided to assist them, or training should be provided in other ways. An **'IG Workbook'** has been developed for primary care staff who do not use IT facilities and is available to download from the IG website.

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 either an 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. For example, in May this year:

The Information Commissioner's Office (ICO) has reprimanded two councils that have failed to respond to the public when asked for personal information held about them – known as a Subject Access Request (SAR).

Both Plymouth City Council and Norfolk County Council repeatedly failed to meet the legal deadline of one to three months for responding to a SAR. The ICO has issued a reprimand to both councils, instructing them to take steps to ensure that the public receive their personal information within the statutory period.

Following enquiries, the ICO found that Norfolk County Council had only responded to 51% of SARs on time between April 2021 and April 2022, meaning that 251 residents did not receive a response within the legal timeframe.

Subject Access Requests (SAR) are a routine task within General Practice however, responding to requests is not always a straightforward task. Take the time to consider, could the example described above have happened in your practice?

- Are all staff made aware of the limited timescales of one calendar month, set in legislation, for responding to a request for information?
- Does the practice have a procedure in place for processing SARs?
- Does the procedure include guidance on the timescales and when you may be able to extend the timescales, does it detail where to seek further advice if needed?
- Does the procedure include guidance on redaction, particularly third-party information?
- Does the organisation have a process in place for documenting SARs?
- Are staff members with allocated responsibility for responding to SARs appropriately trained?

Further information on Subject Access Requests is available on **the ICO Website**

A set of FAQ's regarding Subject Access Requests if available on **the IG Website**
Further information on any available **IG training** can be found on the IG website

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 related 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 the 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**

ICO Newsletter

The Information Commissioner's Office (ICO) publish an e-newsletter at least once a month which provides an overview of their work. They bring you the latest news and events, information about enforcement, 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.**

The **Latest news from the ICO** is now available to view. Previous editions of the ICO newsletter can be found using the following **Previous newsletters | ICO**

If you do not wish to receive further editions of the newsletter, please email **DHCWInformationGovernance@wales.nhs.uk**