



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



**WELCOME**

**to the March 2024 edition of the  
IG Support Service for Primary Care  
Newsletter**

As you will be aware we publish these newsletters on a bi-monthly basis. 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.



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

### Information Governance Support for Primary Care

The IG Support for Primary Care Team continue to review and update a range of IG guidance documents. The following documents have been reviewed and updated this month and are now available on our webpage:

- IG Guidance on Communicating Emergency Prescriptions between Prescribers and Community Pharmacies
- IG Guidance on completing the FOI Publication Scheme

These updated guidance documents along with additional guidance materials on a wide range of topics and can be found using the link below:

<https://dhw.nhs.wales/ig/information-governance/information-governance-support-for-primary-care/>

### IG Training Resources

The team have updated the user guide which details how staff can access the current IG Training package available to GPs via the [Learning@wales](#) website.

For staff who do not have access to IT facilities, the IG Workbook has also been updated in line with the latest legislation. This contains important information staff will need to be aware of in relation to their responsibilities surrounding information governance. This is then followed by a short assessment which will need to be completed by staff utilising the workbook for their IG training requirements.

The user guide and training workbook can be found on the [Information Governance Training](#) webpage.



## Welsh Information Governance Toolkit

This is a reminder that in line with your GP contract, your practice is required to submit the [Welsh Information Governance Toolkit](#) by 31st March 2024, if you have not already done so.

### Registration

The IG Toolkit transitioned on to a new platform this year, as a result you are required to [register an account on the new platform](#). This will need to be completed by the organisation administrator, this individual will act as the 'superuser' for the organisation. Within the registration process you will be asked to set your 'organisation profile', it is strongly recommended this is completed at this stage.

Once your account has been approved, you will receive an email advising you to set your password. Please be aware this may fall into your junk email inbox. If you do not receive this within 3 hours during normal business hours (9am-5pm, Monday – Friday), please contact the Welsh IG Toolkit team via [WelshIGToolkit@wales.nhs.uk](mailto:WelshIGToolkit@wales.nhs.uk), who will arrange for this to be re-sent. Following this, the organisation administrator will be able to set up any additional users required. Please visit the [Registration Support page](#) of the IG Website for further support on the registration process.

### Supporting Resources

A library of training videos, requirement guidance documents, a comprehensive user guide, and FAQs are available to support you. This includes a full video from start to finish on how to complete your submission, along with bitesize videos covering specific functionality, which are a couple of minutes long. It is strongly recommended that you either familiarise yourself with the User Guide or watch the training videos prior to accessing the IG Toolkit. These and other supporting resources along with an offline copy of the question set can be accessed via the [IG Website](#).



## DPO Subscribers

Those practices who are subscribed to DHCW's Data Protection Officer Support Service have access to an enhanced information governance service. The DPO Service has developed a library of supporting resources and templates mapped to the revised IG Toolkit question set, along with a breakdown of each question. These resources can be accessed via the [DPO Support Service Website](#) using your subscriber password. Should you require further support the DPO Service can be contacted via [DHCWGMPDPO@wales.nhs.uk](mailto:DHCWGMPDPO@wales.nhs.uk).

Those practices not subscribed to the Service are required to contact their DPO for any further support they require in relation to the IG Toolkit requirements.

## Confirming Submission

To confirm you have submitted your IG Toolkit, please refer to the "Forms" page. If you have submitted your IG Toolkit, the "Last submitted" date will be populated with the date your IG Toolkit was submitted in green.

## Further Support/Issues

If you require further support or experience any issues in accessing or completing your IG Toolkit, please contact the IG Toolkit Team via [WelshIGToolkit@wales.nhs.uk](mailto:WelshIGToolkit@wales.nhs.uk). Please note, enquiries will be responded to in the order they are received, with a maximum response time of two business days, however the Team endeavour to respond sooner where possible. If it is not possible to resolve your query within this time, a member of the team will be in touch to provide an update.

All answers and evidence will remain on the organisation's IG Toolkit form until users delete or update it. Therefore, in future years, evidence from the previous year's submission will remain on the form to assist practices, enabling only a review 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 only a simple click of the declaration control will be required to confirm everything remains the same and is still up to date.

## Authorised Requesters

We can confirm that the following number of Practices in the following Health Boards have not updated their Authorised User forms in the past 6 months.

ABUHB - 32

BCUHB - 32

CAVUHB - 22

CTMUHB - 20

HDUHB - 30

PTHB - 9

SBUHB - 24

It is recommended that each practice nominate four Authorised Requesters. These are usually made up of the Practice Manager, a GP Partner or senior member of staff, and two other staff members of choice.

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 has not updated their list in the last 12 months and wishes 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).

## Mail Marshal Breaches

All emails in and out of the NHS Wales email system 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 figures for Mail Marshall Breaches from September 2023 – February 2024

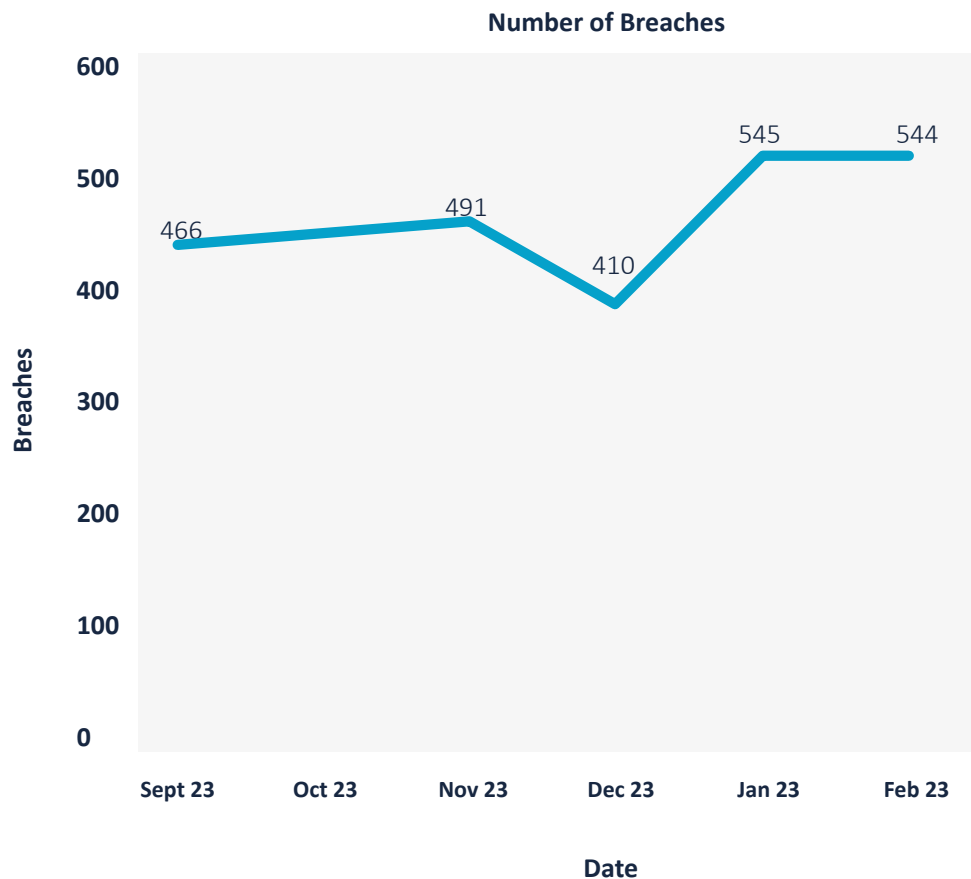
Please see below the link for further information regarding Mail Marshall Breaches along with Cyber Security Training videos and other useful resources.

The NHS Wales Secure File Sharing Portal (SFSP) or MOVEit both provide an alternative and safe way to send personal and business sensitive information to third parties.

Utilising SFSP or MOVEit is a safe and quick way of avoiding Mail Marshal breaches when the practice is required to share documents containing personal information via email.

Further information is available via the below link:

[NHS Wales Secure File Share Service \(MoveIT\) \(sharepoint.com\)](#)



## 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.

### ICO enforcement action

A Trust administrator sent a standard letter to inform the father of a child patient of an appointment made for the child to attend hospital for a medical examination. The appointment letter was sent to the wrong address.

The Commissioner decided to issue a reprimand to South Tees Hospitals NHS Foundation Trust in respect of the following infringements of the UK GDPR:

- Article 5 (1)(f) of the UK GDPR which states, “appropriate technical and organisational measures to be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.”
- Article 5 (1)(d) of the UK GDPR which states, “accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.”

In their investigation, the ICO found:

- The Trust failed to ensure that the personal data it held for the child patient in this case was accurate.
- The Trust failed to ensure the integrity and confidentiality of the personal data it held for the child.

Having robust processes and procedures in place for all staff to follow is essential. This will help staff to carry out their specific roles effectively and understand what is expected of them when undertaking certain tasks. It also helps the organisation to demonstrate their accountability and demonstrate that they have mitigated against potential risks by providing staff with clear processes.

You should consider whether you have the following in place to help you mitigate any potential risks regarding security of data:

- Are your processes, procedures, and SOPs up to date and in line with UK GDPR and are staff aware of the importance of reading and understanding these?
- Do staff receive full training of how to undertake a new task that is assigned to them? Including checking systems for updates, where to find the most accurate data and double checking all data is correct before completing a task.
- Are your systems updated promptly when patients inform you of changes to their personal data such as to their address, telephone number etc. and are staff aware of how to update systems correctly to reflect any changes?

Organisations must also ensure staff receive relevant Information Governance training that is suited for their role. This will ensure staff understand what is expected of them regarding protecting the security of all data types and what to do if there are any issues.

## 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](mailto: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](mailto:DHCWInformationGovernance@wales.nhs.uk)