



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



WELCOME

to the May 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.



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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 Team have so far updated the following documents:

- IG Guidance on Capturing and Obtaining Clinical Images
- IG Guidance on Cyber Insurance
- IG Guidance on Remote Working for General Practice Staff;
- 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 materials on a wide range of topics can be found using the link below:

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

The Team continues to work through the remaining guidance documents, updating these where necessary in line with current legislation.

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, that 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.

Clinical Governance Practice Self-Assessment Tool (CGPSAT)

The Welsh IG Toolkit Team are not involved with the CGPSAT, therefore please direct any queries you may have in relation to the CGPSAT including requirements, accessing the form, password resets to nwssp.pcs-gms&coreserviceteam@wales.nhs.uk

For general information regarding the CGPSAT, you can find this using this [link](#).

To aid the registration process for users who have an existing account on the Caforb platform for the purpose of completing the Welsh IG Toolkit, the IG Toolkit Team have produced a registration guidance document for practices to utilise, to assist organisations adding the CGPSAT to the same account, so all toolkits are visible in one location. This can be accessed on our [Support & Resources page](#).

PECYN CYMORTH LLYWODRAETHU GWYBODAETH CYMRU WELSH INFORMATION GOVERNANCE TOOLKIT



Welsh Information Governance Toolkit

The 2023/24 Welsh Information Governance Toolkit closed on the 31st March 2024. We can confirm that the 2024/2025 version of the Welsh Information Governance Toolkit was released on the 5th April 2024 and is now available for practices to complete. The deadline for the 2024/2025 toolkit is the 31st March 2025.

Carry Over of Evidence

We can confirm that evidence from the previous year's submission will remain on the IG Toolkit 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.

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.

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.

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.

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.

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.

Aneurin Bevan University Health Board - 40

Betsi Cadwaladr University Health Board - 44

Cardiff and Vale University Health Board - 38

Cwm Taf Morgannwg University Health Board - 25

Hywel Dda University Health Board - 32

Powys Teaching Health Board - 8

Swansea Bay University Health Board - 34

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 transferred insecurely and therefore potentially creating a data protection issue/breach.
- reduce the risk of business sensitive information being transferred insecurely resulting in a potential inappropriate disclosure risk to the practice.
- ensure that the language used by staff does not contain profanities.
- reduce the risks to NHS Wales organisations from malicious file attachments.

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

[Mail Marshal \(sharepoint.com\)](#)

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 provide this information to you, so that you can consider if this is a risk that could occur 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 reprimand is being issued to University Hospital of Southampton NHS Foundation Trust as they have only responded to 59% of incoming SARs within the statutory timeframe during the period of 01 August 2022 to 01 July 2023.

The Commissioner decided to issue a reprimand in respect of the following infringements of the UK GDPR:

- Article 12 (3) which states ‘The controller shall provide information on action taken on a request under Articles 15 to 22 to the data subject without undue delay and in any event within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject.’
- Article 15 (1) which states ‘that the data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data.’
- Article 15 (3) which states ‘The controller shall provide a copy of the personal data undergoing processing.’

In their investigation, the ICO found:

- Processes and procedures followed to complete SAR were inadequate and not in line with current legislation
- UHS failed to inform data subjects of the progress of their request, other than the acknowledgement email sent when the request is received
- UHS continues to have a backlog of SAR cases (621 as of 30/01/2024) and, based on recent figures provided, this does not appear to be improving.

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, such as responding to SARs. Having up to date policies and procedures also helps the organisation to demonstrate their accountability and demonstrate they have mitigated against potential risks by providing staff with clear processes to follow.

You should consider whether you have the following in place to help you mitigate any potential risks surrounding the processing of SARs:

- 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 and informative training of how to undertake specific tasks, such as processing SARs, which are assigned to them?
- Do staff know where to find further support and information on how to process SARs effectively should they require assistance?

Organisations must ensure staff receive relevant Information Governance training and any specific training that is suited for their role, which covers topics in more depth should it be required. For example, how to process SARs.

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