



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

NOV 2021



WELCOME

**to the November 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.



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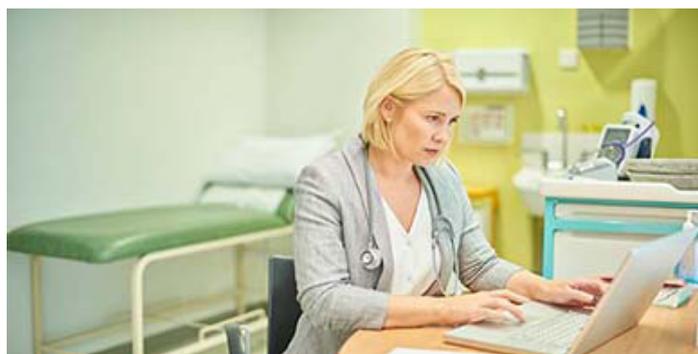
Welsh GP Record (WGPR)

Following the consolidation of numerous websites after the introduction of the new MURA content management platform, the WGPR website was closed, and its content transferred to the patient and public section of the DHCW website.

The Support Service have recently reviewed the WGPR webpage to reflect the additional services now accessing WGPR. The new page is due to be made available this month and will be found here [Welsh GP Record - Digital Health and Care Wales](#). The associated leaflet and poster have also been reviewed and will also be available in November on the same webpage.

We suggest GP practices direct their patients to this page, 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 This will ensure the most current information is available and previous outdated version are not incorrectly referred to.

Cofnod Meddyg Teulu Cymru Welsh GP Record



We will keep you updated on additional updates to these pages in future newsletters.

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



IG Toolkit Submissions – Final Position Statistics

The 2020-21 edition of the IG Toolkit closed on 30th September 2021 with a **very positive 99.5%** of practices across Wales submitting it. This was an increase from 96.6% in the 2019-20 edition and the highest number of practices since the IG Toolkit was implemented.

Health Boards	No of Practices	Not Started	In Progress	Complete
Aneurin Bevan	73	0	0	73
Betsi Cadwaladr	97	0	1	96
Cardiff & Vale	60	0	0	60
Cwm Taf Morgannwg	49	0	0	49
Hywel Dda	47	0	0	47
Powys	16	0	0	16
Swansea Bay	49	0	1	48
All Wales	391	0	2	389

Completion Scoring Reports

By now each practice will have received an individual Scoring Report detailing their submission for the 2020-21 IG Toolkit. The report is based on a rudimentary scoring matrix to determine where practices consider they meet the individual requirements.

With the toolkit being a self-assessment, the reports can only confirm which questions have been answered, they do not acknowledge the quality of those answers or uploaded documentation.

Information on how the Completion Scoring Reports are populated can be found on the [Support and Resources section of the IG website](#).

Practices who are subscribers of the DHCW Data Protection Officer Service will have had the opportunity to have their IG Toolkit submission audited by the DPO team. We understand the team will conduct a robust auditing to assess the level of compliance for five key areas of the toolkit and subsequently provide an audit score with actions and recommendations for you.

2021-22 edition of the Welsh IG Toolkit for GMP's

The next edition of the IG Toolkit is due to be released on 1st December 2021.

We would like to remind you that the Information Governance website hosts a [specific section](#) designed to support GMPs in completing the IG Toolkit, including detailed information on each of the requirements, a User Guide, Guidance on carrying over evidence, Template IG Improvement Plan, etc



Should you have any questions regarding the IG Toolkit you can contact the Information Governance Toolkit Team via WelshIGToolkit@wales.nhs.uk

Information Governance Training

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The DHCW Primary Care Services (PCS) Team have recently issued a Training Needs Analysis (TNA) to practices. The PCS team will be sharing a summary of responses received regarding information governance training. This will help to inform our plan for IG training moving forward over the coming year or two.

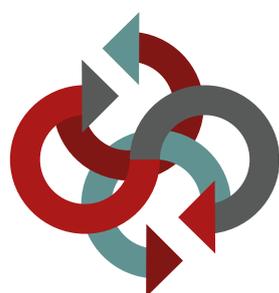
Information Governance knowledge and awareness should be at the core of an organisation's objectives, embedded alongside other governance initiatives

and should provide a stable foundation for the workforce. This will make sure that all staff, including GP partners, receive appropriate training about your privacy programme, what it requires staff to do and what responsibilities they have. The



training must be relevant, accurate and up to date. Without this knowledge, the ability of the organisation to meet its legal and policy requirements will be severely impaired.

Further information on any available [IG training](#) can be found on the IG website.



Wales Accord on the Sharing of Personal Information

Wales Accord on the Sharing of Personal Information (WASPI)

The WASPI Team have reviewed and updated some of their documentation to reflect the [Information Commissioner's Office \(ICO\) Data Sharing Code of Practice](#). These include the WASPI Accord and the Information Sharing Protocol (ISP) template as well as other templates and guidance. [Details of all the changes and updated documentation can be found on the WAPI website.](#)

Lessons Learnt

Sometimes things go wrong; when this happens, it is important that lessons are learnt. In each edition of the newsletter, we plan to 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 issues warning for organisations to revisit their bulk email practices, after failures by HIV Scotland led to a £10,000 fine.

The Information Commissioner's Office (ICO) is urging organisations to revisit their bulk email practices after failures by HIV Scotland led to a £10,000 fine.

The breach of data protection law involved an email to 105 people which included patient advocates representing people living in Scotland with HIV. All the email addresses were visible to all recipients, and 65 of the addresses identified people by name.

From the personal data disclosed, an assumption could be made about individuals' HIV status or risk.

An ICO investigation of the February 2020 incident found shortcomings in the charity's email procedures. These included inadequate staff training, incorrect methods of sending bulk emails by blind carbon copy (bcc) and an inadequate data protection policy.

It also found that despite the charity's own recognition of the risks in its email distribution and the procurement of a system which enables bulk messages to be sent more securely, it was continuing to use the less secure bcc method seven months later.

Ken Macdonald, Head of ICO Regions, said:

"All personal data is important, but the very nature of HIV Scotland's work should have compelled it to take particular care. This avoidable error caused distress to the very people the charity seeks to help.

"I would encourage all organisations to revisit their bulk email policies to ensure they have robust procedures in place."

Under data protection law, organisations responsible for personal data must ensure they have the appropriate technical and organisational measures in place to ensure personal data is secure. You can read the full article from the [ICO Website](#).

Do you know the difference between To, CC and BCC?

To	
Cc	
Bcc	
Subject	

- **THE 'TO' FIELD** is meant for the main recipient(s) and is generally used for recipients who are required to take action in response to the email.
- **THE 'CC' FIELD** stands for carbon copy and is generally used to refer to additional copies of a single email to one or more recipients who are not expected to take action or reply to the message but are to be kept in the loop.

However, you must be aware that all recipients included within the TO and CC field are able to view the details of the other recipients within the field, such as name and email addresses.

- **THE 'BCC' FIELD** stands for blind carbon copy and is generally used to send either a copy of the email, or an email to multiple recipients where you do not want the recipients to know about any other people that you have sent the email to. This field can be used to protect the privacy of recipients when sending emails to multiple recipients, without disclosing who is included within the email chain.
- **Unlike To and CC, none of the recipients in BCC receive the reply posted by any of the other recipients on the same email thread.**

A basic knowledge of the email fields can help reduce the risk of unintentionally disclosing information.





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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.

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