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*STANDARDS FOR  
HANDLING PERSONAL INFORMATION*

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## WHAT I WANT TO DO

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- explain the standards, and the acronym HORUS
- explain why we need to move past 'just' information sharing
- explain the Social Care Information Governance Toolkit project
- illustrate the standards, requirements, guidance & examples
- remind us all that standards and principles  
need a solid practice-base
- suggest where we are going next

# Effective Information Governance

**PUBLIC RECORD**

**PERSONAL INFORMATION**

Freedom of Information Act

Data Protection Act

Human Rights Act

*Caldicott*

*E-Govt*

*E-Govt*

*Communications  
Policy*

Performance  
Measurement

*Confidentiality  
Policy  
Code of Conduct*

Management Information

Data Processing

*Information Sharing*

Records Management



# Governance of Person - identifiable Information

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*“A framework  
for **handling** personal information  
in a confidential and secure manner  
to appropriate ethical and quality standards  
in a modern personal care service”*

*(adapted from NHS)*



Where we have started -  
Caldicott & The Principles for Sharing Information

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**F**ormal justification of purpose

**I**dentifiable information transferred  
only when absolutely necessary

**O**nly the minimum required

**N**eed-to-know access controls

**A**ll to understand their responsibilities

**C**omply with and understand the law



# Information Sharing – Lots of (England) examples

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Dept. of Constitutional Affairs – all public sector

DfES - IRT policy

DH – social care information policy

Home Office – Crime Reduction

NHS Information Authority - Mental Health

Special areas – sexual health, violent offenders etc.

NHS new Model of Confidentiality & Code

NHS Information Governance model & Toolkit



## Managing Information Sharing is critical ...

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- to work with older people  
through the Single Assessment Process
- to mental health service teams  
through the CPA
- to Children's Services  
through 'IRT'
- to the NHS Care Record,  
through access to the national spine, and  
through 'messaging'

**... to practitioners and good practice**



BUT HANDLING PERSONAL INFORMATION

IS NOT JUST ABOUT SHARING IT ....

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## HORUS Standards Model

- **H**olding information securely and confidentially
- **O**btaining information fairly and efficiently
- **R**ecording information accurately and reliably
- **U**sing information effectively and ethically
- **S**haring information appropriately and lawfully



# IG Standards

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Derived from:

- Caldicott Report & Caldicott for Social Care
- Confidentiality & Consent Guidance
- Data Protection, Human Rights, Freedom of Information Acts & Common Law
- IM&T Security Manual, BS 7799
- Records Management & Data Quality Initiatives

**ALL OF WHICH, although starting in the NHS,  
apply equally to local authority personal care services**

Hence the work on Toolkits ...



# Structure of the toolkit

	<b>Holding</b>	<b>Obtaining</b>	<b>Recording</b>	<b>Using</b>	<b>Sharing</b>
<b>Management</b>	<a href="#">Structures</a> <a href="#">Policies &amp; Procedures</a>	<a href="#">Structures</a> <a href="#">Policies &amp; Procedures</a>	<a href="#">Structures</a> <a href="#">Policies &amp; Procedures</a>	<a href="#">Structures</a> <a href="#">Policies &amp; Procedures</a>	<a href="#">Structures</a> <a href="#">Policies &amp; Procedures</a>
<b>Systems</b>	<a href="#">Access Controls</a> <a href="#">Cryptography</a> <a href="#">Monitoring/Audit</a> <a href="#">Remote Working</a>	<a href="#">N/A</a>	<a href="#">Application Security</a> <a href="#">Validation</a> <a href="#">Audit of Data input</a>	<a href="#">N/A</a>	<a href="#">N/A</a>
<b>Processes</b>	<a href="#">Systems Support</a> <a href="#">Physical/Environment</a> <a href="#">Operational Procedures</a> <a href="#">Personnel Security</a> <a href="#">Compliance/ Review</a>	<a href="#">Compliance/ Review</a> <a href="#">Protocols (Receipt)</a> <a href="#">Informing patients/clients</a> <a href="#">Caldicott Processes</a>	<a href="#">Data Quality Assurance</a> <a href="#">System Design</a> <a href="#">Compliance/ Review</a> <a href="#">Records Management</a>	<a href="#">IM&amp;T Controls</a> <a href="#">Caldicott Processes</a> <a href="#">Availability of Records</a> <a href="#">Compliance/ Review</a>	<a href="#">Subject Access</a> <a href="#">Compliance/ Review</a> <a href="#">Lawful disclosure</a> <a href="#">Protocols (Disclosure)</a>
<b>People</b>	<a href="#">ETD</a> <a href="#">Guidance</a>	<a href="#">Guidance</a> <a href="#">ETD</a>	<a href="#">Guidance</a> <a href="#">ETD</a>	<a href="#">Guidance</a> <a href="#">ETD</a>	<a href="#">Guidance</a> <a href="#">ETD</a>



## HOLDING INFORMATION – example standards

<p>Is there a clear retention/disposal policy?</p> <p>Are all staff working with personal information trained to manage the information they produce and use within their role?</p> <p>Is all personal data protected through the application of robust security measures, to ensure its confidentiality, integrity and availability?</p> <p>Are records systems designed to ensure that they will remain accessible, authentic, reliable and usable through any system changes?</p>	<p>Management</p> <p>People</p> <p>Processes</p> <p>Systems</p>
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## OBTAINING INFORMATION – example standards

Are there leaflets explaining 'informed consent'?	Management
Are staff trained in 'informed consent' practices?	People
Is there a process ensuring that users can get answers to any detailed questions about 'consent' that concern them?	Processes
Is the gaining of consent built into care processes and are 'flags' built into recording systems?	Systems



## RECORDING INFORMATION – example standards

Is there one person with lead responsibility for data quality?

Is there a training programme for all staff involved in collecting or managing personal information, including temps, students etc.?

Are data collection and recording practices Monitored, including sample checks?

Are all entries into personal records attributable?

Management

People

Processes

Systems



## USING INFORMATION – example standards

Is there an appropriately trained person leading on Freedom of Information policy?

Are all staff aware of/trained in their personal professional responsibilities for record keeping?

Do contracts with service providers specifically draw attention to policies on the use of personal information?

Is there a tracing/tracking system to control the movement & location of records, and to provide an auditable record of transactions?

Management

People

Processes

Systems



## SHARING INFORMATION – example standards

<p>Is there an appropriate Caldicott Guardian in post?</p>	<p>Management</p>
<p>Does the Confidentiality Code provide sufficient guidance to staff on the disclosure of personal information?</p>	<p>People</p>
<p>Are there 'safe haven' procedures for sending/receiving documents that contain person-identifiable information?</p>	<p>Processes</p>
<p>Are there encryption facilities within systems?</p>	<p>Systems</p>



## SUPPORTING EACH STANDARD ...

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- guidance and explanation
- the legislative or regulatory framework
- examples
- it will be web-based and hot-linked

AND

- for social care, they are standards, not (yet?) requirements
- we want to provide discussion boards or forums

# DEVELOPING THE S.C.I.G. TOOLKIT

## Reference Group

- SC CG Reg. Groups
- facilitated by IPU-SC & ADSS IMG

## Building links to

- other SC CGs
- NHS CGs, & UK CG Forum
- practitioner & manager groups (ADSS)
- LG community

- supported by NHSIA

## Project Board

- DH IPU
- NHSIA
- SOCITM
- ADSS
- DfES
- e-SB

## I.G. TOOLKIT (NHSIA & Secondments)

✓ toolkit

✓ Implementation

?Code of Practice



# NHSIA Developing the Toolkit

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- Phase 1 by November 2003
  - Develop standards Version 1
    - Acute Trusts
    - PCT's
    - General Practice
    - Launch event/communication plan
- Phase 2 through April 2004
  - Develop draft standards in Version 2
    - Social Services
    - Other NHS organisations



# SO WHERE ARE WE NOW?

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- NHSIA with Reference Group (and Project Board)
  - ✓ Examining c. 140 'requirements'
  - ✓ Adapting guidance
  - ✓ Checking statute, regulations, etc.

## TO DO

- 'standards' to validate examples
- discussion boards and forums
- enabling web access for social care workers
- submitting to e-Standards Body or Information Standards Board



# SO WHERE ARE WE NOW? (2)

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- Reference Group with community
  - Sharing the message
  - Gaining support & volunteers
  - Collecting 'exemplars'

## TO DO

- planning for testing and implementation
- engaging (with Project Board) the wider CSSR community including corporate IM&T managers AND engaging practitioners – it is about

BEHAVIOUR IN RELATION TO STANDARDS.



## WHO WILL BE USING THE TOOLKIT?

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- information governance managers and staff with
- Caldicott Guardians

These will be 'the intermediaries' –

But they will be working locally for implementation with ...

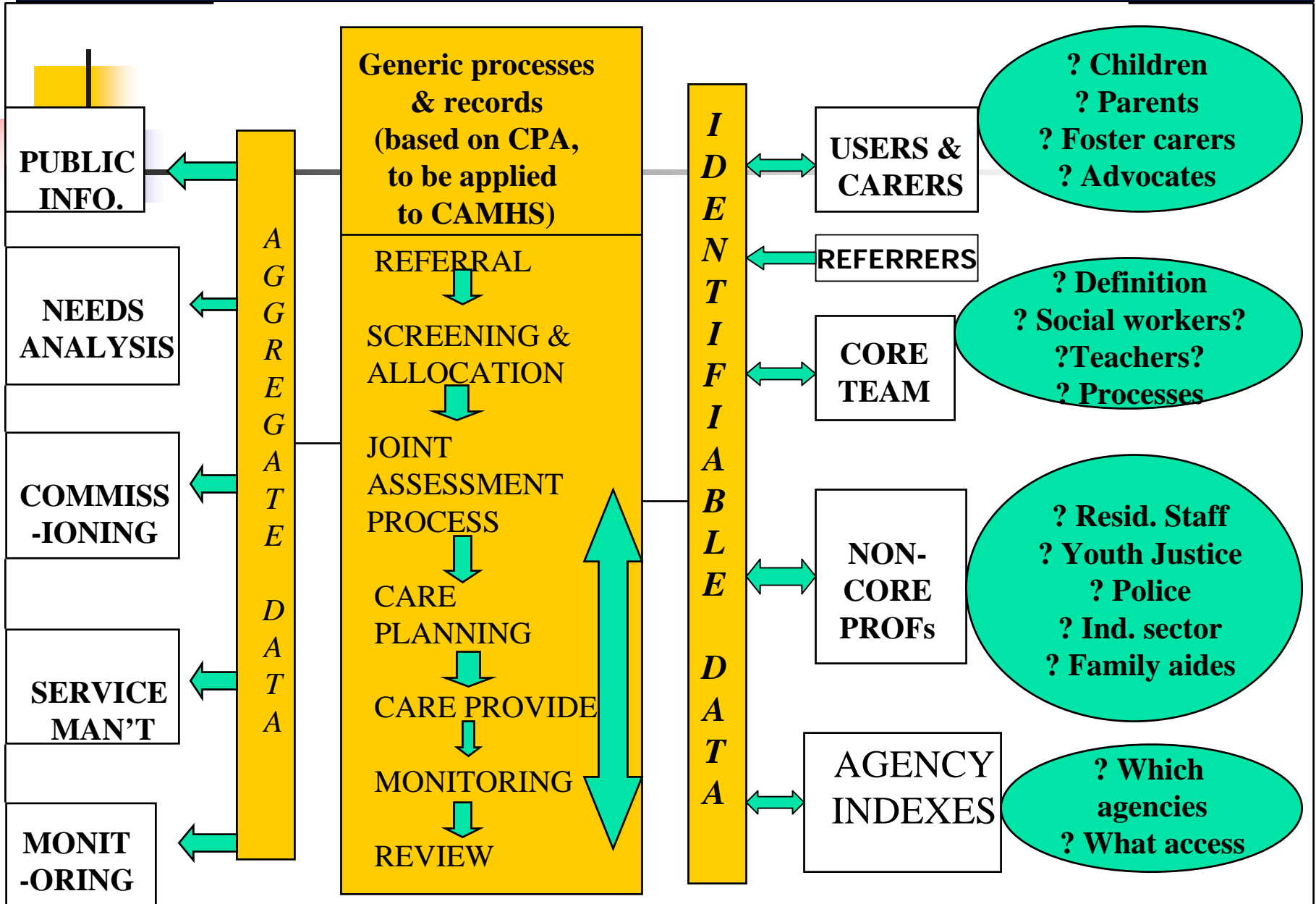
- staff and their managers
- senior management
- IM&T staff within social care
- IM&T staff corporately

And possibly regionally & nationally for standards, materials etc. with ...

- regional social care Caldicott Groups (& NHS groups?)
- the SCIG Project and Reference groups
- the new UK Council for Caldicott Guardians

BUT AT THE END OF THE DAY ....

# THIS IS WHAT 'HORUS' HAS TO SUPPORT - PRACTICE





# For further information

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[www.nhsia.nhs.uk/confidentiality](http://www.nhsia.nhs.uk/confidentiality)

[www.doh.gov.uk/ipu/socialcare/caldicott.htm](http://www.doh.gov.uk/ipu/socialcare/caldicott.htm)

[www.nhsia.nhs.uk/caldicott](http://www.nhsia.nhs.uk/caldicott)

[www.adss-img.org.uk](http://www.adss-img.org.uk)

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