

TERMS OF REFERENCE: INFORMATION GOVERNANCE STEERING GROUP

1 Executive Summary

The following document sets out the Terms of Reference for the Imperial College Health Partners Information Governance Steering Group. The group is responsible for the following areas:

- Confidentiality and Consent;
- Data Protection;
- Data Quality;
- Information Management;
- Information Disclosure and Sharing;
- Information Security;
- Records Management;

The Information Governance Steering Group also acts as the following committees for the organisation:

- Caldicott Committee;
- Information Asset and Information Flow Committee;
- Records and Information Lifecycle Management Committee;

The Group is tasked with ensuring a robust assurance framework is in place across the statutory body and with its principle suppliers. It reports to the Imperial College Health Partners Performance and Integrated Governance Committee which reports to Management Board.

2 Introduction

Imperial College Health Partners is accountable for all of the data it processes in law. This processed data may be personal and sensitive data, within the definition of the Data Protection Act, or corporately sensitive data or the services it provides.

All of the data under our control and processed for or by Imperial College Health Partners must be appropriately handled at every stage of its lifecycle, from creation to destruction, to ensure maximum value is extracted and within adequate protection regimes in proportion to its risk. Data handling governance or Information Governance (IG) broadly falls in to four risk categories:

- Organisation governance failing
- Information management failing
- Information security failing
- Information quality failing

3 Roles and Responsibilities

Information Governance is the discipline which incorporates:

- Confidentiality and Consent;
- Data Protection;
- Data Quality;
- Information Management;
- Information Disclosure and Sharing;
- Information Security;
- Records Management;
- Registration Authority.

The Information Governance Steering Group will be the organisation's forum with delegated authority to oversee information governance issues, assurance and work plans on behalf of the organisation.

4 Purpose

4.1 Information Governance Steering Group (IGSG)

The IGSG is responsible for overseeing the assurance framework, management of risks and setting the priorities of information governance and associated work plans. The committee is accountable to; and authorised by the Management Board to:

- Support a coordinated approach to the information governance agenda for the organisation and with its service providers.
- Ensure that an Information Governance Framework is in place that provides an appropriate assurance framework and management of associated risk across the information agenda.
- Identify resource requirements, including capacity and capability and ensures that these resources are deployed and managed effectively.
- Identify roles and responsibilities for IG, both internal and external to the organisation.
- Scrutinise the effectiveness of strategy, policies and procedures across the information governance agenda.
- Review and approve IG related strategies, policies and procedures on behalf of the organisation on an annual basis.
- Ensure that IG related risk management arrangements are in place and adhered to.
- Scrutinise any IG related audit or external reports and direct the response to recommendations and recommend input into the annual audit plans.
- To establish an active and integrated approach to information governance, records management and Registration Authority through developing and maintaining robust and effective procedures, policies, system and processes that ensure information governance is embedded across the organisation.
- To coordinate the organisation's response to the Information Governance Toolkit to meet the relevant deadlines.

- Review the flows of information to ensure they are appropriate and supported by relevant documents, including those that involve any transfer of personal data overseas.
- Set out mandatory and non-mandatory IG training requirements and ensure that they are implemented and adhered to.
- Ensure that the organisation as a statutory body complies with law, statute and other information governance requirements.
- Support the work of the Senior Information Risk Owner (SIRO) and Caldicott Guardian, Information Asset Owners and Information Asset Administrators.
- Provide a forum for the scrutiny of the information governance framework and assurance model across the organisation.
- Review information incidents and information security incidents and report outcomes to the ICHP Management Board These include information and data quality, as well as records management and record keeping.
- Support Records Management and records standards within the organisation.

5 Accountability and delegated authority

The Accountable Officer has overall accountability for ensuring that the organisation operates in accordance with the law as outlined in the Information Governance Framework. The Chair/Vice Chair of the IGSG will report to the Management Board on a routine basis, this being not less than every two months. An annual report for the Management Board will be provided alongside the annual submission of the Information Governance Toolkit.

5.1 Delegated Authority

The IGSG is authorised by the Imperial College Health Partners Management Board to:

- Investigate any activity within its terms of reference.
- Seek any information it requires from any employee and all employees are directed to cooperate with any request made by the organisation. This remit extends to those working on behalf of the organisation.
- Implement any activity which is in line with the terms of reference, as part of the Information Governance work programme, which shall be signed off by the steering group or referred to the Management Board as decided by the Chair.

5.2 Confidentiality

- The Chair shall advise on all aspects of confidentiality with respect to the information presented to and discussed by the membership.
- All person-identifiable information shall be subject to the Confidentiality Code of Conduct.

6 Quorum rules

6.1 Steering Group

In order to meet the required standard for the committee, the following functions need to be represented. Where a post holder is listed, they are required to represent the interests of those work streams. The core membership of this committee is as follows:

Role	Responsible Member
Chair	Ross Gribbin
Siro	Ross Gribbin
Caldicott Guardian	Natalie Angus
NELCSU IG Compliance Lead	Tony Haworth
ICT Representative	Alison Maffey
Business Intelligence	Andi Orłowski – Head of Business Intelligence

- The Chair may invite other persons to attend according to agenda items.
- Invited persons shall have no voting rights.

7 Requirements for Quoracy

7.1 Steering Group

Quorum for the IGSG will be half the number of representatives. However, this must include either the SIRO or the Caldicott Guardian. Where required membership is not quorate, the Chair will decide on whether the meeting can continue dependent upon decisions required for any particular IGSG meeting.

8 Schedule of meetings

- The IGSG will meet at least Bi-monthly or as required by the IG work plan.
- The Chair and Deputy-Chair of the group may request additional meetings as necessary.

9 Administration

- The agenda will be managed by the administrator and circulated to members at least three working days prior to the meeting.
- All papers will be circulated to members at least five working days prior to the meeting.
- Papers tabled on the day will be accepted for discussion only unless agreed by the Chair.
- The minutes of the meeting will be recorded by the appointed secretary.
- Minutes and agreed actions will be documented and circulated to all attendees within five working days.
- Attendees will be given five working days to query details and submit any concerns, after which the minutes will be considered ratified.

- Electronic copies of all minutes will be maintained on the ICHP network and NELCSU network.

10 Reporting Arrangements

- Once ratified, minutes of all meetings will be circulated to all members and the Management Board.
- The Chair will report any urgent matters to the Management Board as necessary.
- The Chair will present an annual report on the work of the IGSG to the Management Board.
- Caldicott and confidentiality issues will be reported on within the IGSG and will form part of the IGSG's standard agenda items.
- Information quality and records management issues will be reported on within this forum.
- All information governance related services provided by the CSU will be reported to this forum as a standard agenda item.

11 Audit Programme

The audit of the organisation's Information Governance strategy and assurance framework model (Information Governance Toolkit) is an annual requirement which will be supported by the IGSG.

11.1 Confidentiality audits

Confidentiality audits will be managed by this committee on behalf of the organisation and will include electronic and paper records systems and processes. These audits will be carried out in accordance with schedules determined by this group.

12 Performance and Monitoring

The effectiveness of the committee will be measured as part of the Information Governance Toolkit assessment and the associated audit. The Steering Group may request spot checks in order to ensure compliance.

The requirement to ensure that all information governance related guidance is appropriately disseminated through the organisation.

The IGSG will be responsible for implementing surveys, staff compliance and monitoring of systems, processes and training in relation to the organisation's information governance programme and framework.

This group will be responsible for seeking assurance from relevant parties, directorates, departments and teams within the organisation on proposed introduction of new projects, systems or processes or where change to existing systems or processes may impact upon corporate or personal information security. The IGSG will be responsible for monitoring and responding to information quality and records management issues throughout the organisation.

The requirement for staff training on information governance will be a focus of the IGSG. Ensuring that all staff receive effective training and guidance on information governance best practices, knowledge and understanding.

13 Forward Programme

The IGSG will maintain a view on the development of the IG agenda and framework for upcoming changes in legislation and national guidance and requirements. This will oversee programmes to implement major changes, especially with regard to law, National Data Guardian reports and structures and tools such as the IG Toolkit. Where major changes are anticipated, the group will require regular updates on implementation timeframes and progress.

14 IGSG Links

14.1 Key links to be maintained by the Committee

- Accountable officers;
- Heads of Department;
- Management Board;
- Risk Management and incident reporting processes.

14.2 External

- Members
- Wider NHS