



# Information Governance Policy

First introduced September 2012

Review Date 23rd January 2018

Next Review Due 23rd January 2020

Physiotherapy2fit Ltd is committed to ensuring that, as far as it is reasonably practicable, the way we provide services to the public and the way we treat our staff reflects their individual needs and does not discriminate against individuals or groups on the basis of their age, disability, gender, race, religion/belief or sexual orientation. Should a member of staff or any other person require access to this policy in another language or format (such as Braille or large print) we will do our best to provide this in a format the user is able to access. Physiotherapy2fit Ltd will do its utmost to support and develop equitable access to all policies. The Director is responsible for ensuring staff are aware of Physiotherapy2fit Ltd policies and that staff adhere to them. It is also the Director's responsibility to keep staff up to date with new policy changes.

Staff are responsible for ensuring they are familiar with policies, know where to locate the documents on Physiotherapy2fit's main website, and seek out every opportunity to keep up to date with them

Independent contractors are expected to identify a lead person to be responsible for ensuring staff employed within their place of work are aware of Physiotherapy2fit Ltd policies.



**Summary:** This policy is overarching. All disciplines of Information Governance are incorporated so that an understanding of each aspect can be obtained and the interdependencies identified.

This policy should be read in conjunction with the following policies/protocols:

Data Protection

Information Sharing Policy

Confidentiality Policy

Information Security

Records Management

### **Introduction**

Physiotherapy2fit recognises the importance of reliable information, both in terms of the clinical management of individual patients and the efficient management of services and resources. Without it Physiotherapy2fit and individual staff cannot make informed substantive decisions.

This policy outlines the mechanisms required by Physiotherapy2fit to manage the information it holds. By applying the relevant policies produced by Physiotherapy2fit will enable us to support patient care, manage services and facilities as determined by law, statute and best practice. Information Governance must be addressed at an organisational level and applied to working practice of staff if it is to be effective.

Information Governance Toolkit - Information Governance is an encompassing term that relates to all laws, regulations, policies, procedures and protocols for the creation, use, amendment, storage, release, sharing, re-use, disposal and destruction of all information held by the Physiotherapy2fit.

The Department of Health has developed information governance standards for all NHS organizations and AQPs. These standards are incorporated into the Information Governance Toolkit self-assessment tool. It assesses four key components relating to how information is held by the PCT, namely: Management, Processes, Systems, People.

The above components have been cross-referenced to the following five Information Governance initiatives:

- Information Governance Management
- Confidentiality and Data Protection Assurance
- Information Security Assurance
- Clinical Information Assurance
- Corporate Information Assurance

Information Governance Disciplines cover:

- Confidentiality
- Data Protection
- Freedom of Information
- Records Management
- Information Security
- Information Quality Assurance
- Information Management and Technology

- Intellectual Property
- Copyright
- Business Continuity and Disaster Recovery
- Regulation Authority Procedures

These disciplines impact the following Physiotherapy2fit business functions and responsibilities:

- Contracting, commissioning and monitoring services
- Employment procedures for all staff
- Training and development of Physiotherapy2fit staff
- Communications
- Complaints
- Managing risk and reporting of incidents
- Public involvement
- Security of premises
- Business Continuity

This policy draws together all the individual policies which enable the implementation of good practice in Information Governance requirements. Current Physiotherapy2fit policies that directly relate to Information Governance are:

Data Protection and Confidentiality  
 Information Security  
 Records Management  
 Information Sharing Policy

These policies are necessary because they provide a framework to support the five main purposes of Information Governance, namely:

- A proactive use of information within the organisation both for patient care and service management as determined by law, statute and best practice.
- A proactive use of information between Physiotherapy2fit, other NHS and partner organisations to support patient care as determined by law, statute and best practice.
- A commitment to making non-confidential information widely available to support openness in line with responsibilities under Freedom of Information Act 2000, Environmental Information Regulations 2004 and the Re-use of Public Sector Information Regulations 2005.
- Effective arrangements to ensure confidentiality, security and quality of personal and other sensitive information.
- Information within Physiotherapy2fit should be of the highest quality in terms of accuracy, timeliness and relevance.

### **Scope of the policy**

This policy applies to all information held by or on behalf of Physiotherapy2fit. It is an overarching statement that draws together all policies that relate to information held by or on behalf of the Physiotherapy2fit or used by Physiotherapy2fit staff.

Information Governance is a framework that brings together legislation, national initiatives and best practice through the following:

- Data Protection Act 1998
- Caldicott
- The Common Law Duty of Confidence
- Freedom of Information Act 2000
- Records Management

- IG Toolkit
- ISO27001 (BS7799)
- Data accreditation and data quality

### **Policy Statement**

The objectives of the Physiotherapy2fit Ltd's Information Governance Policy are to preserve:

- Confidentiality Integrity
  - Availability Quality
- Protecting sensitive information from unauthorised access or disclosure.
  - Safeguarding the accuracy and completeness of information and computer software.
  - Ensuring information and vital services are available to users when required.
  - Ensuring information is of sufficient quality for the intended purpose.

The potential impact of failure to preserve any of the above can be extremely serious and needs to be assessed using risk analysis techniques.

The aim of this policy is to establish and maintain the security, quality and confidentiality of information, information systems, applications and networks owned or held by Physiotherapy2fit Ltd by:

- Ensuring that all members of staff are aware of and fully comply with the relevant legislation as described in this and other Physiotherapy2fit policies and standards.
- Describing the principles of security and explaining how they will be implemented by Physiotherapy2fit
- Introducing a consistent approach to security and ensuring that all members of staff fully understand their own responsibilities.
- Creating and maintaining within Physiotherapy2fit a level of awareness of the need for Information Security as an integral part of the day-to-day business.
- Protecting information assets under the control of Physiotherapy2fit Ltd.
- Assess the training needs of staff against the Information Governance requirements, systems in place and current organisational structure.

### **Duties**

The Director is ultimately accountable for information Governance. As a small company she is responsible for ensuring that sufficient resources are provided to support the requirements of the policies and that compliance with the necessary laws and professional conduct is maintained.

The Director will assume the role of Senior Information Risk Owner (SIRO), Caldicott Guardian and the role of Information Governance Manager will be carried out by Julie Rockingham. The Director will act as an advocate for information risk and be responsible for the content of the annual Statement of Internal Control in regard to information risk. She is responsible for overseeing the areas of Information Governance that relate to use and disclosure of patient identifiable information. She will ensure that she reports all IG events or incidents, actual and potential breaches of confidentiality or information security. The Director and other Clinical Specialist Physiotherapists will analyse, investigate and upward report events / incidents and any recommendations for remedial action. The Director will also report and disseminate annual IG assessment and improvement plans, as well as any ongoing IG development to all staff.

She is responsible for the annual submission of the Information Governance Toolkit as well as carrying out performance monitoring and co-ordinating all Information Governance requirements as defined in this policy. She is to ensure that the appropriate IG procedures are available to all staff. She will ensure that

the policy and its supporting standards and guidelines are built into local processes to ensure ongoing organisational compliance and that staff receive appropriate training and guidance to support this.

All Physiotherapy2fit Staff, whether permanent, temporary or contractors are responsible for ensuring that they are aware of the requirements of this and its associated policies and procedures and implement it accordingly into their day-to-day work.

As a small company it is essential that IG is on the agenda at all monthly staff meetings. This allows staff to discuss internal auditing, patient safety and the need for any risk assessment

### **Implementation Strategy and dissemination**

Annual Improvement Plan and IG Toolkit Self-Assessment – Physiotherapy2fit assessment on Information Governance is submitted annually through the Information Governance Toolkit. The IG Toolkit is managed by Connecting for Health for the Department of Health.

The submission of the baseline assessment will provide a framework from which an action plan can be produced.

Dissemination – this policy will be placed on Physiotherapy2fit’s internet sites.

### **Training:**

Physiotherapy2fit will ensure that:

- All staff receive training in the areas of Information Governance appropriate to their role (online training).
- There will be specific detailed training in areas of Information Governance for key staff where appropriate.
- Information Governance will be considered in all training strategies.

### **Audit and Monitoring:**

- The Director will carry out performance monitoring every three months to ensure that the IG Toolkit action plan is on track.
- The Director will carry out regular audits and reports in order to ascertain how well the organisation complies with information governance requirements. Where there are any deficits the Director will discuss with staff in team meeting suggestions as to what measures can be put in place in order to improve compliance.
- Non-compliance or breaches with all Physiotherapy2fit information governance policies will be dealt with under disciplinary procedures and/or in line with laws associated with each individual policy.

**Review** – this policy will be reviewed every two years or sooner if new legislation, codes of practice or national standards are to be introduced.