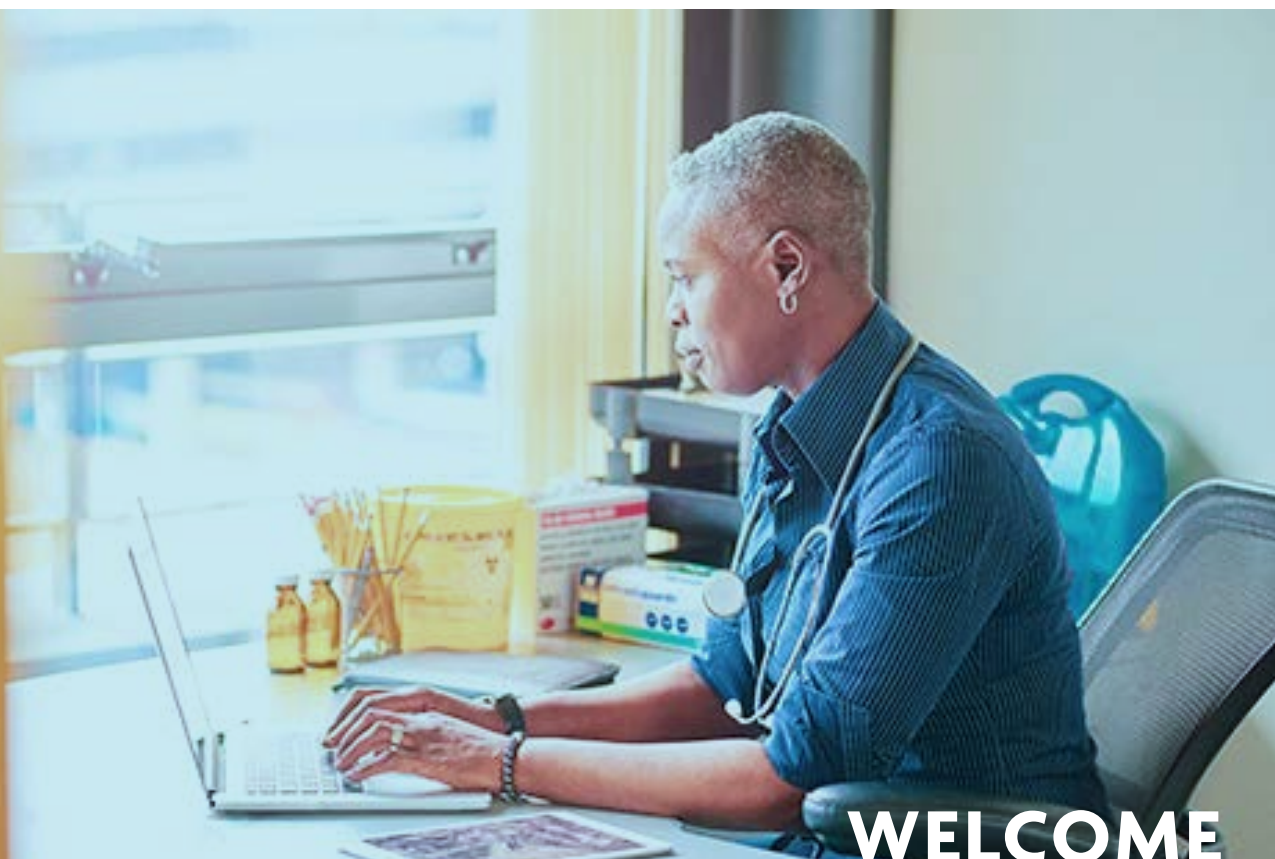




CYMORTH LLYWODRAETHU GWYBODAETH AR GYFER GOFAL SYLFAENOL
INFORMATION GOVERNANCE SUPPORT FOR PRIMARY CARE



WELCOME to the January 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.



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

Information Governance Support for Primary Care

The IG Support for Primary Care Team have been working through a range of IG guidance documents to review and update these accordingly. The following documents have been reviewed and updated this month:

- IG Guidance on Capturing and Obtaining Clinical Images
- IG Guidance on Cyber Insurance
- IG Guidance on Remote Working for General Practice Staff;
including working from home

These updated guidance documents along with additional guidance materials on wide range of topics and can be found using the link below:

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

PECYN CYMORTH LLYWODRAETHU GWYBODAETH CYMRU **WELSH INFORMATION GOVERNANCE TOOLKIT**



Welsh Information Governance Toolkit

As you will be aware, the IG Toolkit has now launched on a new platform.

The [previous edition of the IG Toolkit](#) will continue to be available for practices to download previous evidence and create reports via the FormBuilder Two platform.

The Corporate Applications Team will be de-commissioning FormBuilder Two on the 2nd February 2024. We therefore encourage users to download copies of reports and information they require prior to this date.

New IG Toolkit Platform - Caforb

The [new IG Toolkit](#) was released on the 31st July 2023.

In-line with the latest GP contract, General Practices have

until 31st March 2024 to submit the Toolkit, although we

do encourage organisations to work through the assessment throughout the submission period to avoid last minute pressures leading up to the submission date.



The new platform consists of just one IG Toolkit form for all its stakeholders. It is broken down into 'core' questions that target all organisations, with additional questions relevant to specific organisation types. Therefore, you will find some questions are written with terminology to encompass the wide range of users.

There are lots of new, exciting, and useful features to the Caforb platform, making the IG Toolkit more seamless to the user. The Toolkit will now be available all year round, closing on the submission date and re-opening the following day, giving organisations more time to populate/update the assessments.

All answers and evidence will remain on the organisation's IG Toolkit form until users delete or update it. Therefore, in future years evidence from the previous year's submission will remain on the 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 is required to confirm everything remains the same and is still current. The user can then move onto the next assessment section and repeat the process.

The Software Development team are currently working on Version 5, which focuses on reporting functionalities. We expect this to be released in February 2024.

The [Support and Resources](#) section has been updated to support the requirements in the new IG Toolkit, which includes a range of bitesize videos and guides. As more resources are developed, the pages will be updated. A written User Guide for [the New Welsh IG Toolkit](#) is also available.

A set of [Frequently Asked Questions](#) has also been developed.

Following publication of the new platform, the team have planned several drop-in sessions, where we will be on hand to answer your questions and guide you through the platform with a full demonstration.

These drop-in sessions will be held monthly. The link to the sessions will be made available via each future newsletters and within the IG Toolkit itself, on the new Alerts section.

The scheduled dates and links to join are detailed below:

15th February at 12-1pm - [Click here to join the meeting](#)

18th March at 11am-12pm - [Click here to join the meeting](#)

Requirement Guidance Documents

The Welsh IG Toolkit Team have been developing a set of requirement guidance documents which will assist users in completing the Welsh IG Toolkit. These requirement documents provide more in-depth guidance and further information on each section of the toolkit and is broken down into categories specific to the questions.

The guidance documents also highlight where questions are only relevant to certain organisation types, so users know if it is applicable to them or not.

These requirement guidance documents can be found on the Support and Resources page on the Welsh IG Toolkit webpage using the link below.

<https://dhcw.nhs.wales/ig/information-governance/welsh-information-governance-toolkit/support-and-resources-for-the-ig-toolkit/>

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.

ABUHB - 22

BCUHB - 14

CAVUHB - 12

CTMUHB - 11

HDUHB - 11

PTHB - 2

SBUHB -13

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).

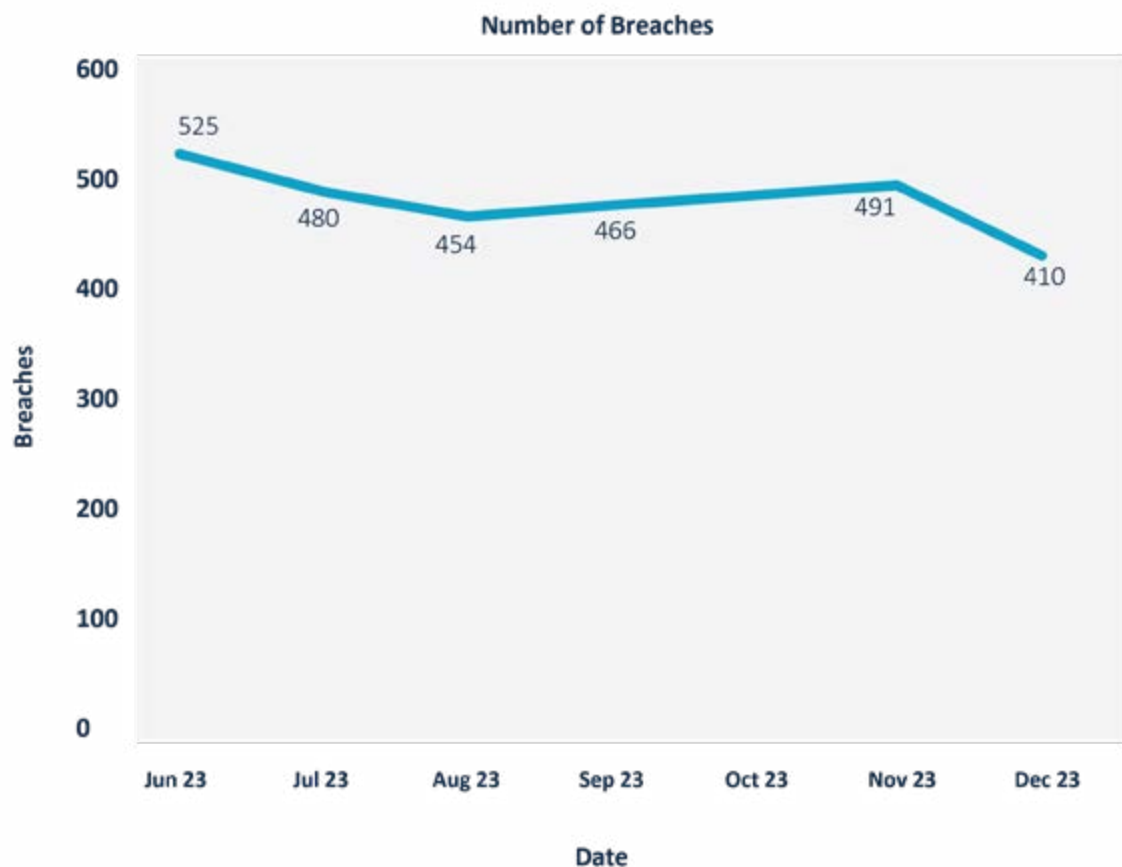
Mail Marshal Breaches

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 breached.
- reduce the risk of business sensitive information being breached.
- ensure that the language used by staff does not contain profanities.
- reduce the risks to NHS Wales organisations from malicious file attachments.

Below are the figures for Mail Marshall Breaches from June 2023 – December 2023.

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



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 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 enforcement action

An unauthorised individual was handed a document (SBAR) containing personal data of 14 individuals and assisted with administering care to one patient. The personal data on the SBAR included personal identifiers and special category health data. The SBAR was taken off site by the unauthorised individual, and the data has not been recovered to date.

A reprimand has therefore been issued to NHS FIFE in accordance with Article 58(2)(b) of the UK General Data Protection Regulation (UK GDPR) in respect of certain infringements of the UK GDPR.

In their investigation, the ICO found:

- Lack of robust procedures to document whether SBARs were destroyed correctly or collected at the end of the shift
- Failings surrounding the security of the data
- Low levels of data protection training across the organisation as a whole

Having robust policies and procedures in place for all staff to follow is essential. This will help staff to carry out their roles effectively and understand what is expected of them. It also helps the organisation to demonstrate their accountability and demonstrate that they have mitigated against potential risks by providing staff with clear processes.

Organisations must also ensure staff receive relevant Information Governance training that is suited for their role. This will ensure staff understand what is expected of them regarding protecting the security of all data types and what to do if there are any issues.

You should consider whether you have the following in place to help you mitigate any potential risks regarding security of data:

- Does your practice have an effective ID checking process for staff and any visitors who may require access to the practice?
- Are your policies and procedures up to date in line with UK GDPR and are staff aware of the importance of reading and understanding these?
- Is there appropriate security in place to protect physical documentation stored within your practice, and it is recorded when these are removed from the practice, destroyed etc?



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