CYMORTH LLYWODRAETHU GWYBODAETH AR GYFER GOFAL SYLFAENOL

INFORMATION GOVERNANCE SUPPORT FOR PRIMARY CARE

WELCOME

to the September edition of the
IG Support Service for Primary Care
Newsletter

This is our fourth edition of the bi-monthly newsletter, providing you with updates on support and guidance developed by the Support Service, progress and developments with the Welsh IG Toolkit for GMPs, and related IG training and resources which will include 'Lessons Learnt' scenarios.

Information Governance Support for Primary Care

The Support Service has recently been involved in reviewing the MHOL documentation, details of the updates can be found below.

New! My Health On-Line – Access for Under 16's

A set of documents have been developed to support Practices when providing access to children and young people under 16 years of age. These include:

- MHOL - Information Leaflet for Under 16's
- MHOL – Request for Access Under 16's Form

Both documents are available via the **My Health Online pages** on the Primary Care website in both Welsh and English. The information leaflet is also available in a printable version.

New! My Health On-Line – Documentation Review

Several of the existing documents have also been reviewed and updated. These include:

- MHOL – Safe and Secure Leaflet
- MHOL – What you need to know Leaflet
- MHOL – Request for access, acting on behalf of another Form

Again, these documents are available via the **My Health Online pages** on the Primary Care website in Welsh and English and are available in a printable format.

The Privacy Information and Terms of Use for both clinical system suppliers have been reviewed and will shortly be updated by the suppliers.

The Information Governance Support Service for Primary Care can be contacted via **DHCWinformationgovernance@wales.nhs.uk**

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WELSH INFORMATION GOVERNANCE TOOLKIT

Welsh Information Governance Toolkit

As the submission date for the Welsh IG Toolkit is quickly approaching, we've noted a few pointers below, to help practices who are yet to complete their annual submission.

You can access the Welsh IG toolkit via the **IG Website**. If you have issues with access or require a reminder of your log-in details, then please contact the team via **WelshIGToolkit@wales.nhs.uk**

The current edition of the IG Toolkit is available via the Information Governance Website.

The website hosts a specific section containing **Support and Resources for GMPs**. In the 'Supporting Resources' tab you can find the '**IG Toolkit User Guide - GMPs**' that explains how to get started, complete the assessments, and how the Hints and Tips provide a wide range of support.

As detailed in the User Guide, we hoped to be able to pre-populate previously uploaded evidence to the relevant questions in this edition, despite our best efforts this has not been possible due to the platform which the toolkit sits on. With this in mind guidance was developed to detail how you can '**carry over evidence from previous submissions**'. We appreciate this is not ideal for many and are working with our Software Development Team to find a solution moving forward.

A wealth of resources can also be found in the **Support and Resources for GMPs** to help with the completion of each assessment of the toolkit and how to meet the attainment levels of each requirement.

Completing the IG Toolkit

At the top of each Section in the Toolkit, a hyperlink to the full 'Requirement' takes you through to information on the IG Website to help you with this specific section. It is useful to read each Requirement before populating the assessments as it sets out what is required to meet each attainment level.

See the example below:

3.2 Right to be Informed

The full 'Requirement' provides further guidance and useful links to support population of this section

Only insert an answer if it is a positive one. For example, please do not enter 'this requirement is being developed by the Practice', 'no current policy in place, currently being developed', etc. See the User Guide for further information on this

Hints and Tips in the form of information 'Icons' are placed alongside most questions which provide examples of suggested evidence, further explanations of the question, additional guidance, links to templates and references to legislation and national standards detailing how they apply to the practice. These are either simple hover Icons that provide 'at a glance' support, for example, suggestions of what evidence to provide or brief information/ explanation for the question. The yellow click icons tend to provide more detailed information and/or included hyperlinks that direct you to other relevant sections of the website or link you to external sites such as the ICO. See the example below:

Attainment	Summary Requirement	Complete
Level 1	The organisation has developed and made available privacy information to respect individuals rights to comply with the General Data Protection Regulation and the Data Protection Act	☑

Privacy information is provided to individuals which is clear and informative and reflects all statutory requirements. A layered approach is used, with short notices containing key privacy information and additional layers of more detailed information 🅘 ❓ 🅘 ⓘ

Current evidence:
• answer REMOVE

Add new evidence: UPLOAD OR CHOOSE EXISTING OR ALTERNATE DESCRIPTION

If you have any questions with regards to completing the IG Toolkit or need further support, please contact the Welsh IG Toolkit team at **WelshIGToolkit@ wales.nhs.uk**.

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INFORMATION GOVERNANCE TRAINING

Information Governance Training

DHCW Primary Care Services are asking all practice staff to complete a Training Needs Analysis (TNA). You will find a section on the TNA regarding information governance training needs. Primary Care will be sharing collated information with us on your responses. This information will help to inform future training provision in several areas of IG therefore we encourage all staff to feed into this questionnaire.

Lessons Learnt

Sometimes things go wrong; when this happens, it is important that lessons are learnt. In this section we look at a real-life scenario, either an incident or audit finding, and reflect to see if this could happen in your organisation and if training should be provided to your staff. Consideration should be given to any changes that can be implemented in the practice to prevent a similar situation occurring.

'Three-Second Pause' – Always check email recipients

The ICO monitor and report upon data security incident trends on a quarterly basis. Data security incidents, which are breaches of the seventh data protection principle or personal data breaches reported under the Privacy and Electronic Communications Regulations (PECR), are a major concern for those affected and a key area of action for the ICO.

> According to the figures based on the number of reports of personal data breaches received by the ICO during 2020-21, there were 1503 reported incidences of *'data emailed to the incorrect recipient'*, which equates to almost a quarter of all reported non-cyber incidents.

One of the largest risks with email is misdirection because of human error. The practice should ensure all staff who have @wales.nhs.uk accounts read and understand the **NHS Wales Email Use Policy for Primary Care Service Providers**, a record of this should be made to document staff have been made aware of their responsibilities when using the email system, and they have read and understand the policy.

This will also help the practice if investigations are required, should any information be mis-directed or released in error or indeed on purpose.

- The practice should have local procedures in place to reflect the above policy
- When communicating with colleagues within the NHS Wales network, use the NHS Email Directory to confirm the correct email address is used
- If the recipient is outside of NHS Wales network, check to see if their organisation is **Transport Layer Security (TLS)** enabled prior to sending personal data, this is secure alternative
- Staff should not email patients with health-related information without prior approval from the Caldicott Guardian or their deputy
- Staff should take time when emailing personal information on every occasion, pause and check the email address, email trail and any attachments, and ensure no one other than the intended recipient has been accidentally included in the 'to', 'cc' or 'bcc' fields.

IG Guidance on Communicating with Patients using the NHS Wales email service and other resources relating to email use is available on the on the **Information Governance for Primary Care section of the IG Website**.

The DHCW DPO Support Service also have a range of supporting documentation regarding emailing on their **website for their subscribers**.

Data security incident trends can be found on the **ICO website**.

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 **eAlert Archive** on the **Information Governance** 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. They bring you the 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** on the **ICO website**.

You can also sign up to receive the ICO's action we've taken e-newsletter which reports on trends and investigations and other news by **completing the form on the ICO website**.

The **previous editions of the ICO e-newsletters** are now available to view in the ICO website.

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