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INFORMATION GOVERNANCE SUPPORT FOR PRIMARY CARE

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WELCOME

to the September 2023 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.

Medical Examiner Service

The team are currently working with the DHCW Primary Care Services Team regarding the new Medical Examiners Service, due to be fully established in Wales by April 2024. Processes are currently being developed around the provision of access to the deceased patient record by the Medical Examiner's Office. Guidance will be developed and made available over the coming months.

Contact the Information Governance Support Service for Primary Care via

DHCWInformationGovernance@wales.nhs.uk

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WELSH INFORMATION GOVERNANCE TOOLKIT

Welsh Information Governance Toolkit

Old IG Toolkit Platform – FormBuilder

The previous edition of the IG Toolkit will continue to be available to practices to download previous evidence and create reports via the Formbuilder platform. The Corporate Application Team will be de-commissioning Formbuilder later this year. We therefore encourage users to download copies of reports and information they require over the coming months.

New IG Toolkit Platform - Caforb

The **new IG Toolkit** was released on the 31st July. In-line with the latest GP contract, General Practice's will be given until the end of March 2024 to submit the Toolkit, although we do encourage organisations to work through the assessment throughout the year, 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 in the platform until users delete or update it. Therefore, the first year will require more time populating the assessments, however in future years evidence from previous years will remain 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 a simple click of the Declaration to confirm everything remains the same and is still current, is all that is required. The user can then move onto the next assessment section and repeat the process.

A selection of some of the new features include:

- Individual log in rather than generic access – enables more than one user at a time to access and populate the assessments, with section locking if more than one user is logged in.
- A range of access permissions - Organisation Administrator, User or Read Only
- The ability to re-set your password using the system – will mean you are no longer required to log a call with the Service Desk
- An 'Alert' facility - ability for Users to view messages from the IG Toolkit Team
- A 'Dashboard' - displaying organisation progress.
- An 'Action Plan' - ability for users to record required actions, update progress on actions and create reports.
- The introduction of Minimum Expectation and Expectations Exceeded rather than the previous three levels.

The **Support and Resources** section has been updated to support the requirements in the new IG Toolkit. As more resources are developed the pages will be updated. A set of **Frequently Asked Questions** has also been developed.

A range of bitesize training videos and guides have been developed to support users in navigating the new platform. These are available on our **eLearning section.** A written User Guide for the **New Welsh IG Toolkit** is also available.

Following publication of the new platform the team have planned several drop-in sessions, over lunchtime hours, where we will be on hand to answer your questions and guide you through the platform. During each session we are also looking to include a 15-to-20-minute slot from 1.15pm focusing on specific areas of the Toolkit. The first two drop-in sessions held on the 2nd and 16th August were a success. These sessions will not be recorded at present, but the presentation slides will be distributed out following the session with useful links and screenshots. You can also review the topic and watch the training videos associated with what was discussed from the E learning page.

They will be held every other week for the first few weeks following publication, then moving to monthly. The link to the sessions will be made available via each future Newsletter, on the IG Website and within the IG Toolkit itself, on the new Alerts section.

Links to the planned dates are detailed below:

- Wednesday 30th August: 1-2pm- **Click here to join the meeting** Minimum Expectations and Expectations Exceeded (1.15pm)
- Wednesday 13th September: 1-2pm – **Click here to join the meeting** Information Governance Action Plan and Action Plan Report (1.15pm)
- Wednesday 27th September: 1-2pm – **Click here to join the meeting** Tool Tips and Supporting Resources (1.15pm)

Authorised Requesters
We can confirm that the number of Practices in the following Health Boards have not updated their Authorise User forms.

- ABUHB- 53
- BCUHB- 50
- CAVUHB- 35
- CTMUHB- 26
- HDUHB- 25
- PTHB- 8
- SBUHB- 36

It is recommended that each practice nominate two Authorised Requesters. These are usually the Practice Manager and one nominated deputy, such as a GP Partner or senior member of staff.

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 hasn't 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 NHS Wales Email Service 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 last September.
As you can see from the graph there has been a slight drop for July's figures.

Please see the link for further information regarding **Mail Marshall Breaches** along with Cyber Security Training videos and other useful resources. Also see the link for **MOVEit**; an alternative and safe way to send personal and business sensitive information to third parties.

Mail Marshal Breaches
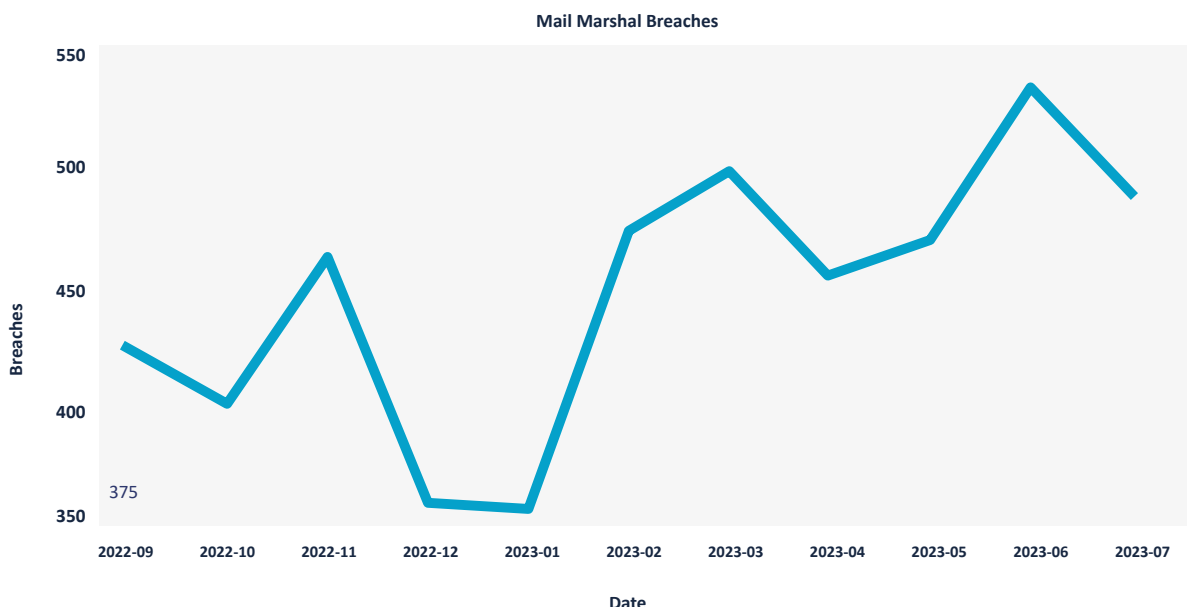
Information Governance Training

Data Protection legislation requires individuals who process personal information to undertake regular data protection training. In NHS Wales refresher training in data protection is included in the Information Governance (IG) eLearning course, which is mandated for ALL staff who provide NHS Wales services to complete every two years as a minimum. This includes ALL staff in General Practices, from reception and administration staff, to nurses, locums, pharmacists, and practice partners. This is not an exhaustive list.

The course aims to inform staff on how information governance should be applied in Wales and includes:

- An introduction to IG training
- Definition of IG
- Confidentiality
- Security of personal Information
- IG Breaches
- Access to information

The course has been updated to reflect the recent changes in data protection legislation and has been approved by the Information Governance Management Advisory Group (IGMAG).

General Practice staff can access the Information Governance eLearning package through the following link **learning@wales**

An IG eLearning Step by Step User Guide for GMPs is available. It takes staff through how to find the course, requesting an Enrolment Key, Accessing the Course, The Assessments, getting your Certificates, and How to Access Learning and IT Support.

If there are staff members who are not IT literate or do not have readily available access to a computer then support should be provided to assist them, or training should be provided in other ways. An **'IG Workbook'** has been developed for primary care staff who do not use IT facilities and is available to download from the IG website.

Further information on any available IG training can be found on the IG website.

Lessons Learnt

ICO Reprimands NHS Lanarkshire

Since the pandemic, the use of social media applications is on the rise.
They are being commonly used for communication between healthcare providers and its patients and practice staff. However useful these applications can be, they come with risks and these risks need to be appropriately managed to ensure that personal information is protected, and the use of these applications adhere to data protection legislation at all times.

An example of how this can go wrong is when 26 staff at NHS Lanarkshire set up a WhatsApp group between staff members for communicating basic information at the start of the pandemic in April 2020. This group continued to be used until April 2022, where patient data was shared on more than 500 occasions, including names, phone numbers and addresses. Images, videos and screenshots, which included clinical information, were also shared.

NHS Lanarkshire did not approve WhatsApp for processing patient data and its use was adopted by these staff without the organisation's knowledge. On one occasion, a non-staff member was also added to the WhatsApp group in error, resulting in the inappropriate disclosure of personal information to an unauthorised individual. Thus, breaching Article 58 (2)(b) of the UK General Data Protection Regulation (UK GDPR) for the sharing of personal data of patients via unauthorised means and secondly, inappropriate disclosure of personal data.

When NHS Lanarkshire became aware, they reported the incident to the ICO who investigated and concluded that NHS Lanarkshire did not have the appropriate policies, clear guidance and processes in place when WhatsApp was made available to use and therefore no assessment was conducted of the potential risks relating to sharing patient data in this way.

Practices should consult their Data Protection Officer (DPO) for support on processes and considerations required when assessing risks when taking on new services or software that involve the sharing of personal data.
Further information on DPIAs is available here **Data Protection Impact Assessments (DPIA) (sharepoint.com)**

Information Commissioners Office (ICO) is trialling an online "Make a Subject access request" Service.

The ICO is currently trialling an online tool to help data subjects make Subject Access Requests to controllers. It is a UK wide pilot project.

The tool encourages the requester to provide additional details that should be helpful in including all the correct information and clarifying what data is being sort. This service will generate an email for the requestor to send, which will also contain ICO guidance for organisations on how to comply with requests. Practices may receive requests via this service, they are not being monitored by the ICO. Practices can still request identification and clarification on these requests; however, you should be mindful that these will be considered relevant requests and you cannot insist users complete specific practice forms. If you have any queries when receiving such requests, please contact your Data Protection Officer for advice. Further information about this new tool can be found on the ICO website: **ico.org.uk**

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**