



REPORT TO THE TRUST BOARD – 29 March 2013

Title	Information Governance Toolkit 2012/13 Submission
--------------	---

Executive summary

This report covers the outcome of the Information Governance (IG) work programme for 2012/13 in relation to the Information Governance Toolkit (IGT) submission at March 31st 2013.

Information Governance (IG) is the framework by which the NHS combines the requirements, standards and best practice that apply to the handling of information. The Information Governance Toolkit (IGT) is a performance tool mandated by the Department of Health (DH) that all Trusts are required to complete annually to measure compliance with a range of information handling requirements.

The Information Governance Assurance Development Work Programme and associated Action Plan agreed at the August 2012 Quality Assurance Committee (QAC) to embed information governance practices within the Trust and to support the IGT submission, was updated for QAC at its February 2013 meeting, prior to final ‘sign off’ of the scores by the Trust Board in March 2013, to meet the IGT assurance requirements.

There are 45 requirements applicable to LPT in Version 10 (2012/13) of the IGT grouped into six initiatives. The following table summarises the final position as at the submission date of 31st March 2013 for each of the six initiatives:

*Standard Numbers	Initiative	Final Position 31/3/2012
101-112	Information Governance Management	93% (Satisfactory - Green)
200-210	Confidentiality & Data Protection Assurance	88% (Satisfactory – Green)
300-324	Information Security Assurance	80% (Satisfactory – Green)
400-406	Clinical Information Assurance	80% (Satisfactory – Green)
501-516	Secondary Use Assurance	83% (Satisfactory – Green)
601-604	Corporate Information Assurance	77% (Satisfactory – Green)

*NB: The standard numbers do not necessarily run consecutively as the standards applicable to Mental Health Trusts are a subset of the IGT standards.

The overall score for the Trust is 83% (Satisfactory – Green)

Appendices 1 and 2 to this paper provide the detailed final position statement and comparison with 2011/12 (Version 9)

Recommendation

The Trust Board agrees that Due Regard has been evidenced in the report.

The Trust Board is recommended to:

- Accept assurance for Trust board 'sign off' of the IGT scores in time for the IGT submission deadline of the 31st March 2013.
- Accept that EMIAS IGT Audit review report has yet to be provided, although there are no indications that it will not support the scored indicated.

Related Trust objectives	We will continuously improve quality, with services shaped from user experience, audit and research.
Risk and assurance	<p>Non-compliance with achievement at Level 2 for all standards impacts on the Monitor compliance framework in relation to the Trusts Foundation application.</p> <p>Assurance through East Midlands Independent Assurance Solutions is still awaited, although there are no indications that this will impact the scores indicated.</p>
Legal implications/ regulatory requirements	CQC Regulated Activity: Treatment of disease, disorder or injury; Assessment and medical treatment for persons detained under the Mental Health Act 1983; Nursing Care Registration Outcome: 21 – Records
Presenting Director	Sue Hitchener, Managing Director of Finance, Performance and Information/ Deputy Chief Executive
Author(s)	Sam Kirkland (Records Transformation & Information Governance Manager)

*Disclaimer: This report is submitted to the Trust Board for amendment or approval as appropriate. It should not be regarded or published as Trust Policy until it is formally agreed at the Board meeting, which the press and public are entitled to attend.

TRUST BOARD - 28 March 2013

THE INFORMATION GOVERNANCE TOOLKIT SUBMISSION 2012/2013

FINAL STATEMENT – MARCH 2013

1.0 Introduction

- 1.1. Information Governance (IG) is the framework by which the NHS combines the requirements, standards and best practice that apply to the handling of personal information.
- 1.2 The Information Governance Toolkit (IGT) is a performance tool mandated by the Department of Health (DH), and which all Trusts have been required to complete since March 2005. The toolkit enables organisations to measure compliance with a range of information handling requirements. In previous years the IGT process has been based upon a self assessment approach to provide assurance on the adequacy of health bodies IG arrangements. Internal Audit reviews carried out nationally identified differences between self assessed and independently validated scores, for example, through over statement of scores, misinterpretation of requirements or the absence of supporting evidence.
- 1.3 It is against this background that the Care Quality Commission (CQC) in September 2009 recommended that 'external validation and audit by NHS internal audit or external auditors of healthcare organisations' self assessments should be mandatory' (The right information, in the right place, at the right time). This recommendation was accepted by the DH and was included within the NHS Informatics Planning Guidance for the 2010/11 financial year. Although the revised NHS Operating Framework did not include a mandate around the Information Governance Toolkit, the DH via NHS Connecting for Health communicated that the expectations outlined in the Operating Framework in relation to IGT for 2010/11, were carried forward to through the Information Standards Board (ISB). There is also an additional requirement for NHS Trusts applying for Foundation status, to be compliant with achieving Level 2 across all IGT standards, as part of the Monitor framework.

2.0 Aim

- 2.1 The aim of this paper is to provide the Trust Board with assurances to the outcome of the Information Governance work programme for 2012/13 in relation to the Information Governance Toolkit submission at the 31st March 2013.

3.0 Recommendations

- 3.1 The Trust Board is asked to:
 - Accept assurance for Trust board 'sign off' of the IGT scores in time for the IGT submission deadline of the 31st March 2013.

- Accept that EMIAS IGT Audit review report has yet to be provided, although there are no indications that it will not support the scores indicated.

4.0 Discussion

- 4.1 The Information Governance Assurance Development Work Programme and associated Action Plan agreed at the August 2012 Quality Assurance Committee (QAC) to embed information governance practices within the Trust and to support the IGT submission, was updated for QAC at its February 2013 meeting, prior to final 'sign off' of the scores by the Trust Board in March 2013, to meet the IGT assurance requirements.
- 4.2 Appendices 1 and 2 attached provide a breakdown by initiative and also a direct comparison with the submission for 2011/12.
- 4.3 There are 45 requirements applicable to LPT in Version 10 (2012/13) of the IGT grouped into six initiatives. The following table summarises the final position as at the submission date of 31st March 2013 for each of the six initiatives:

*Standard Numbers	Initiative	Final Position 31/3/2012
101-112	Information Governance Management	93% (Satisfactory - Green)
200-210	Confidentiality & Data Protection Assurance	88% (Satisfactory – Green)
300-324	Information Security Assurance	80% (Satisfactory – Green)
400-406	Clinical Information Assurance	80% (Satisfactory – Green)
501-516	Secondary Use Assurance	83% (Satisfactory – Green)
601-604	Corporate Information Assurance	77% (Satisfactory – Green)

*NB: The standard numbers do not necessarily run consecutively as the standards applicable to Mental Health Trusts are a subset of the IGT standards.

The overall score for the Trust is 83% (Satisfactory – Green)

5.0 Conclusion

- 5.1 Although this score is an improvement on 2011/12, the Trust Board should note that there is a risk of this score being decreased to below 80% (RED Unsatisfactory) if we do not obtain 95% across the Trust for Mandatory Information Governance Training, equating to a Level 1 standard. This would be the only non-compliant standard for the Trust but does impact on overall compliance as there is a requirement to achieve Level 2 across **all** standards.
- 5.2 It should be noted that at the point of writing this report, East Midland Independent Assurance Solutions (EMIAS), who conducted the Internal Audit review of the IGT, have not provided their audit opinion, although they support our scoring.

Appendix 1 - IG Toolkit Assessment Summary Report (breakdown by initiative)
 Appendix 2 - IG Toolkit Assessment Summary Report (direct comparison with the submission for 2011/12)

IG Toolkit Assessment Summary Report
LEICESTERSHIRE PARTNERSHIP NHS TRUST
Prepared on 15/03/2013

Information Governance Management

Assessment	Stage	Overall Score	Initial Grade	Current Grade
Version 10 (2012-2013)	Current	93%	Satisfactory	Satisfactory

Confidentiality and Data Protection Assurance

Assessment	Stage	Overall Score	Initial Grade	Current Grade
Version 10 (2012-2013)	Current	88%	Satisfactory	Satisfactory

Information Security Assurance

Assessment	Stage	Overall Score	Initial Grade	Current Grade
Version 10 (2012-2013)	Current	80%	Satisfactory	Satisfactory

Clinical Information Assurance

Assessment	Stage	Overall Score	Initial Grade	Current Grade
Version 10 (2012-2013)	Current	80%	Satisfactory	Satisfactory

Secondary Use Assurance

Assessment	Stage	Overall Score	Initial Grade	Current Grade
------------	-------	---------------	---------------	---------------

Version 10 (2012-2013)	Current	83%	Satisfactory	Satisfactory
------------------------	---------	-----	--------------	--------------

Corporate Information Assurance

Assessment	Stage	Overall Score	Initial Grade	Current Grade
Version 10 (2012-2013)	Current	77%	Satisfactory	Satisfactory

Overall

Assessment	Stage	Overall Score	Initial Grade	Current Grade
Version 10 (2012-2013)	Current	83%	Satisfactory	Satisfactory

Grade

Not Satisfactory	Not achieved Attainment Level 2 or above on all requirements (Version 8 or after)
Satisfactory	Achieved Attainment Level 2 or above on all requirements (Version 8 or after)

IG Toolkit Assessment Summary Report
LEICESTERSHIRE PARTNERSHIP NHS TRUST
 Prepared on 15/03/2013

Information Governance Management

Assessment	Stage	Overall Score	Initial Grade	Current Grade
Version 10 (2012-2013)	Current	93%	Satisfactory	Satisfactory
Version 9 (2011-2012)	Published	80%	Satisfactory	Satisfactory

Confidentiality and Data Protection Assurance

Assessment	Stage	Overall Score	Initial Grade	Current Grade
Version 10 (2012-2013)	Current	88%	Satisfactory	Satisfactory
Version 9 (2011-2012)	Published	74%	Satisfactory	Satisfactory

Information Security Assurance

Assessment	Stage	Overall Score	Initial Grade	Current Grade
Version 10 (2012-2013)	Current	80%	Satisfactory	Satisfactory
Version 9 (2011-2012)	Published	82%	Satisfactory	Satisfactory

Clinical Information Assurance

Assessment	Stage	Overall Score	Initial Grade	Current Grade
Version 10 (2012-2013)	Current	80%	Satisfactory	Satisfactory
Version 9 (2011-2012)	Published	66%	Satisfactory	Satisfactory

Secondary Use Assurance

Assessment	Stage	Overall Score	Initial Grade	Current Grade
Version 10 (2012-2013)	Current	83%	Satisfactory	Satisfactory
Version 9 (2011-2012)	Published	75%	Satisfactory	Satisfactory

Corporate Information Assurance

Assessment	Stage	Overall Score	Initial Grade	Current Grade
Version 10 (2012-2013)	Current	77%	Satisfactory	Satisfactory
Version 9 (2011-2012)	Published	77%	Satisfactory	Satisfactory

Overall

Assessment	Stage	Overall Score	Initial Grade	Current Grade
Version 10 (2012-2013)	Current	83%	Satisfactory	Satisfactory
Version 9 (2011-2012)	Published	77%	Satisfactory	Satisfactory

Grade

Not Satisfactory	Not achieved Attainment Level 2 or above on all requirements (Version 8 or after)
Satisfactory	Achieved Attainment Level 2 or above on all requirements (Version 8 or after)