

REPORT TO THE TRUST BOARD – 26 SEPTEMBER 2013

Title	The Role of the Senior Information Risk Owner
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Executive summary

The establishment of the role, Senior Information Risk Owner (SIRO) within NHS organisations, is one of several NHS Information Governance (IG) measures identified to strengthen information assurance controls for information assets. These arrangements are consistent with the requirements introduced by the Cabinet Office for Departments that came out of the recommendations of the data handling review within Government Departments (2009).

The allocation of the SIRO role must be reviewed within the Trust due to the change in Chief Executive, as the current Acting Chief Executive Officer holds the SIRO duties. It is key that the Trust Board in September 2013 receive a recommendation as to the new SIRO post holder.

Formal consideration of the proposed change has been undertaken through the Quality Assurance Committee in September 2013, with the Committee recommending the actions shown below.

Recommendation

The Trust Board is asked to consider the following recommendations;

1. Appoint the Chief Nurse role to be the Trust SIRO from 1 October 2013, with support provided by the Information Governance team lead by the Chief Information Officer.
2. Continue to support the Chief Information Officer undertaking the Deputy SIRO role.

Related Trust objectives	We will continuously improve quality, with services shaped from user experience, audit and research
Risk and assurance	Risk of failure to comply with legal requirements and evidence learning from external reviews.
Legal implications/ regulatory requirements	CQC Requirement to have robust Governance process in place and compliance with DoH/Cabinet Office guidance for information handling.
Evidence for the Quality Governance	Paper evidences;

Framework	<p>1B Is the board sufficiently aware of potential risks to quality?</p> <p>3A Are there clear roles and accountabilities in relation to quality governance?</p>
Presenter	Will Legge, Chief Information Officer
Author(s)	Sam Kirkland, Records Transformation and IG Manager & Will Legge, Chief Information Officer
<p>*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.</p>	

The Role of the Senior Information Risk Owner

Background

The establishment of the role, Senior Information Risk Owner (SIRO) within NHS organisations, is one of several NHS Information Governance (IG) measures identified to strengthen information assurance controls for information assets. These arrangements are consistent with the requirements introduced by the Cabinet Office for Departments that came out of the recommendations of the data handling review within Government Departments (2009).

The Role

The Senior Information Risk Owner (SIRO) should be an Executive Director or other senior member of the Board. The SIRO may also be the Chief Information Officer (CIO) if the latter is on the Board, but should not be the Caldicott Guardian as the SIRO should be part of the organisation's management hierarchy rather than being in an advisory role.

The SIRO is expected to understand how the strategic business goals of the organisation may be impacted by information risks and it may therefore be logical for this role to be assigned to a Board member already leading on risk management or information governance.

The SIRO will act as an advocate for information risk on the Board and in internal discussions, and will provide written advice to the Accounting Officer on the content of the annual Statement of Internal Control (SIC) in regard to information risk.

The SIRO will provide an essential role in ensuring that identified information security risks are followed up and incidents managed and should have ownership of the Information Risk Policy and associated risk management Strategy and processes.

Responsibilities of the SIRO may be in addition to other job responsibilities and should be identified clearly within the role-holders' job description.

Training

The SIRO will be required to successfully complete strategic information risk management training at least annually.

LPT Position Statement

The Director of Finance, Performance and Information within the Trust, has been the SIRO since April 2011 and maintained the role during the move to Acting Chief Executive. Given the changes due to take place within the organisation with the arrival of a new substantive Chief Executive, it is necessary to review the arrangements going forward.

It is necessary for the Committee to recommend the desired Post to hold the SIRO role to the Trust Board in September 2013, to ensure continuity of cover in this statutory organisational role.

It should be noted that full support is given to the holder of the SIRO duties, including annual training and support from the Chief Information Officer and Records Transformation and IG Manager.

The table shown on Page 5 outlines a brief option appraisal on the potential posts for consideration of where the SIRO role could potentially be allocated.

Internal Consideration

Formal consideration of the proposed change (and a form of this paper) has been undertaken through the Quality Assurance Committee in September 2013, with the Committee recommending the actions shown at the end of this paper.

Options Appraisal

	Director of Finance, Information & Performance	Chief Nurse	Medical Director	Chief Operating Officer	Chief Information Officer	Comments
Post has information governance lead in portfolio	1	0	0	0	1	
Post has responsibility for defining and implementing organisational incident management strategy and process	0	1	0	0	0	
Post has responsibility for defining and implementing organisational risk management strategy and process	0	1	0	0	0	
Post has no other statutory information governance lead responsibilities (to give confirm/challenge ability)	1	1	0	1	1	Medical Director has Caldecott Guardian responsibilities
Post holder has previous SIRO experience	0	0	0	0	1	CIO is current deputy SIRO for LPT
Post is a Trust Executive and formal member of the Board	1	1	1	1	0	The CIO post is not a Trust Executive and therefore cannot be the Trust SIRO role (this overrides all other scoring)
Total	3	4	1	2	3	

Recommendation

Following the outline options appraisal shown on Page 5, the role of the Chief Nurse scored the highest, with the roles of the Director of Finance, Performance and Information coming joint second with the Chief Information Officer.

The Chief Information Officer role must be discounted from the appraisal due to the requirement of the SIRO role to be a Trust Executive and member of the Trust Board.

The Trust Board is asked to consider the following recommendations;

- 1. Appoint the Chief Nurse role to be the Trust SIRO from 1st October 2013, with support provided by the Information Governance team lead by the Chief Information Officer.***
- 2. Continue to support the Chief Information Officer undertaking the Deputy SIRO role.***