

Approved by Committee on 7 February 2022
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Information Governance Committee

Monday 8 November 2021 at 10am

MS Teams meeting

- Present: Mrs Jean Ford, Non-Executive Board Member (Chair)
 Cllr Joe Cullinane, Non-Executive Board Member (Vice Chair)
 Mr Michael Breen, Non-Executive Board Member
 Ms Sheila Cowan, Non-Executive Board Member
- Ex-officio: Prof Hazel Borland, Interim Chief Executive, NHSAA
 Mrs Lesley Bowie, Board Chair
 Mr Derek Lindsay, Senior Information Risk Owner
 Ms Nicola Graham, Director Infrastructure and Support Services
 Dr Crawford McGuffie, Medical Director and Caldicott Guardian
 Mrs Jillian Neilson, Head of Information Governance (IG) and Data Protection Officer (DPO)
- In attendance: Mr Robert Bryden, Health Records Manager
 Ms Natali Higgins, Information Governance Manager
 Ms Tara Palmer, Freedom of Information Officer
 Mrs Angela O'Mahony, Committee Secretary (minutes)

1. Apologies for absence

Apologies were noted from Mr Marc Mazzucco and Mr Andy Grayer.

2. Declaration of any Conflicts of Interest

There were no conflicts of interest declared.

3. Draft Minute of the Meeting held on 30 August 2021

The minute of the meeting held on 30 August 2021 was approved as an accurate record of the discussion.

4. Matters Arising

- 4.1 The action log had previously been circulated to Committee members and all progress against actions was noted. Committee members received an update on the following actions:

Item 6.1 (30/08/2021), PRSA 2011 update – Mrs Ford will discuss and complete this action with Ms Higgins outwith the meeting.

JF

Item 6.1, Information Security Policy Framework – Ms Graham will discuss with Ms Neilson outwith the meeting and update the action to align with the updates provided.

NG/JN

4.2 IGC Work Plan 2021-22

Committee members noted and the following updates were provided:

The Cyber Security workshop should be added back in to the work plan with the date to be confirmed. Prof Borland confirmed that the Cyber Security workshop was still planned and the timing would be considered as part of the Board's wider workshop planning process.

The Committee noted that following agreement at the last IGC meeting, FOI and PRSA updates had moved to six monthly reporting and were due to be presented at the next meeting.

5. Reform

5.1 Digital/Cyber Security update

The Director Infrastructure and Support Services, Ms Nicola Graham, provided an update on the progress of the Cyber Security work programme. This report had been deferred from the last Committee meeting and had previously been discussed and agreed at the Corporate Management Team on 27 July 2021.

The Committee was advised that the Board's work programme had been developed to ensure good cyber awareness across the organisation; appropriate and fit for purpose information security policies; and a clear and simple process to report anomalies to help mitigate the risk of cyber attack. Ms Graham highlighted the recent cyber attacks on the Irish health service, SEPA and other public sector organisations in terms of the state of readiness for cyber attack and the impact on these organisations.

Ms Graham advised that the Cyber Security action plan set out the high level actions taking place across the Board. There were plans to hold a series of three Board workshops, all using the National Cyber Security Centre awareness tool kit methodology. The timescale for completion of this action had been extended due to the absence of the Assistant Director, Digital Services and there was a need to pick up this work and move forward.

Ms Graham advised, in response to a question from a Committee member, that there had been some communication about the Cyber Security work programme. All information security and associated policies were currently being pulled together and a framework was being considered to prioritise review of these policies. Preparation for the planned workshops was underway. Ms Graham agreed that it would be helpful to establish a regular reporting cycle to monitor progress against this work programme. The risk relating to service business interruption - cyber incident will continue to be reported through the IGC Strategic Risk Register.

Ms Graham confirmed, in response to a comment from a Committee member, that business continuity plans, including regular testing of system restore arrangements, tied in closely with the Cyber Security

work programme and risk reporting process.

Outcome: The Committee received a detailed update on Cyber Security and acknowledged the progress being made with this important work programme.

5.2 Health Records update

The Health Records Manager, Mr Robert Bryden, provided an update on activities performed within the Health Records Service that fall within the remit of the Board's IG function.

Mr Bryden highlighted in particular the work that had been progressed under the auspices of the new CHI Programme to receive CHI broadcast of changes to patient demographic details into NHSAA TrakCare Patient Management System from 7 October 2021. Mr Bryant advised that each territorial Board has agreed to share workload by leading testing for a designated accredited business system. Within NHSAA, a further workstream had now begun to test the look up functionality in new CHI from the AyrShare system.

The Committee was advised of changes to arrangements for obtaining supporting information for disability claims. Mr Bryden advised that from the new year, the Health Records Team would be the single point of contact for health care requests, including circulation to colleagues, follow up and submission of final reports via the on-line portal. Mr Bryden highlighted that this work will have a significant impact and resource implications for the team once introduced in the new year. An SBAR report will be provided to CMT to highlight these changes.

In response to a question from a Committee member, Mr Bryden gave reassurance that there was a robust and secure process in place to destroy confidential records that had been selected as appropriate for destruction.

Outcome: The Committee noted the update on activities being undertaken by the Health Records Service.

6. Information Governance

6.1 Information Governance Work Programme

The Head of IG and DPO, Mrs Jillian Neilson, advised that as agreed at the last Committee meeting, IG work programme assurance updates will be provided six monthly going forward to enable the Committee to monitor progress and compliance with legislative requirements. These options had not yet been considered by the Information Governance Operational Delivery Group (IGODG) due to reporting timescales.

Mrs Neilson presented two exemplar compliance matrices, a checklist and an accountability framework, for future reporting of the IG work programme, both of which had come from the Information Commissioner's Office (ICO).

Mrs Neilson highlighted that following the UK's exit from the EU, a consultation was ongoing in relation to reform of Data Protection legislation and the Board was feeding into this on a national basis. If the proposed changes were implemented, this could change the ICO Accountability Framework, one of the options proposed.

The Committee discussed the two options for future reporting. Committee members agreed that the checklist option would provide appropriate assurance in relation to the systems and processes in place, and enable the Committee to focus on key priority areas, with exception reporting provided as required.

Committee members suggested that the accountability framework should belong to the IGODG to allow the group to monitor progress against the work programme and provide exception reporting to the Committee as required. The Committee agreed that as the IGODG had not yet had the opportunity to consider these options, discussion should take place at the group's next meeting around how to blend the checklist and framework to provide appropriate assurance reporting to the Committee, including self-assessment and data controller arrangements.

Outcome: The Committee agreed that the two options for future reporting be considered in detail by the IGODG and a firm proposal presented at the next Committee meeting on 7 February 2022.

JN

7. For Assurance

7.1 Information Security Breach

The Head of Information Governance and DPO, Mrs Jillian Neilson, presented the information security breach report covering the period July to September 2021.

Mrs Neilson reported that there had been 39 breaches during the reporting period, above average for the quarterly period. There had been no breaches that required to be reported to the ICO during this reporting period. Mrs Neilson updated that there had been one breach reported to the ICO for this quarter and further details would be provided at the next meeting. There were no complaints being investigated by the ICO.

Committee members welcomed the summary information provided in relation to trends identified. The Committee highlighted a discrepancy in relation to dates provided within two of the data charts and Mrs Neilson would ensure these were rectified. The Interim Chief Executive, Prof Hazel Borland, suggested that the first chart provided be presented in a control chart format.

Outcome: Committee members discussed the report and were assured of the work being done to promote

compliance with Data Protection Legislation.

8. Governance

8.1 Information Governance Operational Delivery Group (IGODG) approved minutes of meeting on 17 August 2021

The Committee discussed the approved minutes of the IGODG meeting held on 17 August 2021.

The Committee discussed the use of email distribution lists across the organisation and the control measure put in place for a specific distribution list following a recent information security breach. The Head of IG, Ms Jillian Neilson, explained that this was a complex area and while the specific distribution list was not used frequently, other distribution lists across the organisation were in regular use. The Director of Infrastructure and Support Services, Ms Nicola Graham, underlined the need to support users to understand the format of distribution lists, when they should be used and the need to check emails before sending. Ms Graham will discuss this further with Ms Neilson outwith the meeting.

NG/JN

Outcome: Committee members noted the approved minutes of the IGODG meeting held on 17 August 2021.

9. Risk

9.1 Information Governance Committee Strategic Risk Register

The Medical Director, Dr Crawford McGuffie, presented a report on risk management arrangements and the IGC Strategic Risk register.

Outcome: Committee members discussed the organisation's risk management arrangements and approved the IGC Strategic Risk Register.

9.2 Risk issues to report to NHS Board

There were no risks to report to the Risk and Resilience Scrutiny and Assurance Group.

10. Information Governance Committee meeting dates 2022-2023

10.1 Committee members approved the proposed meeting dates for 2022-2023.

11. Key issues to report to NHS Board

11.1 Committee members agreed that the following key issues be reported to the NHS Board meeting on 29 November 2021:

Approved by Committee on 7 February 2022

- To acknowledge progress of the important cyber security work programme
- Approval of IG Strategic Risk Register.
- Approval of IGC meeting dates 2022-2023

12. Any Other Competent Business

11.1 There was no other business.

**13. Date and Time of Next Meeting
Monday 7 February 2021 at 10am, MS Teams**

Signed (Chair) Date