



# Information Governance Policy

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Produced by the Business Support Unit  
Regulation and Quality Improvement Authority

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## 1 Introduction

- 1.1 Information governance (IG) describes the approach within which accountability, standards, policies and procedures are developed, implemented and maintained to ensure that all types of information are processed appropriately, securely and in line with current legislation. It has four fundamental aims:
- to support the provision of a high quality service by promoting the effective and appropriate use of information;
  - to encourage responsible staff to work closely together, preventing duplication of effort and enabling more efficient use of resources;
  - to provide staff with appropriate tools and support to enable them to discharge their responsibilities to consistently high standards; and
  - to enable organisations to understand their own performance and manage improvement in a systematic and effective way.
- 1.2 Information held by RQIA represents one of its most valuable assets, and core to most of the services delivered to service users, business partners and customers. It is therefore essential that all information is managed effectively within a robust framework, in accordance with best practice and legislative requirements.
- 1.3 Having accurate relevant information available at the time and place where it is needed, is critical in all areas of business and plays a key part in corporate governance as well as risk, planning and performance management.
- 1.4 RQIA carries a legal responsibility for the appropriate processing and protecting information of many types. This includes information which contains personal details of staff and, at times, of patients/clients and their families.
- 1.5 This policy also recognises the necessity to share some personal data with other health organisations and agencies in a controlled manner consistent with the interests of the individual and, in some circumstances, in the public interest.
- 1.6 Some information may be non-confidential and is for the benefit of the general public. Examples include information about services, annual report and business plans. The RQIA and its employees share responsibility for ensuring that this type of information is accurate, up to date and easily accessible to the public.
- 1.7 Although the majority of information about RQIA should be open for public scrutiny, it is acknowledged that some information, which is commercially sensitive, may need to be safeguarded.

## 2 Purpose

- 2.1 The IG requirements set out within this policy and subsequent policies and procedures are intended to:
- outline the approach to fulfilling IG responsibilities;
  - ensure compliance with legal and regulatory framework is maintained;
  - establish a robust framework for preserving the confidentiality, integrity, security and accessibility of data, systems and information; and
  - give assurance that information is processed legally, securely, efficiently and effectively.

- 2.2 This policy acts as an overall umbrella policy that sets out the approach to be adopted for the processing of information, sitting over the other policies relating to each aspect of IG.
- 2.3 The IG requirements set out within this policy and subsequent policies and procedures are intended to ensure that there is a robust framework concerning obtaining, recording, holding, using, sharing and destruction of all data and records held or used and ensuring that relevant information is available where and when it is needed.

### **3 Scope**

- 3.1 The scope of this policy is to support the protection, control and management of information and information assets. The policy will cover all information within the RQIA and is concerned with all information systems, electronic and non-electronic. It applies to all directorates, services and departments, all permanent and temporary staff, all agency staff, and as appropriate to contractors and third party service providers acting on behalf of the organisations.
- 3.2 IG covers all information held, and all information systems purchased, developed and managed by/or on behalf of, the RQIA and any individual directly employed or otherwise used by the RQIA to hold that information.
- 3.3 This policy covers all forms of information held, including personal data as defined in data protection legislation, as well as organisational, business and operational information.

### **4 Policy Statement**

- 4.1 Openness: RQIA will:
- establish procedures and arrangements for handling queries from service users and members of the public;
  - undertake regular assessments of IG policies and arrangements, via the RQIA Information Governance Group (IGG);
  - ensure that non-confidential information about the organisation and its services is readily and easily available, in line with the Freedom of Information Act 2000, Environmental Information Regulations 2004 and the ICO's model publication scheme; and
  - ensure that privacy notices are published to advise the public of its role.
- 4.2 Legal Compliance: RQIA will:
- establish and maintain policies and procedures to ensure compliance with data protection legislation, the common law duty of confidentiality, Environmental Information Regulations 2004, and the Freedom of Information Act 2000;
  - develop and maintain the appropriate registers and systems to permit its functions as a data controller, where this is required;
  - develop and provide sufficient guarantees in its capacity as a processor as to appropriate technical and organisation measures for the services it provides to the wider HSC; and
  - establish and maintain policies and procedures for the controlled and appropriate sharing of personal data, taking account of relevant legislation.

- 4.3 Information Security: RQIA is dedicated to the secure management and use of information held, and will:
- establish and maintain a Data Protection Policy along with respective procedures for effective policing and secure management of all information assets and resources;
  - establish and maintain appropriate incident reporting procedures to report, monitor and investigate all instances actual and/or potential along with any reported breaches of confidentiality and security;
  - undertake and/or commission audits to assess Information and ICT Security arrangements; and
  - promote effective confidentiality and security practice to ensure all permanent/temporary, contracted staff and third party associates adhere to this policy, and associated policies and procedures.
- 4.4 Information Quality Assurance: Information quality is fundamental to supporting business decision making processes. RQIA will ensure that information it holds is of the highest quality, and will:
- establish and maintain appropriate policies and/or procedures for information quality assurance and the effective management of records in terms of completeness, accuracy, relevance, accessibility, timeliness and intelligibility;
  - undertake or commission regular assessments and audits of its information quality and records management arrangements;
  - ensure that data standards are set through clear and consistent definition of data items, in accordance with quality standards;
  - promote information quality and effective records management through policies, staff awareness and training; and
  - report and act upon incidences of known or suspected poor data quality.
- 4.5 Information Risk Management: RQIA will:
- Risk assess all information assets and information flows to determine that appropriate, effective and affordable IG controls are in place; and
  - Put in place appropriate contingencies to reduce risk to an accepted level, where appropriate.
- 4.6 Records Management: The underlying principle of records management is to ensure that a record is managed through its life cycle from creation or receipt, through maintenance and use to disposal. RQIA will:
- establish and maintain a policy and appropriate procedures for effective records management;
  - promote records management through policies, procedures and training; and
  - adhere to the regional retention schedule ('Good Management, Good Records' - GMGR).
- 4.7 Training: RQIA, with support from the BSO Data Protection Officer (DPO), will ensure that:
- training is assessed for quality, and specific training is available for different roles as appropriate;
  - all staff complete mandatory training at induction, and on a 2 yearly cycle thereafter; and

- all staff have access to relevant IG policies and procedures.

## **5 Responsibilities**

- 5.1 Responsibilities are as set out within RQIA's Information Governance Assurance Framework, which is available on request.
- 5.2 RQIA will also operate an internal Information Governance Group (IGG), with representation from each service area. This group will:
- promote an IG culture within RQIA;
  - hold responsibility for the maintenance of RQIA's Information Asset Register;
  - develop and review policies and procedures to assist in the protection and safe use of information within RQIA;
  - develop action plans to ensure ongoing improvements in the management of IG within RQIA;
  - maintain an overview of incidents affecting IG and security; and
  - identify training and development requirements for RQIA staff in respect of IG.

## **6 Performance and Monitoring Compliance**

- 6.1 The effectiveness of this policy will be assessed on a number of factors:
- compliance with legislation;
  - the management (including frequency) of data breaches;
  - the retention, disposal and destruction of records in accordance with GMGR;
  - satisfactory completion of the annual Information Management Assurance Checklist (IMAC) to the Northern Ireland Department of Health (DoH); and
  - staff training records.

## **7 Non-Compliance**

- 7.1 A failure to adhere to the policy and its associated procedures/guidelines may result in disciplinary action. In relation to the use of ICT Equipment including the use of the Internet and Email, staff should be aware that they might be personally liable to prosecution and open to claims for damages if their actions are found to be in breach of the law.
- 7.2 Serious breaches may be reported to the PSNI, ICO, or other public authority for further investigation.

## **8 Review**

- 8.1 This policy and all associated documents within the Information Governance Framework will be reviewed no later than 2 years from approval, to ensure their continued relevance to the effective management of Information Governance within RQIA.

## **9 Equality Statement**

- 9.1 This policy has been screened for equality implications as required by Section 75 and Schedule 9 of the Northern Ireland Act 1998. The screening has identified no specific

equality impacts for all section 75 groups. The equality screening has been published and can be accessed here <https://hscbusiness.hscni.net/services/3231.htm>