

Information Governance Policy

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2. Introduction

Information Governance (IG) is a set of multi-disciplinary structures, policies, procedures, processes and controls implemented to manage information at an organisational level. Information Governance supports ImproveWell's immediate and future regulatory, legal, risk, environmental and operational requirements.

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Information is a vital asset, both in terms of the commercial development and the efficient management of services and resources. It plays a key part in governance, service planning and performance management.

It is therefore of critical importance to ensure that information is appropriately managed, and that policies, procedures and management accountability and structures provide a robust governance framework for information management.

ImproveWell recognises the need for an appropriate balance between openness and confidentiality in the management and use of information. ImproveWell fully supports the principles of corporate governance and recognises the power of public accountability, but equally places importance on the confidentiality of, and the security arrangements to safeguard, both personal information about App users, the public and staff and commercially sensitive information. ImproveWell also recognises the need to share information with customers and third parties in a controlled manner consistent with the lawful basis.

This overarching Information Governance Policy sets out ImproveWell's policy with respect to the governance of;

- Privacy
- Information and Cyber Security
- Data Quality and Records Management

3. Statutory Mandatory Framework

This policy serves to support ImproveWell to navigate and comply with the complex framework within which Information Governance operates.

This framework includes but is not limited to;

- Data Protection Act 2018
- Human Rights Act 1998
- Common Law Duty of Confidence
- Computer Misuse Act 1990
- General Data Protection Regulations (EU) 2016/679
- Mental Health Capacity Act 2005

4. Accountable Parties

Chief Executive Officer

The Chief Executive Officer has overall responsibility for Information Governance at ImproveWell. As accountable officer, she is responsible for the management of the organisation and for ensuring appropriate mechanisms are in place to provide the necessary assurance to internal and external stakeholders.

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The CEO has a particular responsibility for ensuring that it meets its corporate legal responsibilities, and for the adoption of internal and external governance requirements.

As a small organisation, The Chief Executive Officer of ImproveWell will assume the combined role of IG Lead and Senior Information Risk Owner.

Senior Information Risk Owner (SIRO)

The SIRO:

- leads and fosters a culture that values, protects and uses information for the success of the organisation and benefit of its customers;
- owns the organisation's overall information risk policy and risk assessment processes and ensuring they are implemented consistently by Information Asset Owners / Administrators;
- assists the Chief Executive or relevant accounting officer on the information risk aspects of his/her statement on internal controls; and
- owns the organisation's information incident management framework.

Information Asset Owners (IAOs)

The IAO will:

- hold local responsibility for information risk management, devolved to the relevant directors, directorate managers and department managers by the SIRO.

Heads of Departments, other units and business functions within ImproveWell have overall responsibility for the management of risks generated by their information assets and are supported on a daily basis by Information Asset Administrators.

Data Protection Officer (DPO)

The DPO will:

- inform and advise the organisation and its employees about their obligations to comply with the GDPR and other data protection laws;
- monitor compliance with the GDPR and other data protection laws, including managing internal data protection activities, advise on data protection impact assessments; train staff and conduct internal audits; and
- be the first point of contact for supervisory authorities and for individuals whose data is processed (employees, customers etc.).

All Staff

All staff, whether management or administrative, who create, receive and use data have information governance responsibilities. Employees have a contractual and legal obligation to read and comply with all company policies and to attend mandatory training to support the appropriate management of information.

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5. Openness

Non-confidential information related to ImproveWell and its services will be available to the public through a variety of media, in line with ImproveWell's overall commitment to transparency.

ImproveWell will adopt and maintain clear procedures and arrangements for liaison with the press and broadcasting media.

ImproveWell will adopt and maintain an Information Rights and Access Protocol and a Freedom of Information Protocol to provide guidance for handling queries from data subjects and the public.

6. Privacy and Information Rights

ImproveWell is committed to the privacy of its staff, App users and its stakeholders. ImproveWell will undertake or commission annual assessments and audits of its compliance with privacy legislation and will adopt and maintain protocol for completion of Data Protection Impact Assessments.

ImproveWell regards all Personal Confidential Information relating to staff as confidential except where national policy on accountability and openness requires otherwise.

ImproveWell will adopt and maintain protocols to ensure compliance with the Data Protection Act, General Data Protection Regulations, Human Rights Act and the common-law confidentiality.

ImproveWell will establish and maintain protocols for the controlled and appropriate sharing of personal information with other agencies, taking account of relevant legislation (e.g. Data Protection Act, Human Rights Act).

ImproveWell will ensure that contractual or best practice documents are in place for routine sharing of information between sharing partners.

7. Information Security

ImproveWell will adopt and maintain protocols for the effective and secure management of its information assets and resources.

ImproveWell will undertake or commission annual assessments and audits of its information and IT security arrangements.

ImproveWell will promote effective information and cyber security practice to its staff through policies, procedures and training.

ImproveWell will establish and maintain incident reporting procedures and will monitor and investigate all reported instances of actual or potential breaches of information and cyber security.

8. Information Quality and Records Management

ImproveWell will establish and maintain protocols and procedures for information quality assurance and the effective management of records.

ImproveWell will undertake or commission annual assessments and audits of its information quality and records management arrangements.

Managers will be expected to take ownership of, and seek to improve, the quality of information within their services.

Wherever possible, information quality will be assured at the point of collection.

Data standards will be set through clear and consistent definition of data items, in accordance with national standards.

ImproveWell will promote information quality and effective records management through protocols, procedures/user manuals and training.

9. Associated Protocols

This policy should be read in conjunction with;

- Risk Management Policy
- Change Management Policy
- Information Rights and Access Protocol
- Information Sharing and Privacy Protocol
- Information Lifecycle and Data Quality Protocol
- Information / Cyber Security Protocol
- Information Incident Protocol
- Information Risk and Audit Protocol
- Data Protection Impact Assessment Protocol
- Freedom of Information Protocol

10. Audit Schedule

Compliance with this policy will be audited and the results fed into the Plan, Do, Check, Act Cycle described in the Information Risk and Audit Protocol.

Policy Section	Compliance Evidence	Monitoring Method	Frequency
4 Accountable Parties	The most senior members of the organisation are regularly appraised of internal and external governance status and requirements including resource requirements	IG Audit	Quarterly

4 Data Protection Officer	Changes within the organisation are subject to a Data Protection Impact Assessment	IG Audit	Quarterly
4 Data Protection Officer	The DPO is being made aware of all processing activities across the organisation	Processing Activities Log	Quarterly
6 Privacy and Information Rights	The organisation has an effective infrastructure in place to ensure privacy and to give effect to the information rights of individuals	IG Audit	Quarterly
7 Information Security	The organisation has an effective infrastructure in place to ensure information security	IG Audit	Quarterly
8 Information Quality and Records Management	The organisation has an effective infrastructure in place to ensure information security	IG Audit	

11. Review

This policy will be reviewed every two years or sooner where necessary.