

# INFORMATION GOVERNANCE COMPLIANCE IN WALES

## BACKGROUND TO REQUIREMENTS

It is an NHS requirement that all NHS providers must be able to provide information governance (IG) and information security (IS) assurances to their commissioners regarding the management of person identifiable information (PII) within the provider organisation.

ENGLAND - in January 2010, the Department of Health published an "NHS Information Governance Resource" for community pharmacy contractors in England. This was provided in the form of a Contractor Workbook, with the specific IG/IS requirements laid out in a Tier system of compliance (Levels 0,1,2,3).

WALES - however, the **decision was made to issue separate guidance to contractors in Wales**, as some of the DH requirements were not considered appropriate and the Tier system of compliance thought too complex.

Therefore, the Primary Care Informatics Programme, in conjunction with the Royal Pharmaceutical Society (Welsh Pharmacy Board) and in consultation with other key stakeholders, was delegated by the Welsh Assembly Government to take forward the Information Governance (IG) and Information Security (IS) requirements for contractors in Wales.

In May 2010, the Programme, through its Pan Profession Associate Information Group, conducted an initial Information Governance Workshop, involving all the major profession's representative bodies (RPS, CPW, NPA, the CCA and AIMP), NHS Wales Informatics Service (NWIS), Local Health Boards (LHBs), Welsh Assembly Government (WAG) and Public Health Wales (PHW) NHS Trust.

The IG Workshop Group agreed that an IG sub-group should be convened to work through the detailed requirements for Wales, which took place in June 2010. This information has now been collated and shared with the IG Workshop Group for comments and endorsement.

## APPROACH TO COMPLIANCE

The Information Governance requirements for Wales **will be delivered through an appropriate ISMS** which accommodates NHS Wales requirements, plus common areas across LHBs and the pharmacy profession's own regulatory bodies. This work will be based as far as possible on existing ISMS standards and requirements given to GP Practices in Wales, though tailored accordingly to the pharmacy profession, where the needs may be different.

## INFORMATION SECURITY MANAGEMENT SYSTEM (ISMS)

### WHAT IS ISMS?

An Information Security Management System is not just a system; rather it is also an ongoing process consisting of the following elements:

- PLANNING
- DOING
- CHECKING
- ACTING

It is important that there is a structure in place to support delivery of the ISMS requirements, as defined through the sub-group work and endorsed by the national IM&T programme board.

Policies and procedures do not constitute an ISMS on their own; their implementation must be assessed (via audit – formal or informal) and there must be a system in place to identify the need for and to undertake regular revision.

### PURPOSE OF ISMS FOR COMMUNITY PHARMACY

**The aim of an ISMS is to raise the awareness and standard of information security within CP Practices in Wales.**

This will ensure that CP Practices fulfil their obligations regarding the handling of person identifiable information as well as the security of their systems and processes. In addition, ISMS will allow CP Practices to safely contribute to future information systems and services implemented through the Programme on behalf of NHS Wales.

### ISMS REQUIREMENTS FOR COMMUNITY PHARMACY IN WALES

There are currently 708 CP Practices in Wales, including branches of independent contractors, independent multiples and large multiples and the ISMS requirements will need to be standardised across the different 'sectors' of pharmacy.

**Work on a definition of appropriate ISMS requirements for contractors in Wales is currently being defined by the stakeholder group.**

### ONLINE 'IT TOOLKIT' RESOURCE

NWIS has commissioned the development of an online 'IT Toolkit' resource for primary care contractors in Wales and this includes the specific IG/IS requirements for CP contractors to assist with their ISMS requirements.

## **OTHER SUPPORT**

To support completion of ISMS, it is also expected that a percentage of CP Practices may benefit from a support visit from NWIS Primary Care Support Staff - these details will form part of the implementation planning.

## ISMS REQUIREMENTS

Currently contractors and their constituent branches are required to report to a number of statutory bodies on a range of contractual, professional and clinical governance requirements, which includes a number of disparate, and often geographically inconsistent, information governance and I.T security requirements.

Some of the information governance and IT security requirements may be duplicated across different auditing organisations (e.g. LHBs, Royal Pharmaceutical Society Inspectorate visits) which is time consuming and results in duplication of effort for CPPs and the auditing bodies.

Work on defining the exact ISMS/Information Governance requirements for CP Practices / contractors in Wales are in its early stages; however, the following will be key objectives:

- A baseline assessment of existing policies and procedures already in place within individual CP Practices;
- A gap analysis of the baseline assessment against the ISMS requirements for the year 2010-11;
- A review of submissions made and identification of areas requiring further attention in the short to medium term.

**Following three stakeholder group meetings in May and June 2010, an initial set of ISMS requirements is now being considered by the representative bodies as appropriate for endorsed publication. The date for returned comments will be 16th July 2010.**

## ONLINE ISMS (IT SECURITY TOOLKIT)

### ONLINE RESOURCE

To support the ISMS requirements of community pharmacy contractors, a new, online IT Toolkit will be developed by NHS WALES Informatics Service:

- To provide a single and convenient location for contractors to access relevant IG and I.T. security information;
- To provide contractors with the means of completing their IG baseline assessment online;
- To provide NHS Wales and other approved bodies with a robust auditing system to avoid duplicated effort on common areas;
- To provide NHS Wales with reporting functionality:
  - to provide aggregated information about levels of compliance
  - to identify any areas of weakness for additional support to the contractor

## HOW WILL IT WORK?

Initially, the tool will provide a YES/NO and 'comments' box as a basic requirement for online returns and the number of questions are likely to be set to demonstrate high level IG compliance requirements.

In the next phase of development, it is envisaged that a new document management facility will be included so that contractors may upload evidence of their compliance, as appropriate. This would be optional but, when utilised, will reduce the requirement for longer assessment visits than when not used.

## WHEN WILL IT BECOME AVAILABLE?

The IT Toolkit will be rolled out to contractors/CP Practices in phases. **The exact implementation plans have yet to be finalised; however it is anticipated that this may commence from as early as Quarter 4, 2010.**