

Information Governance Policy

1. Introduction

- 1.1. Information Governance (IG) enables the Spring North ("Spring North") and individual members of staff to ensure that information, including personal & sensitive information, is handled legally, securely, efficiently & effectively, in order to deliver the best possible service.
- 1.2. Additionally, it enables Spring North to put in place procedures and processes for their corporate information that support the efficient location & retrieval of corporate records where and when needed, in particular to meet requests for information and assist compliance with corporate governance standards.
- 1.3. IG has the following fundamental aims: -
 - 1.3.1. To support the provision of high-quality service by promoting the effective & appropriate use of information;
 - 1.3.2. To encourage staff to work closely together, preventing duplication of effort & enabling more efficient use of resources;
 - 1.3.3. To develop support arrangements & provide staff with appropriate tools & support to enable them to discharge their responsibilities to consistently high standards;
 - 1.3.4. To enable organisations to understand their own performance & manage improvement in a systematic & effective way.
- 1.4. This Policy together with the following form Spring North's Information Governance Strategy: -
 - 1.4.1. Other Consortium Policies & Procedures when they have a relevance to IG-related matters (Confidentiality, Data Protection, Safeguarding, Social Media).

2. Policy Statement

- 2.1. This Policy sets out how Spring North provides a robust IG Management Framework to ensure the delivery of internal IG assurance in accordance with national operating frameworks, legislation & the IG Toolkit.

3. Responsibility for IG

- 3.1. The role of the **Board of Directors** is to define Spring North's policy in respect of IG, taking into account legal requirements. The Executive Committee is also responsible for ensuring that sufficient resources are provided to support the requirements of the Policy and to monitor IG within Spring North. Regular reporting to the Executive Committee will be via the Chief Executive.
- 3.2. The **Chief Executive** has overall control over Spring North's IG.

4. Principles of IG

- 4.1. Spring North believes that "the right information, right person, right time" is essential to deliver a high quality service. There are four key interlinked strands to this IG Policy: -
 - 4.1.1. Openness;
 - 4.1.2. Legal Compliance;
 - 4.1.3. Information Security;
 - 4.1.4. Quality Assurance.

4.2. Openness

- 4.2.1. Non-confidential information on Spring North & its services should be available to the public through a variety of media.

- 4.2.2. Spring North will establish & maintain policies to ensure compliance with the Freedom of Information Act.
- 4.2.3. Spring North will undertake annual assessments & audits of its policies & arrangements for openness.
- 4.2.4. Clients should have ready access to information relating to the services they receive from Spring North.
- 4.2.5. Spring North will have clear procedures & arrangements for liaison with the press, broadcasting media & for handling queries from clients and the public.

4.3. Legal Compliance

- 4.3.1. Spring North regards all identifiable personal information relating to individuals as confidential.
- 4.3.2. Spring North will undertake or commission annual assessments & audits of its compliance with legal requirements.
- 4.3.3. Spring North regards all identifiable personal information relating to staff as confidential except where national policy on accountability & openness requires otherwise.
- 4.3.4. Spring North will establish & maintain policies to ensure compliance with the Data Protection Act, Freedom of Information Act, Human Rights Act & the common law of confidentiality.

4.4. Information Security

- 4.4.1. Spring North will establish & maintain policies for the effective & secure management of its information assets & resources.
- 4.4.2. Spring North will undertake or commission annual assessments & audits of its information & IT security arrangements.
- 4.4.3. Spring North will promote effective confidentiality & security practice to its staff through policies, procedures & training.
- 4.4.4. Spring North will establish & maintain incident reporting procedures & will monitor & investigate all reported instances of actual or potential breaches of confidentiality & security.

4.5. Quality Assurance

- 4.5.1. Spring North will establish & maintain policies & procedures for information quality assurance & the effective management of records.
- 4.5.2. Spring North will undertake or commission annual assessments & audits of its information quality & records management arrangements.
- 4.5.3. Wherever possible, information quality should be assured at the point of collection.
- 4.5.4. Data standards will be set through clear & consistent definition of data items, in accordance with national standards.
- 4.5.5. Spring North will promote information quality & effective records management through policies, procedures, user manuals & training.

5. Incident Management

- 5.1. All IG incidents, including breaches of confidentiality & data loss, will be managed by the Chief Executive Officer.

6. IG Risk

- 6.1. Incomplete or inaccessible information is a risk to the quality of service. The IG risks should be monitored and reviewed by the Chief Executive & issues reported regularly to the Executive Committee.

7. Training/Awareness

- 7.1. All staff must attend: -

- 7.1.1. A training session on IG as part of their induction; and
- 7.1.2. Undertake refresher IG training either through a facilitated session or e-learning on an annual basis.

8. Monitoring & Auditing

- 8.1. The focus is on sustaining robust IG by: -
 - 8.1.1. Continuing to demonstrate compliance with the key IG standards through achievement of satisfactory performance in terms of the IG, and ensuring plans are in place to progress where it has not been achieved;
 - 8.1.2. Executive Committee to review risk register regularly for any potential concerns which would affect the commitment and confidence in respect of company information governance.

9. Review

- 9.1. This Policy will be reviewed annually each November or earlier if appropriate, to take into account any changes to legislation that may occur and/or guidance from the Department of Health and/or the Information Commissioner's Office.



Signature:

Date: 15.11.23

Review date: 14.11.24