

**NHS South Lincolnshire Clinical Commissioning Group  
(CCG)**

**INFORMATION ASSURANCE DOCUMENTED  
PLAN**

**Document History**

Document Reference:	IG20
Document Purpose:	To provide guidance to all CCG staff about the CCG's documented plan for Information Assurance which identifies the support necessary to ensure work related to information security management is appropriately carried out.
Date Approved:	22 <sup>nd</sup> January 2015
Approving Committee:	NHS South Lincolnshire Clinical Commissioning Group Risk and Governance Committee (delegated authority to approve)
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Status:	Final
Next Revision Due:	January 2017
Developed by:	Information Governance, Greater East Midlands Commissioning Support Unit (GEMCSU)
Policy Sponsor:	Lynne Moody, Executive Nurse and Quality Lead, South Lincolnshire CCG and Caldicott Guardian
Target Audience:	This Plan applies to all Staff within the CCG whether operating directly or providing services to other Clinical Commissioning Groups under a service level agreement or joint agreement, and to contracted third parties (including agency staff), locums, students, volunteers, trainees, visiting professionals or researchers, secondees and other staff on temporary placements within the Clinical Commissioning Group.
Associated Documents:	<ul style="list-style-type: none"> <li>• The Information Governance Management Framework Policy and all other Information Governance related policies</li> <li>• IG Staff Code of Conduct</li> <li>• IG Staff Handbook</li> <li>• IG Training Plan</li> </ul>
Distributed Via:	Internet and Intranet

**Revision History**

Version	Revision date	
1.0	November 2014	New Plan in line with NHS guidance, the Caldicott Review and version 12 of the IG Toolkit.

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### 1. Introduction and aims

The purpose of this document is to provide guidance to all NHS Lincolnshire East Clinical Commissioning Group's (CCG) staff on the CCG's Information Assurance

## Documented Plan

The aims of this document are to ensure that:

- Individuals are aware of the support necessary to ensure work related to information security management is appropriately carried out
- Individuals are aware of the CCG's mandatory responsibilities in relation to information security management issues and their own.

## **2. Scope**

This policy applies to those members of staff that are directly employed by the CCG and for whom the CCG has legal responsibility. This policy applies to all third parties and others authorised to undertake work on behalf of the CCG.

## **3. Information Assurance Documented Plan (IGT Requirement 12-340 1b)**

This documented plan for Information Assurance Documented Plan headed up by the Senior Information Risk Owner (SIRO), identifies the support necessary to ensure work related to information security management is appropriately carried out.

The information assurance documented plan details:

- The promotion of information security throughout the Clinical Commissioning Group.
- The review and recommendation for the approval of all information security related policies and procedures.
- The monitoring of progress in programmes to achieve compliance/certification with ISO27001.
- The review and monitoring of security incidents, their cause, resolution and future prevention.
- Reviewing information security risk assessments and improvement plans.
- Consideration of solutions to improve security.
- Monitoring and auditing compliance with standards and policies.
- Receiving and reviewing information security related reports (e.g. internal audit)
- Reviewing and commenting upon the security impact of information system development.
- Reviewing, and recommending for approval, the information security elements of the annual IG toolkit submission.

## **4. Accountability**

Overall responsibility for the Information Assurance Plan sits with the Accountable Officer who has delegated the responsibility for managing the Plan to the Senior Information Risk Owner in the CCG. Support is provided from the GEMCSU Information Governance Team under the terms of the Service Level Agreement.

The CCG may take disciplinary action against users found to have contravened this Plan.

## 5. Training

The following e-learning training modules are relevant for the Information Security Manager/Officer to undertake:

- Introduction to Information Governance (mandatory)
- NHS Information Risk Management - an introductory level module (mandatory)
- NHS Information Risk Management - a foundation level module (mandatory)
- NHS Information Risk Management for SIROs and IAOs - an introductory module (mandatory)
- Password Management - an introductory module (optional)
- Information Security Guidelines - an introductory module (mandatory)
- Secure Transfers of Personal Data - a foundation level module (optional)
- Information Security Management (mandatory)

Further specialised information governance training modules are listed within the IGT Version 12.

## 6. Equality and Diversity

The CCG aims to design and implement policy documents that meet the diverse needs of the services, population and workforce, ensuring that none are placed at a disadvantage over others. It takes into account current UK legislative requirements, including the Equality Act 2010 and the Human Rights Act 1998, and promotes equal opportunities for all.

This document has been designed to ensure that no-one receives less favourable treatment due to their personal circumstances, i.e. the protected characteristics of their age, disability, sex (gender), gender reassignment, sexual orientation, marriage and civil partnership, race, religion or belief, pregnancy and maternity. Appropriate consideration has also been given to gender identity, socio-economic status, immigration status and the principles of the Human Rights Act.

In carrying out its functions, the CCG must have due regard to the Public Sector Equality Duty (PSED). This applies to all the activities for which the Clinical Commissioning Group is responsible, including policy development, review and implementation.

## 7. Due Regard

This policy has been reviewed by GEMCSU's IG Product Group in relation to having due regard to the Public Sector Equality Duty (PSED) of the Equality Act 2010 to eliminate discrimination, harassment, victimisation; to advance equality of opportunity; and foster good relations

## 8. Review

This plan will be reviewed annually in line with Information Governance Toolkit requirements or where changes occur with legislation or national policy.