

## **Request for information under the Freedom of Information Act - 6797**

Thank you for your email dated 18 January 2017 requesting information regarding information governance service provision.

Please find detailed below your original request and our response.

### ***Original Request:***

***I am writing to you under the Freedom of Information Act 2000 to request the following information from your NHS Trust submitted in the attached form.***

Please find attach as appendix 1 our response. Within the response, we refer to not being able to provide the names and contact details of individual staff members as this constitutes the personal information of the individuals concerned. Staff under Director level would not expect their personal details to be released. This is therefore exempt information by virtue of Section 40(2) in conjunction with Section 40(3)(a)(i) of the Freedom of Information Act 2000 which relates to 'Personal Information'.

An excerpt of the relevant Freedom of Information legislation can be found below:

### ***Section 40 – Personal information***

*(2) Any information to which a request for information relates is exempt information if—*

- (a) it constitutes personal data which do not fall within subsection (1), and*
- (b) either the first or the second condition below is satisfied.*

*(3) The first condition is—*

*(a) in a case where the information falls within any of paragraphs (a) to (d) of the definition of “data” in section 1(1) of the Data Protection Act 1998, that the disclosure of the information to a member of the public otherwise than under this Act would contravene —*

- (i) any of the data protection principles*

## Appendix 1 - Information Governance Service Provision FOI Request

<b>Trust Name</b>	Kent Community Health NHS Foundation Trust (KCHFT)
<b>Organisation Code</b>	RYY

### TRUST SCALE (2015/16)

Annual Total Elective G&A Planned Daycase Admissions (FFCEs)	Annual Total (2015/16)	This activity is not strictly relevant for community hospitals. None of KCHFT's beds are consultant led. They are nurse led and therefore not reported on KH03.  In 2015/16 there were 2,854 admissions. In 2015/16 there were 89,042 available bed days. 79,070 bed days were occupied.
Annual Total Elective G&A Planned Admissions (FFCEs)	Annual Total (2015/16)	
Annual Total Non-elective G&A Admissions (FFCEs)	Annual Total (2015/16)	
Annual Total 1st Outpatient Attendances (G&A)	Annual Total (2015/16)	
Available Bed Days (2015/16)	Annual Total Available Bed Days as per KH03	

### TRUST SCALE (as of 18/01/2017)

Number of Salaried Staff (2015/16)	Whole Time Equivalents	4,067
Number of Clinical Specialties	Number	17

### CURRENT IG TEAM STRUCTURE (as of 18/01/2017)

At your Trust, is there an Information Governance team with Trust wide responsibilities?	Yes, KCHFT does have an Information Governance Team with Trust wide responsibilities.
Please attach your IG Team Organisational Structure if available	Structure chart attached as appendix 2.
Which Trust function does the IG team or function fall within?	The IG Team falls under the Trust's Corporate Governance function.

### IG TEAM STAFF (as of 18/01/2017)

Please state the profession of the Trust Caldicott Guardian	The Trust's Caldicott Guardian is a Consultant Doctor.
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**CURRENT IG TEAM STAFF (as of 18/01/2017)**  
**(please only report staff based in the IG Team)**

Role / Equivalent Role	Whole Time Equivalent	Band	Funding
Caldicott Guardian	Not in the team		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
Director of IG	Not in the team		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
IG Manager (Head of IG)	1 WTE		<input checked="" type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
RA Manager (if a separate role from IG Manager)	Not in the team		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
ICT Security Manager	Not in the team		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
RA Officer (if a separate role from IG Officer)	Not in the team		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
FOI Manager (if a separate role from IG Manager)	Not in the team		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
<b>Other IG Posts based in the IG Team* (Please list)</b>	None		
IG Compliance Manager	0.8 WTE		<input checked="" type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
IG Assurance Lead	1 WTE		<input checked="" type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
Compliance Officer (FOI Lead)	0.6 WTE		<input checked="" type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent

*\*Please add extra lines as appropriate.*

**Total number of substantive IG Staff = 3.4 WTE**

**VACANCIES (as of 18/01/2017)**

Are there any current vacancies within the IG team?	No, there are no current vacancies within the IG Team
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If yes, Please list any vacant roles in year

Role / Equivalent Role	Whole Time Equivalent	Band	Funding
Caldicott Guardian	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
Director of IG	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
IG Manager	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
ICT Security Manager	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
RA Manager (if a separate role from IG Manager)	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
IG Officer	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
RA Officer (if a separate role from IG Officer)	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
FOI Manager (if a separate role from IG Manager)	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
<b>Other Vacancies in the IG Team* – (Please list)</b>			
			<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
			<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent

*\*Please add extra lines as appropriate.*

**Total number of substantive IG Staff Vacancies = None**

**CONTRACTORS (as of 18/01/2017)**

Are there any Contractors providing services to the IG team?	No, KCHFT does not have any contractors providing services to the IG team.
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If yes, Please list any contract roles in year

Role / Equivalent Role	Whole Time Equivalent	Band	Funding
Caldicott Guardian	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
Director of IG	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
IG Manager	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
ICT Security Manager	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
RA Manager (if a separate role from IG Manager)	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
IG Officer	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
RA Officer (if a separate role from IG Officer)	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
FOI Manager	n/a		<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
Other IG Contractors based in the IG Team (Please list)			
			<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent
			<input type="checkbox"/> Recurrent <input type="checkbox"/> Non Recurrent

*\*Please add extra lines as appropriate.*

**Total number of IG Contractor Staff = None**

**Information Governance Management Services Provided (as of 18/01/2017)**

IG Service Management	Provided by		
IG Toolkit	<input checked="" type="checkbox"/> IG Team	<input type="checkbox"/> Other staff outside IG Team	<input type="checkbox"/> Not Provided
Registration Authority	<input type="checkbox"/> IG Team	<input checked="" type="checkbox"/> Other staff outside IG Team	<input type="checkbox"/> Not Provided
FOI Requests	<input checked="" type="checkbox"/> IG Team	<input type="checkbox"/> Other staff outside IG Team	<input type="checkbox"/> Not Provided
Data Quality Services	<input type="checkbox"/> IG Team	<input checked="" type="checkbox"/> Other staff outside IG Team	<input type="checkbox"/> Not Provided
Data Leakage Prevention	<input checked="" type="checkbox"/> IG Team	<input checked="" type="checkbox"/> Other staff outside IG Team	<input type="checkbox"/> Not Provided
Subject Access Request	<input type="checkbox"/> IG Team	<input checked="" type="checkbox"/> Other staff outside IG Team	<input type="checkbox"/> Not Provided
IG Incidents / IG SIRIs	<input checked="" type="checkbox"/> IG Team	<input type="checkbox"/> Other staff outside IG Team	<input type="checkbox"/> Not Provided
IG Complaints	<input checked="" type="checkbox"/> IG Team	<input type="checkbox"/> Other staff outside IG Team	<input type="checkbox"/> Not Provided
IG Risk Register / Issues Log	<input checked="" type="checkbox"/> IG Team	<input type="checkbox"/> Other staff outside IG Team	<input type="checkbox"/> Not Provided
IG Advice Services	<input checked="" type="checkbox"/> IG Team	<input type="checkbox"/> Other staff outside IG Team	<input type="checkbox"/> Not Provided
Computer Audit Services	<input type="checkbox"/> IG Team	<input checked="" type="checkbox"/> Other staff outside IG Team	<input type="checkbox"/> Not Provided
Data Flow Mapping	<input checked="" type="checkbox"/> IG Team	<input type="checkbox"/> Other staff outside IG Team	<input type="checkbox"/> Not Provided
<b>Other Management Services Provided by IG Team*</b> <i>(Please complete as appropriate)</i>			
Information Sharing Agreements	<input checked="" type="checkbox"/> - Provided by IG Team		
Privacy Impact Assessments	<input checked="" type="checkbox"/> - Provided by IG Team		
Archiving services	<input checked="" type="checkbox"/> - Provided by IG Team		
Records management support (clinical and non-clinical)	<input checked="" type="checkbox"/> - Provided by IG Team		
Training	<input checked="" type="checkbox"/> - Provided by IG Team		

Communication (Newsletter, IG Workspace, Internet, Intranet, patient and staff literature)	<input checked="" type="checkbox"/> - Provided by IG Team
Information Governance Assurance Group / Assurance reporting	<input checked="" type="checkbox"/> - Provided by IG Team
Internal IG Audits / Support external IG Audits	<input checked="" type="checkbox"/> - Provided by IG Team
Support and guidance for all staff	<input checked="" type="checkbox"/> - Provided by IG Team
Policy and process management	<input checked="" type="checkbox"/> - Provided by IG Team

*\*Please add extra lines as appropriate*

### Information Governance Advice Services Provided (as of 18/01/2017)

Service	Provided by
New Systems	<input type="checkbox"/> IG Team <input checked="" type="checkbox"/> Other staff outside IG Team <input type="checkbox"/> Not Provided
Information Asset Management	<input type="checkbox"/> IG Team <input checked="" type="checkbox"/> Other staff outside IG Team <input type="checkbox"/> Not Provided
Clinical Research	<input type="checkbox"/> IG Team <input checked="" type="checkbox"/> Other staff outside IG Team <input type="checkbox"/> Not Provided
Clinical Audit	<input type="checkbox"/> IG Team <input checked="" type="checkbox"/> Other staff outside IG Team <input type="checkbox"/> Not Provided
Service Evaluation	<input type="checkbox"/> IG Team <input checked="" type="checkbox"/> Other staff outside IG Team <input type="checkbox"/> Not Provided
Interoperability Projects	<input type="checkbox"/> IG Team <input checked="" type="checkbox"/> Other staff outside IG Team <input type="checkbox"/> Not Provided
IG Advice based upon interpretation of law and national guidelines	<input checked="" type="checkbox"/> IG Team <input checked="" type="checkbox"/> Other staff outside IG Team <input type="checkbox"/> Not Provided

IG Advice Services Provided by IG Team	
Compliance with the Data Protection Act 1998 / GDPR 2016-18	<input checked="" type="checkbox"/> Provided by IG Team
Compliance with the Freedom of Information Act 2000	<input checked="" type="checkbox"/> Provided by IG Team
Codes of Practice / Best practice / National guidance	<input checked="" type="checkbox"/> Provided by IG Team
Generic IG advice / support	<input checked="" type="checkbox"/> Provided by IG Team
Project implementation / privacy by design	<input checked="" type="checkbox"/> Provided by IG Team
Incident management / investigation	<input checked="" type="checkbox"/> Provided by IG Team
Move management (office or building vacation)	<input checked="" type="checkbox"/> Provided by IG Team

*\*Please add extra lines as appropriate.*

### INFORMATION GOVERNANCE TEAM CONTACT DETAILS

Role	Name	Email Address
Director of Information Governance	KCHFT is not able to provide the names and contact details of individual staff members as this constitutes the personal information of the individuals concerned. Staff under Director level would not expect their personal details to be released. This is therefore exempt information by virtue of Section 40(2) in conjunction with Section 40(3)(a)(i) of the Freedom of Information Act 2000 which relates to 'Personal Information'. The Corporate Services Director has overall responsibility for Information Governance, see below for contact details.	
IG Manager		
Caldicott Guardian		
Corporate Services Director	Natalie Davies	<a href="mailto:Natalie.davies1@nhs.net">Natalie.davies1@nhs.net</a>

## Information Governance Incidents / IG SIRIs

### Exemplar Table

<i>Case Number</i>	<i>Date</i>	<i>Cyber Security SIRI</i>	<i>IG SIRI</i>	<i>Breach Type</i>	<i>IG SIRI Level</i>	<i>Cyber SIRI Level</i>
C18	15/11/2015	Yes	No	Hacking	n/a	1
S2	28/02/2016	No	Yes	Disclosed in Error	1	n/a

*Using the exemplar table please append the following information*

### IG SIRIs and CYBER SIRIS 2015/16 – (01/04/2015 – 31/03/2016)

<b>Case Number</b>	<b>Date</b>	<b>Cyber Security SIRI</b>	<b>IG SIRI</b>	<b>Breach Type</b>	<b>IG SIRI Level</b>	<b>Cyber SIRI Level</b>
IGI/3665	15 May 15	No	Yes	Disclosed in error	2	n/a

*\*Please add extra lines as appropriate.*

## Appendix 2 - Information Governance Team Structure Chart

