

## **Information Governance Accreditation Process for New or Amended Information Assets and Systems**

### **Introduction**

NHS Barnsley CCG requires that prior to introducing any new process, service, system or asset, the person responsible must, in association with a member of the IG Team, undertake an information governance (IG) review. This applies to all information assets regardless of whether they contain personal confidential data (PCD).

An IG review should also be undertaken when existing processes are significantly amended.

This will enable any IG issues to be identified before implementation and ensure the organisation meets information security, confidentiality, data protection, information quality and records management requirements.

### **Key Aspects**

- The IG Lead should be contacted at the design phase / outset of projects.
- IG Accreditation is mandatory and is achieved by obtaining SIRO sign off prior to implementation.
- For information assets holding PCD, prior approval from the Caldicott Guardian is also required.

## Procedure

For each request for a new or amended process, service, system and information asset the procedure below should be followed:

- The IG Lead will support the requestor in producing an IG Accreditation document for the information asset, which will detail as appropriate:
  - What sort of information will be held
  - What it will be used for
  - Who will access it
  - How people will access it
  - If a privacy impact assessment (PIA) is required for it
  - What the potential risks associated with its introduction are
  - How it will be backed up
  - What protection from malicious software and unauthorised access will be required
  - How will third party support access be provided
  - What will be put in place for business continuity and disaster recovery
  - Plans for each stage of the information management lifecycle
  - Will NHS Barnsley CCG's Data Protection notification require amending
- On completion of the IG Accreditation documentation the IG Lead will send it to the IT Manager (and also to the Caldicott Guardian if PCD is involved), for their consideration and comments. Additional information may also be sought from the Customer Intelligence Manager as required.
- Based on the views of the IG Lead, the IT Manager and the Caldicott Guardian, a recommendation will be made to approve or decline the request.
- If recommended for approval, the IG Lead will send the request to the SIRO with a summary of the rationale and a request for them to give their final approval.
  - If approved by the SIRO, the requestor will be advised and the changes will commence implementation.
- If recommended to be declined, the IG Lead will send the request to the SIRO with a summary of the rationale and a recommendation that the request is declined.
  - If the SIRO is in agreement with the decision to decline the IG Lead will advise the requestor and alternatives solutions will be considered.

## Monitoring

- A list of the requests for new and amended information assets which have been reviewed between IG Group meetings will be presented to each meeting of the IG Group for recording in the minutes.