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Bwrdd Iechyd Prifysgol
Bae Abertawe
Swansea Bay University
Health Board



Meeting Date	04 November 2019	Agenda Item	6.1
Report Title	Presenting the SIRO Report 2019-2020		
Report Author	Becs Wadley, Head of Information Governance		
Report Sponsor	Pam Wenger, SIRO, Director of Corporate Governance		
Presented by	Pam Wenger, SIRO, Director of Corporate Governance		
Freedom of Information	Open		
Purpose of the Report	The purpose of this report is to request approval for the SIRO Report 2019-2020 before its external publication. This type of report is seen nationally as good practice to inform Board members and the public of the information governance challenges and to satisfy regulatory requirements.		
Key Issues	The SIRO Report 2019-20 requires approval from Audit Committee prior to external publication to provide the public with adequate assurances around the Health Board's commitment and work completed to become and remain compliant with the new data protection legislation.		
Specific Action Required <i>(please choose one only)</i>	Information	Discussion	Assurance
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input checked="" type="checkbox"/>
Recommendations	Members are asked to: <ul style="list-style-type: none"> • Agree the report for submission to Audit Committee • Note the assurances and progress provided across all areas of the report • Note the objectives and priorities across the five sections of the report for 2020-2021. 		

SIRO Annual Report

1. INTRODUCTION

The SIRO Report 2019-20 requires approval from Audit Committee prior to external publication to provide the public with adequate assurances around the Health Board's commitment and work completed to become and remain compliant with the new data protection legislation.

2. BACKGROUND

This is the 4th year that the report has been produced and demonstrates legislative and regulatory requirements relating to the handling, quality, availability and management of information, including compliance with the Data Protection Act (1998) (2018), General Data Protection Regulations (GDPR) and the Freedom of Information Act (2000).

The previous three SIRO Reports have been well received, and this updated 2019-20 report builds on previous versions with the ongoing achievements the Health Board has made with its IT, information and personal data management.

Relevant amendments and additions to last year's report have been made. This report provides robust assurances to staff, the public and the Information Commissioner's Office that the Health Board is committed to good information governance, data quality, records management, digital inclusion and cybersecurity in all its practices, and respects the rights and freedoms of all those whose personal data the organisation processes. Details include:

2.1 Information Governance Section demonstrates comprehensive evidence of the work programme undertaken to ensure the organisation is compliant and demonstrating ongoing improvement and achievement against the requirements of data protection legislation, Information Commissioner's Office (ICO) guidance, national direction and local requirement. This section demonstrates action and improved assurance and compliance across all areas. Examples of IG achievements include:

- A very good Caldicott Principles into Practice (C-PiP) self-assessment score of 94.3%;
- Improved training compliance, at the end of 2019-2020 the Health Board stood at 87% overall compliance, a 2% increase from 12 months previously;
- Production of a new IG mandatory training video enabling staff, students, volunteers and temporary staff to access training in an accessible format at a time of their choosing;
- Implementation of the Information Asset Register (IAR). As of 31st March 2020 the IAR held details of 1816 assets, all quality assured;
- Achievement of 99.91% compliance with Subject Access Requests;
- 28 IG audits were conducted and a full analysis is available in the report demonstrating action plans and improvements;
- 37 Data sharing agreements supported and approved;

- A new process and template devised for Data Protection Impact Assessments, with 161 being supported and 30 approved;
- Robust IG support for new ways of working in response to the Covid-19 situation; and
- 501 Freedom of Information Act requests processed.

2.2 Clinical Coding and Health Records Section provides evidence of the sustained transformation of the Clinical Coding Service following investment in 2016 and the ongoing work to continuously improve the Service and coding more activity electronically. The Health Board has achieved the Year End Coding Completeness Target for 2019-2020, attaining 99% coding completeness for the year end. Quality has also remained high during the period externally validated from the CHKS Benchmarking System. Depth of coding was on average 4.7 during 2019-2020, which was consistent with the previous year.

The Health Records section describes the significant investment in the Health Records Service, to modernise the management of the library services with the introduction of Radio Frequency Identification (RFID) technology to track records and change the way the service is delivered and deliver operational and organisational benefits. The section also demonstrates the ongoing challenges that the Service continues to face with retaining thousands of additional records that would have previously been destroyed in line with the embargo that is now in place across all Health Boards in Wales as a result of the Infected Blood Inquiry.

2.3 Data Quality Section presents the SBU performance against the Data Quality standards for data submitted within the 2019-2020 financial year. SBU achieved 97.4%, and achieved 270 of the 277 checks in place; the Health Board are comparing extremely well alongside other Health Boards in Wales, as shown in the annual performance reports published by NWIS. Full details are detailed in the report along with other Data Quality and improvement initiatives.

2.4 Cyber Security Section describes the increased attention and focus following the “Wannacry” Cyber Attack in May 2017, and the subsequent assessments and actions the Health Board has taken to improve security and reduce vulnerabilities. 2019-2020 has seen real progression with the resources given to tackle this serious threat including the establishment of a Cyber Security Team in Digital Services. Areas of improvement and change include:

- Establishing a Cyber Security Team, including appointment of a Cyber Security Manager and two Senior Cyber Security Specialists;
- The development of a new Cyber Security Policy to compliment the national and local policies;
- The development of a Cyber Security Impact Assessment document to compliment the Data Protection Impact Assessment and capture Cyber Security assessment of new procurements;
- Significant progress in identifying and replacing obsolete operating systems on desktop PCs and laptops;

- A full patching regime was implemented across all PCs, laptops and servers within the Health Board for all Microsoft software to reduce risk;
- Identification and removal of old, unnecessary, unsupported software installed across the estate;
- Adoption of a number of new Cyber tools from Welsh Government money, including Phishing simulation and training, Cisco Stealthwatch for network monitoring and new Cisco Firewalls;
- Adoption of National Cyber Security tools provided through NWIS, including a Security Incident and Event Monitoring solution and a Vulnerability Assessment Service; and
- Preparation and assessment for the implementation of the Network and Information Systems Directive (NIS-D).

3. GOVERNANCE AND RISK ISSUES

There are no identified significant risks or governance issues associated with approval of the SIRO Report 2019-20.

4. FINANCIAL IMPLICATIONS

There are no significant financial implications associated with approval of the SIRO Report 2019-20.

5. RECOMMENDATION

Members are asked to:

- Agree the report for submission to Audit Committee
- Note the assurances and progress provided across all areas of the report
- Note the objectives and priorities across the five sections of the report for 2020-2021.

Governance and Assurance		
Link to Enabling Objectives <i>(please choose)</i>	Supporting better health and wellbeing by actively promoting and empowering people to live well in resilient communities	
	Partnerships for Improving Health and Wellbeing	<input checked="" type="checkbox"/>
	Co-Production and Health Literacy	<input type="checkbox"/>
	Digitally Enabled Health and Wellbeing	<input checked="" type="checkbox"/>
	Deliver better care through excellent health and care services achieving the outcomes that matter most to people	
	Best Value Outcomes and High Quality Care	<input type="checkbox"/>
	Partnerships for Care	<input checked="" type="checkbox"/>
	Excellent Staff	<input checked="" type="checkbox"/>
	Digitally Enabled Care	<input checked="" type="checkbox"/>
	Outstanding Research, Innovation, Education and Learning	<input checked="" type="checkbox"/>
Health and Care Standards		
<i>(please choose)</i>	Staying Healthy	<input type="checkbox"/>
	Safe Care	<input type="checkbox"/>
	Effective Care	<input type="checkbox"/>
	Dignified Care	<input type="checkbox"/>
	Timely Care	<input type="checkbox"/>
	Individual Care	<input type="checkbox"/>
	Staff and Resources	<input type="checkbox"/>
Quality, Safety and Patient Experience		
The SIRO must advocate at the Board the reduction of information risk by ensuring effective use of resource, commitment and execution and appropriate communication to all staff. The aim is to create a culture in which information is valued as an asset and information risk is managed in a realistic and effective manner within the legislative frameworks that pertain to the Health Board.		
Financial Implications		
None		
Legal Implications (including equality and diversity assessment)		
Compliance with the General Data Protection Regulation (GDPR), the Data Protection Act (1998) and other relevant legislation.		
Staffing Implications		
None		
Long Term Implications (including the impact of the Well-being of Future Generations (Wales) Act 2015)		
Robust IG, data quality, records management and cybersecurity arrangements will ensure the best decisions are made regarding the management of data		
Report History	First report to the Senior Leadership Team.	
Appendices	Appendix 1 - SIRO Report 2019-20	