

INFORMATION GOVERNANCE POLICY

1. Introduction

Information is a vital asset, both in terms of providing information on staff, volunteers, trustees, placements, trainees, service users, customers, donors and contractors and by providing information to ensure the efficient management of services and resources. It plays a key part in the management of the organisation and is used in the planning and development of services and activities and resources, as well as performance management. It is therefore of paramount importance that information is efficiently managed and that appropriate policies, procedures, management accountability and structures provide a robust governance framework for information management.

Age UK Blackburn with Darwen recognises the rights of individuals in relation to their data; and the need to respect confidentiality in the management and use of information of its service users, customers, donors and personnel. Age UK Blackburn with Darwen fully supports the principles of information governance and recognises the role it plays in the security arrangements to safeguard personal and sensitive information.

Age UK Blackburn with Darwen provides services for vulnerable older people and as such recognises the importance of respecting confidentiality in order to protect individuals, whilst also recognising the need to share sensitive information with other partner organisations/agencies, if it meets the needs or is in the best interest of the customer.

1.1 Scope

This policy applies to Age UK Blackburn with Darwen, the registered charity and any subsidiary company.

2. Purpose of the policy

This Information Governance (IG) policy provides an overview of Age UK Blackburn with Darwen's approach to information governance; a guide to the procedures in use and details about the IG management structures within the organisation. This policy should be read in conjunction with our Confidentiality Policy, Data and Record Management Policy including the records retention matrix; the Data Protection impact assessment guidance and the Information Governance and GDPR handbook for personnel, and the data mapping document.

3. Age UK Blackburn with Darwen's approach to Information Governance

Age UK Blackburn with Darwen undertakes to implement information governance effectively and will ensure the following:

- Information will be protected against unauthorised access
- Confidentiality of information will be assured
- Integrity of information will be maintained
- Information will be supported by the highest quality data
- Regulatory and legislative requirements will be met
- Business continuity plans are produced, maintained, reviewed and tested

- Information governance training guidance will be given to all personnel¹, as appropriate to their role
- All breaches of confidentiality and information security, actual or suspected, will be reported and investigated
- We will meet our obligations for reporting to the Information Commissioners Office when required and within the 72 hour deadline

4. Themes underpinning this IG policy

There are four key themes underpinning this IG policy:

- Openness
- Legal compliance
- Information security
- Quality assurance

Openness

- Age UK Blackburn with Darwen will seek individuals' permission before using any images or personal information in any marketing and publicity materials
- Individuals will be provided with information on what data is held on them and how it will be used, stored and disposed of
- We will have clear procedures and arrangements for dealing with complaints
- There will be documented procedures for personnel on disciplinary action, making reference to non-compliance against information governance procedures and a documented grievance procedure
- Individuals will be made aware that they have a right to make a Subject Access Request, how to do this and the 30 day response time limit.

Legal compliance

- Age UK Blackburn with Darwen regards all identifiable personal information relating to individuals as confidential
- Age UK Blackburn with Darwen will implement and maintain policies to ensure compliance with all current Data Protection regulations, Human Rights Act and confidentiality
- Age UK Blackburn with Darwen will implement and maintain policies and procedures for the controlled and appropriate sharing of information with other agencies, in particular in relation to the safeguarding of vulnerable adults and children. The legal basis for sharing information will be made clear to the data subject at the time the information is collected.

Information security

- Age UK Blackburn with Darwen will implement and maintain policies and procedures for the effective and secure management of its information assets and resources. The agreement with the confidential waste contractor form part of this implementation
- Age UK Blackburn with Darwen has additional measures in place to protect the organisation and its data and information from cyber attacks and these include additional technical protection systems via our IT support contract, regular training and guidance for staff and cyber insurance
- Age UK Blackburn with Darwen will undertake regular assessments and audits of its information and IT security arrangements
- Age UK Blackburn with Darwen will promote effective confidentiality, data and record management and security practice to its personnel, through policies, procedures and training

¹ Personnel applies to staff, volunteers, trustees, placements, trainees, secondees, consultants and relevant contractors

- Age UK Blackburn with Darwen will implement and maintain incident reporting procedures and will monitor and investigate all reported instances of actual or potential breaches of confidentiality and information security and take corrective action as required

Information quality assurance

- Age UK Blackburn with Darwen will establish and maintain policies and procedures for information quality assurance and the effective management of records and data
- Age UK Blackburn with Darwen will undertake regular assessments and audits of its information quality and records management arrangements
- Management will take ownership of, and seek to improve, the quality of information within their services. New issues of data management will be added to procedures before personal data is collected
- Wherever possible, information quality and integrity will be assured at the point of collection
- Data standards will be set through clear and consistent definition of data items, in accordance with national standards
- Age UK Blackburn with Darwen will promote and maintain information quality and effective records management through policies, procedures and training

5. Data Protection Impact Assessments

The organisation recognises its responsibilities in relation to carrying out Data Protection Impact assessments (DPIA) and has a guidance document in place to support the consistent application of these responsibilities.

Our current processes, procedures and protocols relating to data protection have all been reviewed and it is considered that in relation to current processing the controls in place are adequate and there is no requirement for a DPIA.

However we recognise that our processing may change and will implement the documented process for carrying out a DPIA whenever we either start a new activity/service or make a significant change to the way we collect and process data within existing operations. The requirement to do this is incorporated within the organisational 'New Service Checklist' which is utilised for any new service provision.

A DPIA must be signed off by a member of the senior management team, involving personnel from the relevant service/activity area.

6. Responsibilities and accountabilities

This policy has been approved by the Charity Board of Trustees and will be reviewed on an annual basis.

The designated responsible officer for Information Governance is Sharon Lucas, Head of Prevention and Wellbeing.

The senior managers are responsible for ensuring appropriate systems and processes are in place within their areas of responsibility.

All personnel are responsible for ensuring that they are aware of and comply with, the requirements of this policy and the procedures and guidelines produced to support it.

