

**Agenda Item 14**

**Enclosure 12**

**Health and Care Professions Council  
22 September 2016**

**Six monthly review of Information  
Governance**

**For discussion**

**From Claire Amor, Information Governance  
Manager**

Council, 22 September 2016

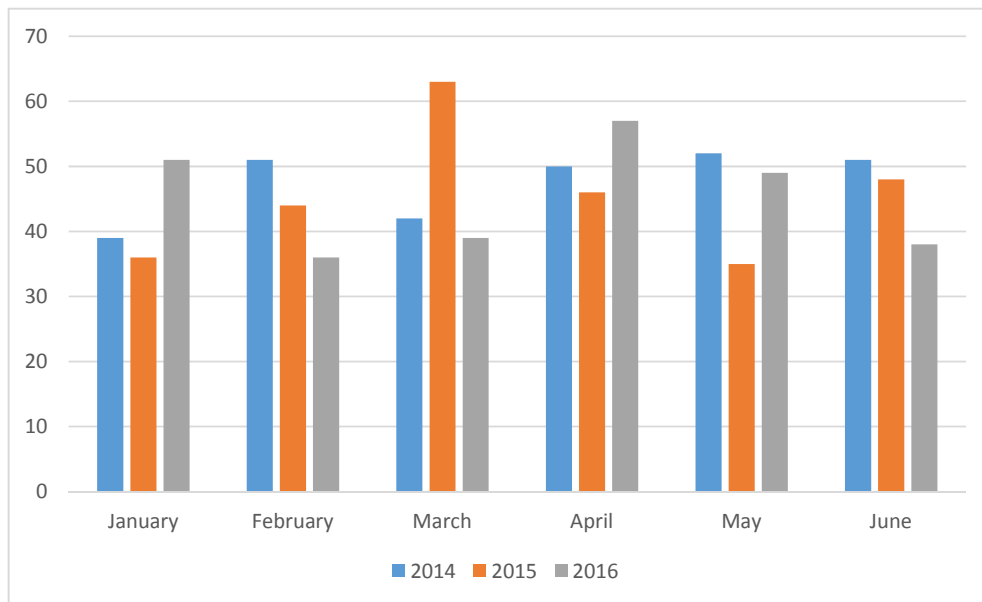
## Information Governance Report

### Introduction

- 1.1 The Information Governance (IG) function within the Secretariat Department is responsible for the HCPC's ongoing compliance with the Freedom of Information Act 2000 (FOIA), the Environmental Information Regulations 2004 (EIR) and the Data Protection Act 1998 (DPA). The Department also manages the HCPC's relationship with the Information Commissioner's Office (ICO), the information rights body.
- 1.2 More information on the context of this function is available in the Information Governance Report paper discussed by Council on 14 May 2015. The Information Governance Manager (IGM) ran a session on IG for Council on 23 September and the Council agreed that it would receive six monthly reports on the HCPC's IG work. The first such report was received by Council at its meeting of 3 December 2015.
- 1.3 This report provides an update on IG activity.

### Information requests

- 2.1 As previously reported, the number of information requests received by the HCPC grew considerably following the on boarding of social workers to the HCPC Register in 2012. In 2011, the HCPC received 170 requests and in 2014, 579 requests were received. The number of requests received in 2015 and so far in 2016 is steady with no further increases seen.
- 2.2 Requests are roughly split between registration statistics or specific FTP case information, with occasional requests for HR or financial information.
- 2.3 In the reporting period we have seen an increase in the number of registration data requests, with many citing a dissertation or research project when requesting data.
- 2.4 In April 2016, an Information Governance Officer post was added to the Secretariat department to assist in the cover arrangements for the Director. This addition has helped the management of the volume of requests received, with the dedicated resource being better able to respond to increases or complex requests that take more time
- 2.5 The table below shows the monthly totals for requests over the past 3 years.



- 2.6 The government set up the Independent Commission on Freedom of Information (the Commission) on 17 July 2015 to review the Freedom of Information Act 2000. The Commission published its report on 1 March 2016 concluding that overall, the Act is working well, and that it has been one of a number of measures that have helped to change the culture of the public sector by enhancing openness and transparency.

### Information Incident Management

- 3.1 The HCPC encourages an open reporting culture, with an emphasis on analysis and learning in order to engineer-out any weaknesses in our processes, much like the feedback and complaints function.
- 3.2 Since February 2015, all incidents, regardless of how minor they may initially appear, are reported centrally and risk scored. The EMT have receive a monthly report of all incidents and their scorings.
- 3.3 So far in 2016, the HCPC has recorded 68 incidents. The year total in 2015 was 113 incidents.
- 3.4 No incidents have been reported to the ICO in 2016 to date, no incidents were reported in 2015. Two were reported in 2014 but these did not meet the ICO's threshold for enforcement and were closed with no further action.

### Information Governance

- 4.1 In June the HCPC attended a Health Regulators Information Security Special Interest Group, the focus of which was Safe Harbour, FTP redaction and the issue of register disclosure. In December the Group received a presentation

from the ICO on the General Data Protection Regulation (GDPR). The Q&A session following was very useful, however following the referendum result in June 2016, there is uncertainty about the future applicability of the GDPR.

- 4.2 Also in June, IG organised the first quarterly HCPC Quality Assurance (QA) Group meeting. This brings together all HCPC QA teams to discuss best practise. IG has an interest in this area as information incidents are reported through internal audits. In October, Grant Thornton will present to the Group on their approach to audit and experiences of working with the HCPC.

**Decision**

The Council is requested to discuss the report.

**Appendices**

None.

**Date of paper**

12 September 2015.