

<b>Title of paper:</b>	Policies for approval
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<b>Meeting:</b>	Governing Body
<b>Agenda item:</b>	16
<b>For:</b>	Agreement

**Executive Summary**

Surrey Downs CCG has been using policies approved by the former Surrey PCT during the transition year. CCG specific policies are now being developed. At the July meeting the Governing Body approved policies relating to Assisted Conception and Individual Funding Requests.

The policies being presented for agreement today relate to Human Resources (HR) and Information Governance (IG).

*Information Governance Policies*

The policies are:

- IG Framework
- IG Policy
- Information Security Policy
- Remote Working and Portable Devices Policy
- Safe Haven Policy
- Subject Access Policy
- Confidentiality Policy
- Records Management Policy

The basis for compliance is the IG Toolkit. There is no definitive statement on what the penalties are for non-compliance but discussions with the IG team suggest that it could impact on:

- Authorisation, as the Area Team will raise this during quarterly and annual reviews

- Levels of fines should we breach our legal duties
- Reputation, if we are seen to be below benchmark levels
- Delivery, particularly as we host functions such as CHC and IFR where record keeping and confidentiality are key issues

The suite of policies produced by the CSU provides a framework of guidance for staff. The CSU IG team are also supporting us practically in a number of areas, such as developing the action plan, training for staff, and providing standard wording for things we need to put on our website.

As an organisation we need to:

- Approve the policies
- Agree and implement the action plan
- Put infrastructure in place in terms of lead and subsidiary roles
- Provide assurance that we are working towards IG compliance

The action plan will require an organisation wide approach that appoints data controllers and information asset owners in each service area, to ultimately support the Senior Information Risk Owner (SIRO – Miles Freeman) and Caldicott Guardian (Dr Andrew Sharpe) at Governing Body level. This will consume organisational resource initially, reducing as good IG practice becomes a matter of habit.

The critical path for IG policies is:

- Development of policies by CSU (done)
- Low level internal consultation (done)
- Review by Executive Committee (Completed on 10<sup>th</sup> Sept)
- Governing Body approval (27<sup>th</sup> Sept)
- Equality Impact Analysis (EIA) – normally done earlier but timescales are against us so it is proposed that the EIA is done subsequently and any compliance issues are taken back to the Governing Body with a revised policy to be completed by end of November 2013. Cliff Bush, Lay Member, has agreed to do the EIAs with staff who have completed EIA training, which is being commissioned for October.
- Disseminate and make staff aware as part of the IG Action Plan. This will include the use of policy “quick start” guides that cover the essential bullet points of each policy on a single sheet of paper.

### *Freedom of Information Policy*

One policy that has only just been completed is the Freedom of Information (Fol) policy. The Governing Body is asked to approve this along with those already approved by REMCOM as this policy is urgently required to meet statutory compliance.

## *HR Policies*

The CSU has produced a suite of policies that provides a framework of guidance for staff and which will be used in practice. These are:

- Sickness/Absence Management Policy
- Alcohol and Substance Misuse at Work Policy
- Disciplinary Policy
- Grievance, Bullying and Harassment Policy
- Leave Policy and Flexible Working Guide
- Health & Safety Policy
- Performance Management Policy
- Recruitment Policy and Procedure
- Whistleblowing Policy

The CCG will Disseminate and make staff aware of HR policies through weekly staff meetings and newsletters. This will include the use of policy “quick start” guides that cover the essential bullet points of each policy on a single sheet of paper.

## *Policy dates*

All policies will be reviewed in line with their expiry date and amended, or amended earlier if there is any change in the law or best practice.

## **Committees and other groups**

- HR Policies have been discussed and agreed by the Remuneration and Nominations Committee
- Information Governance Policies have been reviewed and agreed by the Executive Committee

## **Recommendation(s):**

The Governing Body is asked to AGREE that the policies listed above are now approved for use, subject to consideration of the issues below, particularly those relating to Equality Analysis.

## **Implications for wider governance**

**Quality and patient safety:** All policies ultimately support better quality and patient safety. However the Whistleblowing Policy is of particular relevance to quality.

**Patient and Public Engagement:** Most of the policies are internal to the CCG but will be subject to equality impact analysis.

**Equality analysis:** To be carried out as set out above. Any policies that are deemed unsatisfactory from an EA perspective will be revised and re-submitted to the Governing Body

**Finance and resources:** All policies guide start in effective use of resources and are consistent with the Scheme of Delegation.

**Workforce:** Training of staff will be undertaken as set out above. Allocation of Information Asset Owner and Data Custodian may require amendments to individual job descriptions.

**Statutory compliance:** All these policies are relevant to overall good governance and statutory compliance in many cases. This is particularly relevant to health and safety and information security policies.

**Conflicts of interest:** There are no known conflicts relating to this item.

**Risk and assurance:** There are currently no directly applicable risks relating to these policies. However SD0013 (Recruitment and Talent Management) is relevant to HR policies.

**Communications Plan:** Communications plans for staff are set out as above. These policies will also be available on the CCG web site.

**Attachments:**

- Freedom of Information Policy