



## CCC Information Governance policy May 2018

### 1. Introduction

Information is a vital asset, both in terms of the management of care for service users, the quality assurance of that care and the efficient management of services and resources. It is therefore of paramount importance that appropriate policies, procedures and governance provide a robust framework for our organisation's information management.

### 2. Purpose of the policy

This Information Governance policy provides an overview of our organisation's approach to information governance; a guide to the procedures in use; and details about the management structures that oversee these arrangements.

### 3. Our approach to Information Governance

CCC undertakes to implement information governance effectively and will ensure the following:

- Information will be held securely;
- Confidentiality will be assured;
- Information will be complete, accurate and up to date;
- Regulatory and legislative requirements will be met;
- Business continuity plans will be produced, maintained and tested;
- Training and guidance will be available to all counsellors and contractors as necessary for their role;
- All breaches of confidentiality and information security, actual or suspected, will be reported and investigated.

### 4. Procedures in use in the organisation

This Information Governance policy is underpinned by the following procedures:

- **Records management procedures** that set out how records will be created, used, stored and disposed of;
- **Access control procedures** that set out how we will control access to computer-based information systems;
- **Information handling procedures** that set out how we will transfer information safely and securely;
- **Incident management procedures** that set out how we will manage and report information incidents;
- **Business continuity procedures** that set out how we will support service delivery in the event of a system failure or other disaster.

All these procedures and confidentiality policy, privacy policy and confidentiality agreement are available on the members section of CCC's website for all counsellors and officers to access.

## 5. Training and guidance

Counsellors, contractors and officers will be trained in how to adhere to our procedures and will be provided with supplementary guidance where necessary. Compliance with the procedures will be monitored and additional support and training provided where issues are identified.

Personal identifying information concerning clients, members or contractors is strictly confidential and must not be disclosed to unauthorised persons. This obligation shall continue in perpetuity. Disclosures of confidential information or disclosures of any data of a personal nature can result in prosecution for an offence under the Data Protection Act 1998 or General Data Protection Regulations 2018 or an action for civil damages under the same Act in addition to any disciplinary action taken by CCC.

If this policy is breached an investigation will be carried out by the data protection officer, an incident form will be completed and further training and monitoring will be undertaken. In the case of gross misconduct disciplinary action will be taken including the removal membership. This action may include a formal complaint to the individual's professional body.

## 6. Responsibilities and accountabilities

The designated **Information Governance lead and data protection officer** for the organisation is Kirstin Bicknell, trustee of CCC

The key responsibilities of the lead are:

- Maintaining the IG Policy and developing and implementing required IG procedures across the organisation;
- Raising awareness and providing advice and guidance about IG to all counsellors and officers;
- Ensuring that any training made available is taken up;
- Coordinating the activities of any other contractors given data protection, confidentiality, information quality, records management and Freedom of Information responsibilities;
- Monitoring adherence with the organisation's IG procedures and guidance.

All counsellors, whether paid or volunteer, and contractors 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. Where trained officers or counsellors fail to adhere to the organisation's policy and procedures, disciplinary action may be taken.

## 7. Approval

This policy has been approved by the individual identified below and will be reviewed on an annual basis.

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| <b>Approving individual</b> | <b>Kirstin Bicknell</b> |
| <b>Date approved</b>        | <b>May 2018</b>         |
| <b>Review date</b>          | <b>May 2019</b>         |