



Information Commissioner's Office
Promoting public access to official information
and protecting your personal information

The Development and Maintenance Initiative (DMI)

Health Circular

Circular 2

| | |
|--------|---|
| Health | (Wales 12_04_07) (Manchester 05_04_07) |
|--------|---|

1.1 Issues affecting the health sector

It has been suggested that [Connecting for Health](#) may be able to assist with the development of information audits for this sector. In any such audit, it would be helpful to ensure that there are mechanisms to measure positive elements of proactive dissemination. For example, some trusts employ information governance tools which register the number of times the authority is thanked for the provision of information.

[Standards for Better Health](#) has also been suggested as a basis for audit. Additions to an existing audit framework would assist in securing senior buy-in for the development of schemes. It must be noted that at this stage, these are preliminary suggestions and the Information Commissioner's Office (ICO) is yet to approach the relevant organisations for further discussion.

In order to gain maximum buy in from authorities at a senior level, the ICO is keen to tap into existing communication channels for senior staff members. It was suggested that the [NHS Chief Executives Bulletin](#) may be one such medium. It may also be prudent to consult the Caldicott Guardians.

It has been suggested that the delegates attending the DMI workshops be formally recognised in association with the development of the new model schemes. The ICO will offer delegates the opportunity to opt into affiliation with the new models if they wish to do so. The possibility of providing a formal recognition of attendance by way of a certificate is also under consideration.

1.2 Presenting Information

It will be necessary for the ICO to provide a steer as to what should be included in each class of information.

The ICO will look to case precedent, detailed in [Section 50 Decision Notices](#) to establish whether a benchmark for the provision for certain types of information has already been set.

A statement of compliance may help to bind authorities to the commitment to provide information within the schemes.

1.3 Draft mandatory classes

As in earlier workshops, there was some discussion as to the way in which classes should be presented to the public. It was noted that some authorities in Northern Ireland present classes as 'categories'.

A number of class headings were preliminary discussed at the Salford workshops. These are provided in more detail below:

Organisational Governance

➤ Corporate Governance

This is likely to include:

- Details on the authority's role and objectives. The authority's Constitution should be included in this section
- Annual Report
- Operational framework
- Policies – to include communication, complaints, equality and diversity and recruitment policies where available. Any policies an authority is statutorily required to operate should also be included
- Staff Information – to include salary bands and staff handbook
- HR policies
- Workforce profile and statistics
- Organisational Structure, and information on how the authority fits within the overarching NHS framework
- Service level agreements
- Scheme of delegation
- Standards for health action plan
- Standing Orders
- Statutory Instruments/legal obligations

- Research framework
- List of audits
- Information on clinical effectiveness
- Strategy on management of aggression and violence
- Incidents occurrence
- Minutes of meetings
- Information on the role of the Chief Executive/senior staff

➤ **Information Governance**

This is likely to include:

- Information on ICT services
- Information governance toolkit
- Information sharing policies
- Records management policies
- Commitments on the secure and fair processing of personal data
- Risk Register
- Information on FOI/DP/EIR

➤ **Strategy and Performance**

This is likely to include:

- Links to Connecting for Health
- Business/development plans
- Targets
- Performance indicators

Finance and Accounting

This is likely to include:

- Summary of audited accounts
- Hospitality Register
- Declaration of Interest
- Expenses of senior staff
- Purchasing plan (where available)
- Procurement plan (where available)
- Conditions for contracting
- Total value of contracts for the last financial year
- Information on current contracts. It has been suggested that the threshold requiring the publication within the [Official Journal of the European Union](#) could act as a benchmark in this respect

- Scheme of delegation
- Information on PIF

Communications

This is likely to include:

- How to contact the authority
- How to request information
- How to find the authority
- Complaints/compliments procedure
- Patient and Liaison Service information
- Public Patient Involvement information
- Leaflets
- Public consultations
- Media releases
- Newsletters

Our Services

This may be split into clinical and non-clinical. For acute trusts (and indeed other authorities) it may be split by service area, for example; Renal, GPs and Paediatrics. At a minimum it should include information on what services are provided and how to access them.

It is also likely to include:

- Patient Charter
- Occupational Health Services

At the moment, these are initial drafts, and the ICO would like [feedback](#) on the extent to which they are appropriate. For example, what information is missing? Is some of the information sat in the wrong class? Is there some information which should be removed?

Any commitment to proactively publish information will be tempered by the right to exempt information where it is appropriate to do so. The model scheme standard paragraphs will address this issue.

1.4 Further Input

If you have any comments on this circular or anything you would like to contribute to the initiative, please contact Paul Damerill at paul.damerill@ico.gsi.gov.uk

The next Health workshops will be held as follows:

- Northern Ireland: 26th April 2007
- Manchester : 8th June 2007
- Wales: 17th May 2007