

lechyd Cyhoeddus Cymru Public Health Wales

National Intelligent Integrated Audit Solution

Introduction and Aim

This Procedure introduces the National Intelligent Integrated Audit Solution (NIIAS) and explains how staff are required to interact with it.

Linked Policies, Procedures and Written Control Documents

All corporate policies and procedures are available on the Public Health Wales website

Information Governance Policy

Scope

This procedure applies to all employees of Public Health Wales.

Equality and Health	This procedure is subject to the EHIA completed for the			
Impact Assessment	Information Governance Policy IG EHIA Policy			
Approved by	Information Governance Group			
Approval Date	08/12/2022			
Review Date	08/12/2025			
Date of Publication:	11/01/23			
Accountable	Rhiannon Beaumont-Wood, Executive Director Quality,			
Executive	Nursing and Allied Healthcare Professionals.			
Director/Director				
Author	Lisa Partridge Information Governance Manager			

<u>Disclaimer</u>

If the review date of this document has passed please ensure that the version you are using is the most up to date either by contacting the document author or <u>Corporate Governance.</u>

Summary of reviews/amendments						
Version number	Date of Review	Date of Approval	Date published	Summary of Amendments		
1		9.06.17	19.06.17	New procedure		
1.1			31.08.22	Reference number updated from PHW 60/TP01 to PHW STP05		
2	1/11/22	08/12/2022		Extensive re-write. Reference number updated to AW16- TP07		

1 Introduction

This Procedure introduces the National Intelligent Integrated Audit Solution (NIIAS) and explains how staff are required to interact with it.

As a registered data controller under the UK General Data Protection Regulation, Public Health Wales is responsible for processing the personal data of over 3m people in Wales. One of the organisation's responsibilities is having the ability to demonstrate that we are a responsible data controller and as such we are accountable to both the public and the Information Commissioner.

To demonstrate accountability, Public Health Wales employs a range of measures, one of which is the NIIAS system.

NIIAS is an automated audit solution provided by Digital Health and Care Wales and that is linked to the following clinical information systems:

- Welsh Clinical Portal (WCP)
- Welsh Demographics Service (WDS)
- Cancer Network Information System Cymru (CANISC)
- Abdominal Aortic Aneurism Screening (ASIMS)
- Bowel Screening Wales (BSIMS)
- Laboratory Information Management System (LIMS)
- Welsh Immunisation System (WIS)
- Children and Young Persons Integrated System (CYPRIS)
- MYRDDIN
- Choose Pharmacy

2 The Purpose of NIIAS

NIIAS does not change anything about the way Public Health Wales staff are expected to work, neither does it alter the terms and conditions for staff or any disciplinary processes which may arise from breaches of Policy.

NIIAS provides the organisation with an audit trail to show who has accessed the personal data of service users and when. This information can then be used by managers to ensure that any data that is accessed is done so appropriately and in accordance with Public Health Wales Policies and Procedures.

3 Confidentiality

Staff are reminded that the Information Governance Policy is very clear that personal data must not be accessed for any purposes other than where it is required to carry out their work. Staff are not permitted to view any personal data, including their own health records for any other purposes.

4 Use of systems for training purposes

The use of live information for the purposes of training is not permitted.

Training environments can be accessed in:

- ASIMS
- BSIMS
- CANISC
- LIMS
- WDS

Note – WDS holds the following records that can be used for training purposes

NHSNumber	Family Name	First Name
1231231234 1212121212 7080545226 7080558131 DUMMY6	TEST TEST TEST MOUSE	BABY1 CAS LLWYN PRACTICE SPLIT MO

5 Roles and responsibilities

All staff will:

Access personal data only for reasons connected with their work

The Head of Information Governance will:

 Maintain a process for interrogating NIIAS in order for regular audit checks to be carried out on accessing personal data
Page 4 of 6

- Notify the appropriate manager when a potential breach of Policy is identified through NIIAS
- Report regularly on the results of such audits to the Business Executive Team

All managers will:

- Investigate as a priority, any notification from the Head of Information Governance of a potential breach of Policy or Procedure identified through NIIAS
- Deal with any breaches of Policy or Procedure in accordance with Public Health Wales Human Resources Policies
- Report the findings of the investigation back to the Head of Information Governance within 14 days of receiving the notification.

6 Procedure

Following an alert from NIIAS identifying a potential inappropriate access of information, an email notification will be issued to the appropriate manager by a member of the Information Governance Service. This will normally be the line manager of the person accessing the information. The notification will include a simple form which must be completed and returned to the Information Governance Service.

The manager will investigate as a priority whether there is a legitimate clinical or administrative reason for the employee to have accessed the records.

If the manager is satisfied that the access was for a legitimate clinical or administrative reason, they confirm as such to the Information Governance Service by responding to the initial notification email.

If it is identified that the access may be inappropriate then managers should contact the People and Organisational Development (POD) department and any investigation carried out in line with Public Health Wales Disciplinary Policy.

7 Training requirements

All employees will be made aware of the procedure upon commencement with Public Health Wales and copies can also be viewed on the Public Health Wales intranet. All Public Health Wales employees are required to undertake Information Governance training every 2 years.

8 Monitoring compliance

The Head of Information Governance will monitor this procedure to ensure it is compliant with current legislation and to ensure it is effectively implemented.