

**Data Protection Act 1998
Undertaking follow-up**

**Great Ormond Street Hospital for Children NHS Trust
ICO Reference: ENF0454698**

On 29 April 2014 the Information Commissioner's Office (ICO) conducted a follow-up assessment of the actions taken by Great Ormond Street Hospital for Children NHS Trust (GOSH) in relation to the undertaking it signed in November 2013.

The objective of the follow-up is to provide the ICO with a level of assurance that the agreed undertaking requirements have been appropriately implemented. We believe that appropriate implementation of the undertaking requirements will mitigate the identified risks and support compliance with the Data Protection Act 1998.

The follow-up assessment consisted of a desk based review of the documentary evidence GOSH supplied to demonstrate the action it had taken in respect of the undertaking requirements. This includes a management summary of actions taken or planned, policies, procedures, training and awareness materials, training statistics and minutes of meetings.

GOSH has taken appropriate steps and put plans in place to address the requirements of the undertaking and to mitigate the risks highlighted.

GOSH confirmed that it has taken the following steps:

- The Information Governance training requirements for temporary and bank staff have been reviewed to include, a local induction on day one which includes reference to Information Governance awareness. By day 5, the same staff are required to have completed the 'Introduction to Information Governance' E Learning module on the GOLD system and passed the associated comprehension test (copies of the E learning module and comprehension test were not provided as evidence to the ICO).
- Completion of the 'Introduction to Information Governance' E Learning module is mandatory for all staff including bank staff on an annual basis and is monitored by the training team and central bank

manager's function. Bank staff who do not successfully complete the training are removed from the bank and substantive staff go through a staged process of reminders ending with disciplinary action if they do not complete the training.

- Data illustrating compliance statistics is produced monthly as a KPI for the Information Governance Steering Group. Data provided from November 2013 to February 2014 shows 100% completion of Information Governance training by current bank staff and 95.1% completion by substantive staff.
- Business procedures for registration, outpatient, handling secure addresses and PIMs training have been updated to include documented processes for collecting and checking patient addresses. These business procedures are available on the Trust intranet and staff awareness has been raised through advertising the new procedures via the intranet news feed. Specific guidance on model procedures for using cc lists has been issued to all general managers and these procedures are being followed within their departments. Lessons learnt from frequently occurring incidents have been highlighted in the Information Governance training update video newsletter 2013/14.
- An awareness campaign reminding patients' families to inform GOSH when their address changes was run.

Date issued: 12 May 2014

The matters arising in this report are only those that came to our attention during the course of the follow up and are not necessarily a comprehensive statement of all the areas requiring improvement.

The responsibility for ensuring that there are adequate risk management, governance and internal control arrangements in place rests with the management of Great Ormond Street Hospital for Children NHS Trust.

We take all reasonable care to ensure that our Undertaking follow up report is fair and accurate but cannot accept any liability to any person or organisation, including any third party, for any loss or damage suffered or costs incurred by it arising out of, or in connection with, the use of this report, however such loss or damage is caused. We cannot accept liability for loss occasioned to any person or organisation, including any third party, acting or refraining from acting as a result of any information contained in this report.