Re: Request for information under the Freedom of Information Act 2000

Thank you for your email, dated 6 January 2019, making a request under the Freedom of Information Act 2000 for access to information which may be held by NHS Greater Preston Clinical Commissioning Group (CCG).

Please find detailed below NHS Greater Preston CCG’s response to your request, which is formatted as follows:

1. Details of NHS Greater Preston CCG’s decision in regard to the information requested.
2. A schedule of all the records covered by your request.
3. A statement concerning copyright and re-use of public sector information.
4. Details of how you can appeal this decision should you wish to do so.

This letter addresses each of these parts in turn:

1. Decision

I can confirm that NHS Greater Preston CCG holds the information requested.

2. Schedule of records/FOI response

Request: Does the organisation deliver specialised training to key staff (those staff that could be targeted as part of a phishing email campaign, ie finance, execs etc)?

Response: Yes. The CCG undertakes a learning needs analysis to establish which staff require additional training. Those identified staff are then asked to undertake specialist training as required.

Request: Does the organisation perform confidentiality audits as per the Data Security & Protection Toolkit?

Response: Yes. The CCG completes confidential audits on a regular basis.

Can you also answer relating to the audits:
Request: Where the audits are undertaken would these be organised with the local team manager or the head of department ie the director etc?

Response: The CCG commissions information governance (IG) support from NHS Midlands and Lancashire Commissioning Support Unit. The provider’s IG team conduct audits on the CCG’s behalf, at random.

Request: Would an audit ever be carried out unannounced?

Response: Yes.

Request: Do you have a policy / procedure of how to conduct the audit? – if so can you supply a copy.

Response: Please see the attached template, which is used to record findings of the audit.

Request: Do you record the results on a checklist / report and return the key contact? – if so can you supply a blank copy.

Response: Results are recorded and reported in a bi-monthly report. They are presented in table form containing the date of the audit, the findings, recommendations, actions and deadlines.

Request: Does the organisations Exec board receive board level training relating to Cyber Awareness?

Response: CCG Governing Body members, including all executives, receive IG refresher training with an element of cyber security training included.

Request: How does the organisation provide Data Security & Protection Training to staff, does the organisation use (please select all the options that are applicable):

Response:  
a. Third party application package ☐
b. Third party Trainer / class room ☐
c. E-Learning for Health Data Security Awareness ☐
d. In house developed package ☐
e. Combination of any of the above X

Class room training developed and provided by the CCG’s IG support provider and is also available online.

3. Copy and reuse of public sector information provided in FOI response
Most of the information provided by NHS Greater Preston CCG in response to Freedom of Information Act 2000 requests will be subject to copyright protection. In the majority of cases the information will be owned by NHS Greater Preston CCG. The copyright for other information may be owned by another person or organisation, as indicated in the information itself: in this case you must apply to the copyright owner to obtain their permission.

You are free to use any information supplied for your own use, including for non-commercial research purposes. It may also be used for the purposes of news reporting. However, any other type of re-use, for example, by publishing the information or issuing copies to the public will require the permission of the copyright owner.

4. Right of appeal to FOI response

If you are dissatisfied with the service you have received in relation to your request and wish to make a complaint or request a review of our decision, you are entitled to complain in the following way:

Initially you should complain in writing to the freedom of information officer, either by email on gpccg.foi@nhs.net or post to Chorley House, Lancashire Business Park, Leyland, PR26 6TT, specifying why you feel you have been wrongly denied access to the information requested. The freedom of information officer will ensure your complaint is investigated under NHS Greater Preston CCG’s internal processes and provide you with a written response within 20 working days.

If you are not content with the outcome of your complaint, you may apply directly to the Information Commissioner’s Office (ICO) for a decision. Generally, the ICO cannot make a decision unless you have exhausted the complaints procedure provided by NHS Greater Preston CCG.

Yours sincerely

Helen Curtis
FOI Lead
Head of Quality and Performance