

Horizon Strategic Partners Ltd Information Governance Policy

Policy Prepared by: Dave Russell	Policy Approved by:	Date Next Review Due:	Feb 2020	
Date Prepared: Feb 2017	Date Approved:	Date Review Takes Place:		

1. Purpose of Policy

This policy sets out the procedures and management accountability and structures that have been put in place within Horizon Strategic Partners to safeguard the movement of personal data in Horizon Strategic Partners.

2. Underpinning Procedures

The following procedures have been put in place to support the confidential handling of information within Horizon Strategic Partners and are all referenced by the company handbook:

- **Staff Confidentiality Code of Conduct** (sets out the standards expected of staff in maintaining the confidentiality of patient information);
- **Information Security Policy** (sets out procedures for the management of access to computer-based information systems);
- **Security Incident Policy** (sets out the procedures for responding to a security breach);
- **Business Continuity SOP** (sets out the procedures in the event of system failure);
- **Portable Device Staff Guidelines** (provides guidance for staff use on the use of portable devices).

3. Staff Duties and Responsibilities

All staff with access to confidential data, whether permanent, temporary or contracted are responsible for ensuring that they remain aware of the requirements incumbent upon them for ensuring compliance on a day to day basis. This includes maintaining confidentiality of data, ensuring secure storage of data and being aware of situations where disclosure may be required or may not be required.

4. Accountability and Responsibility for this Policy

The designated Information Governance Lead is responsible for overseeing day to day Information Governance issues; developing and maintaining policies, standards, procedures and guidance, coordinating Information Governance in Horizon Strategic Partners, raising awareness of Information Governance and ensuring that there is ongoing compliance with the policy and its supporting standards and guidelines.

The Horizon Strategic Partners Directors are responsible for ensuring that sufficient resources are available to support the implementation of Information Governance procedures in order to ensure compliance with legal and professional requirements and the NHS Information Governance requirements.

4. Monitoring this Policy

This policy will be reviewed at least annually.

5. Sanctions

Breach of this policy could lead to disciplinary action. Depending on the circumstances this could range from remedial training to dismissal.