

**Our Ref: CTFOI2262**

1<sup>st</sup> November 2023

**Quality and Governance Service**  
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## **Re: Freedom of Information Request**

### **Original Request and Response:**

We are asking for the following information regarding your Information Asset Owners (IAO) / SiRO set up and how you conduct your assessments. We are reviewing our structure and have a new model we would like to use. However our Board is interested in what is used elsewhere. Please can you answer the following

1. Do you have a single IAO for each information system or are they grouped for instance pathology, EPRs etc?

**Response:** yes, every asset has an IAO and IAA.

2. Do you have written duties / job description for them? If so please share

**Response:** No, however asset owners/ administrators complete annual training and are responsible for overseeing their designated asset.

3. Do you have specific risk assessment documents? If so please share

**Response:** Yes, Wirral Community Trust Health and Care NHS Foundation Trust has a Data Protection Impact Assessment document that can be found attached. If there are significant changes to an information system or to the processing of personal data, this would be completed.

4. Do your IAOs report to the SIRO or into another manager? Please provide a specimen structure

**Response:** Information Asset Owners are accountable to the Information Governance & Data Security Group (IGDS). IAOs do not formally report to the SIRO, but the SIRO has oversight of the Information Asset Register, training compliance and any associated risks.

5. Do you assess all your systems at least annually?

**Response:** Yes, the Information Asset register is audited annually by MIAA (an external auditing organisation) as part of the DSP Toolkit.

6. Do IAOs record risks directly into your risk register? If not who does?

**Response:** Yes, when appropriate to do so.

7. Do all your IAOs have Information Asset Administrators (IAA)? Are your IAAs primarily Digital staff?

**Response:** Yes, all the Trust's IAOs have IAAs. The administrators come from both digital and non-digital backgrounds. All Administrators receive training to support them and can contact the Information Governance team for advice and support.

8. If you have an EPR how many IAOs do you have for it? Could you supply the working role for each one.

**Response:** The Trust uses SystemOne and there is an Information Asset Owner and an Information Asset Administrator of this system. The Owner is the Chief Information Officer, and the Administrator is the Clinical Systems Lead.

If you are not satisfied that your Freedom of Information request has been dealt with in an adequate manner, you have the right to request a review, requiring us to review our action and response. To request a review of this response, please contact the FOI Officer, Wirral Community Health and Care NHS Foundation Trust, St Catherine's Health Centre, Derby Road, Birkenhead, Wirral, CH42 0LQ or email: [WCNT.foi@nhs.net](mailto:WCNT.foi@nhs.net). You will receive a full response to your request for review within 20 working days of its receipt.

If you are unhappy with the way we have handled your request for review, you may ask the Information Commissioner to review our decision: The Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, Telephone: 01625 545700.



**Wirral Community Health and Care  
NHS Foundation Trust**  
Chair: Professor Michael Brown CBE DL  
Chief Executive: Karen Howell