Dear

Freedom of Information Request – DGS 172

Thank you for your recent request for information made under the Freedom of Information Act 2000, which was received by NHS Dartford Gravesham and Swanley Clinical Commissioning Group (CCG) on 7 January 2019. The information you have requested is listed below together with the response:

1. **Does the organisation have training that covers:**

   1. **Recognising and reporting Phishing emails**

      This is covered within the mandatory annual Data Security Awareness Training.

   2. **Recognising Tailgating and how to respond (challenging strangers, checking for ID etc)**

      This is covered within the mandatory annual Data Security Awareness training. In addition signs are put warning of the danger and staff communications are sent.

   3. **Disposal of confidential information**

      The importance of document security is covered within the mandatory annual Data Security Awareness training. In addition, the CCG operates a clear desk policy with the provision of confidential waste bins.

   4. **Dangers of using USB sticks being given away or finding one that looks like it has been dropped**

      The importance of data security is covered within the mandatory annual Data Security Awareness training.
2. **Does the organisation allow the use of USB sticks?**

The organisation only allows the use of CCG supplied, encrypted USB sticks.

3. **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)?**

This is covered within the mandatory annual Data Security Awareness training, but supplemented by ‘in-house’ testing and specific communications.

4. **Does the organisation perform confidentiality audits as per the Data Security & Protection Toolkit?**

Yes, regular Confidentiality Audits are undertaken.

Can you also answer relating to the audits:

1. **Where the audits are undertaken would these be organised with the local team manager or the head of department ie the director etc?**

Confidentially audits are organised and undertaken by the CCG’s Corporate Governance Team.

2. **Would an audit ever be carried out unannounced?**

Confidentiality Audits are always unannounced.

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

A standard template is utilised (please see attached) to undertake the audit.

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

The template referred to in 3 above is the report prepared, transgressions are followed up with an email to the relevant Department head.

5. **Does the organisation have confidential waste receptacles placed through the entire organisation and are they regularly emptied?**

Yes, the CCG has confidential waste receptacles in all offices, these are regularly emptied by a contracted third party.

6. **Does the organisations Exec board receive board level training relating to Cyber Awareness?**

Awareness training is mandatory for all staff including the Executive Board, additional Board specific Cyber training is being scheduled.

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

| a. Third party application package | ☐ |
| b. Third party Trainer / class room | ☐ |
| c. eLearning for Health Data Security Awareness | X |
| d. In house developed package | ☐ |
| e. Combination of any of the above | ☐ |
We hope that this has dealt with your request for information however, should you remain dissatisfied, you have the right to request that we conduct an internal review of your request. If you would like us to conduct such a review please contact us within two months of this letter using the contact details below:

E-mail: swccg.northkent.foi@nhs.net

Post: FOI, NHS Dartford Gravesham and Swanley Clinical Commissioning Group, 2nd Floor, Gravesham Civic Centre, Windmill Street, Gravesend, Kent DA12 1AU.

Your request for an internal review will then be processed in accordance with our Freedom of Information Policy, a copy of which can be found on our website:

www.dartfordgraveshamswanleyccg.nhs.uk

If you are still dissatisfied following the internal review, you have the right under Section 50 of the Freedom of Information Act 2000 to appeal against the decision by contacting the Information Commissioner. The Information Commissioner provides full and detailed guidance on the Freedom of Information Act, and on when and how to complain.

Please find below the link to their website page and their helpline number.
https://ico.org.uk/for-the-public/official-information/
Helpline number: 0303 123 1113

In line with the Information Commissioner’s directive on the disclosure of information under the Freedom of Information Act 2000 your request will form part of our disclosure log. An anonymised version of our response will therefore be posted on our website.

Please remember to quote the reference number above in any future communications.