



REPORT TO: HEALTH AND SOCIAL CARE INTEGRATION JOINT BOARD – 26 JUNE 2026

REPORT ON: INFORMATION GOVERNANCE ANNUAL ASSURANCE REPORT

REPORT BY: CHIEF OFFICER

REPORT NO: DIJB24-2026

1.0 PURPOSE OF REPORT

- 1.1 This report provides Dundee City Integration Joint Board with assurance regarding the effectiveness of Information Governance (IG) arrangements across Dundee Health and Social Care Partnership (HSCP). It outlines compliance with relevant legislation and clarifies the respective roles and responsibilities of Dundee City Council and NHS Tayside in relation to the management of personal and sensitive information.
- 1.2 Annual Information Governance reporting is an action within the Governance Action Plan.

2.0 RECOMMENDATIONS

It is recommended that the Integration Joint Board (IJB):

- 2.1 Note the contents of this report.
- 2.2 Note the assurance that appropriate Information Governance arrangements are in place across Dundee HSCP.
- 2.3 Acknowledge the respective responsibilities of Dundee City Council and NHS Tayside as partner organisations
- 2.4 Note the improvement actions identified and support continued development of integrated Information Governance arrangements.

3.0 FINANCIAL IMPLICATIONS

- 3.1 There are no financial implications.

4.0 MAIN TEXT

- 4.1 Background
- 4.2 Dundee Integration Joint Board is responsible for the strategic planning and oversight of integrated health and social care services under the Public Bodies (Joint Working) (Scotland) Act 2014. Within this context, effective Information Governance is essential to the safe, lawful and transparent delivery of services. It provides the framework through which personal and sensitive information is handled securely, individuals' rights are upheld in line with UK GDPR and the Data Protection Act 2018, and statutory duties relating to openness and access to information are met under the Freedom of Information (Scotland) Act 2002 and the Environmental Information (Scotland) Regulations 2004.

- 4.3 As Dundee IJB does not directly employ staff or operate its own information systems, it relies on Dundee City Council and NHS Tayside to undertake the operational Information Governance functions required to support these responsibilities.

5. Governance Arrangements

- 5.1 Information Governance within Dundee HSCP is delivered through the existing governance frameworks of Dundee City Council and NHS Tayside.

Key arrangements include:

- Oversight by the Dundee HSCP Senior Management Team
- Reporting through:
 - Clinical, Care and Professional Governance Group
 - Performance and Audit Committee (Dundee IJB)
- Professional leadership from:
 - Data Protection Officers (DPOs) – Council and NHS Tayside
 - Caldicott Guardian (NHS Tayside)
- Established policies covering:
 - Data protection
 - Records management
 - Information security
 - Data sharing protocols

Dundee HSCP operates within both parent organisations' governance systems, with coordination to support integrated working.

- 5.2 Lead Officers attend and contribute to Information Governance meetings in NHS Tayside and Dundee City Council.

6. Integration Joint Board

- 6.1 The IJB has strategic oversight of Information Governance and is responsible for seeking assurance that robust arrangements are in place within the Partnership, that information governance risks are identified and managed appropriately, and that a culture of compliance and transparency is promoted across Dundee HSCP. In undertaking this role, the IJB does not itself act as a Data Controller for personal records of patients and service users.
- 6.2 The IJB's Records Management Plan was submitted to the National Records of Scotland (NRS) in 2022. It was approved, demonstrating compliance with the Public Records (Scotland) Act 2011 and supporting the effective management of records for the partnership.
- 6.3 An Information Asset Register is being developed for the IJB. An Information Asset Register is a structured record that identifies and describes an organisation's information assets, including their ownership, location, security requirements, and how they are managed to support compliance and risk management. Dundee HSCP staff with a remit for Information Governance are being supported by NHS Tayside Information Governance team on this task.

7.0 Dundee City Council Responsibilities

Dundee City Council is the Data Controller for:

- Social care records and associated personal data
- Adult protection and social work services information

Responsibilities include:

- Compliance with UK GDPR and Data Protection Act 2018
- Responding to FOI requests and Subject Access Requests (SARs) for social care records
- Maintaining secure ICT and records systems
- Delivering IG training to Council-employed HSCP staff

7.1 **NHS Tayside Responsibilities**

NHS Tayside is the Data Controller for:

- Patient health records
- Community health and clinical systems

Responsibilities include:

- Compliance with NHS Scotland Information Governance standards
- Oversight from the Caldicott Guardian
- Management of clinical confidentiality and information sharing
- Responding to patient information requests and SARs
- Ensuring cyber security and information assurance standards are met

7.2 **Shared / Joint Responsibilities**

Dundee City Council and NHS Tayside share responsibility for:

- Data sharing in integrated services (e.g. community health and social care teams)
- Developing and maintaining Data Sharing Agreements (DSAs)
- Managing information incidents involving joint services
- Promoting consistent staff training and awareness
- Supporting integrated digital and information systems

8. **Performance and Compliance**

8.1 **Staff mandatory learning.**

E-learning modules are mandatory and are completed by staff in NHS Tayside and Dundee City Council. NHS Tayside's e-learning module is called Safe Information Handling and is part of the suite of e-learning modules called Once for Scotland. Dundee City Council's e-learning module is called GDPR.

Current performance completion rates are :

Data Protection Training Compliance:

- Dundee City Council (HSCP staff): 39% (April 2026)
- NHS Tayside (HSCP staff): 64% (May 2026)

8.2 Dundee City Council's GDPR e-learning module was refreshed in 2025 and completion rates for the previous module were significantly higher than for the new module. Management will communicate to all staff the importance of regularly checking their completion of mandatory e-learning modules.

8.3 **Subject Access Requests**

Both organisations continue to aim to meet statutory timescales, with occasional extensions in complex cases. NHS Tayside Subject Access Requests are processed by an NHS Tayside team. It is not possible to separate and report on NHS Subject Access Requests that contain information about DHSCP NHS services.

8.4 DHSCP Subject Access Requests that are about information held on Dundee City Council systems concerning Social Work and Social Care are processed by staff in Dundee Health and Social Care Partnership.

8.5 There has been an increase in the numbers and complexity of DHSCP Social work and Social Care SARs. In 2025/26 there were 20 SARs . 55% were completed within timescales.

8.6 Freedom of Information

Requests relating to HSCP services are managed through respective Council and NHS processes. DHSCP staff work to complete FOISAs within timescales. However the amount and complexity of Foisa requests have steadily increased. It has become evident that people are using AI to make Foisa requests that are becoming longer and more complex to answer.

8.7 Data Breaches

There has only been one data breach reported in 2025/26 for Council DHSCP services. This was an incident where an email was sent to the wrong email address. The email was destroyed by the recipient. We are aware that there is likely to be significant under reporting of near misses of data breaches.

NHS Tayside Data breaches.

BREACH OF CONFIDENTIALITY	27
COMPUTER/SYSTEM MISUSE	2
HARDWARE FAILURE	1
INFORMATION SECURITY - MALICIOUS ACT	1
INFORMATION SECURITY LOSS	2
SOFTWARE FAILURE	1
UNAUTHORISED ACCESS TO AREA	2
Grand Total	36

NHS data breaches are recorded through the Datix incident reporting system, which ensures that each incident is reviewed and that appropriate actions are identified and implemented to reduce the risk of recurrence.

8.8 Records Management Arrangements

Records management is supported by policies and procedures already in place across Dundee City Council and NHS Tayside, including retention and disposal schedules to make sure information is not kept longer than necessary and is disposed of securely. Information is classified and handled in line with organisational standards to protect confidentiality and security. Responsibility for records sits with local services, supported by guidance and training, although there can be some variation in how these are applied in practice.

9. Data Sharing and Integration

9.1 Information sharing is essential to delivering integrated care across Dundee HSCP.

Current arrangements for information sharing include formal Data Sharing Agreements between Dundee City Council and NHS Tayside, supported by information sharing protocols

that underpin key areas of integrated practice such as adult protection and integrated community teams. In addition, work continues to support greater digital integration and interoperability across services.

Challenges remain, particularly in relation to differences between systems and data standards, and in ensuring the consistent application of data sharing agreements across all services. Work is therefore continuing to strengthen governance arrangements and improve consistency in practice.

The implementation of MORSE within NHS Tayside represents a significant step in enhancing electronic records management, supporting more efficient, secure, and compliant handling of health records across services.

Staff received a combination of MORSE system training, including hands-on sessions and user guidance, alongside mandatory information governance and data protection training to support the secure and compliant management of electronic records. MORSE was introduced across NHS Tayside through a phased implementation, with initial go-live commencing in May 2025 and rollout continuing across community, mental health and learning disability services thereafter. Dundee HSCP plan to work with NHS Tayside on developing an interface between Mosaic and Morse to allow for sharing of information between systems.

10 Cyber Security

- 10.1 Cyber security is managed through the established governance frameworks of NHS Tayside and Dundee City Council, with each organisation responsible for maintaining secure systems, protecting information assets, and ensuring appropriate safeguards are in place to mitigate cyber risks.

All staff have a responsibility to remain vigilant to potential cyber threats, including phishing emails, and to follow organisational guidance on identifying, reporting, and preventing such risks to protect sensitive information.

11 IMPROVEMENT PRIORITIES

- 11.1 Opportunities for further strengthening Information Governance have been identified and are outlined below.

- Development of an Information asset register for IJB.
- Reinforcing the importance of data protection impact assessments for new processes
- Recruitment to Records Manager post for Dundee HSCP
- Refresh of data mapping across Dundee HSCP processes.

- 11.2 Nationally, Information Governance continues to develop as digital working across health and social care increases, including plans for a single shared health and social care record in Scotland to support more joined-up, person-centred care. This brings a greater focus on effective data sharing, better connections between systems, and clear responsibilities for protecting information, while still maintaining confidentiality and individuals' rights. As this work moves forward, Dundee HSCP will need to continue to adapt arrangements to support safe and effective information sharing across organisations.

12 CONSULTATIONS

12.1 The Chief (Finance) Officer and Clerk were consulted in the preparation of this report.

13 RISK ASSESSMENT

The content of this report relates to the following risk from the IJB Strategic Risk Register:

Risk	9 IJB – Information Governance - There is a risk of information governance and security arrangements being inflexible to support the delivery of integrated health and social care priorities.
Risk Level	12 – High
Risk Appetite	Within appetite
The report demonstrates:	
	An increase in risk level
	A reduction in risk level
	The effectiveness of current controls
X	The identification and implementation of additional controls The planned recruitment of a Records Manager will add capacity to manage data protection workstreams.
	The presence of a new / emerging risk

14.0 DIRECTIONS

Direction Required to Dundee City Council, NHS Tayside or Both	Direction to:	
	1. No Direction Required	x
	2. Dundee City Council	
	3. NHS Tayside	
	4. Dundee City Council and NHS Tayside	

15.0 BACKGROUND PAPERS

None

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DATE: 12 June 2026

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