

05/10/2022

NN-ICB/22/62

Dear Requestor

**RE: Freedom of Information Request**

With reference to your request for information I can confirm in accordance with Section 1 (1) of the Freedom of Information Act 2000 that we do hold the information that you have requested. A response to each part of your request is below.

Please note that both NHS Nottingham and Nottinghamshire, and Bassetlaw Clinical Commissioning Groups ceased operation on 30 June 2022. They have been superseded by NHS Nottingham and Nottinghamshire Integrated Care Board (ICB) which began operation on 1 July 2022.

In the request you asked:

Would you kindly send me copies of the following policies, or direct me to where I can obtain them.

1. Risk Management Policy

This is publicly available in the Governance Policies section of our website:

<https://notts.icb.nhs.uk/about-us/our-policies-and-procedures/>

2. Emergency Preparedness, Resilience and Response Policy

This is publicly available in the Emergency Preparedness, Resilience and Response Policies section of our website: <https://notts.icb.nhs.uk/about-us/our-policies-and-procedures/>

3. Incident Reporting and Management Policy

This is publicly available in the Health, Safety and Security Policies section of our website:

<https://notts.icb.nhs.uk/about-us/our-policies-and-procedures/>

4. Information Governance Management Framework

This is publicly available in the Information Governance Policies section of our website:

<https://notts.icb.nhs.uk/about-us/our-policies-and-procedures/>

5. Confidentiality and Data Protection Policy

See response to question 4.

6. Internet and Email Policy

See response to question 4

7. Data Quality Policy

See response to question 4.

8. Records Management Policy  
See response to question 4.
9. Freedom of Information and Environmental Information Regulations Policy  
See response to question 4.
10. Safe Haven Procedure  
See attached, NN-ICB 22 62b.
11. Information Governance Staff Handbook .  
See attached, NN-ICB 22 62c
12. IG Code of Conduct  
See attached, NN-ICB 22 62d.
13. DPIA Template and Guidance  
See attached, NN-ICB 22 62e.
14. Information Asset Management Procedure  
See attached, NN-ICB 22 62f.
15. Electronic Remote Working Leaflet  
See attached, NN-ICB 22 62g.
16. SAR – Information Rights Procedure  
See attached, NN-ICB 22 62h.
17. Data Protection by Design Procedure  
See attached, NN-ICB 22 62i.
18. NHIS-001 Smart Card Policy  
Please see the national Registration Authority Policy available at [Registration Authority governance - NHS Digital](#)
19. NHIS-002 NHIS Network Security Policy  
See attached, NN-ICB 22 62j.
20. NHIS-003 NHIS Acceptable Use Policy  
This is publicly available on the Sherwood Forest Hospitals NHS Foundation Trust website:  
<https://www.sfh-tr.nhs.uk/media/10144/ig-009-acceptable-use-of-the-network-policy-nov-20-v2.pdf>
21. NHIS-004 NHIS Removable Media Policy  
This is publicly available on the Sherwood Forest Hospitals NHS Foundation Trust website: [ig-005-removable-media-policy-version-2.pdf \(sfh-tr.nhs.uk\)](#)
22. NHIS-005 NHIS Patch Management Policy  
We are issuing a refusal notice based on the view that security information must not be released into the public domain as this would increase the risk of attack on us as a service.  
  
Maintenance of security is a qualified exemption, and therefore the public interest test must be applied.

This FOI request is exempt under Section 31(1). Information is exempt if its disclosure under this Act would, or would be likely to, prejudice - (a) the prevention or detection of crime. It could be used to withhold information that would make anyone, including the public authority itself, more vulnerable to crime for example, by disclosing its own security procedures and it is the view of this organisation that the disclosure of the requested information would prejudice our ability to resist cyber-attacks on our systems.

#### 23. NHIS-006 NHIS Cloud Storage

We are issuing a refusal notice based on the view that security information must not be released into the public domain as this would increase the risk of attack on us as a service.

Maintenance of security is a qualified exemption, and therefore the public interest test must be applied.

This FOI request is exempt under Section 31(1). Information is exempt if its disclosure under this Act would, or would be likely to, prejudice - (a) the prevention or detection of crime. It could be used to withhold information that would make anyone, including the public authority itself, more vulnerable to crime for example, by disclosing its own security procedures and it is the view of this organisation that the disclosure of the requested information would prejudice our ability to resist cyber-attacks

#### 24. NHIS Cloud Guidance

None available.

If you are unhappy with the way in which your request has been handled, NHS Nottingham and Nottinghamshire Integrated Care Board (ICB) have an internal review procedure through which you can raise any concerns you might have. Further details of this procedure can be obtained by contacting Lucy Branson, Associate Director of Governance via [lucy.branson@nhs.net](mailto:lucy.branson@nhs.net) or by writing to FOI Team at NHS Nottingham and Nottinghamshire ICB, Sir John Robinson House, Sir John Robinson Way, Arnold, Daybrook, Nottingham, NG5 6DA.

If you remain dissatisfied with the outcome of the internal review, you can apply to the Information Commissioner's Office (ICO), who will consider whether the organisation has complied with its obligations under the Act and can require the organisation to remedy any problems. Generally, the ICO cannot make a decision unless you have exhausted the complaints procedure provided by NHS Nottingham and Nottinghamshire ICB. You can find out more about how to do this, and about the Act in general, on the Information Commissioner's Office website at: <https://ico.org.uk/for-the-public/>

Complaints to the Information Commissioner's Office should be sent to:

FOI/EIR Complaints Resolution, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone 0303 123 1113 or report a concern via <https://ico.org.uk/concerns/>

Yours sincerely

Freedom of Information (FOI) Officer on behalf of *NHS Nottingham and Nottinghamshire Integrated Care Board*

[notts.foi@nhs.net](mailto:notts.foi@nhs.net)

*All information we have provided is subject to the provisions of the Re-use of Public Sector Information Regulations 2015. Accordingly, if the information has been made available for re-use under the [Open Government Licence](#) (OGL) a request to re-use is not required, but the license conditions must be met. You must not re-use any previously unreleased information without having the consent of NHS Nottingham and Nottinghamshire Integrated Care Board. Should you wish to re-use previously unreleased information then you must make your request in writing (email will suffice) to the FOI Lead via [notts.foi@nhs.net](mailto:notts.foi@nhs.net). All requests for re-use will be responded to within 20 working days of receipt.*