

Strategy



Information Governance 2019-2022

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1 Introduction

Information is a vital asset and resource for every aspect of the work of the Angus Health and Social Care AHSCP (AHSCP). It enables reliable diagnosis and treatment, social care assessment and service provision, informs our understanding of the needs of local communities, and supports service planning and commissioning.

Maintaining good records of our business is essential for effective governance and ensures we remain accountable to the public for our decisions and actions. The safe and timely sharing of information between partners in delivering health and social care in Angus is also vital to developing truly integrated health and social care services.

Without high quality information we cannot manage our services effectively, continuously improve them, and ensure they are cost effective. Without reliable information we cannot monitor the performance and safety of our services or respond to feedback from our service users, carers, and the staff.

Information about what we do also plays a key role in ensuring we operate transparently and are open to public scrutiny, and needs to be as openly available as possible.

This information governance strategy sets out how the AHSCP will maintain, manage, organise, protect, and publish the information entrusted to it. It is arranged under five themes:

- Organisation and Management
- Integration and Collaboration
- Privacy and Security
- Transparency and Accessibility
- Governance

The overall aim of the strategy is to ensure that the AHSCP effectively manages its information assets while maintaining a balance between confidentiality and openness, and between security and accessibility.

1.1 Scope

This strategy relates to the governance of all information assets created or held by the AHSCP (or created or held by NHS Tayside or Angus Council in carrying out AHSCP functions), including:

- Information stored on computers (including software systems and databases)
- Information stored on microfiche
- Information stored on magnetic and optical media
- Information transmitted across networks
- Information held on mobile devices, including text messages

- Information written or printed on paper, whiteboards etc.
- Emails and instant messenger communications
- Information published on social media sites
- Information published on AHSCP internet or intranet sites
- Information sent or received by fax
- Visual presentations, photographs, and video

The information governance strategy covers all aspects of information handling and all information systems, whether manual or electronic, which are managed by or on behalf of the AHSCP.

In particular, the strategy covers the following areas:

- Information Management
- Records Management
- Data Protection
- Freedom of information
- Information security
- Information quality assurance
- Information risk management

1.2 Legislation

The main statutory duties and powers in relation to information governance are set out in the following legislation:

- [Computer Misuse Act 1990](#)
- [Human Rights Act 1998](#) (HRA)
- [Regulation of Investigatory Powers \(Scotland\) Act 2000](#)
- [Freedom of Information \(Scotland\) Act 2002](#) (FOISA)
- [The Privacy and Electronic Communications \(EC Directive\) Regulations 2003](#) (PECR), as amended
- [Environmental Information \(Scotland\) Regulations 2004](#) (EIR)
- [INSPIRE \(Scotland\) Regulations 2009](#)
- [Equality Act 2010](#) (EA)
- [Public Records \(Scotland\) Act 2011](#) (PRSA)
- [The Public Bodies \(Joint Working\) \(Scotland\) Act 2014](#) (Joint Working Act)
- [British Sign Language \(Scotland\) Act 2015](#) (BSL Act)
- [Re-use of Public Sector Information Regulations 2015](#)
- [General Data Protection Regulation 2016](#) (GDPR)
- [Town and Country Planning \(Environmental Impact Assessment\) \(Scotland\) Regulations 2017](#)
- [Data Protection Act 2018](#) (DPA2018)

- [The Public Sector Bodies \(Websites and Mobile Applications\) \(No. 2\) Accessibility Regulations 2018](#)

1.3 Strategic Objectives

The key objectives of this strategy are:

- To create and sustain an organisational culture that values its information through increasing awareness and promotion of information governance.
- To enable safe, effective, efficient, and appropriate information sharing.
- To improve access to information through technology, processes and tools.
- To ensure information risk can be identified and managed effectively.
- To support the provision of high quality services by promoting the effective and appropriate use of information in a secure manner.
- To comply with all relevant legislation, policies, standards, codes of practice and other guidance.
- To enable staff to work closely together, preventing duplication of effort and enabling more efficient use of resources.
- To develop an information management framework to provide staff with the appropriate tools and support to enable them to discharge their responsibilities to consistently high standards.
- To ensure our business is transparent and accountable to the public.

1.4 Key Benefits of Effective Information Governance

Effective information governance:

- Enables the AHSCP to provide a more effective service to it's the public with greater transparency around the information which it holds.
- Preserves the AHSCP's public reputation and enables it to meet public expectations of how it manages information.
- Builds trust in the quality of information both for staff and for members of the public.
- Supports informed decision and policy making.
- Ensures compliance with legal requirements.
- Increases efficiency by enabling the AHSCP to get the most out of the information it holds, avoiding duplication and promoting re-use where appropriate.
- Reduces levels of information related risk and ensures that AHSCP information is protected and secure.
- Enables the AHSCP to regularly monitor and assess the effectiveness of information governance policies and procedures so that improvements or deterioration in information handling can be recognised and addressed timeously.

- Enables the AHSCP to maintain a clear reporting structure and ensure through management action and training that all members of staff understand the principles of information governance.

Effective information governance gives staff:

- The ability to find information when needed quickly and easily.
- Better quality information that also makes it more trustworthy.
- Knowing what information to keep and what to dispose of – removing duplication.
- Knowing where to keep information and how to save it.
- Knowing what information to share and with whom.
- Knowing how to handle and protect information.
- Working more efficiently and making best use of resources – re-using information created.
- Working more collaboratively – making best use of skills and knowledge.
- Assurance that everyone is complying with responsibilities under legal requirements.
- Clear advice and guidance to all members of staff and ensure that they understand and apply the principles of information governance to their working practices in relation to protecting the confidentiality and security of personal information and to ensure the safe keeping of the AHSCP's business information, ensuring compliance with appropriate legislation.

Effective information governance assures our service users and the public that:

- Information is captured once and not repeatedly.
- Information is accurate, reliable and accessible.
- Information relating to them is protected and handled appropriately.
- Customer transactions with the AHSCP are more responsive and processed quicker.

2 Organisation and Management

The AHSCP's information assets are diverse, complex, and mainly held by NHS Tayside and Angus Council on the AHSCP's behalf.

This raises particular challenges in locating, accessing, and maintaining those assets in a way which supports the integration purposes of the AHSCP.

The Public Records (Scotland) Act 2011 sets the framework in which the AHSCP and its constituent authorities must now organise and manage their public records. Both NHS Tayside and Angus Council have established effective information governance arrangements and are carrying out systematic improvement through the implementation of their respective Records Management Plans and digitisation strategies.

However, historically, there has been a significant variation in how information assets have been managed within the two organisations and this presents significant challenges in achieving consistency and consolidation.

AHSCP is directly responsible for the organisation and management of its own corporate information assets. It is also responsible for ensuring that all information collected, processed, and produced by NHS Tayside, Angus Council, and other bodies in the carrying out of AHSCP functions is organised and managed in a way which supports integration.

2.1 What have we achieved to date?

The IJB has adopted a Records Management Plan in compliance with the Public Records (Scotland) Act 2011, and has agreed a Records Management Policy in respect the IJB's corporate records.

We have developed a business classification scheme and schedules for retention and disposal of records created by the AHSCP or created in the carrying out of the AHSCPs functions by NHS Tayside and Angus Council. The scheme and schedules provide a harmonised framework which is consistent the approaches adopted by NHS Tayside and Angus Council.

An inventory of information assets across the AHSCP is being compiled. This includes all information assets produced by NHS Tayside and Angus Council in carrying out AHSCP functions. To date this has been completed for assets which relate to personal information as defined by the GDPR.

A support agreement is now in place setting out the support provided by Angus Council to the AHSCP to fulfil parts of its responsibilities in relation to information governance.

2.2 What remains to be done?

- Complete and maintain the inventory of information assets.
- Develop procedures and guidance on records disposal and preservation.
- Negotiate an archiving agreement with the Angus Archives Service.
- Work with NHS Tayside and Angus Council to ensure resources are available to digitise paper records produced in the carrying out of the IJB's functions, and coordinate digitisation of those records within the timescale of this strategy.
- Implement classification and retention policies for all paper and electronic records.
- Establish an Information Governance Working Group to coordinate the operational implementation of the Information Governance Strategy across the AHSCP.

3 Integration and Collaboration

The Public Bodies (Joint Working) (Scotland) Act 2014 provides a legal framework for the integration of health and social care and the co-production of health and wellbeing with the residents and communities of Angus. Bringing

together the knowledge and information of all stakeholders is critical to enabling AHSCP to deliver on its vision and strategic planning goals.

To achieve this we need to ensure that Partnership staff, whether employed by NHS Tayside or Angus Council, are able to access whatever information they need to carry out their work efficiently and effectively, irrespective of where and by whom that information is held.

We also need to enable independent sector, third sector, and community partners to have access to the information they need, and share their own information and knowledge within the Partnership.

As a Partnership we also need to make best use of technology to support collaboration, innovation, and multi-agency service delivery. People across the Partnership are already experimenting with a diverse range of digital tools to help them collaborate, share information, and build knowledge networks. We need to put in place appropriate governance arrangements to ensure these and other digital collaboration tools can be used safely and securely by the Partnership.

Developing the digital infrastructure and processes to support integration and collaboration is challenging and requires the cooperation and commitment of NHS Tayside and Angus Council. The AHSCP Digital Health and Care Delivery Plan 2019-22 sets out the priorities for the next three years and how those priorities will be achieved.

This strategy provides the information governance framework which underpins and drives the delivery plan.

3.1 What have we achieved to date?

We have agreed a data sharing framework to ensure information can be shared safely and appropriately between NHS Tayside, Angus Council, and the AHSCP.

Operationally, access to NHS Tayside information systems has been agreed for Angus Council staff where this is necessary to carry out AHSCP functions. Similarly, NHS Tayside is now providing access to some of its key information systems to Angus Council where this is necessary to carry out AHSCP functions.

A number of integrated teams have also agreed to use a single information system to hold and process both health and social care information, further improving their efficiency and effectiveness.

Some staff have also begun to creatively use collaborative applications to support their work, particularly where that collaboration involves independent and third sector partners, service users, and carers. The tools being explored include Huddle, Yammer, Skype for Business, the KnowledgeHub, and social media services.

We have lead the establishment of a Tayside Information Governance Group, bringing together the statutory officers of the three Tayside health and social care partnerships, three Tayside local authorities, and NHS Tayside to share best practice and ensure a consistent approach across the region.

3.2 What remains to be done?

- Agree a formal service level agreement with NHS Tayside and Angus Council in respect of IT support of AIJB functions under the Angus Integration Scheme to ensure clarity and consistency.
- Work with NHS Tayside and Angus Council to develop intranet capabilities to support collaboration between Partnership staff employed by NHS Tayside and Angus Council.
- Work with NHS Tayside and Angus Council to develop extranet capabilities to support collaboration with partner organisations.
- Safely and appropriately widen access to key NHS and Angus Council systems to enable fully integrated working.
- Establish liaison arrangements to ensure AHSCP priorities and needs are taken into account by NHS Tayside and Angus Council when planning IT and information governance policy development which might affect the delivery of AHSCP functions.

4 Confidentiality and Security

Information is a vital asset for the AHSCP and need to be managed securely and safely. The AHSCP has duty under the Public Records (Scotland) Act 2011 to maintain and preserve its own corporate records securely. The AHSCP also requires to secure assurance from NHS Tayside and Angus Council that information collected, processed, or produced by those bodies in carrying out AHSCP functions is also managed securely and safely.

Currently much of the information collected, processed, or produced in carrying out the AHSCP functions, is held in paper form. This raises a range of challenges in relation to security and confidentiality as it is difficult to manage access, duplication, updating, transfer, and disposal in a systematic and safe manner. Physical files also present challenges as staff are increasingly required to work in agile ways and budget pressures mean extensive storage space for paper records is no longer affordable.

There are particular ongoing risks arising from community health and social care staff having to carry highly confidential information with them in paper form on home visits.

Some of these are also present where information is kept in electronic format in manually structured file systems such as shared network drives where access, alteration, and deletion of information is not systematically logged.

There is an urgent need to digitise and integrate all clinical and social care records with existing computerised information management systems, and to equip Partnership staff with mobile devices to enable them to access relevant information safely and securely when from any location.

Under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018, the AHSCP is jointly responsible with NHS Tayside and Angus Council for ensuring that personal information processed in the carrying out of AHSCP functions is processed in accordance with the data protection principles, particularly in regards to confidentiality, integrity, and security.

The new legislation requires us to review all electronic and manual work systems to ensure that data protection is designed into every aspect of our processing of personal information. This is particularly important where major changes in systems or work practices are being planned, such as the replacement of the social work information management system, CareFirst, or the introduction of Microsoft Office 365 cloud computing platform in both NHS Tayside and Angus Council and the consequent migration of information assets cloud based data centres.

At the same time the digitisation of paper records and the move to cloud based platforms for file storage and management offer opportunities to improve data security, data protection, and records management.

4.1 What have we achieved to date?

The current work on creating an Information Asset Register for the AHSCP is enabling us to quantify the type, volume, and format of all our information assets to enable planning of improved information security.

An audit of current manual processing of personal information is underway and Data Protection Impact Assessments (DPIA) are being carried out on key new and existing information systems, in order to assess the level of GDPR compliance and to identify areas for improvement.

All information governance incidents including data breaches are reported directly to the AHSCP's Data Protection Officer who jointly reviews them with the NHS DPO or Angus Council DPO as appropriate. The three DPOs liaise closely together and meet regularly to share learning.

Guidance has been provided on improved document transfer arrangements and agreement has been reached with NHS Tayside to improve arrangements for the storage and management of health records created by community services.

Angus Council has developed a new records storage and digitisation facility in Arbroath which will be used for storage and digitisation of social work records.

4.2 What remains to be done?

- Adopt and implement an Information Security Policy.
- Complete cycle of data protection audits and DPIAs.
- Work with Angus Council and NHS Tayside to ensure that a comprehensive DPIA is carried out in respect of any new IT system development or operational policy which might impact on AHSCP functions.
- Work with Angus Council and NHS Tayside to move all information storage and processing to robust cloud based data systems to ensure improved information security, confidentiality, accessibility, and resilience.
- Work with Angus Council and NHS Tayside to accelerate the introduction of mobile devices to improve information security and data

protection, especially for community nurses, allied health professionals, and care management staff.

- Adopt and implement a Data Protection Policy and produce guidance for staff.

5 Transparency and Accessibility

Transparency is essential to building trust between public bodies and the general public. The AHSCP is accountable to the public and its decisions and activities should be open to scrutiny by the people of Angus.

Under the Freedom of Information (Scotland) Act 2002 all information held by the AHSCP, or by NHS Tayside and Angus Council on its behalf, is open to scrutiny on request by members of the public unless the information meets a very narrow set of exemption criteria set out in the Act.

The Act also requires public bodies to publish a wide range of information in a way which is easily accessible to the public, preferably online. The more information the AHSCP published in this way the less members of the public have make individual Freedom of Information requests, which saves staff time and resources and improves public trust in the AHSCP. This includes the publishing of data in line with the Scottish Government's [Open Data Strategy](#).

Under the Equalities Act 2010 the Partnership must ensure its information can be accessed by people in alternative languages or in accessible formats. This includes making sure documents provided electronically are formatted in a manner which can be read by text to speech applications.

More recently, the [Public Sector Bodies \(Websites and Mobile Applications\) \(No. 2\) Accessibility Regulations 2018](#) require that all public sector bodies must ensure that all websites and mobile applications they use to share information with the public comply with enhanced accessibility standards.

5.1 What have we achieved to date?

We have established the AHSCP website <https://www.angushscp.scot/> to provide information and advice to the general public on the work of the AHSCP. The site also provides access to performance information, and records of meetings of the IJB and its standing committees.

The AHSCP website aims to meet the [Web Content Accessibility Guidelines \(WCAG\) 2.0](#) for all its content in compliance with the [Public Sector Bodies \(Websites and Mobile Applications\) \(No. 2\) Accessibility Regulations 2018](#).

We have created a [data dashboard](#) on our website to provide the public with a rich picture of the health and social care needs of the Angus population and the AHSCP performance against national and local outcomes.

This work has been made possible with funding through the [European Union North Sea Region LIKE! Programme](#) in partnership with Angus Council.

We have adopted the Scottish [model publication scheme](#) and published a [Guide to Information](#) as required under the Freedom of Information (Scotland) Act 2002. We have also begun to make some of our datasets

publicly available on [Angus Council's opendata portal](#) in line with the Model Publication Scheme.

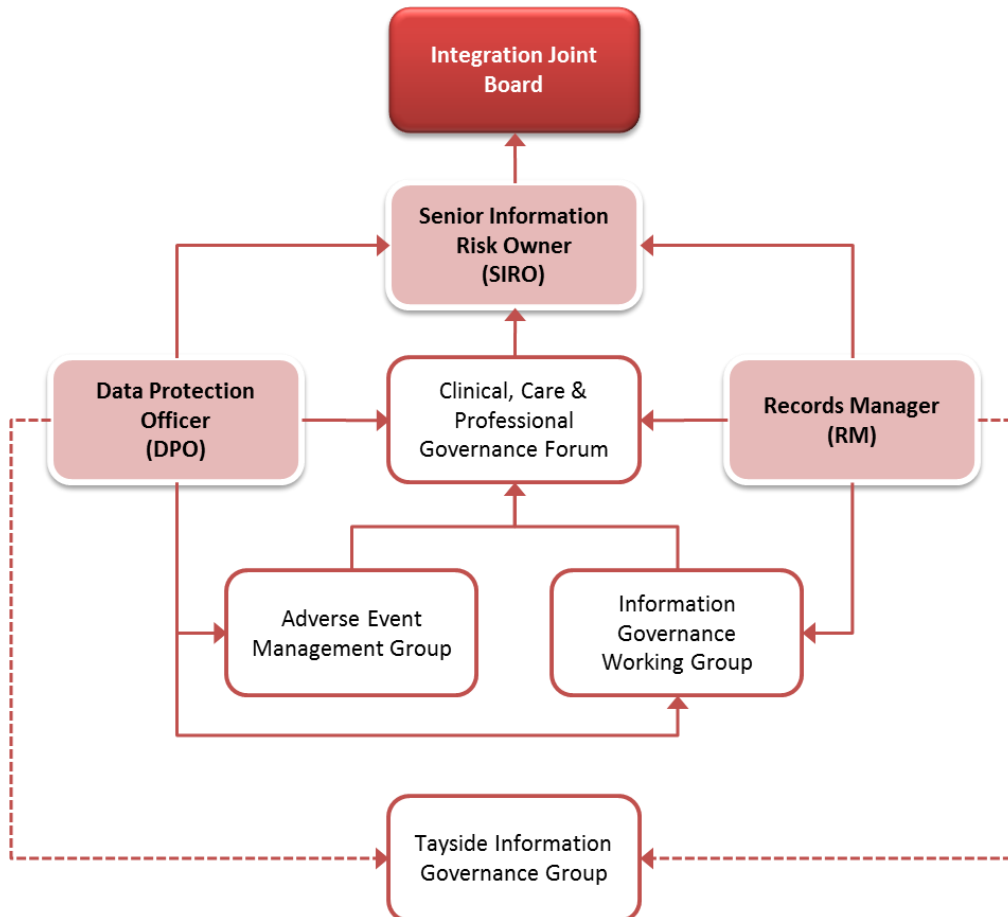
5.2 What remains to be done?

- Continue to develop the AHSCP website, including offering interactive capabilities such as feedback forms and online self-referral to services.
- Review the AHSCP's Guide to Information with a view to expanding the range of information we routinely make available to the public in line with current guidance.
- Increase access of AHSCP staff to records of decision making, policies, etc. through development of intranet capabilities in collaboration with NHS Tayside and Angus Council.
- Increase access for partner organisations to records of decision making, policies, etc. through development of extranet capabilities in collaboration with NHS Tayside and Angus Council.
- Ensure all website pages published by the AHSCP, and documents made available electronically from those pages, meet accessibility requirements wherever possible.
- Adopt and implement an Access to Information Policy.

6 Governance Arrangements

Achieving a consistently high standard of information governance and records management is complex and requires ongoing commitment by staff at all levels of the AHSCP to continuous improvement.

The IJB needs to be assured that all aspects of the management of the AHSCP's information assets are maintained.



6.1 Senior Management Oversight

The Clinical Director will fulfil the role of Senior Information Risk Owner (SIRO) for the AHSCP.

The SIRO will be accountable for the delivery of the Information Governance Strategy and for overseeing the development, implementation, and monitoring of information governance policies and practice at all levels of the AHSCP. The SIRO will provide assurance to the Board and the Executive Management Team that information governance standards and performance are maintained.

Both as a non-voting member of the IJB and as a member of the Executive Management Team, the SIRO will promote best practice in information governance in all aspects of the AHSCP's business.

The SIRO will work closely with the SIRO for NHS Tayside and the Chief Information Governance Officer (CIGO) for Angus Council to ensure that

both parties maintain appropriate standards of information governance in carrying integration functions under the direction of the IJB.

The SIRO will be accountable to the IJB and to the Chief Officer.

6.2 Governance and Assurance

As part of its wider governance and assurance role, the Clinical, Care, and Professional Governance Forum (CCPG) will be responsible for overseeing, scrutinising, and monitoring the delivery of the Information Governance Strategy, the development of the AHSCP's information governance policies, and for providing assurance that the AHSCP's information governance duties are being discharged appropriately in line with current legislative requirements.

Specifically, the CCPG will direct and monitor compliance with the Freedom of Information (Scotland) Act 2002 (FOISA), the Access to Environmental Information Scotland Regulations 2004 (EIRS), the Public Records (Scotland) Act 2011 (PRSA), the General Data Protection Regulation EU 2016 (GDPR), the Data Protection Act 2018 (DPA 2018), and all equalities legislation insofar as it applies to information governance.

The CCPG will be responsible for assessment and review of the AHSCP's Records Management Plan and related improvement actions, and will oversee the preparation of annual Progress Update Reports to the Keeper of the National Records of Scotland.

In relation to all aspects of Information Governance the CCPG will be accountable to the IJB and the Chief Officer through the SIRO.

6.3 Incident Management

As part of its role in monitoring and managing adverse events, the Adverse Events Management Group (AEMG) will be responsible for supporting the Data Protection Officer in monitoring and managing information security and personal data breaches affecting the AHSCP as a data controller or creator of public records.

The AEMG will report to and be accountable to the CCPG.

6.4 Operational Implementation

The Partnership Information Governance Working Group (PIGWG) will be responsible for the development of policies, guidance, and work systems to support the implementation of the strategy.

The PIGWG will report to and be accountable to the CCPG.

6.5 Statutory Officers

The AHSCP is a data controller as defined by the General Data Protection Regulation (EU 2016) and the Data Protection Act 2018 and is required to appoint a Data Protection Officer to advise the IJB and Chief Officer in relation to data protection. The Data Protection Officer will act as a single point of contact for all data protection enquiries from the public, from staff, and from the Information Commissioner.

The DPO reports to the CCPG and is accountable to the SIRO and the Chief Officer.

Under the Public Records (Scotland) Act 2011 the AHSCP, as a public body, must appoint a Records Manager to oversee the day to day implementation of the AHSCP's Records Management Plan. This role will be carried out on behalf of the IJB by Angus Council's Team Leader (Information Governance).

The Records Manager reports to the CCPG and is accountable to the SIRO.

6.6 Cooperation and Collaboration

The SIRO and the statutory officers will maintain good links with the information governance teams of NHS Tayside and Angus Council.

The statutory officers shall work through the Tayside Information Governance Group with the other Tayside statutory officers to ensure a consistent approach to all information governance matters and to share best practice.

The AHSCP shall be represented on NHS Tayside Information Governance Committee and Angus Council Information Governance Steering Group to ensure cooperation in the development of information governance policies and initiatives affecting the AHSCP.

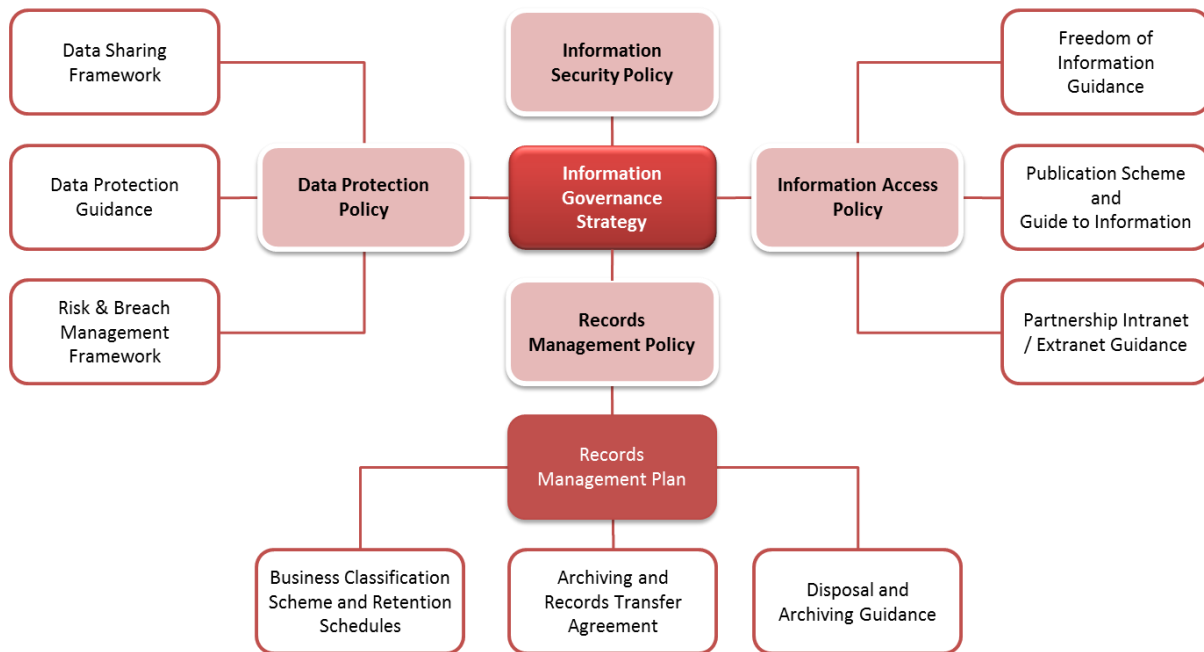
7 Strategy Implementation

7.1 Policy Framework

This strategy will be supported by a strategic policy framework covering four areas:

- Information Security
- Data Protection
- Records Management
- Access to Information

In turn these policies will be supported by operational policies, guidance, and public documents.



7.2 Training

The AHSCP will establish a formal training programme for all staff to ensure that they are fully aware of their information governance responsibilities.

All NHS and Angus Council staff involved in the delivery of AHSCP functions are required to complete mandatory data protection and information governance e-Learning modules annually. Both NHS Tayside and Angus Council will shortly be moving their e-learning resources to a common platform, TURAS, which will provide the opportunity for further integration of learning.

7.3 Resources

Most of the actions set out in this strategy arise directly from statutory obligations to which the AHSCP is subject. The cost for implementing elements of this strategy cannot be quantified at this stage. Where resources are required to implement the strategy these will need to be contained, as far as possible, within current resources. The Senior Information Risk Owner will be responsible for providing the necessary business case for any proposed capital or revenue costs in consultation with Chief Officer and Chief Finance Officer.

The AHSCP looks to its principle partners, NHS Tayside and Angus Council, for their commitment to actively work with us to avoid duplication and develop joint endeavours wherever we can to ensure together we achieve best value in information governance.

7.4 Communication

The strategy, and associated policies and guidance, will be published on the AHSCP website.

8 Monitoring & Review

Progress in delivery of the strategy will be monitored by the CCPG through the Pentana Performance Management System and reported on a six monthly basis to the Executive Management Team. The CCPG will also monitor the impact of the strategy, and the associated policies and guidance, on compliance with the AHSCP statutory information governance responsibilities.

The CCPG will also undertake an annual review of the strategy to ensure it remains consistent with emerging best practice and changes to legislation.

9 Implementation Plan

Theme	Action	Timescale		
		2019-20	2020-21	2020-22
Organisation & Management	Complete and maintain the inventory of information assets.			
	Develop procedures and guidance on records disposal and preservation.			
	Negotiate an archiving agreement with the Angus Archives Service.			
	Work with NHS Tayside and Angus Council to ensure resources are available to digitise paper records produced in the carrying out of the IJB's functions, and coordinate digitisation of those records within the timescale of this strategy.			
	Implement classification and retention policies for all paper and electronic records.			
	Establish an Information Governance Working Group to coordinate the operational implementation of the Information Governance Strategy across the AHSCP.			
Integration & Collaboration	Safely and appropriately widen access to key NHS and Angus Council systems to enable fully integrated working.			
	Work with NHS Tayside and Angus Council to develop intranet capabilities to support collaboration between Partnership staff employed by NHS Tayside and Angus Council.			
	Work with NHS Tayside and Angus Council to develop extranet capabilities to support collaboration with partner organisations.			
	Agree a formal service level agreement with NHS Tayside and Angus Council in respect of IT support of AIJB functions under the Angus Integration Scheme to ensure clarity and consistency.			

Theme	Action	Timescale		
		2019-20	2020-21	2020-22
	Establish liaison arrangements to ensure AHSCP priorities and needs are taken into account by NHS Tayside and Angus Council when planning IT and information governance policy development which might affect the delivery of AHSCP functions.			
Confidentiality & Security	Adopt and implement an Information Security Policy.			
	Complete cycle of data protection audits and DPIAs.			
	Work with Angus Council and NHS Tayside to ensure that a comprehensive DPIA is carried out in respect of any new IT system development or operational policy which might impact on AHSCP functions.			
	Work with Angus Council and NHS Tayside to move all information storage and processing to robust cloud based data systems to ensure improved information security, confidentiality, accessibility, and resilience.			
	Work with Angus Council and NHS Tayside to accelerate the introduction of mobile devices to improve information security and data protection, especially for community nurses, allied health professionals, and care management staff.			
	Adopt and implement a Data Protection Policy and produce guidance for staff.			
Transparency & Accessibility	Continue to develop the AHSCP website, including offering interactive capabilities such as feedback forms and online self-referral to services.			
	Review the AHSCP's Guide to Information with a view to expanding the range of information we routinely make available to the public in line with current guidance.			
	Increase access of AHSCP staff to records of decision making, policies, etc. through development of intranet capabilities in collaboration with NHS Tayside and Angus Council.			

Theme	Action	Timescale		
		2019-20	2020-21	2020-22
	Increase access for partner organisations to records of decision making, policies, etc. through development of extranet capabilities in collaboration with NHS Tayside and Angus Council.			
	Ensure all website pages published by the AHSCP, and documents made available electronically from those pages, meet accessibility requirements wherever possible.			
	Adopt and implement an Access to Information Policy			