National Intelligent Integrated Auditing Solution (NIIAS)

Purpose

The purpose of this paper is to report on NIIAS incidents up to and including 31st January 2017.

Background

NIIAS is a software auditing tool available to all Health Boards / Trusts across NHS Wales. It is used to detect potentially inappropriate access to electronic clinical records where employees may have accessed and/or viewed data they are not entitled to access.

Monitoring NIIAS Alerts

The verified figures (after removal of false positives), split by week, are as follows:

October 2016		November 2016		December 2016		January 2017	
Own Record	**Family Record**	**Own Record**	**Family Record**	**Own Record**	**Family Record**	**Own Record**	**Family Record**
14	6	6	*	*	*	13	5
10	8	8	*	*	*	5	*
11	*	*	*	10	*	*	*
10	11	11	*	*	*	5	*
		*	*	*	0	*	*
45	**29**	**31**	**13**	**27**	**9**	**28**	**14**

Manager Responses to NIIAS notifications

From 1st December 2016 the IG Department have been monitoring how well Line Managers respond to NIIAS notifications we send to them. Any feedback and / or confirmation of appropriate action received from Line Managers is recorded. As of 6th February 2017 the figures for Line Manager responses back to IG are as follows:

December 2016 – Manager Responses by week			
2nd access to Own Record	**Family Record**	**Confirmation of appropriate action received**	**Disciplinary action taken. Yes / No / Unknown**
0	*	Yes	Unknown
0	*	No	Unknown x4
0	*	Yes/No	Unknown x2
0	*	Yes	Unknown
0	0	---	---
0	9		

January 2017 – Manager Responses by week			
2nd access to Own Record	Family Record	Confirmation of appropriate action received	Disciplinary action taken. Yes / No / Unknown
0	5	Yes/No	Unknown - 5
0	*	Yes	Unknown
*	*	Yes – *; No - *	Unknown - *
0	*	Yes – *; No - *	Unknown - *
*	*	Yes – *; No - *	Unknown - *
*	**14**		

Breakdown by SDU

From 1st December 2016 the IG Department have also been recording the number of incidents by Service Delivery Unit. The monthly incident figures by SDU are as follows:

December 2016 – SDU by month			
Own Record		Family Record	
SDU	Incidents	SDU	Incidents
Mental Health	*	Mental Health	*
Morriston	*	Morriston	*
NPTH	0	NPTH	0
PoWH	**11**	PoWH	0
Primary Comm.	*	Primary Comm.	0
Singleton	**6**	Singleton	0
Corporate (HR)	0	Corporate (HR)	0
Corporate (Strategy)	0	Corporate (Strategy)	0
Corporate (Informatics)	*	Corporate (Informatics)	*
Corporate (Finance HQ)	0	Corporate (Finance HQ)	*
Corporate (R&D)	0	Corporate (R&D)	*
Unknown	0	Unknown	0
External Organization	*	External Organization	0
	27		**9**

January 2017 – SDU by month			
Own Record		**Family Record**	
SDU	**Incidents**	**SDU**	**Incidents**
Mental Health	*	Mental Health	0
Morriston	6	Morriston	*
NPTH	6	NPTH	*
PoWH	7	PoWH	*
Primary Comm.	*	Primary Comm.	*
Singleton	*	Singleton	*
Corporate (HR)	0	Corporate (HR)	0
Corporate (Strategy)	0	Corporate (Strategy)	0
Corporate (Informatics)	*	Corporate (Informatics)	0
Corporate (Finance HQ)	0	Corporate (Finance HQ)	0
Corporate (R&D)	0	Corporate (R&D)	*
Unknown	*	Unknown	0
External Organization	*	External Organization	0
	28		**14**

* Where less than 5 has been indicated we are unable to provide you with the exact number of patients as due to the low numbers, there is a potential risk of identifying individuals if this was disclosed. We are therefore withholding this detail under Section 40(2) of the Freedom of Information Act 2000. This information is protected by the Data Protection Act 1998, as its disclosure would constitute unfair and unlawful processing and would be contrary to the principles and Schedules 2 and 3 of the Act. This exemption is absolute and therefore there is no requirement to apply the public interest test.

Procedural updates

1. Following discussions within the IG Department, it is proposed that the time given to Line Managers to initially respond to NIIAS notifications is increased to 2 weeks. This will allow for things such as Annual Leave or Sick Leave to be taken into consideration.

2. The Policy Acceptance screen that appears periodically when a user logs onto the network has now been amended to include awareness of NIIAS.

3. It is proposed that the IG Department will provide the SDU leads with a monthly breakdown of any outstanding / open incidents in their areas. A template spreadsheet is being developed by the IG Department which will be distributed as soon as it is ready. It is hoped that this will assist the SDU leads to bring outstanding / open cases in their areas to conclusion.

Recommendations

- IGB are asked to note the number of NIIAS breaches, which appears to have increased slightly in the last month

- IGB are asked to note that a consistent approach to breaches across ABMU still needs to be developed and this is an outstanding action from the October 2016 IGB meeting.