



**Health  
Information  
and Quality  
Authority**

An tÚdarás Um Fhaisnéis  
agus Cáilíocht Sláinte

## ASSESSMENT JUDGMENT FRAMEWORK

# National Standards for Information Management in Health and Social Care



*Safer Better Care*

## About the Health Information and Quality Authority

The Health Information and Quality Authority (HIQA) is an independent statutory body established to promote safety and quality in the provision of health and social care services for the benefit of the health and welfare of the public.

Reporting to the Minister for Health and engaging with the Minister for Children, Equality, Disability, Integration and Youth, HIQA has responsibility for the following:

- **Setting standards for health and social care services** — Developing person-centred standards and guidance, based on evidence and international best practice, for health and social care services in Ireland.
- **Regulating social care services** — The Chief Inspector of Social Services within HIQA is responsible for registering and inspecting residential services for older people and people with a disability, and children’s special care units.
- **Regulating health services** — Regulating medical exposure to ionising radiation.
- **Monitoring services** — Monitoring the safety and quality of permanent international protection accommodation service centres, health services and children’s social services against the national standards. Where necessary, HIQA investigates serious concerns about the health and welfare of people who use health services and children’s social services.
- **Health technology assessment** — Evaluating the clinical and cost effectiveness of health programmes, policies, medicines, medical equipment, diagnostic and surgical techniques, health promotion and protection activities, and providing advice to enable the best use of resources and the best outcomes for people who use our health service.
- **Health information** — Advising on the efficient and secure collection and sharing of health information, setting standards, evaluating information resources and publishing information on the delivery and performance of Ireland’s health and social care services.
- **National Care Experience Programme** — Carrying out national service-user experience surveys across a range of health and social care services, with the Department of Health and the HSE.

## Overview of the health information function of HIQA

Good information is the foundation of a high-quality health and social care service. As part of a person's journey through the health and social care system, information is collected and shared at different stages and used to inform their care. This is known as the primary use of information. High-quality data is also important for other purposes such as planning and managing services, policy-making, research and innovation. For example, information may be used to decide where to locate a new service or to understand how practice can be changed to improve a person's experience of care. This is known as the secondary use of information.

Whether used for primary or secondary purposes, it is essential that information is managed effectively and securely and used to its full potential to promote safer better care, improved outcomes and overall wellbeing for people using services. A human rights-based approach should be of central importance and seek to balance the rights of people with the broader societal value of using health and social care information. A strategic and coordinated approach that is aligned with information standards is also essential to ensure data is captured and managed in line with best practice. A well-embedded standards-based information environment will allow all stakeholders, including the general public, patients and service users, health and social care professionals and policy-makers, to make choices or decisions based on the best available information.

Digital health, which is the use of digital technologies to improve health, is critical to ensuring that information is available when and where it is required. An effective digital health infrastructure can support the secure, effective transfer of information by ensuring information is captured in the right format so that it can be shared easily and securely across services. The necessary information should be accessible by all health or social care professionals providing care and to the person it relates to. This will lead to more efficient and effective delivery of care and ensure people do not have to provide the same information on multiple occasions.

The Health Information and Quality Authority (HIQA) has responsibility for setting standards for all aspects of health information and monitoring compliance against those standards, as set out in Section 8(1) of the Health Act 2007.<sup>(1)</sup> Under the Act, HIQA is also charged with evaluating the quality of the information available on health and social care and making recommendations to the Minister and the Health Service Executive (HSE) in relation to improving the health information system. Through its health information function, HIQA also plays a key role in providing evidence to inform national health information policy and shape the health information landscape in Ireland. HIQA works to ensure that high-quality health and social care information is available to support the delivery, planning and monitoring of services which in turn ensures safer better care for all.

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## 1 Introduction

Data and information are generated in huge volumes everyday across the health and social care system. Although health data is an extremely valuable resource, there are significant costs associated with its management in terms of how it is collected, used and shared. Therefore, it is imperative that organisations have appropriate structures, systems, policies and procedures in place which are aligned with evidence-based standards. This will ensure that data collected is of the highest quality and used to its full potential to promote safer better care, improved outcomes and overall wellbeing.

The aim of the *National Standards for Information Management in Health and Social Care* (referred to as national standards in this document) is to contribute to safer better care by improving the management of health and social care information. They complement other [health and social care standards](#) which have been developed by HIQA.

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**The *National Standards for Information Management in Health and Social Care* should be reviewed in advance of reading this Assessment Judgment Framework.**

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### 1.1 Purpose of the Assessment Judgment Framework

This document was developed as part of a suite of resources to support the implementation of the national standards, to include:

- **The Assessment Judgment Framework**
- Guide to the Assessment Judgment Framework
- Self-assessment tool.

<b>National Standards for Information Management in Health and Social Care</b>	<b>Assessment Judgment Framework</b>	<b>Guide to the Assessment Judgment Framework</b>	<b>Self-assessment tool</b>
	Sets out lines of enquiry to assist organisations and HIQA reviewers in assessing and making judgments on compliance with the standards.	Provides detailed guidance for organisations and HIQA reviewers about how compliance with the national standards will be assessed and how each standard can be met. Used alongside the Assessment Judgment Framework when assessing compliance.	Helps organisations determine the extent to which they comply with the standards and identify areas of good practice and where improvement is needed.

## 2 Judgments on compliance

There are four levels of compliance, outlined in **Table 1**. We term them 'judgment descriptors', and they are used to describe how an organisation performed against each of the standards.

**Table 1 Judgment descriptors**

<b>Compliant</b>	A judgment of compliant means that the organisation was in compliance with, or exceeded, the requirements of the relevant standard.
<b>Substantially compliant</b>	A judgment of substantially compliant means that the organisation met most of the requirements of the relevant standard, but some action is required to be fully compliant.
<b>Partially compliant</b>	A judgment of partially compliant means that the organisation meets some of the requirements of the relevant national standard while other requirements are not met.
<b>Not compliant</b>	A judgment of non-compliant means that one or more findings indicate that the relevant national standard is not being met, and immediate action is required by the organisation to mitigate the impact of the non-compliance.

### **3 Structure of the Assessment Judgment Framework**

This Assessment Judgment Framework is arranged into four sections based on each of the four principles underpinning the national standards.

Each standard is comprised of two elements:

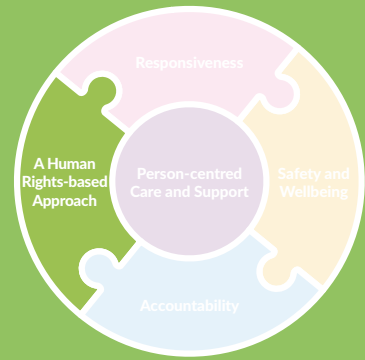
- a statement written from the service user's perspective stating the outcomes they can expect from the health and social care organisation
- a statement setting out the arrangements that organisation should have in place to achieve a rights-based quality service.

The Assessment Judgment Framework sets out examples of the lines of enquiry (the questions) to be explored by reviewers and organisations in order to assess compliance with the standards. In many but not all cases, the line of enquiry will explore a specific feature of the standards.

# Principle 1

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## A human rights-based approach





## Principle 1 – A human rights-based approach

### Standard 1.1 Uphold people’s rights relating to information

#### What a person should expect:

I am confident that arrangements are in place to promote and uphold my rights relating to information and I fully understand how and why the organisation collects, uses and shares my information.

#### What an organisation should do to achieve this:

The organisation has effective arrangements in place to ensure a person’s rights under relevant legislation are promoted and upheld, balancing these rights against other values, fundamental rights, human rights, or legitimate, public or vital interests. The organisation is transparent about how and why it collects, uses and shares information.

#### Lines of enquiry

1. Does the organisation provide clarity on what people’s rights are in relation to their data and the choices they have about their data? These rights include, but are not limited to: right of access, right to be informed (transparency), right to rectification, right to erasure, right to data portability, right in relation to automated processing, right to object to processing and right of restriction?
2. Does the organisation document and communicate a clear process on obtaining informed consent for the use of health data for specific purposes including the process to be followed when an individual wishes to change their consent preferences.
3. Does the organisation have effective arrangements in place to align practices with relevant legal frameworks and human rights treaties which establish data rights?
4. Does the organisation promote an inclusive, sensitive and equitable approach to information management for individuals, groups and communities with diverse needs? This should consider data collection methodologies and processes, intended uses and accessibility to information.

## Principle 1 – A human rights-based approach

### Standard 1.2 - Protect privacy and confidentiality

What a person should expect:	What an organisation should do to achieve this:
I am confident that the organisation will protect my privacy and confidentiality when collecting, using and sharing my information.	The organisation has effective arrangements in place to protect the privacy and confidentiality of people about whom it collects, uses and shares information.

#### Lines of enquiry

1. Is there an identifiable individual within the organisation whose role includes providing education, advice, guidance and support to the organisation and staff in the area of data protection?
2. Is there evidence of the organisation publishing and regularly reviewing a Privacy Statement or Notice? This includes:
  - clearly and comprehensively outlining what information is collected
  - explaining how it is used and shared
  - a point of contact to facilitate feedback and review.
3. Are Data Protection Impact Assessments (DPIAs) conducted to identify and mitigate any data protection-related risks arising from new and ongoing projects?
4. Has the organisation published a summary of findings and/or actions arising from the DPIA, if appropriate to do so?
5. Does the organisation have effective arrangements in place to check that the collection, use and sharing of personal information is justified, required, limited to what is necessary and that access to personal confidential data is on a strict need-to-know basis?
6. Can the organisation provide evidence of the implementation, review and audit of policies and procedures to protect privacy?

# Principle 2

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## Safety and wellbeing



## Principle 2 – Safety and wellbeing

### Standard 2.1 - Optimise the accessibility, use and value of information

#### What a person should expect:

I am confident that my information is used in line with legislation and innovation, to continuously drive improvements in care, safety and wellbeing.

#### What an organisation should do to achieve this:

The organisation effectively uses data and information as a resource in the planning, delivering, management of care and improvement of safety and wellbeing in line with legislation, national digital health policies and strategies, and emerging and evolving technologies.

#### Lines of enquiry

1. Does the organisation provide access to high-quality information, in line with legislation, to promote effective and safe use of data in a timely manner to improve safety and wellbeing?
2. Does the organisation demonstrate effective use of resources and infrastructure (including software, ICT equipment, cloud services) in a way that:
  - enables safe access to data to support safety and wellbeing?
  - supports learning health systems in line with emerging and evolving technologies and national digital health policy and strategies?
3. Are individuals, providers, locations and assets uniquely identified to enhance safety, and to promote effective use of information for both primary and secondary purposes?
4. Has the organisation established data sharing rules and guidelines and defined multiple levels of data access in association with policies and procedures?
5. Where relevant, does the organisation assess and manage risks associated with information sharing using the 'Five Safes Framework'?
6. Does the organisation have contingency plans in place to ensure a timely response to an event which may impact on accessibility or use of information including:
  - business continuity and continuity of care plans?

- a disaster recovery plan?

7. Does the organisation routinely monitor the use of information for relevance and usability to identify areas for improvements?

## Principle 2 – Safety and wellbeing

### Standard 2.2 - Undertake effective stakeholder engagement

#### What a person should expect:

I am confident that the organisation engages with all relevant stakeholders, including people using services, members of the public and professionals, to identify their priorities and expectations in terms of information management and in getting access to information to inform decisions about care, support and wellbeing.

#### What an organisation should do to achieve this:

The organisation has effective arrangements in place to promote a strategic approach to engaging with key stakeholders, including people using services, members of the public and professionals, in order to identify current and future needs for information management including providing access to information and the associated system design and requirements to inform decisions about care, support and wellbeing.

#### Lines of enquiry

1. Does the organisation perform a stakeholder analysis to identify key stakeholders including people using services, members of the public, marginalised groups, professionals and other users of the data?
2. Does the organisation engage with key stakeholders to:
  - empower people to make informed decisions about their health information?
  - develop and inform relevant information management policies and procedures?
  - co-design and evaluate new health information initiatives and systems?
  - determine and design outputs, such as reports and meaningful indicators of person’s safety and quality of care outcomes?
3. Has the organisation established learning communities to inform and evolve practices regarding how routinely collected data can be used to achieve continuous and collective improvements in safety and wellbeing?



## Principle 3 - Responsiveness

### Standard 3.1 - Align with national and international best practice regarding standards and agreed definitions

#### What a person should expect:

I am confident that my information is collected and managed so it can be shared across organisations to ensure it is meaningful, accurate and available when needed to inform good decision-making.

#### What an organisation should do to achieve this:

The organisation has effective arrangements in place to align with the latest national and international standards, policies, guidance and recommendations for safe and effective collection, use, and sharing of information, and it strives to drive innovation in its information management practices to ensure good quality data is available when and where it is needed.

### Lines of enquiry

1. Is there an identified individual within the organisation whose role includes:
  - overseeing that systems are compliant with relevant standards, policies, guidance and recommendations?
  - identifying future requirements in terms of adopting forthcoming standards and agreed definitions?
  
2. Does the organisation have effective arrangements in place to ensure compliance with relevant standards? This should include the following:
  - information standards for clinical content
  - information standards for clinical terminologies and classifications.
  - messaging standards for interoperability
  - data security standards
  - other relevant standards specific to organisations functions.
  
3. Has the organisation developed and implemented a data dictionary to ensure consistency and comparability of data in line with nationally and internationally agreed definitions where they exist?



<b>Principle 3 - Responsiveness</b>	
<b>Standard 3.2 - Enhance data quality</b>	
<b>What a person should expect:</b>	<b>What an organisation should do to achieve this:</b>
I am confident that my information is accurate, relevant and it can be accessed in a timely manner to meet my needs.	The organisation has effective arrangements in place to systematically assess, document and improve the quality of its data throughout the data and information lifecycle by using a data quality framework that is in line with best practice.

<b>Lines of enquiry</b>
<ol style="list-style-type: none"> <li>1. Has the organisation identified an individual who is responsible for data quality?</li> <li>2. Does the organisation have a data quality framework that outlines the approaches to assure the quality of data? All of the following components should be included: <ul style="list-style-type: none"> <li>▪ A data quality strategy*</li> <li>▪ A data quality assessment tool</li> <li>▪ Data quality reports</li> <li>▪ A data quality improvement cycle.</li> </ul> </li> <li>3. Has the organisation undertaken a data flow mapping exercise which: <ul style="list-style-type: none"> <li>▪ details all data entering and leaving the organisation?</li> <li>▪ is informed by a record of all data processing activities to help with the segregation of data quality activities?</li> </ul> </li> </ol>

\* Please visit [www.hiqa.ie](https://www.hiqa.ie) to read about our guidance on developing a data quality framework

<b>Principle 3 - Responsiveness</b>	
<b>Standard 3.3 - Ensure data security</b>	
<b>What a person should expect:</b>	<b>What an organisation should do to achieve this:</b>
I am confident that my information is shared safely and held securely, and that my confidentiality is protected.	The organisation has effective physical and technical security arrangements in place to ensure the confidentiality, integrity and availability of data and information, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

<b>Lines of enquiry</b>
<ol style="list-style-type: none"> <li>1. Has the organisation identified an individual who is responsible for data security?</li> <li>2. Does the organisation have adequate physical and technical environments to ensure data security?</li> <li>3. Does the organisation implement role-based access controls for all systems?</li> <li>4. Has the organisation effective arrangements in place to ensure data security? This should include: <ul style="list-style-type: none"> <li>▪ clearly documented roles and responsibilities of all staff for data security including cyber security</li> <li>▪ security risk assessments linked to the organisation’s risk register</li> <li>▪ a schedule of internal and external audits to improve data security practices and cyber security</li> <li>▪ monitoring and implementing measures to improve data security controls on a regular basis</li> <li>▪ regular reporting to senior management to provide assurance of data security arrangements.</li> </ul> </li> <li>5. Does the organisation have effective arrangements in place to ensure the development, implementation, review and auditing policies and procedures for data security?</li> </ol>

**Principle 3 - Responsiveness**

**Standard 3.4 - Develop staff capability and capacity for information management**

**What a person should expect:**

I am confident that staff have the skills and knowledge to collect, use and share my information appropriately.

**What an organisation should do to achieve this:**

The organisation has effective arrangements in place to routinely identify training needs and deliver required training to enable the development of highly trained and competent staff to manage information in line with relevant legislation, standards, policies, guidance and recommendations.

**Lines of enquiry**

1. Does the organisation conduct an annual training needs analysis and deliver associated training plans for staff in the area of information management?
2. Does the organisation ensure ongoing training and education is provided in the following areas:
  - people’s rights relating to their data are upheld
  - staff obligations relating to data protection are clear
  - appropriate use of data standards and agreed definitions
  - continuous improvements to data quality
  - best practice in relation to data security and cyber awareness
  - compliance with relevant legislation, codes of practice.
3. How does the organisation ensure that ongoing professional development is provided for staff with specialist information management roles?
4. Does the organisation perform a regular review of training plans and auditing of knowledge in key areas of information management?

# Principle 4

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## Accountability



## Principle 4 - Accountability

### Standard 4.1 - Develop strong organisational governance, leadership and management

#### What a person should expect:

I am confident that the organisation is governed and managed in a way that ensures my information is collected, used and shared appropriately.

#### What an organisation should do to achieve this:

The organisation has effective strategic governance, leadership and management arrangements in place with clear lines of accountability to ensure that information is collected, used and shared appropriately.

### Lines of enquiry

1. Is there a well-defined governance and organisational structure to ensure that the organisation's current and anticipated needs are met in relation to information management?
2. Are there clear lines of accountability for all staff members to promote a shared understanding of roles and responsibilities in relation to information management?
3. Where joint governance arrangements or joint data controllers are required, is there a memorandum of understanding or equivalent in place to provide assurances that all information is handled legally and securely?
4. Are there formalised agreements between data providers, data processors and data recipients to provide:
  - clarity around roles and responsibilities?
  - support in the providing, safe sharing and generating of quality data?
5. Does the organisation ensure that all data sets or systems are identifiable, documented and controlled by assigning a responsible data controller to oversee their management?
6. Does the organisation publish and regularly update a Statement of Purpose in an accessible format?

## Principle 4 - Accountability

### Standard 4.2 - Implement strategy for information management

#### What a person should expect:

I am confident that the organisation has clear plans about how my information will be collected, used and shared to support me and my health and social care needs now and into the future.

#### What an organisation should do to achieve this:

The organisation has effective arrangements in place to set clear objectives in relation to the services that it provides and the associated information management and system requirements, and develops a plan for delivering on these objectives.

#### Lines of enquiry

1. Does the organisation have clear plans for delivering on its objectives in relation to information management that take account of the following:
  - overall strategic and business plans?
  - future needs in relation technological and infrastructure?
  - optimising the accessibility, use and value of information?
  - effective engagement with key stakeholders?
  - evolving data security requirements?
  - data quality?
  - national and international strategies, standards, policies, guidance and recommendations?
2. Is there evidence of strategic workforce planning?
3. Does the organisation manage resources effectively, including human, physical and information and communication technology (ICT) resources?

## Principle 4 - Accountability

### Standard 4.3 - Implement strategy for information management

#### What a person should expect:

I am confident that the organisation assesses its performance and manages risks relating to my information.

#### What an organisation should do to achieve this:

The organisation has effective performance assurance and risk management arrangements in place in relation to information management to promote accountability to all stakeholders and to encourage continuous and rigorous self-assessment and improvement.

### Lines of enquiry

1. Does the organisation publish an annual report on progress against business and strategic plans for key stakeholders, including people about whom it holds information?
2. Does the organisation promote a culture of continuous quality improvement and development of learning systems? This includes responding to and learning from audits, significant events, reviews, evaluations, feedback and complaints.
3. Does the organisation undertake a regular review of performance relating to information management in the following areas?
  - progress against business plan objectives
  - key performance indicators
  - internal and external audits
  - risk management
  - capturing positive and negative feedback.

**Principle 4 - Accountability**

**Standard 4.4 - Ensure compliance with relevant legislation and codes of practice**

**What a person should expect:**

I am confident that my information is being collected, used and shared in a way that is aligned with Irish and European law.

**What an organisation should do to achieve this:**

The organisation has effective arrangements in place to ensure compliance with relevant Irish and European legislation and codes of practice, and has a process in place for identifying and addressing potential gaps in compliance with existing and forthcoming legislation.

**Lines of enquiry**

1. Has the organisation identified an individual who is responsible for assessing compliance with legislation and identifying future legislative requirements?
2. Does the organisation have effective arrangements in place to assess compliance with relevant existing Irish and European legislation and codes of practice?



## References

1. Health Act 2007 (Ireland). Available from: <https://www.irishstatutebook.ie/eli/2007/act/23/enacted/en/html>. Accessed on: 14 December 2023
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