

INFORMATION GOVERNANCE TRAINING PROCEDURE

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VALIDITY – Policies should be accessed via the Trust intranet to ensure the current version is used.

CHANGE RECORD

Version	Date	Change details
1.00	March 2017	Updated to a procedure as agreed at the IG Committee November 2016. Updated to all staff requiring an annual refresher rather than those with access to personal data. Training needs Analysis matrix updated with specific IG roles.
1.01	18/09/2018	Update references to Data Protection Act 2018 and General Data Protection Regulation.
2.0	Jan 2020	Update the procedure in line with the DSP toolkit standard 03 and the national Data Security Level 1 training. Add in the annual learning needs analysis exercise. Remove the training evaluation. Update the training needs analysis in Appendix 1.
3.0	Feb 2023	Procedure updated to reflect that most training is now undertaken online and that new starters now receive a short interactive face to face session, followed up with online IG and Data Security training. Section 4.5 updated to include the Data Matters newsletter, bespoke IG sessions and NHS Digital short videos. Appendix 2 updated to remove the basic and advanced face to face IG training sessions. Formatted to procedure template. Approved at IG Group (9 February 2023).

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1. INTRODUCTION

Information and information processes of all NHS organisations are vitally important to maintain customer service. The management of information security and confidentiality is essential, particularly for a service that requires high levels of confidence and trust with service users.

It is important that staff understand information governance issues. This is recognised in the Data Security and Protection Toolkit which the Trust reports on annually. The aim of this procedure is to ensure that information governance training is provided appropriately to all staff in line with the requirements of the toolkit.

The Trust recognises the benefits of ensuring members of staff receive information governance training and will:

- Provide comprehensive awareness raising training on information governance in the staff induction procedure.
- Systematically assess the information governance training needs of all staff that have access to personal information. Provide the training identified in the training needs analysis.
- Check staff comprehension of key information governance requirements and ensure that action is taken to address any identified gaps.
- Promote information governance issues within the Trust.

2. SCOPE

This policy applies to all employees of the Trust, including all staff who are seconded to the Trust, contract, voluntary, temporary and agency staff and other people working on Trust premises. This includes members of staff with an honorary contract or paid an honorarium.

3. DUTIES AND RESPONSIBILITIES

3.1. Chief Executive

The chief executive has overall responsibility for the effective implementation of this policy.

3.2. Training Department

The Training Department will:

- Record attendance at face to face and online information governance training.
- Submit training figures to the Information Governance Team monthly for submission to the Information Governance Group.

3.3. Information Governance Team

The Information Governance Team will:

- Deliver targeted, context relevant training in information governance at Induction and at team meetings (on request).
- Review the content of the face to face training to ensure it is kept up to date in line with changes in legislation and guidance.
- Conduct an annual learning needs analysis exercise to identify any data security and protection skills and knowledge gaps and submit the findings to the Information Governance Group.

3.4. Line Managers

Line managers at all levels will:

- Ensure all new members of staff receive and understand the Confidentiality Code of Conduct as part of the Induction Checklist.
- Ensure that the information governance training needs of their members of staff are evaluated using the form in Appendix 1, as outlined in Section 4.2.
- Ensure that all members of staff attend the training identified in the training needs analysis.
- Review the training needs analysis matrix when there is a change in the role/responsibilities of the member of staff or an organisational or system change.

3.5. Employees, contract and agency staff and other people working on Trust premises

- Undertake all Information Governance training as identified in the Training Needs Analysis matrix (Appendix 1)

4. PROCEDURES

4.1. Induction Procedure

- A copy of the Code of Conduct summarising confidentiality and information security requirements will be provided to all staff including temporary, contract, agency and student members of staff at the commencement of work with the Trust.
- The line manager will highlight the Code of Conduct to the employee as part of the Induction Checklist.
- Information Governance training will be provided at the Corporate Induction, as detailed in Appendix 2. This short session will be attended by all new starters and followed up with IG and Data Security online training.

4.2. Training needs Analysis

The information governance training needs of all staff will be assessed using the matrix in Appendix 1. This will be completed at the start of employment and reviewed when there is a change in the role and responsibilities of the member of staff or an organisational or system change.

A learning needs analysis exercise will be undertaken annually to identify any data security and protection skills and knowledge gaps. The findings will be submitted to the Information Governance Group.

4.3. Information Governance Training

It is mandatory that all staff receive face to face IG training at Induction and complete the national IG and Data Security level 1 training annually.

Further IG training may be needed when there is a system change or when a staff member changes role or has increased responsibility. The training should also be undertaken if there has been a serious IG breach within a team.

The Training Need Analysis in Appendix 1 details the training required by each staff group.

Further training sessions are available at team meetings on request. This can include any of the content detailed in Appendix B. Face-to-face IG training content will be

reviewed on an annual basis to ensure that the training continues to meet the information governance agenda.

4.4. Staff comprehension

Staff comprehension will be tested at the end of the IG and Data Security Training.

4.5. Information Governance Promotion

In addition to the training provision, information governance issues and policy updates will be promoted through:

- Articles in global communications
- Data Matters IG Newsletter
- Bespoke IG Training sessions
- NHS Digital short videos
- Dedicated Information Governance page on the intranet

5. EQUALITY AND DIVERSITY

An Equality and Diversity Impact Assessment has been carried out on this document using the Trust approved EIA.

6. IMPLEMENTATION

This procedure will be disseminated by the method described in the Document Control Policy.

The implementation of this procedure requires no additional financial resource.

7. MONITORING AND AUDIT

Staff compliance with the mandatory IG training requirements will be monitored through a quarterly report to the Information Governance Group and the Trust Board.

Compliance will also be monitored through Data Security Standard 3 (Training) in the Data Security and Protection Toolkit. The Trust is required to achieve a compliance rate of 95% of all staff contracted to work in the organisation completing their IG and Data Security training annually within the financial year.

The effectiveness of the training will be monitored through the IG monitoring report highlighting IG incidents and complaints.

8. REFERENCES/EVIDENCE/GLOSSARY/DEFINITIONS

Data Security and Protection Toolkit – Data Security Standard 3 – Staff Training

9. RELEVANT POLICIES/PROCEDURES/PROTOCOLS/GUIDELINES

Confidentiality Code of Conduct
Information Governance Policy

Appendix 1: Information Governance Training Needs Analysis

Training	Frequency	Method	Clinical Staff						Admin staff				Facilities			Managers	
			Registered Doctors	Registered Nurses	Registered Allied Health Professionals	Registered Psychologists	Local Authority staff working in the Trust.	Clinical Support Bands 2-4	Receptionists	Secretary	Ops Admin Bands 2 -4	Corporate Admin & HQ Bands 2 – 6	Catering	Estates	Portering and Domestic	Corporate	Operational
Induction	Once (Mandatory)	Face to face training only	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Data Security Awareness	Annually (Mandatory)	E-learning	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
IG Basic	If identified in PADR	Face to Face training or E-learning (Data Security and Awareness Training)	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓*				✓	
IG Advanced	If identified in PADR process	Face to face training only															✓

* - bespoke sessions available for those with access to staff personal data rather than patient data.

For example, a secretary will be required to complete the Induction session at the start of employment, followed by a yearly online refresher. The IG Basic only needs completed if a need is identified e.g. a change in role or responsibility.

Specialist Training

Role	Training	Frequency	Method
Caldicott Guardian	Caldicott Guardian Training	Once only	External Course
	Refresher Training	Every three years	
Senior Information Risk Owner	NHS Information Risk Management Workbook	Annual	Workbook
Information Asset Owners	NHS Information Risk Management Workbook	Once only on commencement	Workbook
Data Protection Officer	GDPR Foundation and Practitioner Certificate for DPO role	Once only	External Course
Information Governance Officers	BCS Practitioner Certificate in Data Protection	Once only	External Course
	BCS Information Security Management Principles	Once only	External Course
Information Governance Support Officer	BCS Foundation Certificate in Data Protection	Once only	External Course
Information Governance Support Officer / Assistant Legal Services Officer	FOI Practical Training - Level 1 (Essential Knowledge)	Once only	External Course
Assigned IT member of staff	Certified Information Systems Security Professional (CISSP)	Once only	External Course
Subject Access Staff	Subject Access Training Certificate	Once only	External Course
	Handling Data Subject Requests under GDPR	Once only	External Course
Clinical Coding	Clinical Coding Refresher Course	Every three years	Internal or Clinical Coding Academy
CCIOs	Cyber Security for CCIOs	Once only	External Course
Clinical Safety Officer	Data Security Awareness	Annually	Internal Course

Appendix 2: Information Governance Training Content

Induction Training

This is a short interactive session for new starters to supplement the online IG and Data Security Training.

This session will cover

- Introduction to Information Governance in every day working environments.
- Why IG is important
- Measuring compliance and penalties for breaches
- Information security guidance
- Local IG requirements within policies and procedures
- Patient rights under UK GDPR
- Staff role in ensuring our compliance
- National data opt-out
- Key roles and further information

Annual IG Refresher

Staff with access to personal data will complete the national IG and Data Security Level 1 training online.

Bespoke Session

The Information Governance Team is available to deliver bespoke sessions on specific Information Governance areas. Sessions can include:

- Understanding the Data Protection Act 2018 and General Data Protection Regulation (GDPR) and applying the data protection principles.
- The essentials of providing a confidential service to patients in line with the duty of confidentiality.
- Sanctions for breach of the duty of confidentiality/data protection legislation.
- Information security guidance.
- The frameworks in place to allow appropriate disclosure of personal information.
- The use of security measures to ensure information is not inappropriately disclosed.
- Dealing with subject access request.
- Freedom of information responsibilities.
- Caldicott principles.
- The importance of accurate information capture and principles of good record keeping.
- Pointers to where Trust policies, procedures and further information group are located.

Appendix 3: Equality Impact Assessment (EIA) Toolkit

For strategies, policies, procedures, processes, guidelines, protocols, tenders, services

1. Document or Process or Service Name: Information Governance Training Procedure
2. EIA Reviewer (name, job title, base and contact details): Karen Robinson, Information Governance Officer, Mary Seacole Building, Willerby Hill. Tel. 01482 477856. Karen.robinson1@nhs.net
3. Is it a Policy, Strategy, Procedure, Process, Tender, Service or Other? Procedure

Main Aims of the Document, Process or Service
The aim of this procedure is to ensure that information governance training is provided appropriately to all staff in line with the requirements of Information Governance Toolkit.
Please indicate in the table that follows whether the document or process has the potential to impact adversely, intentionally or unwittingly on the equality target groups contained in the pro forma

Equality Target Group 1. Age 2. Disability 3. Sex 4. Marriage/Civil Partnership 5. Pregnancy/Maternity 6. Race 7. Religion/Belief 8. Sexual Orientation 9. Gender reassignment	Is the document or process likely to have a potential or actual differential impact with regards to the equality target groups listed? Equality Impact Score Low = Little or No evidence or concern (Green) Medium = some evidence or concern (Amber) High = significant evidence or concern (Red)	How have you arrived at the equality impact score? a) who have you consulted with b) what have they said c) what information or data have you used d) where are the gaps in your analysis e) how will your document/process or service promote equality and diversity good practice
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Equality Target Group	Definitions	Equality Impact Score	Evidence to support Equality Impact Score
Age	Including specific ages and age groups: Older people Young people Children Early years	Low	No issues relating to this equality target group that have emerged from the: Information Governance Issues Log PALS and Complaints reports supplied to the IG Committee IG incidents.
Disability	Where the impairment has a substantial and long term adverse effect on the ability of the person to carry out their day to day activities: Sensory Physical Learning Mental Health (including cancer, HIV, multiple sclerosis)	Low	Training venues to deliver IG training will be accessible to those with disabilities. Training will be delivered to accommodate the requirements of staff with disabilities.
Sex	Men/Male Women/Female	Low	No issues relating to this equality target group that have emerged from the: Information Governance Issues Log PALS and Complaints reports supplied to the IG Committee IG incidents.
Marriage/Civil Partnership		Low	No issues relating to this equality target group that have emerged from the: Information Governance Issues Log PALS and Complaints reports supplied to the IG Committee IG incidents.
Pregnancy/Maternity		Low	No issues relating to this equality target group that have emerged from the: Information Governance Issues Log PALS and Complaints reports

Equality Target Group	Definitions	Equality Impact Score	Evidence to support Equality Impact Score
			supplied to the IG Committee IG incidents.
Race	Colour Nationality Ethnic/national origins	Low	No issues relating to this equality target group that have emerged from the: Information Governance Issues Log PALS and Complaints reports supplied to the IG Committee IG incidents.
Religion or Belief	All religions Including lack of religion or belief and where belief includes any religious or philosophical belief	Low	No issues relating to this equality target group that have emerged from the: Information Governance Issues Log PALS and Complaints reports supplied to the IG Committee IG incidents.
Sexual Orientation	Lesbian Gay Men Bisexual	Low	No issues relating to this equality target group that have emerged from the: Information Governance Issues Log PALS and Complaints reports supplied to the IG Committee IG incidents.
Gender reassignment	Where people are proposing to undergo, or have undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attribute of sex	Low	No issues relating to this equality target group that have emerged from the: Information Governance Issues Log PALS and Complaints reports supplied to the IG Committee IG incidents.

Summary

Please describe the main points/actions arising from your assessment that supports your decision above	
The procedure will ensure that information governance training is provided appropriately to all staff in line with the requirements of the toolkit and will not have a negative effect on any of the above quality targets groups.	
EIA Reviewer: Karen Robinson	
Date completed: January 2023	Signature: K Robinson