

# Buckinghamshire CCG IG Training Requirements Policy

Document Control Summary	
<b>Title</b>	Buckinghamshire CCG Training Requirements Policy
<b>Lead Officer</b>	Snr. Information Risk Owner.
<b>Purpose of document</b>	Comply with the Department of Health mandate for the use of the NHS DSP Toolkit (v.15.1) by all NHS organisations. A requirement of the DSPTK is that all relevant staff complete their annual mandatory Information Governance (IG) Training.
<b>Status</b>	Final
<b>Version No.</b>	2.1
<b>Date</b>	December 2018
<b>Author(s)</b>	SCW CSU Information Governance Team
<b>Date of Approval by IGG</b>	December 2018
<b>Review Date</b>	January 2021

Version Control Summary			
Version	Date	Status	Comments/Changes
2.0	15/12/2018	Final	Amendments in line with GDPR and the Data Protection Act 2018
2.1	26/03/2019	Final	Insertion under 3.5.2; line manager responsibilities Agreeing any reasonable adjustments as required in the training delivery method or approach for staff if required for reason of disability or other factor

## **Model Guidance for Information Governance Training**

### **1. Purpose**

The Department of Health has mandated the use of the NHS DSP Toolkit (DSPTK) for all NHS organisations' compliance. One of the requirements of the DSPTK is that all relevant staff complete their annual mandatory Information Governance (IG) Training.

The NHS Information Governance Training Tool (IGTT) ensures a consistent and measurable approach to IG Training. There are a large variety of modules and these cover distinct areas of IG and can be related to various roles in the CCG.

DSPTK identifies holistically the various requirements and standards for handling patient data and deals with the following areas:

- Confidentiality
- Information Security
- Records Management
- Data Quality
- Data Protection, Subject Access
- Freedom of Information

The CCG must continue to ensure and demonstrate that information is used legally and ethically, and prove to be a trustworthy and considerate data custodian when carrying out the high quality services that the CCG's reputation is based upon.

This Guidance ensures that the CCG:

- will be compliant with the DSPTK requirements;
- that staff can demonstrate through the IGTT reports the required level of understanding; and
- that staff are provided with training on internal procedures that support the Information Governance agenda.

## **2. Scope**

This Guidance applies to all staff of the CCG, including contracted, non-contracted, temporary, honorary, secondments, agency, students, volunteers or locums.

## **3. Guidance**

### **3.1 Training Needs Analysis**

Annual IG Training is a mandated requirement of the DSPTK. All the CCG Line Managers must ensure that the appropriate modules are completed:

- During staff induction into the CCG
- When a change in role and/or responsibilities occurs
- As part of the annual staff performance development review

New starters complete IG training on appointment as part of their induction. Staff will also have access to the IG Training Tool modules on Learning for Health via Consult OD . This training will be supplemented by IG Training Seminars and attendance at staff meetings by the IG Manager. As part of a holistic approach to training delivery it is intended to assure staff understanding of IG through:

#### Annual IG audits

The Information Governance Lead with the approval of the Buckinghamshire CCG Information Governance Group (IGG) may also request that additional Information Governance training is undertaken by relevant staff as a result of a security breach or Serious Incident Requiring Investigation (SIRI) involving information assets.

The frequency that CCG staff are expected to complete the IGTT modules is located at Appendix 1.

Guidelines on how to access the online IGTT are located at Appendix 2.

### **3.2 Minimum training requirements**

The IGG has agreed that it cannot be assumed that any staff do not process Personal Identifiable Data (PID), and that as a minimum the following module is mandatory for all CCG staff:

#### **3.3 Data Security Awareness Level 1 e-learning package**

The Data Security Awareness Level 1 e-learning package, which replaces the annual IG training provided through the IG Training Tool, is now live and can be accessed for training through Consult OD.

Certificates must be printed by staff and kept for review and provided to their line manager at the annual staff performance development review as proof of completion of training. Line managers are expected to encourage and remind staff to complete the relevant courses.

#### **3.4 Face-to-Face Training**

Staff attending face to face sessions will be provided with a certificate, which must be printed by staff and kept for review and provided to their line manager at the annual staff performance development review as proof of completion of training.

### **3.5 Responsibilities**

#### **3.5.1 The IG Lead will:**

- Issue prompts and updates to all staff via email, intranet, team meeting briefings and newsletters regarding completion of annual mandatory Information Governance Training as per this Guidance.
- Monitor staff completion of Information Governance Training.

- Issue periodical reports showing the CCG progress for Information Governance Training to IGG members for discussion at IGG and other CCG meetings. The reports will be statistical only (no personal data) and obtained from Consult OD.
- Provide ad hoc reports to Line Managers for monitoring staff performance on the Information Governance Training Tool. The reports will provide detailed information for Line Managers staff and will show completion of modules using Consult OD

### 3.5.2 Line Managers are responsible for:

- Confirming and monitoring that their staff have completed the relevant annual mandatory Information Governance Training via the appraisal process.
- Agreeing actions and associated timescales with staff that have not completed their identified training.
- Agreeing any reasonable adjustments as required in the training delivery method or approach for staff if required for reason of disability or other factor

### 3.5.3 Staff are responsible for:

- Completing identified Information Governance Training within the specified timescales.
- Keeping themselves informed and up to date about changes to all corporate policies and procedural documents.
- Notifying their Line Manager when they cannot complete the identified Information Governance Training online as soon as possible.

## 3.6 Implementation and compliance

3.6.1 Information about this Guidance will be disseminated via e-mail, intranet, website, staff meetings, team meeting briefings and Information Governance or other CCG newsletters.

3.6.2 All staff as defined in Section 2.0 are obliged to adhere strictly to all the CCG policies and a failure to do so may lead to disciplinary action.

3.6.3 Managers must ensure that staff are made aware of this Guidance, understand the Guidance and adhere to it.

3.6.4 Implementation and compliance with this Guidance will be audited by the Information Governance Team.

3.6.5 The Department of Health will review compliance via access to the Information Governance Training Tool and Data Security and Protection Toolkit Submissions by the CCG.

#### **4. Related Policies and Procedures**

4.1 This document should be read in conjunction with:

- Information Governance Framework & Strategy
- Information Security Policy
- Individual Rights Policy/Standard Operating Procedure
- Records Management Policy

4.2 Other policies and procedures may become available during the lifespan of this policy.

#### **5. Related Guidance**

5.1 The NHS Code of Confidentiality

## Appendix 1

### **Information Governance Training Tool – Training Modules to be undertaken by staff.**

- 1.1.1 All the CCG staff must undertake the Data Security Awareness Level 1 e-learning package, which replaces the annual IG training provided through the IG Training Tool, now available for training on Consult OD. This needs to be completed by all CCG staff yearly.
- 1.1.2 The relevant modules identified for each job role are mandatory and must be undertaken within six weeks of being allocated and within every three years thereafter. The identified relevant modules are mandatory.
- 3.3.1 If you are unsure which job role to follow please ask your Line Manager. They will contact the Information Governance Lead for advice if necessary.

## Training Needs Analysis 2019/20

Modules	Data Security Awareness Lv1 e-LfH modules	Data Security Awareness Lv1 Consult OD link	The Role of the Caldicott Guardian – Workbook	Introduction to Risk Management for SIROs and IAOs	Access to Health Records - Workbook
Senior Information Risk Owner	<b>Mandatory</b> To all new staff or contractors	<b>Mandatory</b> To all existing staff or contractors	<b>Recommended</b>	<b>Mandatory</b>	Recommended
Caldicott Guardian	<b>Mandatory</b> To all new staff or contractors	<b>Mandatory</b> To all existing staff or contractors	<b>Mandatory</b>	Recommended	Recommended
Data Protection Officer	<b>Mandatory</b> To all new staff or contractors	<b>Mandatory</b> To all existing staff or contractors	Recommended	<b>Mandatory</b>	Recommended
Executive Team & Lay Members	<b>Mandatory</b> To all new staff or contractors	<b>Mandatory</b> To all existing staff or contractors		Recommended	Recommended
Information Asset Owners	<b>Mandatory</b> To all new staff or contractors	<b>Mandatory</b> To all existing staff or contractors		<b>Mandatory</b>	Recommended
Data Custodians/Information Asset Administrators	<b>Mandatory</b> To all new staff or contractors	<b>Mandatory</b> To all existing staff or contractors		Recommended	Recommended
All Staff	<b>Mandatory</b> To all new staff or contractors	<b>Mandatory</b> To all existing staff or contractors			<b>Mandatory</b> (if the team manages records)

Colour code: **Complete once** – **Complete annually** – **Complete every 3 years**



## Appendix 2

### How to complete Information Governance Training:

The Data Security Awareness Level 1 e-learning package, which replaces the annual IG training provided through the IG Training Tool, is now live on [Consult OD](#) Data Security Standard 3 in the Caldicott 3 Review requires that all staff undertake appropriate annual data security training and pass a mandatory test. Therefore, all CCG staff including non-permanent staff need to complete annual training. The training is easy to follow with a short assessment at the end of each module. It should take approximately 1 hour to complete.

### Training Modules

The training is split into four learning modules with an additional “Welcome module”. Each learning module takes 12-14 minutes to complete and concludes with an assessment. The modules can be taken in any order and the system will record the assessment pass mark and issue a certificate on successful completion (a score of 80% or more).

The topics covered in the four modules are:

1. Introduction to security awareness
2. Information and the law
3. Data security - protecting information
4. Breaches and incidents

### Help and Queries

Any further queries, please contact your IG leads Russell Carpenter or Paul Antony [russell.carpenter@nhs.net](mailto:russell.carpenter@nhs.net) or [paul.antony@nhs.net](mailto:paul.antony@nhs.net)