

NHS Oxfordshire Clinical Commissioning Group

Policy	Information Governance Training Requirements Policy
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Responsible Owner	Governance Managers
Approving Body	Executive Committees / Commissioning Executive
Target Audience	All staff

Document Control

Reviewers and Approvals

This document requires the following reviews and approvals:

Name	Version Approved	Date Approved
Information Governance Steering Group	1.0	September 2021
Combined Executive Committee	1.0	October 2021

Revision History

Version	Revision Date	Details of Changes	Author

Links or Overlaps with Other Key Documents and Policies

Document Title
Information Governance Staff Handbook

Acknowledgement of External Sources

Title / Author	Institution	Link

Freedom of Information

If requested, this document may be made available to the public and persons outside the healthcare community as part of BOB CCGs' commitment to transparency and compliance with the Freedom of Information Act.

Equality Analysis

The BOB CCGs aims to design and implement services, policies and measures that are fair and equitable. As part of the development of this Policy, its impact on staff, patients and the public has been reviewed in line with BOB CCGs' legal equality duties.

Model Guidance for Information Governance Training

1. Purpose

The Department of Health has mandated the use of the NHS Data Security Protection 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.

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 BOB CCGs 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 BOB CCGs' reputation is based upon.

This Guidance ensures that the BOB CCGs:

- will be compliant with the DSPTK requirements;
- that staff can demonstrate through the Information Governance Tool Kit (IGTK) 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 BOB CCGs, including contracted, non-contracted, temporary, honorary, secondments, agency, students, volunteers or locums.

3. Guidance

3.1 Training Requirements

Annual IG Training is a mandated requirement of the DSPTK. All Line Managers must ensure that staff are compliant:

- During staff induction into the BOB CCGs

- 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. This training will be supplemented by IG Training Seminars and attendance at staff meetings by the IG Manager.

How to complete Information Governance Training:

All staff must undertake Data Security Awareness Level 1 e-learning training on an annual basis and pass the mandatory test. The training is easy to follow with a short assessment at the end of each module. It should take approximately 1 hour to complete.

Annual IG audits

The Information Governance Lead with the approval of the BOB CCGs' Information Governance Steering Group (IGSG) 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.

Training requirements for specialist IG roles are outlined in appendix 1.

3.2 Responsibilities

3.2.1 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. Consult OD will also send reminders to staff to complete IG training when their training is due.
- Monitor staff completion of Information Governance Training.
- Update the Information Governance Group, Line Managers and Directors as appropriate.

3.2.2 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.

3.2.3 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.

3.3 Implementation and compliance

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

Appendix 1

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

Training Requirements 2018/19

Modules	Data Security Awareness Lv1 e-LfH modules / 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	Mandatory To all existing staff or contractors	Recommended	Mandatory Annual	Recommended
Caldicott Guardian	Mandatory To all existing staff or contractors	Mandatory Annual	Recommended	Recommended
Data Protection Officer	Mandatory To all existing staff or contractors	Recommended	Mandatory 3 yearly	Recommended
Executive Team & Lay Members	Mandatory To all existing staff or contractors		Recommended	Recommended
Information Asset Owners	Mandatory To all existing staff or contractors		Mandatory 3 yearly	Recommended
Data Custodians/Information Asset Administrators	Mandatory To all existing staff or contractors		Recommended	Recommended
All Staff	Mandatory To all existing staff or contractors			Mandatory (if the team manages records)

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