1. Requirements for Information Governance Training

The Information Governance Toolkit specifies uptake of a number of training modules to support certain requirements:

Requirements 112, 300 and 307 specify the following:

1.1 Requirement No. 112 - "Information Governance awareness and mandatory training procedures are in place and all staff are appropriately trained."

“To ensure organisational compliance with the law and central guidelines relating to Information Governance (IG), staff must receive appropriate training. Therefore, IG training is mandatory for all staff, (comparable to health and safety training) and staff IG training needs should be routinely assessed, monitored and adequately provided for.”

This is also specified in the NHS Operating Framework – Informatics Planning 2010/11 which provides guidance on the informatics components of local operating plans. National expectations for the NHS for delivery of national and local objectives are set out, building on existing investments to strengthen local information and data management. Under ‘Annex 1 National Expectations’ the section on sustaining robust information governance (IG)’ states that: ‘All staff should receive annual basic IG training appropriate to their role through the online NHS IG Training Tool.’

In addition, confirmation of IG training being mandatory is documented in the DoH Guidance for NHS Boards: Information Governance – August 2011 “Appropriate annual information governance training (which may be via the on line training tool), is mandatory for all staff who have access to personal data and for all those in key roles.”

1.2 Requirement No. 300 – “The Information Governance (IG) agenda is supported by adequate information security skills, knowledge and experience which meet the organisation’s assessed needs.”

“Information security is a key element of the IG agenda. The information security assurance framework should be supported by adequate skills, knowledge and experience across the whole organisation. The levels of competency should be commensurate with the duties and responsibilities of particular posts or staff groups to provide an adequate level of assurance.”

1.3 Requirement No. 307 – “An effectively supported Senior Information Risk Owner (SIRO) takes ownership of the organisation’s information risk policy and information risk management strategy.”
“Organisations should ensure that appropriately senior individuals are allocated responsibility for owning information risk. In NHS organisations this role is referred to as the Senior Information Risk Owner (SIRO), who should be an Executive Director or other senior member of the Board (or equivalent), e.g. senior management committee. SIROs should be familiar with information risks and the organisation’s response to risk to ensure they can provide the necessary input and support to the Board and to the Accounting Officer.”

The SIRO is required to successfully complete strategic information risk management training at least annually.

Information Asset Owners (IAOs) must also be appropriately trained to carry out their roles.

2. Training Needs Analysis

2.1 The above requirement is already covered within the Trust’s Education, Training and Development Policy C05 (Appendix 1 of that Policy) and includes all staff groups within the Trust. There is additional training available via the on-line training tool for all staff.

Appendix A of this training plan sets out the specific training to be undertaken or is recommended to be undertaken by all staff as stipulated within the Information Governance Toolkit.

2.2 New Staff

Information Governance basic training takes place at every induction via the workstation learning format. All staff (substantive, temporary and students) receive the corporate induction. Corporate induction runs 22 to 24 times per year. Additionally, the Trust provides four further inductions for psychiatrists (training grades) and the Practice Education Facilitators provide two induction sessions for student nurses entering fieldwork practice within the Trust.

Students from other groups e.g. occupational therapists are prepared for fieldwork by the Higher Education bodies and, as such, may not receive the Information Governance information at induction. These students are, however, supervised by staff who will have undertaken the Information Governance training.

At corporate induction, staff are instructed to complete the mandatory on-line IG training within three months of starting their post. Induction is a process that starts with an initial contact day via the corporate process but continues into post for up to three months, hence the instruction to complete the on-line training as part of their ongoing induction into the Trust.
2.3 **Current staff**

If the *Introduction to Information Governance* or the *Information Governance: the Beginner’s Guide* have previously been completed and passed within the last 12 months, the requirement is to complete:

**Information Governance: The Refresher Module** – this must be completed every 12 months.

**The importance of good clinical record keeping** - Any staff using clinical records should also complete this module every 3 years or undertake face to face training provided by the Records Manager(s).

**NHS Information Risk Management for SIROs and IAOs** - the SIRO must undertake this module every 12 months and it is recommended that Information Asset Owners also undertake this module every 12 months.

All staff may wish to undertake any of the modules which are considered to be appropriate to their area of responsibility within the organisation. These are marked *Recommended* when accessing the training tool.

Managers are requested to recommend staff members to complete these modules where appropriate.

See Appendix A for further details.

2.4 **Staff with no direct access to a PC or without basic ICT skills**

The Trust recognises that not all staff will have direct access to a PC or possess the basic ICT skills needed to undertake the required training via the on-line training tool. The Department of Health has confirmed that a combined approach (including e-learning and face-to-face training) would be acceptable to evidence the delivery of IG training for the IG Toolkit Requirement No.112.

If required, the Senior Information Risk and Governance Officer will develop a number of bespoke ad-hoc training sessions to be delivered throughout the Trust, where required. Staff undertaking the training in this way will be evaluated and, should they reach an acceptable level of understanding i.e. 80% pass, they will receive a certificate for their portfolio.

3. **Accessing training via ESR e-learning**

In addition to attendance at induction and annual mandatory update training sessions, all staff are required to complete a mandatory e-learning Information Governance module. It is a Department of Health requirement that at least 95% of all staff are trained on the required IG modules at any one time. All of the Trust’s workforce (including all permanent staff and staff on temporary contracts of more that three months) must receive basic Information Governance training.

All staff should access the Mandatory IG training: *Introduction to Information Governance or Information Governance – The Refresher Module*, through the
ESR e-learning gateway. Any other modules that are mandatory or recommended should be accessed via the Information Governance Training Tool Portal, until these become available via the ESR e-learning gateway. The link is -
https://www.igtt.hscic.gov.uk/igte/index.cfm

IG training is now included within the Core and Essential e-learning courses along with all other core e-learning.

All staff must register by clicking on the following link:

http://www.nwyhelearning.nhs.uk/elearning/northwest/penninecare

User guides and further information can be found under the OL&D E-learning site.

4. Reporting and Monitoring

Responsibility for monitoring the uptake of IG training will be managed by the Information Governance Assurance Group and performance levels are reported to Executive Directors and all IAOs on a monthly basis.

5. Recommendation

The Information Governance Assurance Group are requested to approve the Information Governance Training Plan for 2015 – 2018.

Appendix A

G:\Corporate Services\Information Governance\Training\IG Mandatory training\2013 2014\IG Training Plan 2013 14 JOB ROLES AND MODULES.xls