NHS Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (BOB ICB)

Policy	Information Governance Training Requirements Policy
Version Number	1.0
Version Date	September 2022
Review Date	September 2024
Responsible Owner	Governance Manager
Approving Body	Audit and Risk Committee
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 2022
Combined Executive Committee	1.0	October 2022

Revision History

Version	Revision Date	Details of Changes	Author

Links or Overlaps with Other Key Documents and Policies

Document Title
Information Governance Staff Handbook Information Governance and Data Protection Policies | BOB ICB

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 ICB's commitment to transparency and compliance with the Freedom of Information Act.

Equality Analysis
The BOB ICB 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 ICB's 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 (DSPT) for all NHS organisations' compliance. One of the requirements of the DSPT 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 ICB 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 ICB's reputation is based upon.

This Guidance ensures that the BOB ICB:

- will be compliant with the DSPT requirements;
- that staff can demonstrate through the Information Governance Toolkit (IGT) 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 ICB, 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 DSPT. All Line Managers must ensure that staff are compliant:

- During staff induction into the BOB ICB
- 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.

Cyber Security Training
Staff will also undertake Cyber Security Training. This will be tested by regular phising email exercises for all staff. Staff who respond to phising emails will be provided with extra training.

Annual IG audits
The Information Governance Lead with the approval of the BOB ICB's 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 Steering 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 (Data Security Awareness) 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 (Data Security Awareness) 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 Heath will review compliance via access to the Information Governance Training Tool and DSPT submissions by the BOB ICB.

Appendix 1

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

Training Requirements 2022/23

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**