
Data Security / Information Governance Training Needs Analysis

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Table of Contents

1.	Introduction	3
2.	Mandatory Data Security / IG Training.....	3
2.1.	All Staff.....	3
2.2.	Specialist Data Security / IG Training.....	4
2.3.	Departmental Training	4
3.	What training do I have to do?.....	4
3.1.	New Starters / Returning to Work	5
3.2.	Existing permanent staff / contractors (been in post over 12 months).....	5
3.3.	Work Experience Staff	5
4.	Monitoring and Compliance.....	5
5.	Reporting	5
6.	Contact Details.....	6
	Appendix A – Data Security / Information Governance Training Needs Analysis Matrix.....	7

1. Introduction

Information is an extremely valuable resource and is essential for the delivery of high quality services. Good Data Security / Information Governance (IG) practices ensure necessary safeguards for the appropriate use of business and Personal Data are in place and managed effectively. These safeguards can be found in the policies and procedures applicable to all staff but of equal importance is the knowledge and awareness each individual maintains of Data Security / IG to recognise and work within these safeguards.

Therefore it is a mandatory requirement that all staff including permanent, temporary, contractors and agency staff will receive appropriate basic Data Security / Information Governance Training and to have that training refreshed annually.

While there is already an existing requirement within the CCG Data Security and Protection Toolkit to annually complete IG training, the importance of this training was also clearly recognised in the recent Caldicott Review 2 which states:

‘All staff should receive annual basic Information Governance Training appropriate to their role’

The Data Security / IG training requirement also requires that:

- Basic Data Security / IG training is provided for all new starters as part of their induction; and
- Additional training is provided to staff in key roles where applicable.

2. Mandatory Data Security / IG Training

2.1. All Staff

All staff including executive and non executive board members must complete the Data Security Awareness training and pass the test. The CCG follow the process below:

- New starters must complete the new e-learning module made available by the Enable System hosted by Virtual College entitled **“Data Security Awareness.”** This must be completed within **7 days of commencement in post.**
- Existing staff must complete the **“Data Security Awareness”** e-learning package prior to the 12 months expiry date.

In light of the recent changes in Data Protection Legislation (General Data Protection Regulation and Data Protection Act 2018) the Data Security Awareness training module has been updated recently by the IG Team.

The CCG have a ‘IG Training Month’ which is normally every November which assists to ensure there is a controlled way of monitoring compliance and to provide additional support to staff to complete training / deal with any queries.

For this year, due to the new legislation ALL staff will be encouraged to complete the new Data Security Awareness training module in November even if their training has not expired.

2.2. Specialist Data Security / IG Training

To identify if any additional modules/workbooks and / or if externally provided specialist training is required in addition to the mandatory module, staff should choose if they fit into one of the staff groups / job profile as listed in the Data Security Training Needs Analysis Matrix (See Appendix A). Please be aware that some staff may find they fit into more than one category. If you are unsure which category you fit into, please contact the IG Team.

This list is not exhaustive and colleagues who have a requirement to undertake additional specialist data security training will be informed. This may be identified through a reported data breach, for example or review of current processes to improve data security in compliance with the General Data Protection Regulation 2016 and / or the Data Protection Act 2018.

The frequency and type of training required is listed on the Data Security Training Needs Analysis Matrix in Appendix A.

The CCG can either use the additional workbooks provided by NHS Digital as below to support the provision of additional training or external providers can be utilised. The workbooks are:

- Information Risk Management for SIRO and Information Asset Owners (IAO's) workbook
- The Role of the Caldicott Guardian workbook
- Access to Health Records workbook

The frequency and type of training required is listed on the Data Security Training Needs Analysis Matrix in Appendix A.

The IG Team will send the workbook/s to staff for completion and / or require staff members to register and attend on the appropriate training session as advised. The workbooks on completion are returned to the IG Team for marking and feedback.

2.3. Departmental Training

To complement the knowledge gained from the Workbooks and Data Security / IG suite of policies. The IG team can deliver face to face sessions with each department on an annual basis to support specific business requirement, including:

- Understanding and application of Data Security / IG policies and procedures
- Provision of specific departmental advice and guidance
- Facilitation of informal Q&A session

3. What training do I have to do?

Appendix 'A' - The Data Security / IG Training Need Analysis (TNA) matrix highlights the training all staff are mandated to complete for Information Governance. It also highlights the additional IG Training staff have to complete for their job roles.

3.1. New Starters / Returning to Work

If you are a new starter whether you are permanent, temporary, contractor or agency, you must complete your training **within the 7 days** of commencing in post.

If you have changed roles within the organisation and your new role or area is one of those listed at Appendix 'A' then you will be regarded as a new starter in that role.

If you have been absent from work and your required Data Security / IG training status elapsed during your absence, for example maternity leave, external secondment, career break, or long term sick.

You are required to complete your Data Security / IG training within the first 7 days of your return.

3.2. Existing permanent staff / contractors (been in post over 12 months)

If you are an existing member of staff, you must complete the mandatory Data Security / IG training module (as highlighted in matrix according to your role) on an annual basis.

3.3. Work Experience Staff

You are still required to complete Data Security / IG training prior to be given access to Bury CCG data. Speak to the IG Team regarding what training you will be required to complete.

4. Monitoring and Compliance

All staff must maintain a valid 12 month mandatory data security training pass and complete the necessary specialist training if required according to the training matrix.

Organisations are expected to achieve and maintain 95% compliance for Data Security Mandatory training every year for the Data Protection and Security toolkit however under GDPR and personal responsibility 100% of all staff must undertake appropriate training. Failure to achieve this target, would mean that Data Security Standard 3 on the Data Security and Protection Toolkit (DSPT) has not been achieved resulting in the CCG not attaining all the mandatory assertions. This means the CCG would not be regarded as a trusted organisation.

5. Reporting

The CCG must ensure that at least 95% (5% is for those staff on maternity or long term sick) of staff have completed their annual Data Security / IG awareness training. Training compliance is reported via the IG Key Statistics Dashboard to the Information Governance Operational Group throughout the assessment year. The IG Operational Group report to the Audit Committee who are provided with status updates as and when required.

6. Contact Details

For IG Training queries, please contact:

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Senior IG Lead

Appendix A – Data Security / Information Governance Training Needs Analysis Matrix

- All members of staff including permanent, temporary, contractors, agency staff and work placements must complete the mandatory training modules detailed below and in accordance the following:
- New starters / returning to work, are required to complete within their first 7 days of starting or returning to work;
- All staff have to complete the Mandatory Data Security Awareness Annually;
- All other TNA training are to be completed every two years unless otherwise informed.

Job Role	Data Security / IG Modules to be Completed
Mandatory - All Staff working for or under contract to the CCG including board executives and non executives ANNUALLY	Data Security and awareness module or training provided by IG team or work book.
Admin and Clerical (access to personal confidential data)	None additional
Admin and Clerical (no access to personal confidential data)	None additional
Data Protection Officer ANNUALLY	GDPR / DPA / specialist Data Protection Officer Training provided by an External Training Provider.
Caldicott Guardian ANNUALLY	Caldicott Guardian Training provided by External Training Provider or the Senior IG lead AD hock updates to be provided at IGOG via the Senior IG lead every 6/12 months
Senior Information Risk Owner (SIRO) ANNUALLY	SIRO Training provided by External Training Provider or the Senior IG lead AD hock updates to be provided at IGOG via the Senior IG lead every 6/12 months
Senior IG lead ANNUALLY	Access to Health Records Information Risk Management for SIRO and IAO The Role of the Caldicott Guardian OR Accredited Caldicott Guardian Training provided by External Training Provider or by IG Team Any updated training on an ongoing basis
Information Asset Owner (IAO) BIENNIALLY	IAO Training provided by External Training Provider or by Senior IG lead
Information Asset Administrators (IAA) BIENNIALLY	IAO Training provided by External Training Provider or by Senior IG lead
Staff dealing with Subject Access Requests (personal confidential data) BIENNIALLY	SAR Training provided by External Training Provider or Senior IG lead
Corporate Records Management Lead BIENNIALLY	Up to date training from external provider
Business Intelligence and IT Staff BIENNIALLY	Training provided by External Training Provider or by IG Team