

Reference Number: UHB 286 Version Number: 1	Date of Next Review: 21 Jul 2018 Previous Trust/LHB Reference Number: NA
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Information Governance Corporate Training Policy

Policy Statement

Cardiff and Vale University Health Board (the UHB) has an Information Governance Policy that was developed by the Information Governance Sub Committee (IGSC) and approved by the People, Planning and Performance (PPP) Committee.

Information Governance refers to the structures, policies and practice of the UHB, the NHS and its suppliers to ensure the confidentiality and security of all records, and especially patient records, and to enable the ethical use of them for the benefit of individual patients and the public good.

A key element of the policy is to ensure that comprehensive and effective arrangements are in place to provide information governance training (IGT) at all staff levels of responsibility. This procedure translates that principle into more detailed guidance including individual responsibilities. It clearly sets out the IGT programme, management organisation and responsibilities of staff.

Policy Commitment

Employees will be required to complete all necessary and relevant training which is appropriate to their individual job roles to ensure they fully understand their individual responsibilities in respect of the following principles in order to comply with the legal requirements of the Data Protection Act :

- Information is held securely and confidentially
- Information is obtained fairly, lawfully and efficiently
- Information is recorded accurately, reliably and up to date
- Information is used effectively and ethically
- Information is shared appropriately and lawfully.
- Information is retained only for as long as is legally necessary
- Information is held and disposed of appropriately and lawfully
- Information is adequate, relevant and not excessive
- Information is used in line with the rights of the data subjects

The UHB has developed a training programme that will enable staff to process information appropriately thereby ensuring that all legal requirements, standards and obligations are met by the UHB. All staff will be required to complete mandatory foundation level training.

All employees are required to adhere to this procedure. Inappropriate management of data and information may lead to disciplinary action. Serious breaches, such as inappropriate or unauthorised disclosure of person identifiable information, theft and misuse of information technology through acts and omissions of staff may constitute gross misconduct and may

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lead to dismissal and possibly police involvement. All staff, whether permanent, temporary or contracted (including students, contractors or volunteers and those on honorary contracts) are responsible for ensuring they are aware of IG requirements and that they comply with these on a daily basis on a daily basis.

Information Governance Training- Operational Management

Clinical boards Clinical Board Directors are the accountable officers will act as deputies to the SIRO and give assurance that the UHB obligations are met in their areas of responsibility. The Clinical Directors discharge the role of Information Asset Owners (IAOs) and Directorate Managers Information Asset Administrators (IAAs). They will ensure that training can be delivered to all Clinical Board staff and where required will arrange for any cascade training to be disseminated.

Corporate Services Corporate directors are the accountable officers will act as deputies to the SIRO and give assurance that the UHB obligations are met in their areas of responsibility. The Assistant Directors or equivalent discharge the role of Information Asset Owners (IAOs) and Section Managers Information Asset Administrators (IAAs). They will ensure that training can be delivered to all corporate function staff and where required will arrange for any cascade training to be disseminated.

This will ensure that all staff and others undertaking work on behalf of the UHB are trained in IG to the appropriate level commensurate with their job role.

The work of the Clinical Boards and corporate services. Arrangements shall be in place to achieve the UHBs objectives. The key responsibilities are to ensure that:

- Effective training both induction and refresher is in place to achieve a level of at least 80% for mandatory foundation training
- Mandatory and any additional training that has been identified will be managed through personal appraisal and development review
- Year on year improvement in respect of staff training will be actively managed

In order to ensure that this work is successfully supported and completed there must be robust IGT programmes in place. Managers will:

- Complete training needs analyses for all staff as part of mandatory training
- Manage staff training attendance -for new staff and refresher training
- Maintain ESR and local training records
- Identify and implement refresher training where incidents and poor performance has been identified

The deputies to the SIRO will periodically give assurance to the SIRO and IGSC that they have these arrangements in place and an annual performance report will be produced by the deputies to the SIRO for integration into a corporate report. This process will be clearly tied into the performance reporting schedules required by the Health Systems Management Board (HSMB) for clinical boards.

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Information Governance Training Programme Framework

Appendix 1

Monitoring Arrangements The UHB shall routinely monitor its performance for.

- Overall compliance – the SIRO
- Local compliance - clinical boards and corporate services
- Corporate arrangements - the IGSC
- Compliance by formal assessment–
 - Health and Care Standards 3.4 and 3.5
 - Caldicott annual assessment
 - Internal Audits sponsored by the IGSC
 - Annual and specific audits by the Welsh Audit Office
 - Any other audits or assessments directed by the Welsh Government

Scope

This procedure applies to all UHB staff in all locations including those with Honorary Contracts.

Equality Impact Assessment

An Equality Impact Assessment has been completed. The assessment found that there was some impact on the equality groups mentioned in relation to communication. An action plan has been developed to address those areas.

Health Impact Assessment	A Health Impact Assessment (HIA) has not been completed
Policy Approved by	Information Governance Sub Committee
Group with authority to approve procedures written to explain how this policy will be implemented	All controlled documents that sit within the information governance policy framework i.e. the IG Policy and all associated procedures and guidelines that refer to the areas stated in the commitment section in this procedure.
Accountable Executive or Clinical Board Director	Executive Director responsible for Organisational Training and Development

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Disclaimer

If the review date of this document has passed please ensure that the version you are using is the most up to date either by contacting the document author or the [Governance Directorate](#).

Summary of reviews/amendments

Version Number	Date Review Approved	Date Published	Summary of Amendments
1	21.7.2015	05.04.2016	New Policy

Appendix 1

Information Governance Training (IGT) Programme Framework – Training Modules to be taken by staff

1. All new staff to receive corporate induction on appointment and this includes a high level overview of Information Governance. This will include the mandatory Information Governance e-learning module
2. Local induction identified for each job role are mandatory and must be undertaken within six weeks of being appointed and within every three years thereafter
3. On appointment to a new post within the UHB all staff must undertake corporate and local induction alongside any refresher training as appropriate.
4. Routine refresher IGT training is required every three years

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5. Managers can activate refresher training at any time subject to incidents and competency assessments.
6. The Information Governance Team is available for advice. Contact e-mail: information.governance.team@wales.nhs.uk

Ref	Job Role	Mandatory Modules to be undertaken (other might be required locally by management)	Approx Time to complete
A	All staff	<p>Corporate Induction: High level IG</p> <p>Introduction level: IG e-learning tool Induction: Refresher (three years routinely):</p>	<p>1hr</p> <p>1hr</p>
B	Directors and Independent members	<p>Corporate Induction: High level IG</p> <p>Introduction level: IG e-learning tool Induction: Refresher (three years routinely):</p> <p>Business continuity management (foundation):</p>	<p>1hr</p> <p>1hr</p> <p>2hrs</p>
C	Head of Information Governance and Assurance and all Information Governance Department staff	<p>Corporate Induction: High level IG</p> <p>Introduction level: IG e-learning tool Induction: Refresher (three years routinely):</p> <p>Information Security Management Secure Transfers of Personal Data</p> <p>NHS Information Risk Management for SIROs and IAOs</p> <p>Records Management and the NHS Code of Practice Access to Health Records</p> <p>Access to Information and Information Sharing in NHS Wales (WASPI)</p>	<p>1hr</p> <p>1hr</p> <p>1/2 day</p> <p>1 day</p> <p>1day</p> <p>1 day</p>

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D	Caldicott Guardian	<p>Corporate Induction: High level IG</p> <p>Introduction level: IG e-learning tool Induction: Refresher (three years routinely):</p> <p>Records Management and the NHS Code of Practice Access to Health Records</p> <p>The Caldicott Guardian in the NHS and Social Care</p>	<p>1hr</p> <p>1hr</p> <p>1 day</p> <p>1 day</p>
E	Senior Information Risk Owner and Deputy Senior Information Risk Owners	<p>Corporate Induction: High level IG</p> <p>Introduction level: IG e-learning tool Induction: Refresher (three years routinely):</p> <p>Information Security Management Secure Transfers of Personal Data</p> <p>NHS Information Risk Management for SIROs and IAOs</p> <p>Records Management and the NHS Code of Practice Records Management in the NHS</p>	<p>1hr</p> <p>1hr</p> <p>1 day</p> <p>1 day</p> <p>1 day</p>
F	IT Security Manager and team	<p>Corporate Induction: High level IG</p> <p>Introduction level: IG e-learning tool Induction: Refresher (three years routinely):</p> <p>Information Security Management</p> <p>NHS Information Risk Management for SIROs and IAOs</p> <p>Records Management and the NHS Code of Practice Records Management in the NHS</p>	<p>1hr</p> <p>1hr</p> <p>1/2 day</p> <p>1 day</p> <p>1 day</p>

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		Business continuity management	½ day
		Access to Information and Information Sharing in NHS Wales (WASPI)	1day
G	Information Technology Management staff	Corporate Induction: High level IG	1hr
		Introduction level: IG e-learning tool Induction: Refresher (three years routinely):	1hr
		Information Security Management Secure Transfers of Personal Data	1 day
H	Freedom of Information Act Lead and support staff	Corporate Induction: High level IG	1hr
		Introduction level: IG e-learning tool Induction: Refresher (annual):	1hr
		Information Security Guidelines Secure Transfers of Personal Data	1 day
		Information Risk Management : Introductory	1/2day
		Records Management and the NHS Code of Practice	1 day
		Access to Information and Information Sharing in the NHS	1 day
I	Subject Access lead and support staff	Corporate Induction: High level IG	1hr
		Introduction level: IG e-learning tool Induction: Refresher (three years routinely):	1hr
		Information Security Guidelines Secure Transfers of Personal Data	½ day
		Information Risk Management : Introductory	½ day
		Records Management and the NHS Code of Practice	1/2 day

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		Records Management in the NHS Access to Health Records (SARs) Access to Information and Information Sharing in NHS Wales (WASPI)	1/2day 1day
J	Health Records – Head of Health Records and Health Records Teams Corporate Records – IG Team and corporate records teams	Corporate Induction: High level IG Introduction level: IG e-learning tool Induction: Refresher (three years routinely): Access to Health Records Access to Information and Information Sharing in NHS Wales (WASPI) Records Management and the NHS Code of Practice Records Management in the NHS Secure Transfers of Personal Data	1hr 1hr 1/2day 1 day 1 day 1/2day
K	Clinical Board Directors and –Heads of Service Information Asset Owners (IAOs)	Corporate Induction: High level IG Introduction level: IG e-learning tool Induction: Refresher (three years routinely): Information Security Management Secure Transfers of Personal Data NHS Information Risk Management for SIROs and IAOs Records Management and the NHS Code of Practice	1hr 1hr 1/2day 1day 1/2 day
L	Directorate managers and Assistant corporate	Corporate Induction: High level IG Introduction level: IG e-learning tool Induction:	1hr 1hr

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	<p>Directors -</p> <p>Information Asset Administrators (IAAs)</p>	<p>Refresher (three years routinely):</p> <p>NHS Information Risk Management for SIROs and IAOs</p> <p>Information Security Management Secure Transfers of Personal Data</p> <p>NHS Information Risk Management Introductory</p> <p>Records Management and the NHS Code of Practice</p>	<p>1day</p> <p>1/2day</p> <p>1/2day</p> <p>1/2day</p>
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