



SLMS-IG16 Training Policy

Document Information	
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Document History		
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0.2	24/01/2013	Incorporated feedback from Alice Garrett
0.3	24/04/2013	Revisions from Shane Murphy
0.4	10/06/2013	Incorporated revisions from Trevor Peacock
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1.0	02/08/2013	Approved by Chair of SLMS IGSG
1.1	21/08/2014	Amendments by Kristina Drew to reflect in-house SLMS IG training provision and simplified training requirements for SLMS job roles
2.0	23/09/2014	Approved by Chair of SLMS IGSG
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1. Purpose

The UCL School of Life and Medical Sciences (SLMS) operates an Information Governance (IG) Framework in line with the NHS IG Toolkit in order to maintain proper handling of confidential information and for assurance on behalf of our external partner organisations in relation to, for example, sensitive personal data.

The IG Toolkit requires that at staff induction and on an annual basis all staff must be made aware of local IG procedures, and in particular must be given clear guidelines about their responsibilities. As per the IG Toolkit all staff should receive basic training and be informed where to get more support and guidance. Moreover, all staff with routine responsibility for specific confidential information assets should receive additional annual training.

2. Scope

This policy applies to all staff of the SLMS, including contracted, non-contracted, temporary, honorary, secondments, agency, students and volunteers.

3. Policy

3.1 Training Needs Analysis

Information governance training for all staff must cover local procedures, policies and guidance, as advertised on the IG Approved Documents List ([here](#)¹). Training for staff who have responsibility for specific, confidential information assets must consistently and measurably cover all appropriate topics including information security, data protection and confidentiality.

Examples of appropriate training for staff are found in Appendix 1 of this document.

Staff with responsibility for specific, confidential information assets should also be made aware at induction and on an annual basis where to find and how to comply with specific contracts governing the use of specific information assets where those exist.

Where a staff member with responsibility for specific, confidential information assets is unable to fully take part in appropriate information governance training with their employing organisation, appropriate external IG training will need to be sought by information asset owners.

The SLMS must continue to mitigate the risk of a breach of confidentiality by providing a high standard of training for all staff.

The content of IG training should ensure:

¹ <https://www.ucl.ac.uk/isd/it-for-slms/research-ig/approved-information-governance-documents>

- that staff in the SLMS will be compliant with the IG Toolkit requirements;
- that those with responsibility for specific, confidential information assets are given training and assessment appropriate to the type of information involved; and
- that all staff are provided with training on internal procedures that support the SLMS IG Framework.

All SLMS information asset owners must ensure that a Training Needs Analysis in accordance with this policy is completed for their staff to ensure that appropriate IG training is completed:

- during staff induction to the SLMS
- when a change in role and/or responsibilities occurs
- as part of the annual staff performance development review

In carrying out the Training Needs Analysis staff competencies should be compared against the job role requirements in order to identify training needs.

The IG Lead, with the approval of the Information Governance Steering Group (IGSG), may also require that additional IG training is undertaken by staff as a result of a security breach involving information assets.

When a need is identified by an information asset owner or by a member of staff requiring support, the IG Training and Awareness service will ensure that additional training for the role is made available.

3.2 Responsibilities

3.2.1 The SLMS Information Governance Training and Awareness service will:

- Issue prompts and updates to all staff via email, meetings and newsletters regarding completion of annual mandatory IG training.
- Communicate to staff how to access and to complete the required training.
- Monitor staff completion of IG training.
- Escalate cases of non-compliance via the IG Lead to the IG Steering Group and ultimately to the Senior Information Risk Owner
- Issue regular reports showing the SLMS progress for IG training to IG Steering Group members for discussion. The reports will be statistical only (no personal data) and obtained from the SLMS IG training register.

- Provide ad hoc reports to information asset owners for monitoring staff performance of IG training. The reports will provide detailed information for information asset owners' staff and will show completion of IG training.

3.2.2 Information asset owners are responsible for:

- Completing a Training Needs Analysis annually for all staff as in 3.1 above.
- Confirming and monitoring that their staff have completed appropriate annual IG training.
- Agreeing actions and associated timescales with staff who have not completed appropriate training.

3.2.3 Staff are responsible for:

- Completing appropriate IG training within a reasonable timescale during and after induction.
- Keeping themselves informed and up-to-date about changes to IG procedures and policy.
- Notifying their line manager when they cannot complete appropriate IG training within a reasonable timescale after induction.
- Refreshing their training annually according to their current Training Needs Analysis.

Appendix 1

Information Governance Training – specific training to be undertaken by staff.

1. All SLMS staff should be made aware during induction by information asset owners and should be reminded at least annually of local IG procedures and policy, as advertised on the IG Approved Documents List ([here](#)²), and of where to find further support and guidance through the Handling Sensitive Data web pages ([here](#)³).
2. All SLMS staff with responsibility for specific, confidential information assets **must** attend appropriate information governance training which can be measured consistently and covers information security, data protection and confidentiality, either through the SLMS IG Training and Awareness service or through a suitable external provider, e.g. an NHS Trust.

NHS Digital's course, entitled *Data Security Awareness Level 1*, is available online to all UCL staff through the SLMS IG Training and Awareness service and provides a good example of appropriate training for staff working with confidential information. Once registered, staff need to complete four essential modules and pass an assessment after each.

Staff with responsibility for specific, confidential information assets should also be made aware at induction and on an annual basis where to find and how to comply with specific contracts governing the use of specific information assets where those exist.

3. Annual Refresher Training: To remain on the SLMS IG Training Register, staff are required to re-take and successfully complete an appropriate IG training course each year. As part of this process staff will be directed to relevant SLMS IG training resources.
 - Individuals will be contacted by the SLMS Information Governance Training and Awareness Service at least one month before their IG training is due to expire
 - Individuals will then be required to re-take and successfully complete an appropriate IG training course before expiry of their current IG training
 - Those whose IG training lapses within the required one year period, will be removed from the IG training register. The Information Governance Training and Awareness Service will monitor training completion, and will escalate any failure to renew via the IG Lead to the IG Steering Group and ultimately the Senior Information Risk Owner.
 - Once removed, for any staff member needing to be reinstated on the SLMS IG training register, re-attendance of appropriate IG training will be required.
3. The training needs identified for each job role will be mandatory and must be undertaken within six weeks of being allocated and every year thereafter.

² <https://www.ucl.ac.uk/isd/it-for-slms/research-ig/approved-information-governance-documents>

³ <https://www.ucl.ac.uk/isd/it-for-slms/information-governance-and-research-facilitation>

4. Particular roles are required to attend specialist IG training sessions which will be operated by the IG Training and Awareness service:
 - Senior Information Risk Owner
 - IG Lead
 - Members of IGSG
 - IG Service Owners
 - IG Service Operations Managers

