
SLMS-IG16 Training Needs Analysis

Document Information	
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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
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Model Guidance for the SLMS Information Governance Training

1. Purpose

The Department of Health has mandated the use of the NHS IG Toolkit (IGTK) for research studies handling NHS patients' data. One of the requirements (No.14-123) of the IGTK is that all staff complete basic annual Information Governance (IG) training. Additionally, IGTK requirement 14-123 Attainment Level 3 (part a) is to monitor and, where necessary, take action to ensure ongoing understanding of IG responsibilities, which creates a need for annual assessments of understanding.

Specifically, the IGTK states that staff must be aware of what IG procedures are in place, and in particular must be given clear guidelines about their responsibilities. All staff should receive basic training and be informed where to get more support and guidance. All staff with routine access to confidential information should receive additional training.

In-house introductory information governance training ('SLMS Introduction to Information Governance' (SLMS Intro to IG)) with a follow-up in-house assessment ('SLMS Information Governance - Assessment of Understanding' (SLMS IG - Assessment of Understanding)) must cover all appropriate, basic topics of information governance for all staff and ensure a consistent and measurable approach to IG training for those handling sensitive personal data across the SLMS.

Where an individual is unable to attend basic information governance training at their employer organisation, appropriate external IG training will need to be sought.

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

The content of IG training should ensure:

- that SLMS will be compliant with the IGTK requirements;
- that those with access to sensitive personal data can demonstrate through the SLMS IG - Assessment of Understanding or appropriate external training the required level of understanding; and
- that those with access to sensitive personal data are provided with training on internal procedures that support the SLMS Information Governance Framework.

2. Scope

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

3. Guidance

3.1 Training Needs Analysis

Appropriate annual IG Training is a mandated requirement of the IGTK. All SLMS information asset owners must ensure that a Training Needs Analysis is completed for their staff to ensure that appropriate IG training is completed:

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

When a need is identified by an information asset owner or a member of staff requiring support, the IG training service will provide direct face-to-face support and/or support in getting additional training for the role.

Guidance on accessing alternative or additional training materials can be provided on request by the IG training service.

The content of basic IG training will be agreed by IGSG and managed by the IG training service. Basic IG training will feature all content of the IGTK that relates to the SLMS environment and its supporting services [and will be largely based on the Information Governance and Data Security Essentials Workbook \(NHS Digital, December 2016\) until further notice.](#)

SLMS IG training or alternative external training, and the frequency that SLMS staff are expected to complete them is located at Appendix 1.

3.2 Minimum training requirements

In-house SLMS IG training has been devised to cover both the requirements of the IGTK and to inform SLMS staff of locally-provided information governance services and solutions.

The IGSG has recommended that as a minimum the following initial training is mandatory for all the SLMS staff who have access to sensitive personal data:

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Either:

- Attendance of the 'SLMS Introduction to Information Governance' (SLMS Intro to IG) training course.

Followed by

- Successful completion of the online 'SLMS Information Governance - Assessment of Understanding' (SLMS IG - Assessment of Understanding) (See Appendix 2)

Or:

- Staff of SLMS who undertake NHS IG training may provide an up-to-date certificate in lieu of in-house training.

Or:

- Where there is a pressing requirement for IG training and the staff member is unable to attend basic IG training, initial mandatory training may alternatively be met by completion of appropriate externally sourced IG training, e.g. Embedding Informatics in Clinical Education (eICE) modules: *Introduction to Information Governance* and *Access to Information and Information Sharing in the NHS*.

Once the initial mandatory training has been successfully completed, refresher training must be taken and successfully completed on an annual basis and is gained by taking the 'SLMS IG - Assessment of Understanding' again.

A record of IG training will be managed by the Information Governance Training and Awareness service and reminders will be sent to all staff who are approaching their IG training renewal date.

3.3 Staff unable to complete online training/assessment

Information asset owners should contact the IG training service where they have staff who do not have access to the required systems in order to complete their IG training. Alternative arrangements will be agreed to ensure that these staff complete their annual mandatory IG training.

Staff who are unable to complete their annual mandatory IG training for whatever reason must inform their line manager or the IG training service as soon as possible.

3.4 Responsibilities

3.4.1 The SLMS Information Governance Training and Awareness Service will:

- Issue prompts and updates to all staff via email, intranet, meetings and newsletters regarding completion of annual mandatory IG training as per this guidance.
- Communicate to staff how to access and to complete the SLMS in-house IG training course.
- Monitor staff completion of IG training.
- Regularly review and update in-house IG training materials in line with updates to legislation, regulations and central guidance.
- Escalate cases of non-compliance via the IG Lead to the Information Governance Steering Group (IGSG) and ultimately to the SIRO
- Issue regular reports showing the SLMS progress for IG training to IGSG members for discussion at IGSG and other SLMS meetings. 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.

3.4.2 Information asset owners are responsible for:

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

3.4.3 Staff are responsible for:

- Completing appropriate IG training within a reasonable timescale during staff induction.
- Keeping themselves informed and up-to-date about changes to all corporate policies and procedural documents.
- Notifying their line manager when they cannot complete appropriate IG training within a reasonable timescale during staff induction.

3.5 Implementation and compliance

- 3.5.1 Information about this guidance will be disseminated via e-mail, intranet, website, staff meetings, meetings and Information Governance or other UCL newsletters.
- 3.5.2 All staff as defined in Section 2 are obliged to adhere strictly to all SLMS policies and a failure to do so may lead to disciplinary action.
- 3.5.3 Managers must ensure that their staff are made aware of this guidance, understand the guidance and adhere to it.
- 3.5.4 Implementation and compliance with this guidance will be audited by the Information Governance Steering Group.
- 3.5.5 The Department of Health will review compliance via Information Governance Toolkit submissions by the organisation and via audit.

Appendix 1

Information Governance Training - Training to be undertaken by staff.

1. All SLMS staff who are part of a team which handles sensitive personal data **must** attend basic information governance training either through their employer or from a suitable external provider.
2. Annual Refresher Training: To remain on the SLMS IG Training Register, personnel are required to re-take and successfully complete the SLMS IG - Assessment of Understanding annually thereafter. As part of this process personnel will be directed to relevant SLMS IG training resources and updates to IG legislation.
 - Individuals will be contacted by the SLMS Information Governance Training and Awareness Service one month before their IG training is due to expire
 - Individuals will then be required to complete the SLMS IG - Assessment of Understanding before expiry of their current IG training
 - Those whose IG training lapses, either by failing the assessment or not taking the SLMS IG - Assessment of Understanding within the required one year period, will be removed from the IG register and given one month to book onto another 'SLMS Intro to IG' training event. The Information Governance Training and Awareness Service will monitor training bookings, and will escalate the failure to rebook within one month, via the IG Lead to the IGSG and ultimately the Senior Information Risk Owner (SIRO).
 - To be reinstated on the SLMS IG register, re-attendance of the 'SLMS Intro to IG' training and passing the SLMS IG - Assessment of Understanding within two weeks is required.
3. The training needs identified for each job role are mandatory and must be undertaken within six weeks of being allocated and every year thereafter.
4. Particular roles are required to attend specialist IG training sessions:
 - SIRO
 - IG Lead
 - Members of IGSG
 - IG Service Owners
 - IG Service Operations Managers

The SLMS Job Role	Training to be completed	Approx. Time
<p>Personnel who routinely handle sensitive personal data as part of a research project</p> <p>(Includes Principal Investigators, Researchers, Research Students, Project Administrators, IT for SLMS Infrastructure Team)</p>	<p>Mandatory Initial Training</p> <ul style="list-style-type: none"> • SLMS Introduction to Information Governance training and awareness • SLMS IG - Assessment of Understanding ('Pass' required within 2 weeks of attending the SLMS Intro to IG course) <p>Alternative Initial Training</p> <p>(For those unable to attend SLMS Intro to IG training course or those with alternative external IG training)</p> <p>Mandatory Annual Refresher</p> <ul style="list-style-type: none"> • SLMS IG - Assessment of Understanding ('Pass' required annually) • If training lapses, re-do 'Initial training' <p>SLMS mandatory training may be waived where the individual is able to provide evidence of up-to-date IG certification from another recognised organisation (See Appendix 4)</p>	<p>1.5h</p> <p>½h</p> <p>2h</p> <p>½h</p>
<p>SIRO</p> <p>IG Lead</p> <p>Principal Investigators where a need has been formally identified</p>	<p>Additional Training</p> <p>Specialist SIRO/IG Lead training (e.g. as provided by Dilys Jones Associates)</p> <p>Additional Annual Refresher</p> <p>Specialist SIRO/IG Lead refresher training (e.g. as provided by Dilys Jones Associates)</p> <p>Supporting Guides</p> <ul style="list-style-type: none"> • SLMS-IG01 IG Steering Group ToR • SLMS-IG02 SIRO Role • SLMS-IG05 IG Lead Role 	<p>½ day</p> <p>½ day</p>
<p>IGSG members</p> <p>IG Service Service Owners</p>	<p>Mandatory Training</p> <p>Specialist IG training (e.g as provided by Dilys Jones Associates)</p>	<p>½ day</p>

<p>IG Service Operations Managers</p>	<p>Mandatory Annual Refresher</p> <p>Specialist IG refresher training (e.g. as provided by Dilys Jones Associates)</p> <p>Supporting Guides</p> <ul style="list-style-type: none"> • SLMS-IG01 IG Steering Group ToR 	<p>½ day</p>
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Appendix 2
SLMS Information Governance - Assessment of Understanding

Online application	Moodle
When assessment will be used	1. Initial test following attendance of 'SLMS Intro to IG' 2. Annual Refresher
Number of questions	15 Randomly generated from a bank of at least 45 questions
Question types	MCQ
Pass mark	80%
Attempts allowed	5 attempts to gain a pass; otherwise re-attend SLMS Intro to IG training course

Appendix 3

Recognised IG training accepted in lieu of SLMS training

1. HSCIC IG Training Tool 'Introduction to Information Governance' certificate issued from another organisation confirming pass mark within the past 12 months
2. Scottish Health Informatics Programme (SHIP) Information Governance online training course certificate confirming pass mark within validity of the certification