

Meeting the Requirements

Organisational Measures

(Training and Awareness)



Introduction

To ensure organisational compliance with the law and relevant guidance relating to Information Governance (IG), staff must receive appropriate training. Therefore, bi-annual IG training should be made mandatory for all staff; comparable to health and safety training. Staff IG training needs should be routinely assessed, monitored and adequately provided for.

Information Governance knowledge and awareness should be at the core of an organisation's objectives, embedded alongside other governance initiatives and should provide a stable foundation for the workforce. This will make sure that all employees receive appropriate training about your privacy programme, what it requires staff to do and what responsibilities they have. The training must be relevant, accurate and up to date. Without this knowledge, the ability of the organisation to meet its legal and policy requirements will be severely impaired.

Ideally, the organisation should develop an Information Governance Training Programme. It would enable the organisation to establish a clear plan for IG training appropriately tailored to specific staff groups or job roles. The plan should address how and when each staff group will be trained, how training needs beyond the basic level will be assessed and should also include induction processes for new staff. See '[Table One](#)' for detail on who needs IG training. '[Table Two](#)' sets out training for different knowledge levels dependant on job roles.

[Learning@Wales](#) provides an online IG training module for NHS Wales staff. The module has been developed by the Information Governance Management Advisory Group (IGMAG). Online e-learning requires basic IT skills to navigate around a website. If staff are not IT literate or do not have readily available access to a computer then support should be provided to assist them, or training should be provided in other ways. An '[IG Workbook](#)' has been developed for primary care staff who do not use IT facilities and is available on the IG website.

How do we reach Attainment Level 1?

Training and awareness is key to actually putting into practice your policies, procedures and measures by:

- integrating data protection across your entire organisation so it is second nature;
- making sure you are compliant; and
- being able to prove what you are doing.

An IG training programme should be developed that includes induction for new starters and the completion of mandatory refresher IG training. **All staff**, from administrative staff to health professionals, partners to Directors should undertake regular IG refresher training, this includes temporary staff, volunteers and students.

It is vitally important that new staff are made aware of the relevant IG requirements and in particular given clear guidelines about their own individual responsibilities for compliance. Particular emphasis should be placed on how IG requirements affect their day to day work practices. '[Table Three](#)' details what the ICO expect to see in an All-staff training programme and



'[Table Four](#)' sets out the minimum content for Induction training for IG. Appropriate staff, such as the DPO or an information governance manager, should oversee or approve induction training.

Staff inevitably have different levels of awareness of their responsibilities for safeguarding confidentiality, appropriate information sharing, protecting information and preserving information security. It can sometimes be difficult for busy staff to convert theory and guidance into practical work procedures. Changing established routines and adjusting established work practices can be challenging. In some cases, the mandatory basic training will be sufficient to give staff the knowledge that they require, but this should not be assumed as some roles will require additional training and some staff may have struggled with the on-line materials and require additional support. Where necessary, any staff member requiring assistance should be supported to increase their understanding of and adherence to IG best practice.

The organisation should maintain a record of who has received IG training, when and by what means, for example induction or e-learning, this will enable the organisation to be able to easily identify individuals who have received IG training and those who haven't. The organisation should be able to meet a minimum compliance level of 50% for IG mandatory training, this compliance level should be regularly reported to the appropriate forum, such as the Board, Committee or Practice Management Team.

How do we reach Attainment Level 2?

The organisation should adopt a training needs analysis approach to identify any new IG training requirements by staff groups. This analysis will also allow the organisation to identify training programmes in the future where the skills gap detects a common theme. See '[Table Five](#)' for further information and the needs analysis.

The national e-learning tool will form a valuable base on which to build, however, there will inevitably be additional training required to help reinforce it, for example, ensuring that staff know how to apply the theory in their own working environments, understand local procedures and to know where to turn to for advice and any additional support. Additional general awareness training can be tackled in a variety of ways, for example, training videos, group exercises, posters in staff areas, staff leaflets/booklets or staff meetings.

The organisation should ensure IG Leads and subject matter experts receive appropriate specialist training to carry out their role, this may be through a specialised IG training programme or formal procured training.

It is important that study time is "protected" so that all employees are able to access and attend appropriate training.

Larger organisations, such as Health Boards and Trusts should use compliance reports to identify areas of low compliance and target these areas for improvement. This may be done by holding specific IG training sessions in departments where IG training compliance is low.



The organisation should be able to meet a minimum compliance level of 70% for IG mandatory training.

How do we reach Attainment Level 3?

Any training that is provided should be regularly reviewed and updated in line with legal requirements, corporate and/or national policies, or any major changes, which may impact on the Information Governance agenda, at a local or national level. Where training is provided locally, there should be a process in place for staff to provide feedback where appropriate. The organisation should consider this feedback as part of the training programme review.

The organisation should regularly raise awareness across all staff on data protection, information governance and associated policies and procedures. It should make it easy for staff to access relevant materials and resources. See '[Table Six](#)' for the ICO's expectation on awareness raising.

The organisation should meet the national target compliance level of 85% for IG mandatory training.

Supporting Resources

[Learning@Wales](#) provides an on-line training tool with various courses including the NHS Wales IG Refresher e-learning training tool.

Health Board and Trust staff can access the IG eLearning package through ESR.

For staff working in general practice, they can access the same training directly through [Learning@Wales](#). A '[Step by Step User Guide for GMPs](#)' is available to guide practice staff in registering on the course, through to obtaining your certificate.

ICO: Training and Awareness videos on YouTube

Summary Requirement

Attainment Level	Summary Requirement
1	Information Governance training has been provided to staff in line with the core skills framework. Processes are in place to ensure temporary staff, volunteers and students have received appropriate IG Training
2	The organisation has increasing compliance with IG mandatory training. There is a training strategy in place to identify the need and provision of specialist IG training



3

The organisation has a high level of mandatory IG training compliance. Training content is regularly reviewed and updated. Feedback is requested where appropriate

