

# Staff Information Governance Awareness and Training Policy

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# Staff Information Governance Awareness and Training Policy

## 1. Introduction

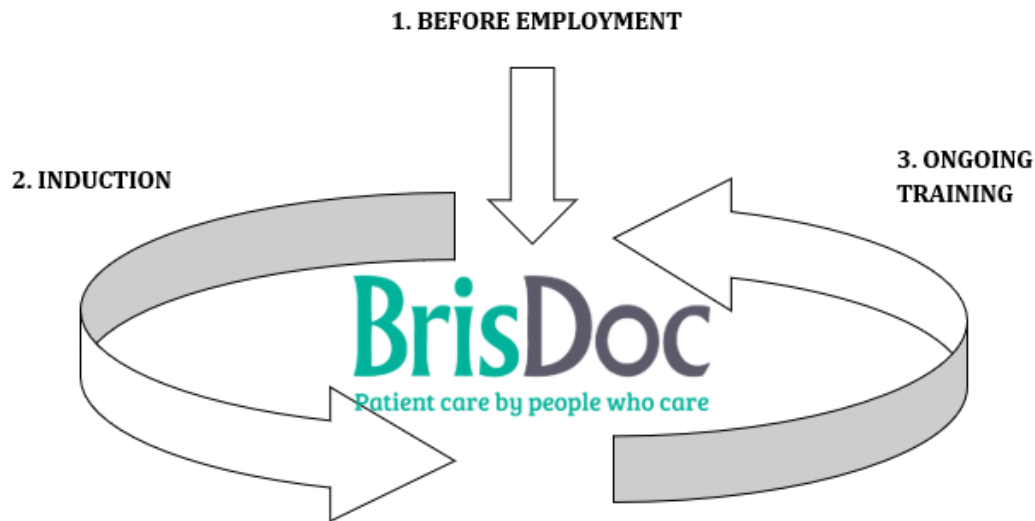
BrisDoc recognises that it is important for all staff to know and be aware of the importance of Information Governance. It is therefore responsible for educating and continually raising awareness of all staff so everyone is clear about their own responsibilities and the consequences should information not be managed correctly.

## 2. Scope

This policy will focus on how staff are made aware of their responsibilities in connection to Information Governance legislation via 3 main stages:

- (1) Before employment
- (2) During Induction
- (3) Ongoing training / awareness

This policy also explores how BrisDoc measures compliance of its staff.



## 3. Awareness Before Employment

### 3.1 Job Descriptions

BrisDoc recognises the importance of making potential applicants aware of Information Governance from the outset. In light of this, all job descriptions contain the following paragraph:

**Confidentiality:**

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Under the Data Protection Act 2018, the post holder must maintain the confidentiality of information about patients and staff. The work is of a confidential nature and information gained must not be communicated to other persons except in the recognized course of duty. Unauthorised disclosure of confidential information will result in disciplinary action and may lead to your dismissal.

- In the course of seeking treatment, patients entrust us with, or allow us to gather sensitive information in relation to their health and other matters. They do so in confidence and have the right to expect that staff will respect their privacy and act appropriately.
- In the performance of the duties outlined in this job description, the post-holder may have access to confidential information relating to patients and their carers, practice staff and other healthcare workers. They may also have access to information relating to the practice as a business organisation. All such information from any source is to be regarded as strictly confidential.
- Information relating to patients, carers, colleagues, other healthcare workers or the business of the practice may only be divulged to authorised persons in accordance with BrisDoc's policies and procedures relating to confidentiality and the protection of personal and sensitive data.

## 4. Awareness During Induction

This section is divided according to the procedure for:

PAYE staff (employees and casual workers); and,

Sessional / Self-employed / Locum Staff

### Process for PAYE Staff

#### 4.1 Pre-Employment

Before employment, several documents need to be signed by staff. As part of this process, staff are required to sign and return a confidentiality statement to the HR department. See appendix 1

#### 4.2 Induction Packs for PAYE Staff

When a new recruit commences employment / work at BrisDoc, they receive an Induction Pack which includes a Staff Handbook as well as additional information. Within this pack are 5 documents relating to Information Governance:

1. The **Caldicott Principles** Leaflet is based on NHS Digital content and is given to staff at induction.
2. The **DPA 2018 Overview Leaflet** is from the Department of Digital, Culture Media and Sport content and is given to staff at induction.
3. Information Governance responsibilities are outlined in the Staff Handbook
4. Code of Expectations and Standards of Behaviour

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## 5. Information Governance and Me handout

### Contracts for PAYE Staff

All new employees and casual workers receive a contract upon commencement of their role. All Terms & Conditions contain details about Confidentiality and Data Protection (see Appendix 3).

All staff are expected to sign and return their contracts of employment where they agree to follow the terms and conditions associated with their specific role and any general principles across BrisDoc.

### 4.3 Inductions Shifts for PAYE Staff

All new recruits are expected to follow an organised Induction Plan with their line manager during the first few weeks of their employment and sign Induction Checklists to confirm they have understood each step in the Induction Process.

Within the first week of work, line managers inform the member of staff about the importance of Information Governance – this includes:

- Confidentiality
- General Data Protection Regulations
- Email and faxing procedures
- Who the Caldicott Guardian is for the service in which they work
- Information Governance and Me

### Process for Sessional/ Self-Employed/ Locum Staff

#### 4.4 Induction Packs for Sessional/ Self-Employed/ Locum Staff

When a self-employed or agency member of staff commences work at BrisDoc, they receive an induction pack as well as the following documents:

1. Confidentiality Statement (Appendix 1) – they must sign and return this statement to the HR Department or GP Contracts Team.
2. The **Caldicott Principles** Leaflet is based on NHS Digital content and is given to staff at induction.
3. The **DPA 2018 Overview Leaflet** is from the Department of Digital, Culture Media and Sport content and is given to staff at induction.
4. Code of Expectations and Standards of Behaviour – an electronic version is sent to each person.
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Information Governance and Me handout

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## 5. On-Going Training/Awareness

### 5.1 Computer Based Training

All employees and casual workers are required to complete on-going training on Information Governance every year. All staff will take the **e-Learning for Healthcare** (HEE e-LfH) training programme. Staff are expected to take and pass a test at the end to assure understanding of the topic. The Workforce Team maintains a database recording the names of staff that have completed Information Governance training.

### 5.2 Locum GPs/ Seasonal GPs

All locum and sessional GPs who access the Out of Hours Booking website can access the Information Governance and Patient Confidentiality leaflet electronically.

### 5.3 Posters

Each site has a poster displayed reminding staff about the importance of information governance and patient/staff confidentiality.

### 5.4 Screen Savers

Where possible, all computers will have a Screen Savers which rotates messages connected to Information Governance.

### 5.5 Caldicott Leads/ Guardians

Every department/service within BrisDoc has an allocated Caldicott Lead. All staff are made aware of who their Caldicott Lead is should any questions be raised over information governance. The Medical Director is the corporate Caldicott Guardian.

### 5.6 Staff Newsletters

Every month, a staff newsletter is issued to every employee and casual worker. Throughout the year (i.e. every quarter), a more comprehensive newsletter is issued which contains reminders and updates relating to Information Governance and a reminder of who the Caldicott Leads are.

### 5.7 Line Manager Input/Team Meetings

Every year, all staff have at least one Performance & Development Review (PDR) with their line manager. If it becomes apparent that the member of staff is not aware of the importance of Patient Confidentiality and Information Governance, the line manager will discuss it further with them and document it within the PDR forms.

The topic will also be raised in Team meetings and feedback provided on any new developments / learning points relating to the topic.

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## 6. Visitors

All visitors who come to BrisDoc must sign a Visitors Confidentiality Statement – see Appendix 2.

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## Appendix 1

### Confidentiality Statement for Staff

The work at BrisDoc is of a confidential nature. Under the Data Protection Act 2018, you must maintain the confidentiality of information about patients and staff at all times:

- All information regarding BrisDoc’s patients and staff must be treated as strictly confidential at all times, and you may not divulge to any other person except with the authority of the Caldicott Guardian for your department / service.
- Such authority may only be given when it is in the patient’s or staff’s own interest and is a necessary part of treatment.
- You may also have access to information relating to the company as a business organisation. All such information from any source is to be regarded as strictly confidential.
- Under no circumstances may any information be given to representatives of the media on any subject concerning BrisDoc’s facilities, its patients or staff, without the written authority of the Chairman.
- Unauthorised disclosure of confidential information will result in disciplinary action and may lead to your dismissal.

After the termination of this agreement, you shall not disclose or use any of BrisDoc’s trade Secrets or any other information, which is of sufficiently high degree of confidentiality. BrisDoc shall be entitled to apply for an injunction to prevent such disclosure or use and to seek any other remedy including without limitation the recovery of damages in the case of such disclosure or use.

The obligation of confidentiality both during and after the termination of this agreement shall not apply to any information which the member of staff is able to disclose under the Public Interest Act 1998 provided the member of staff has first fully complied with BrisDoc’s procedures relating to such external disclosures.

**DECLARATION**

*I hereby declare that I will maintain confidentiality at all times and will not divulge information regarding patients and staff to any other person except with the authority of the Caldicott Guardian for my department / service.*

.....(signature) .....(date)

..... (Printed name)

**PLEASE COMPLETE AND RETURN TO HR DEPT, OSPREY COURT**



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**Appendix 2**

**Confidentiality Statement for Visitors**

As a visitor to BrisDoc Healthcare Services Ltd, I understand that the nature of the work undertaken is highly confidential.

I agree not to disclose any information regarding patients, staff and the business of the organisation that I may gain whilst visiting to any person outside of the organisation itself.

I also agree not disclose any information on any subject concerning BrisDoc’s facilities, its patients or staff, to representatives of the media without the written authority of the Chairman.

This obligation shall continue in perpetuity.

VISITOR NAME:.....

SIGNED:.....

DATED:.....

**BRISDOC STAFF MEMBER ACCOMPANYING AND DIRECTING VISIT:**

NAME:.....

SIGNED:.....

**FORM TO BE RETURNED TO:**

**BrisDoc, Unit 21 Osprey Court, Hawkfield Business Park,  
Whitchurch, Bristol, BS14 0BB  
Fax: 0117 9370919**

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## Appendix 3

### Exempt from Terms & Conditions: Confidentiality & Data Protection

#### Confidentiality of Information

You must also ensure that during the term of your employment or after termination you do not allow disclosure of or use any Confidential Information other than in the proper course of your employment with BrisDoc or after gaining appropriate consent from your Head of Department or the person to whom that Confidential Information relates. For the purposes of this contract “Confidential Information” means details (which are not already in the public domain) relating to patients, contractors and suppliers of BrisDoc, information relating to capital and private finance projects, financial information (save to the extent that this is included in published accounts), details relating to employees and other staff members of BrisDoc and of the remuneration and other benefits paid to them, confidential information specific to BrisDoc, any information which you are told is confidential and any information which has been given to BrisDoc in confidence by patients, suppliers, contractors or other persons.

Under no circumstances may any information be given to representatives of the media on any subject concerning BrisDoc’s facilities, its patients or staff, without the written authority of the Chairman. Any member of staff who has a particular concern should raise this in accordance with BrisDoc’s Whistleblowing Policy. Copies of this guidance are available via the Human Resources Department or the Intranet.

Any unauthorized disclosure of Confidential Information may result in disciplinary action being taken against you up to and including dismissal.

#### Data Protection

BrisDoc retains and processes personal data in relation to its employees and other members of staff. In signing this Agreement, you agree and explicitly consent to BrisDoc processing: -

- personal data where this is necessary or reasonably required for the purposes of your employment (both during and after employment) or the conduct of BrisDoc’s business or where it is required by law
- sensitive personal data, including without limitation any self-certification forms or medical certificates supplied to BrisDoc to explain your absence by reason of illness or injury, any record of sickness absence of any medical records or health assessments where this is necessary or reasonably required for the purposes of your employment (both during and after employment) or the conduct of BrisDoc’s business or where it is required by law

and you acknowledge that such data may be legitimately disclosed to appropriate persons and BrisDoc’s professional advisors, pursuant to the Data Protection Act 2018 (“DPA”).

You must, at all times during this employment, act in accordance with the DPA principles and must comply with any policy introduced by BrisDoc to comply with the said Act

In accordance with the principles of the DPA, the aim is to ensure that data held by BrisDoc is as accurate and up to date as reasonably practicable. If you consider that data held on you is or may be inaccurate, or if you wish to have access to such data, please contact your manager.

You are required to notify your line manager, in writing of any changes in your personal circumstances e.g. address, phone number, next of kin etc.

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## 7. Tables

Date	Reviewed and amended by	Revision details	Issue number
September 2014	SP	Values Quadrant changed	
Sept 2014	SP	Training section amended	
Oct 2015	SP	Sec 4 updated	
Oct 2015	SP	Appendix 4 updated	
Oct 2015	SP	Appendix 3 Updated	
Dec 18	DL	Appendix 4 and 5 removed All references t9o 1998 DPA changes to 2018. New staff materials added, new training toll updated.	
28 <sup>th</sup> February 2024	MD	Changes to owner and updated M Duncans job title.	3.2