North West Core Skills Programme

INFORMATION SHARING PROTOCOL BETWEEN HEALTH CARE ORGANISATIONS AND EDUCATION PROVIDERS SUPPORTING THE ADOPTION OF THE NORTH WEST CORE SKILLS PROGRAMME FOR THE DEVELOPOMENT OF THE CURRENT AND FUTURE HEALTHCARE WORKFORCE.

Version number:	0.3
Author:	Mike Farrell, North West Core Skills Programme
Effective from:	October 2012
Due for review on:	October 2013

1. Purpose

This protocol has been developed to support the effective information sharing requirements related to the adoption of the North West Core Skills Programme by healthcare organisation and education providers.

The aim of the North West Core Skills Programme is to aid the efficient delivery of Core Skills training by encouraging standards to guide its delivery and through recognising previous training preventing unnecessary duplication. Specifically, if unnecessary duplication of Core Skills Training is to be avoided there needs to be sharing of some key learner information by those organisations involved in supporting its delivery. Given current arrangements for supporting the development of the future healthcare workforce this type of training delivery will be supported by both NHS healthcare organisations and education providers.

The purpose of the North West Core Skills Programme and the information Governance implications that it generates has been set out in the document entitled *North West Core Skills Programme - Information Governance Implications* available from www.cmtpct.nhs.uk and has informed the need and focus for this protocol.

2.   Definitions

Definitions	
'NHS North West '	The strategic health authority for the North West Region. NHS North West (or its successor bodies as agreed) who as the sponsor for the North West Core Skills Programme owns this agreement.
'the Data Controller'	The 'owner' of the data in the conglomerate form in which the Core Skills Register system stores it, in this case NHS North West. NB - Data is input into the Core Skills Register by the healthcare organisations and education providers in the North West region. Once it is in the system, NHS North West (and or its agreed successor body) becomes the Data Controller.
'Healthcare Organisations'	Means those healthcare organisations located within the North West who use the North West NHS Core Skills Register system.
'Education providers'	Means those Further and Higher Education Institutions located within the North West who use the North West NHS Core Skills Register system.
'the Data Processor'	Skills for Health has developed the system on behalf of NHS North West and will maintain the security of the system.
'Core Skills Register / 'the system'	The Core Skills Register is an on-line database system which has been developed for NHS North West by Skills for Health. The Core Skills Register collects

	information about statutory and mandatory training undertaken by and which produces management information from the data collected.
'the data'	The sets of data defined in section 4.1.

2. PARTNER(S)

NHS North West (or its nominated successor body) is the Data Controller and will provide the mechanism by which information between the partners involved in supporting the adoption of the North West Core Skills Programme can support any agreed data sharing.

Although healthcare organisations and education providers are the originators of the data, once collected in the North West NHS Skills Register will, for the purpose of this protocol, be controlled by NHS North West (or its successor bodies).

Skills for Health is a partner of the North West Core Skills Programme, and is the Data Processor, being the organisation responsible for the build and hosting/maintenance of the Skills Register. Skills for Health (SfH) is the sector skills council (SSC) for the Health Sector, licensed by the Department of Business Innovation and Skills (BIS). SfH manages a Skills Passport for Health programme under which auspices it is developing a UK Core Skills Framework and a UK Skills Passport application. SfH runs the Core Learning Unit, a national e-learning service, and also offers various workforce related tools, such as WIRED, a compliance reporting application. Further information is available at www.skillsforhealth.org.uk.

A list of partners signed up to this protocol is available from North West Core Skills Programme available from http://www.cmtpct.nhs.uk/north-west-core-skills/default.asp

3. AIM

This protocol has been formulated to facilitate the exchange of information between partners to aid efficiencies in the delivery of Core Skills Training by preventing the unnecessary duplication of mandatory training for learners undertaking healthcare education programmes.

All partners signed up to this protocol are committed to:

- Achieving efficiency
- Partnership working
- Consistency
- Data quality
- Valuing the contribution of all partners
- Clarity of roles, responsibilities and accountability
- Making the best use of resources

4. PROCESSES

4.1 TYPES OF INFORMATION TO BE SHARED

Appendix 1 identifies the outcome of a Privacy Impact Assessment.

For the intended purpose of being able to recognise training previously undertaking and thus preventing the unnecessary duplication of mandatory training the following data will be collected:

Personal Information

- Learners Title

- Learners first and surname

- Learners date of birth

- Learners employee or student ID number

- Learners professional registration number.

- Learners email address

Core Skills Training Information

- Core Skill Course Name

- Core Skill Level

- Date of training completion

- Training Provider

- Training Location

- Training format

- Assessment Status

- Assessment Result

This information will be entered into the North West NHS Core Skills Register, a secure web-based database specifically developed to aid organisations supporting the adoption of the North West Core Skills Programme.

No other data other those identified will be collected and stored in the Core Skills Register. It should be noted in particular that ongoing development of the system and changes to its specification may require additions to, amendments to or deletions from the list above. Therefore, the data which might be processed may differ from the list above during the term of this protocol. In such cases, the terms of this agreement will continue to apply to all data stored in the system. However, there will be an annual review of this data sharing protocol to ensure any amendments are accurately reflected and ensure that the data being collected continues to be suitable for achieving the intended purpose.

4.2 **CONSTRAINTS ON THE USE OF THE INFORMATION**

The information shared must not be disclosed to any third party without the written consent of the partner organisation that provided the information or the data controller if there is any doubt about the source of the data.

4.3 **ROLES AND RESPONSIBILITIES UNDER THIS PROTOCOL**

All partners will

- Ensure that sharing of information for Core Training is included as a specified item in any privacy notice completed by the learner on commencement of their programme of study/employment.

- Make the North West Core Skills Training Privacy Notice available to all learners (Appendix 2). All learners need to be aware that their learning record may be seen by all organisations supporting the data sharing protocol.

- Have a nominated administrator(s) who will manage the North West NHS Core Skills Register on behalf of the partner organisation.

- Ensure that the nominated administrator is supported to undertake any training/support to ensure effective use of the register, are aware and maintain their responsibilities under the Data Protection Act 1998.

- Monitor the use of the North West NHS Core Skills Register to ensure that only authorised use is being ensured for the intended purpose and within the limits of any licensed agreement for use.

- That any data as defined above in 4.1 will not be sent from one place to another unless it is carried by the appropriate secure means. The data shall not be sent by e-mail unless (a) it is encrypted to current NHS standards[1] or (b) it is sent directly within a secure network environment approved for that purpose by NHS North West.

- Complaints about the use or misuse of personal information held within the North West NHS Core Skills Register must be addressed by the organisation where the complaint originated and should be raised using the organisations own complaint's process.

- Ensure that their organisation has Data Protection Information Governance, Records Management Policies that are available on request to other partners.

- Ensure that all users and administrators of the system have received appropriate (information governance specific) training on the relevant policies and procedures referenced in this agreement.

4.4 **SPECIFIC PROCEDURES**

Organisations will need to complete the Action Planning checklist in Appendix 3.

With the support of Skills for Health who have developed the North West NHS Core Skills Register an active log of all data transactions will be maintained. If these transactions indicate any misuse, the appropriate information will be shared and any required action will be shared with the relevant partner organisation.

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[1] For details see https://www.igt.connectingforhealth.nhs.uk/KnowledgeBaseNew/DH_NHS%20IG%20-%20Detailed%20Guidance%20on%20Security%20Measures%20for%20Information%20Transfers.pdf

Any relevant database alerts which all partners might need to be aware of to ensure effective use of the North West NHS Core Skills Register will be posted on the site news section on the database.

The North West Core Skills Programme will annually review the use of the Core Skills Register, seeking contributions from partners to enhance the integrity, efficiency and effectiveness of the register for the benefit of learners and partner organisations.

5. **RETENTION, REVIEW & DELETION**

Partners to this protocol undertake that personal data shared will only be used for the specific purpose for which it is requested. The data will be retained in line with training retention periods as identified in the NHS Records of Management - Code of Practice. which currently indicates 6 years.

6. **REVIEW OF THE INFORMATION SHARING PROTOCOL**

This protocol will be reviewed in twelve months after its implementation and annually thereafter. The nominated holder of this protocol on behalf of NHS North West (the Data Controller) is the North West Core Skills Programme Team.

7. SIGNATURE

By signing this protocol, all signatories accept responsibility for its execution and agree to ensure that staff are trained so that requests for information and the process of sharing itself is sufficient to meet the purpose of this protocol. Signatories must also ensure that they comply with all relevant legislation.

Signed on behalf of NHS North West Core Skills Programme:

Name:_____

Date: _____

Signed on behalf of (*Partner Organisation-for Healthcare Organisations this might be the Lead for the Learning Development Agreement)*:

Title: _____

Position: _____

Date: _____

Key Contact Details

Please include the contact details of a nominated person whose contact details will be used for communicating updates, revisions and other associated activities related to the use of the NHS North West Core Skills Register,

- Name of Nominated Person:_____

- Position:_____

- Email:_____

Telephone Contact:_____

Appendix 1: Privacy Impact Assessment (PIA)

Part 1: Initial Assessment and Screening Process

This process is based on the ICO guidance (http://www.ico.gov.uk) and consists of a number of screening questions help to identify whether a project requires a PIA. The intention of these questions is not to provide over elaborate answers but to get staff thinking about the legal aspects of the project/system they are proposing developing. The aim is to ensure all aspects of the project have been considered regarding Personal Data.

In reviewing the material gathered in the preparation of the initial assessment in respect of the Core Skills Register, it was deemed that the system requires a: Small Scale Privacy Impact Assessment.

The justification for this decision is that 5 of the 16 screening questions indicated a positive response. In 2 of these 5 questions a positive response was indicated for only one scenario when multiple scenarios were presented. As per the ICO guidelines, when considered as a whole, the view of the Core Skills Programme team was that a small scale PIA was the appropriate decision.

Part 2: Small Scale Privacy Impact Assessment

The PIA is a process which helps assess privacy risks to individuals in the collection, use and disclosure of information. It ensures awareness of problems and enables pragmatic solutions to be developed and implemented. The Assessment undertaken was based on the ICO guidance (http://www.ico.gov.uk) and carried out by the North West Core Skills Programme inconjunction with advice and guidance from a CLAS consultancy (http://www.cesg.gov.uk) under the auspices of Skills for Health's Skills Passport Programme.

The outcome of the PIA undertaken was that a number of recommendations were identified to address privacy and security issues. These recommendations impact different stages of the project, from design through development, and implementation. To support the implementations of the recommendations, a series of actions have been included in the project plans for the Core Skills Register. The majority of these actions and requirements are contained in the IG implications paper. A brief summary of those that have not already been outlined follows below:

Key Recommendations in the PIA:

1. A risk assessment against the North West Core Skills Programme's Risk Appetite and Risk Tolerance should be carried out, risk treatment applied and any residual risks accepted by the Senior Information Risk Owner (SIRO).
2. A Technical Risk Assessment should be carried out to assess technical risks and vulnerabilities against current threat levels.
3. An IT Health Check (ITHC) is carried out to establish if there are any technical vulnerabilities in the build that would allow an attack on the system. The scope of the ITHC should include server build, web build and user access, also the firewalls that protect the database.

Appendix 2

North West Core Skills Training Privacy Notice

This notice has been developed to tell you about the need to share personal information about training you have undertaken with healthcare organisations who might be involved in supporting your training programme.

Why is information about a specific aspect of my training being collected and shared?
Healthcare organisations have to ensure that their staff and those undertaking training, work placements receive periodic mandatory training in order to ensure compliance with national quality and risk management standards. This type of training covers topics such as Health and Safety, Fire safety etc.

Presently, there is significant duplication of mandatory training as due to the rotational training systems in place, where a junior doctor and other healthcare students move for a training placement from one organisation to another, may have to repeat training undertaken.

One of the ways this issue is being addressed is through the development of an agreed Skills Framework, called the Core Skills Framework which is part of The North West Core Skills Programme. This programme of work is being supported by NHS North West which is one of the bodies responsible for the commissioning of healthcare training programmes.

The aim through the use of the framework by healthcare organisations and education institutions delivering healthcare training programmes is to prevent the duplication of mandatory training. This will be achieved by standardising the content of mandatory training and indicating expected refresher periods. Healthcare organisations and education institutions within the North West are presently adopting The North West Core Skills Programme by ensuring their mandatory training is delivered to the standards defined in the Core Skills Framework. Further information regarding the programme please visit our website:-
(www.cmtpct.nhs.uk/coreskills).

What and how will my information be shared?
In order to prevent duplication there is a need to ensure training records related to those Core Skills training subjects that you have undertaken are accessible across Health Care Organisations. One of the ways this is being supported is through the development of a secured web-based application called the Core Skills Register. The Core Skills Register is designed to store records of Core Skills training undertaken and contains a small amount of personal identifiable information. This information will include, first name, surname, date of birth, email, Registration Number (i.e. Student number, GMC/NMC Number), course name completion date.

The ability to share your Core Skills training record and the agreed small amount of personal identifiable information will enable organisations/education institutions to review your mandatory training experience and have confidence you are trained to the appropriate level prior to a new placement and/or identify any specific updates that you might need. Only authorised personnel will be allowed to access these applications and view your record.

The sharing of data between health care providers/education providers will promote the efficient organisation and management of induction training, but also improve your own experience by not needlessly repeating mandatory training. A data sharing agreement/protocol has been developed that provides further information about the duties of those organisations involved, and is available online at www.cmtpct.nhs.uk

How can I get a copy of the record/information held?
You will be able to obtain a copy of your record and information held via the authorised administrator within your employing healthcare organisation or education provider.

What if I do not want my Core Skills Training Record to be shared?
Employer organisations and other bodies are required to carry out duties that may necessitate the sharing of your core skill training record. The rationale and agreement to share this data is set out in a data sharing protocol/agreement that is available online at www.cmtpct.nhs.uk if you do not wish to have your Core Skills Training Information shared via the Core Skills Register please notify

Insert name of Administrator.

Further Information about the Core Skills Framework
- For further information regarding the Core Skills programme please contact
  coreskills.programme@nhs.net

Appendix 3: Information Systems and Governance Checklist

How to implement the Core Skills Register

Set Up stage 1 - Training Delivery		Supporting documentation	Response required	Internal Checklist
1.1	Complete mapping exercise to ensure your training meets CSF learning outcomes	CSF mapping tool	Yes	

Set Up stage 2 - IT Department				
2.1	Provide IG documents to appropriate lead to review and sign off to evidence that requirements have been met	IG Briefing Pack	Yes	
2.2	Provide IT with 'Skills Register IT requirements' document to review and sign off to confirm minimum requirements are in place	IT Requirements checklist	No	

Set Up stage 3 - Training Record system				
3.1	Complete data mapping exercise to ensure your system meets minimum data requirements	Minimum data set checklist	No	
3.2	Complete data uploading exercise to ensure your system meets the meets minimum reporting requirements **(change to test // Development)**	How to complete data uploading	Yes	
3.3	Complete data quality exercise to ensure your system meets minimum data quality requirements	Data quality requirements checklist	Yes	
3.4	Agree procedure for uploading compliant training records		No	

Set Up stage 4 - Users				
4.1	Identify administrators/users who are going to be accessing the CSR and arrange for accounts to be set up by CSR helpdesk	Account set up doc	Yes	
4.2	Arrange for users to have appropriate training and familiarisation	Overview and training docs	No	

How to unlock benefits

Agree procedure for checking students/Junior doctors core skills records			No	
Agree flexible training delivery approach to enable individuals to only undertake necessary training			No	