Procedure for overdue IG training renewal for staff and PGR students v5.0

This version (v5.0) approved by the IG Committee 2021-03-18

Whilst initial Information Governance training is mandatory and necessary for access to ScHARR filestore it is just as important for the training to be renewed. This not only serves as a refresher to the user but also introduces new changes that have been introduced since their last training was completed.

There are five mandatory training modules:

- Protecting Information
- Protecting Personal Data
- Protecting Research Data
- ScHARR- Information Governance
- Cyber Safety

Training renewal is required annually for all, including those on sick leave, maternity leave or a leave of absence. Allowing staff or PGR students on leave to retain access without up-to-date information security training does represent an IG risk and must be handled appropriately.

The maternity leave checklist states that access to University systems (including email) is dependent upon up-to-date training. Potential removal of access due to overdue training will be discussed with the line manager.

For staff on long term sick leave it is *not* recommended that access to all University systems be removed due to overdue training only. However, removal of access to risk-bearing research data within Departmental Research storage (X-drive / VM) is recommended, but this must be discussed with the relevant line manager. Removal of access to any data should be clearly communicated and must not prevent effective communication with line managers, HR, occupational health etc.

For students on maternity leave, sick leave or a leave of absence, the PGR administrator should make the student aware of the need to keep training up to date if IT system access is required.

IT Services system-generated emails

The IT Services system automatically emails individuals to remind them when their training is about to expire[1]. If an individual allows their training to expire they get automatic system-generated reminders weekly thereafter. The training system also logs dates of reminders.

[1] Protecting Personal Data is currently only mandated as required for renewal every two years (though there are also plans to change this to annually for the whole University) so reminders will currently not be sent for this module until two years have elapsed since it was previously completed

ScHARR Process

It is necessary to actively monitor renewal of training, as we cannot rely on individuals actioning the IT Services system generated emails.

ScHARR-DS (data security) identifies the current list of ScHARR staff and PGR students. This list is then cross-referenced against the information in the training management system. By querying the training management system, ScHARR-DS can determine when training was undertaken by staff and PGR students, and therefore if it is out of date.

The training management system reports are reviewed weekly by ScHARR-DS and a temporary record of overdue training and reminders kept. Once users have renewed their training they are removed from this temporary record.

In order to ensure that individuals with expired training don't continue to have access to data the following steps are taken.

Step 1

For any training records that are overdue by over a week ScHARR-DS send a reminder by email. The email reminder will not be personalised, due to the likely high numbers; instead all applicable staff and PGR students will be bcc'd.

> Information Security Training - ACTION NEEDED
>
> Our records show that your Information Security training (for at least one of the training modules below) has expired. It is essential that everyone stays up to date with this training so we can reduce the risk of a data breach.
>
> For ScHARR staff and PGR students, the following Information Security training modules **must be completed annually**.
>
> - Protecting Information
> - Protecting Personal Data*****
> - Protecting Research Data
> - ScHARR- Information Governance
> - Cyber Safety
>
> You can find them here: https://infosecurity.shef.ac.uk
>
> ***The RENEWAL DATE on the training system for "Protecting Personal Data" WILL BE INCORRECT for ScHARR staff who must complete this training annually. Please ignore this date and re-do this module if it was last completed over a year ago.**
>
> Please retake any overdue modules (i.e. any completed more than one year ago) as soon as possible.

Training is important. Our data sharing contracts require us to supply evidence that staff have undertaken training. If these contracts were revoked, a considerable number of ScHARR projects could cease as a result.

If you are on maternity leave or a leave of absence you only need to keep your Information Security training up to date **if** you wish to use the University IT system (including email) while on leave. Otherwise, these reminders can be ignored. Your account will be suspended, and then reinstated when you renew your Information Security training on your return to work.

If you are on an extended period of sick leave and your IG training expires, ScHARR-DS will temporarily remove your access to the X drive and any research Virtual Machine storage. Access can easily be reinstated when you return to work and complete the IG training.

Any queries, please do not hesitate to get in touch.

Step 2

When training is overdue by two weeks, an email reminder will be sent by ScHARR-DS.

Information Security Training - REMINDER - ACTION NEEDED

Our records show that your Information Security training (for at least one of the training modules below) expired **over two weeks ago**. It is essential that everyone stays up to date with this training so we can reduce the risk of a data breach.

For ScHARR staff and PGR students, the following Information Security training modules **must be completed annually**.

- Protecting Information
- Protecting Personal Data*
- Protecting Research Data
- ScHARR- Information Governance
- Cyber Safety

You can find them here: https://infosecurity.shef.ac.uk

***The RENEWAL DATE on the training system for "Protecting Personal Data" WILL BE INCORRECT for ScHARR staff who must complete this training annually. Please ignore this date and re-do this module if it was last completed over a year ago.**

Please retake any overdue modules (i.e. any completed more than one year ago) as soon as possible.

Training is important. Our data sharing contracts require us to supply evidence that staff have undertaken training. If these contracts were revoked, a considerable number of ScHARR projects could cease as a result.

If you are on maternity leave or a leave of absence you only need to keep your Information Security training up to date **if** you wish to use the University IT system (including email) while on leave. Otherwise, these reminders can be ignored. Your account will be suspended, and then reinstated when you renew your Information Security training on your return to work.

If you are on an extended period of sick leave and your IG training expires, ScHARR-DS will temporarily remove your access to the X drive and any research Virtual Machine storage. Access can easily be reinstated when you return to work and complete the IG training.

Any queries, please do not hesitate to get in touch.

Step 3

When training is overdue by three weeks, a third and final email will be sent by ScHARR-DS. This email will be **personal, i.e. sent to the named individual beginning "Dear NAME".** The email will be copied to the IG Manager and IG Lead for staff, and the IG Manager, IG Lead and PGR administrator for PGR students.

Information Security Training - FINAL REMINDER - ACTION NEEDED

Our records show that your Information Security training (for at least one of the training modules below) expired **over three weeks ago, and hasn't been renewed despite two email reminders**.

It is essential that everyone stays up to date with this training so we can reduce the risk of a data breach.

Your University IT account will be suspended by IT Services if the training is not renewed in the next seven days.

For ScHARR staff and PGR students , the following Information Security training modules **must be completed annually**.

- Protecting Information
- Protecting Personal Data*****
- Protecting Research Data
- ScHARR- Information Governance
- Cyber Safety

You can find them here: https://infosecurity.shef.ac.uk

***The RENEWAL DATE on the training system for "Protecting Personal Data" WILL BE INCORRECT for ScHARR staff who must complete this training annually. Please ignore this date and re-do this module if it was last completed over a year ago.**

Please retake any overdue modules (i.e. any completed more than one year ago) as soon as possible.

Training is important. Our data sharing contracts require us to supply evidence that staff have undertaken training. If these contracts were revoked, a considerable number of ScHARR projects could cease as a result.

If you are on maternity leave or a leave of absence you only need to keep your Information Security training up to date **if** you wish to use the University IT system (including email) while on leave. Otherwise, these reminders can be ignored. Your account will be suspended, and then reinstated when you renew your Information Security training on your return to work.

If you are on an extended period of sick leave and your IG training expires, ScHARR-DS will temporarily remove access to the X drive and any research Virtual Machine storage. Access can easily be reinstated when you return to work and complete the IG training.

Any queries, please do not hesitate to get in touch.

Step 4

After the third reminder with no response, ScHARR-DS check with the School Operations Manager to determine whether any of those with expired training are on maternity leave or long term sick leave.

For those on maternity leave, ScHARR-DS contact the Section Manager to request that it is appropriately communicated, via the line manager, that access to University Services will be removed. Assuming no objections, ScHARR-DS proceed to step 5. If an objection is raised, then the IG lead will make a decision on the appropriate course of action given the balance of risks, and this will be carefully documented.

For those on sick leave the Section Manager is contacted by ScHARR-DS and asked to appropriately communicate, via the line manager, that access to Departmental Research Storage (X drive and / or research VM storage) will be temporarily removed. Assuming no objections, ScHARR-DS remove access. If an objection is raised, then the IG lead will make a decision on the appropriate course of action given the balance of risks, and this will be carefully documented.

Step 5

The HoD[2] is emailed with details of dates of reminders; an indication if the non-responder is on maternity leave and the date the Section Manager was contacted.

The HoD is asked to confirm, by email, that IT Services can suspend access to their University account (including email, Google drive, calendar and Networked filestore folders).

[2] Or nominated deputy. Currently, the Deputy Dean undertakes this role.

The HoD may additionally contact the staff member or PGR student personally by email at this point with a reminder.

Once this approval is obtained the matter is escalated to IT Services for account suspension as follows:

a. ScHARR-DS must be able to prove three separate contacts attempted to the person who hasn't completed training.

b. ScHARR-DS carries out a final check that training is still outstanding and sends a list of users; approval from the HoD and the dates of when the user's training has expired (per ScHARR annual schedule) to helpdesk@sheffield.ac.uk. The message to IT Services will clearly state that ScHARR requires all five training modules to be completed: the four University modules plus the ScHARR - Information Governance module.

c. Usually within 1 working day, IT Services will check the status of training records, and if still overdue will suspend the accounts.

d. Users will have to make contact with the IT Services Helpdesk to get their account unsuspended, and following this, they will be given a 24hr window to complete the overdue mandatory training courses. If they complete the training, the account remains unsuspended. If they don't complete the training, the account gets suspended again, and the user has to contact the IT Services Helpdesk again.

e. If the training is still not completed one week later, ScHARR-DS will request account suspension again. This is repeated on a weekly basis until the training is completed. This will ensure that the person whose training has expired can not circumvent the system and arrange for their account to be reinstated by IT services, but still avoid doing their training.

Version	Effective Date	Summary of changes
0.3	3rd Oct 2019	n/a first version *Version 1.0 approved by ScHARR Executive 3 OCT 2019*
2.0	20th Feb 2020	Updated to reflect that the automatic email reminder is only applicable to ScHARR IG training. Updates to email text to provide more clarity and include information for maternity and sick leave. Other minor updates to clarify the process.
3.0	13th Nov 2020	Added in information about training being mandatory to retain access when on maternity or sick leave
4.0	18th Feb 2021	Cyber Safety module is now mandatory. PGR students will also be included in reminders. The university modules are now annual rather than 2 yearly (with the exception of

		Protecting Personal Data). A process for ensuring staff and PGR students complete their training upon having their account unsuspended has been added. PGR students added to the process. Text altered accordingly.
5.0		Update to process regarding maternity leave and sick leave, to check with the section manager and line manager before removal of access. It is not felt acceptable to remove all University services for those on sick leave because this would prevent email communication from the line manager, HR, etc. Instead, access to the departmental shared storage (X drive +/- research VM) will be temporarily removed to prevent access to risk-bearing data.