

Our Ref: 300720  
Email: [request-680543-a87848a8@whatdotheyknow.com](mailto:request-680543-a87848a8@whatdotheyknow.com)  
Date: 13 August 2020

Corporate Governance Department  
Legal Services Division  
Freedom of Information Team  
3 Priestley Wharf  
Holt Street  
Aston  
Birmingham  
B7 4BN  
Email: [foi.bchc@nhs.net](mailto:foi.bchc@nhs.net); Tel: 0121 466 7293

Dear Thom

### Re: Freedom of Information Request

With reference to your request for information pursuant to the Freedom of Information Act dated 29 July 2020, I can advise that the Trust **does hold** the information that you are seeking. I will set this out below:

Dear Birmingham Community Healthcare NHS Foundation Trust,

I wish to understand the structure within your organisation around the management of information/data flows and their associated risks and what are your systems and processes you have in place to manage and monitor them. Therefore, to help to understand what is the core business function of these flows, I wish to ask the following;

#### Roles and Structures

1. Who carries out the role of your Senior Information Risk Officer (SIRO) and is this a dual or stand alone role - Full Job title and name  
[Ian Woodall, Chief Finance Officer, is our SIRO. This is a dual role.](#)
2. Who carries out the role of Chief Information Officer (CIO) and is this a dual or stand alone role - Full Job title and name  
[We do not have a Chief Information Officer in the Trust.](#)
3. Who carries out the role of Data Protection Officer (DPO) and is this a dual or stand alone role - Full Job title and name  
[Ben Pumphrey, Head of Information Governance & Legal, is our DPO. This is a dual role.](#)
4. Who carries out the role of IG Manager (or equivalent ie. Head of IG) - Full Job title and name  
[Please see the answer to question 3 above.](#)
5. Questions 1 - 4 - Can we please have a copy of their job descriptions (Whether these are dual or stand alone job descriptions) and their pay banding.  
[For question 1 job description and pay banding, please see the attached \*\*Chief Finance\*\*](#)

**Officer JD.** For questions 3 and 4, please see the attached **DPO & Head of Legal Services JD.** We have none for question 2 because we have no Chief Information Officer.

6. Questions 1 - 4 could we please have a copy of their department structure For question 1, please see the attached **Finance Structure August 2020.** We have none for question 2 because we have no Chief Information Officer. For questions 3 and 4, please see the attached **Information Governance Team Structure August 2020.**
7. Do you have a separate structure specifically to support SIRO/CIO in their roles? We have no separate support structure for SIRO. Instead, he is supported by the Information Governance Team.

#### Information Assets

1. Do you have an information asset structure to support SIRO, can you advise on this is not covered by the above structure chart.  
**This is currently being undertaken by the Information Governance Team.**
2. Have you identified your information asset owners and administrators? What role do they take within your organisation (e.g. head of service level) and how are their responsibilities defined. If in a document or JD please provide a copy.

**The roles of Information Asset Owner (IAO) and Information Asset Administrator (IAA) are undertaken by Trust staff for the system assets that they use / manage in their teams.**

**Information Asset Owner:** IAOs are directly accountable to the SIRO and must provide assurance that information risk is being managed effectively in respect of the information assets that they 'own'. They will also lead and help foster, within their respective Divisions and Departments, a culture that values, protects and uses information.

**Information Asset Administrator:** IAAs support the IAO in their duties to manage their information assets.

**For more information on IAOs and IAAs, please see the table below:**

| Definition              | Function Description  | Example        | Comments   |
|-------------------------|---|----------------|--|
| Information Asset Owner | Senior member of staff accountable for ensuring the operational confidentiality, integrity and availability of a set of personal identifiable data. | Director of HR | Delegated responsibility to 'Head of HR' for operational oversight would be normal, but Director would still be accountable to the organisation's executive. |

|                                 |   |            |  |
|---------------------------------|---|------------|--|
| Information Asset Administrator | Senior member of operational staff ensuring that relevant information asset management policies and procedures are followed, recognise actual or potential security incidents, consult their IAO on incident management, and ensure that information asset registers are accurate and up to date. | Head of HR | Functions may be handled by other senior staff. However, these key responsibilities must be included within a named job description. |
|---------------------------------|---|------------|--|

3. Do you deliver a training package to your Information Asset Owners and/or administrators? How often do they do this training?

Yes, annual training is provided as part of the Trust's mandatory training programme.

- a. If so, can we please see a copy?

This training is undertaken online via NHS Digital; a copy cannot be provided.

4. Do you have a group where the IAO/ IAA or SIRO meet and discuss information risk and if so could I have a copy of the Terms of reference for this group.

Yes, discussion takes place at the Trust's' information governance meetings with the divisional information governance representatives. Attendees are invited to this meeting when required. Please see the attached **Terms Of Reference 2020-2021v1.0**.

#### System and Process

1. What software do you use to map out your information assets i.e. excel, third party solution such as One Trust, CoreStream

This is currently completed in-house on Excel spreadsheet but transferring across to One Trust.

2. Could I request a copy of your information asset register (template) and data flow mapping template

Please see the attached **Information Asset Record Template** and **Information Asset Record Questionnaire**.

3. Could we please have a copy of your Data Protection Impact Assessment (DPIA) template. Please see the attached **Short Form DPIA Template V03**.

I can confirm that as the information has been provided, this request is now closed.

For future reference, the Trust's publication scheme and details of the services that we provide can be found on our website: [www.bhamcommunity.nhs.uk](http://www.bhamcommunity.nhs.uk).

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#### Freedom of Information Publication Scheme

The Publication Scheme is a guide to the information routinely published by Birmingham Community Healthcare NHS Foundation Trust, and made available to the public.

Details of the scheme can be found on the Birmingham Community Healthcare NHS Foundation Trust website (address above). No charge is made for information that is downloadable from the Trust's website; in the event that hard copy information is requested, the Trust reserves the right to levy a charge in accordance with the applicable regulations.

#### Complaints

In the unlikely event that you have cause to complain about the service received in respect of your Freedom of Information request; the Trust operates a complaints procedure which gives the applicant the right to an internal review of the administration or outcome of any valid Freedom of Information request within 40 working days of the date of this response. Such reviews will usually be undertaken within 20 days by the Chief Executive Officer, or an appropriate nominated officer. Where the Chief Executive Officer has been closely involved in the original request, any review will be conducted by the Chairman of the Trust, or an appropriate Non-Executive Director. The Trust will keep a record of all complaints, reviews and outcomes. Should you feel that you have cause to complain then please write to:

**Chief Executive**  
**Birmingham Community Healthcare NHS Foundation Trust**  
**3 Priestley Wharf**  
**Holt Street**  
**Birmingham**  
**B7 4BN**  
**Telephone: 0121 466 6000**

Should you be dissatisfied with the outcome of the internal review, you have the right to lodge a complaint with the Information Commissioner. A complaints form can be obtained from the Information Commissioner's website: [www.ico.gov.uk](http://www.ico.gov.uk) or contact:

**Information Commissioner's Office**  
**Wycliffe House**

**Water Lane  
Wilmslow  
Cheshire SK9 5AF  
Telephone: 01625 545745**

Feedback

We would be interested to receive feedback as to how you feel your request has been dealt with to help us to understand where we are doing well and to make improvements where necessary; your comments (whether positive or negative) can be made either in writing to the address above or by email.

Any queries about this response can be directed to Eugene C Aninweze, Freedom of Information Officer, on 0121.466.7293 or [foi.bchc@nhs.net](mailto:foi.bchc@nhs.net).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'MBullock', with a long horizontal stroke extending to the right.

**Michael Morgan-Bullock\***  
Legal Services Manager

\* Solicitor of the Supreme Court of England and Wales  
SRA number: 136646