

Governance Directorate

JOB DESCRIPTION

Title of Post: Information Governance Manager

The Information Governance post holder also holds the role of the Data Protection Officer. The job description is currently under review to incorporate the role of the Data Protection Officer responsibilities, which have been undertaken since May 2018.

Grade: Under review

Hours: 37.5 hours per week

Tenure: Permanent

Responsible to: Director of Governance

Accountable to: Chief Executive Officer

Responsible for: Management of the Information Governance Officer,
Coordination of Registration Authority Agents

Location: The post will require working at all three Trust sites and pan community, although the post will be based at RHH.

Liases with: Directors, Consultants, Ward Managers and Heads of Service, Trust staff, CCG, CSU, National Information Governance leads, other health service staff within external organisations, the Police, Social Services, Security Services, Summit, Interserve, PALS, Governors Information Commissioner's Office, Health and Social Care Information Centre, Senior Information Risk Owner, Caldicott Guardian,

Is a member of the Caldicott and Information Governance Group, The IT Senate, Data Standards Group, Waste Management Group, Black Country Alliance Information Governance Group, Multi-Agency Safeguarding Hub, Regional Information Governance Partnership

Job Summary:

The post holder will ensure compliance of Information Governance within the Trust, and where appropriate represent the Trust with external agencies and partners on Information Governance matters.

Main responsibilities

Information Governance is a standards-based approach to improving the way in

which NHS organisations manage information.

Under Review

The post holder will:

- Lead and coordinate an Information Governance continuous improvement work programme within the Trust in relation to:
 - Code of Confidentiality (Caldicott, Data Protection)
 - Records Management (Corporate Information Assurance)
 - Freedom of Information
 - IG Training and awareness
- Maintain the Trust's notification with the Information Commissioner's Office (Registration under the Data Protection Act)
- Ensure that Information Governance initiatives are integrated into the core business functions and plans for the Trust.
- Lead the development and implementation of policies and procedures to support the delivery of Information Governance
- Support the Mandatory Information Governance training and awareness programme of work.
- Lead and manage the Trust's Information Governance Toolkit annual assessment work programme and action plans.
- Submit Information Governance returns to Department of Health ensuring accuracy and timely submission to meet mandatory deadlines.
- Preparation of reports for submission to the Caldicott and Information Governance Group and TME regarding the Trust's IG performance rating on the IG Toolkit.
- Brief managers on the implications of the IG Toolkit returns and their possible consequences, facilitating remedial action at an early stage.
- Work with the Data Standards Group and Head of Informatics to ensure the organisation maintains the quality of its data in order to meet compliance requirements.
- Represent the Trust at local, regional and national Information Governance related meetings.
- Write, implement and review Policies and Procedures associated with Information Governance legislation (Information Governance Policy, Freedom of Information Policy, Safe Haven Policy, Confidentiality Policy, Registration Authority Policy) seeking policy approval through the Caldicott and Information Governance Group and the Policy Group ensuring that the policies and procedures are then made available centrally via the Intranet to all Trust staff and via training as appropriate.

- To actively participate in any relevant cross agency forums and working groups designed to facilitate information sharing and compliance with good practice.
- To provide the Trust with advice and guidance on cross agency information sharing and security issues.

Data Protection

- Provide specialist advice and guidance on Data Protection issues for all new projects that deal with the use of confidential information.
- To provide advice and guidance to the Trust on any new developments and legislative changes in relation to Data Protection.
- Ensure staff awareness of Data Protection, information security and confidentiality through mandatory Information Governance e-learning training, through Trust Induction and through face to face Information Governance training.
- Manage the Information Governance Directory on the Intranet, giving staff guidance on Policy, procedure, training, data quality, best practice and lessons learned.

Freedom of Information

- Manage the Trust's Freedom of Information compliance requirement ensuring the legislative 20-day response deadline is met.
- Advise on the documents required for publication within the Trust Publication Scheme on the Trust website and ensure that all Freedom of Information request responses are published within the Trust website Disclosure Log.
- Provide advice and guidance on the interpretation of Freedom of Information legislation keeping up to date on new developments including legal requirements within Freedom of Information.

Caldicott/Confidentiality

- Manage and perform Trust Information Governance Compliance Audits on confidentiality and data protection in line with current legislation and Information Governance requirements, initiating actions to Heads of Departments when changes are required.
- Work closely with the Caldicott Guardian in promoting the safe use of patient information
- Provide advice and guidance based upon legislation for decisions related to Confidentiality.

- Lead, develop and implement a programme of work to ensure all staff within the Trust are aware of Confidentiality.

Serious Incident Reporting

- Support DATIX incident managers with advice and actions for all data protection breaches logged on DATIX ensuring that the SIRO and Caldicott Guardian are kept informed.
- Ensure that the Caldicott and Information Governance Group are informed of all information risk issues.
- Provide a focal point for the resolution and /or discussion of information risk issues.
- Ensure that identified information security risks are followed up and incidents managed.
- Publish Lessons Learned from Data Protection incidents on the Trust Intranet The Hub and disseminate to the Governance Team for Trust risk assurance.
- Inform the Information Commissioner's Office of all Data Protection Serious Incident breaches via the online reporting tool on the IG Toolkit.
- Respond on behalf of the Trust to requests for further information, following data protection incidents, from the Information Commissioner's Office.

Registration Authority RA (SmartCards)

- Manage the Registration Authority provision for Trust (currently not Trust Community Staff) ensuring that role based access positions have been created and RA Sponsors registered and approved by the CEO.
- Coordinate the RA Agents programme of work by providing advice, assistance and guidance and monitoring training.
- Provide guidance and assistance to RA Agents relating to Hardware and software applications for the Trust's RA provision.

Safeguarding Children (Child Protection Plan warning flags)

- Manage the Information Governance Officer in her role relating to the input of Child Protection Plan warning flag notifications on the Trust's Patient Administration System OASIS, received from Dudley Safeguarding Review Team, covering this role in her absence.

- Manage the Information Governance Officer in her role in the validation and error corrections of notifications received from Dudley Safeguarding and Review Service prior to warning flags being placed onto patient records on the Trust's Patient Administration System, OASIS covering this role in her absence.

Information Quality Assurance

- As a member of the Data Standards Group provide advice and assistance regarding the implementation, monitoring and review of Information Quality Assurance standards policies and procedures in line with national and local requirements in respect of IG.
- Work with the Data Standards Group to address Trust demographic data quality issues and assure they are addressed via actions plans and target led training.

LOCATION

Whilst the post holder will be based at Russells Hall Hospital, there will be a requirement to travel to other Trust sites and other organisations to meet the needs of the service.

PERFORMANCE MANAGEMENT

All employees have a responsibility to participate in regular appraisal with their line manager and to identify performance standards of the post. As part of the appraisal process every employee is responsible for participating in identifying their own training and development needs to meet their knowledge skills framework outline.

CONFIDENTIALITY

Patient and/or staff information is confidential. It is a condition of NHS employment that you will not use or disclose any confidential information obtained in accordance with the Data Protection Act 1998.

NO SMOKING

The Trust has a Smoke Free policy. All Health Service premises are considered No Smoking Zones, other than designated staff smoking areas.

HEALTH AND SAFETY

The Trust has a duty of care to employees and will ensure that, as far as is reasonably practicable, adequate training, facilities and arrangements for risk avoidance are in place.

All Trust employees are required to comply with relevant Health and Safety legislation and the Trust's policies relating to Health & Safety and Risk Management. In particular, they have a duty to:

- Take reasonable care of both their own and others' health and safety.

- Report any adverse incident (including “near misses”) in accordance with Trust Policy.
- Report any concerns regarding both general health and safety and the well being of patients and staff, in accordance with Trust Policies.
- Undertake or participate in risk assessments, as appropriate.
- Support the Trust in complying with relevant legislation and/or directives from relevant external organizations, such as the Health & Safety Executive.
- To use facilities and equipment provided in the interests of health and safety in an appropriate manner, in order to minimize risk and avoid compromising health and safety. This will include not intentionally or recklessly misusing facilities and equipment.

EQUALITY AND DIVERSITY

The Trust is committed to building an environment where the diversity of its employees is valued, respected and seen as an asset to enabling deliver of the best possible healthcare services to our communities. It is unlawful to discriminate directly or indirectly in recruitment or employment because of any of the nine ‘protected characteristic contained in the Equality Act 2010. These are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Failure to comply with organisational policies on equality and diversity may result in disciplinary action.

SAFEGUARDING

It is the responsibility of every member of staff to safeguard and protect vulnerable adults, children and young people from abuse. All staff are expected to undertake mandatory training relevant to their role. All staff should familiarise themselves with organisational safeguarding policies.

AGENDA FOR CHANGE

The pay and terms and conditions of service for this post will be subject to change, in accordance with the implementation of Agenda for Change.

This job description may be reviewed from time to time in light of developments and may be amended in consultation with the post holder.

Job Description reviewed February 2016

THE DUDLEY GROUP NHS FOUNDATION TRUST

PERSON SPECIFICATION

Job Title: Information Governance Manager,

	ESSENTIAL	DESIRABLE	HOW IDENTIFIED
Experience.	<ul style="list-style-type: none">• Policy development & implementation experience• Previous audit experience• Expert in information governance• At least 5 years recent supervisory or management experience.• Committed to ongoing training to support job role and professional development	ISEB or equivalent experience Audit Qualification	Application Form Interview References
Knowledge. e.g. Systems Specialist Knowledge	<ul style="list-style-type: none">• Extensive knowledge of the NHS Information Governance Agenda and Information Governance Toolkit• Experience and understanding of complex information governance issues• Experience of planning and implementing organisational culture change to support the Information Governance Agenda• Thorough understanding of NHS and statutory policies and regulations including:<ul style="list-style-type: none">• Data Protection Act• Children Act and Every Child Matters• Computer Misuse Act• Human Rights Act• Principles of Information Governance• Knowledge of current legislation enabling information Sharing• Copyright, Designs and Patents Act		Application Form Interview Assessment

	<ul style="list-style-type: none"> • Interception of Communications Acts • Freedom of Information Act And IG related NHS codes of practice • Knowledge of giving evidence in court • Training Qualification • PC literate in Microsoft Word, Excel, Outlook and PowerPoint • Have a thorough understanding of Information Security issues in Information Governance in a healthcare setting 		
Skills and Abilities.	<ul style="list-style-type: none"> • Excellent verbal and written communication skills and the ability to communicate effectively at all levels • Interpersonal skills, to lead, influence and motivate staff at all levels • Strong analytical skills, with the ability to identify problems and develop solutions • Attention to detail combined with the ability to think laterally and problem solve, pre-empting and dealing with situations to prevent any adverse issues for the Trust • Confident , enthusiastic and self-motivated, able to work independently and as part of a team • Able to work under pressure and manage priorities and workload appropriately • Ability to work to specified and often demanding timescales • Confident with public speaking • To be able to present 		Application Form Interview Assessment References

	<p>awareness and training seminars on Data Protection and related issues.</p> <ul style="list-style-type: none"> • Representing the Trust at various external meetings relating to Data Protection • Research and analytical skills • Ability to translate policy and legislation into practice 		
Personal Qualities	<ul style="list-style-type: none"> • To maintain confidentiality of personal information • Self Motivation • To present oneself and the health informatics service in a professional manner • To comply with all Trust policies and procedures 		<p>Interview References Occupational Health Clearance</p>