

J O B D E S C R I P T I O N

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|-------------------------------|---------------------------------------|
| JOB TITLE: | Information Governance Manager |
| DIRECTORATE: | Nursing and Governance |
| BAND: | Band 6 |
| ACCOUNTABLE TO: | Head of governance |
| RESPONSIBLE TO: | Head of Information Governance/DPO |
| ACCOUNTABILITY FOR: | Information Governance Administrator |
| WORKING RELATIONSHIPS: | |

Staff at all levels throughout the Trust
Head of Governance /DPO
Trust Secretary
SIRO
Caldicott Guardian
Complaints Manager
PALS Manager
Communications Team
Information Services
IT and Cyber Security

J O B P U R P O S E

- Be a senior member of the Information Governance team advising and supporting Trust staff in meeting legal and regulatory requirements around confidentiality, statutory information access and information security
- Take line management responsibility for the IG Officer in the IG Team
- Ensure that the statutory information requests functions (FOI and SAR) are managed appropriately by the IG Team
- Provide subject matter expert advice to staff regarding data protection, information governance and records management queries
- Review Data Protection Impact Assessments (DPIAs) and provide expert advice to services
- Assist with key legal compliance requirements in the NHS Data Security & Protection Toolkit (DSPT)
- Provide specialist IG training across the Trust
- Contribute to the production of reports

Main Responsibilities:

- To provide advice and to act as a source of expertise in all areas of information governance, including data protection and freedom of information legislation, information sharing, DPIAs, records management, etc
- To be able to translate the complex requirements of legislation into comprehensible operational advice for services
- To ensure that the IG Officer manages statutory information requests appropriately using the Datix system, and provide support as required
- To maintain awareness of changes to data protection legislation, in particular how it may affect the Trust
- To ensure that the procedures set out for accessing health records in respect of statutory and legal requirements are clear and concise
- To oversee the records management function for the Trust, including working with offsite suppliers, and advising services on records management processes and retention schedules
- To deputise for the Head of Information Governance as required

Communication

- To communicate clearly and effectively with all Trust staff
- To champion the Trust's 'Data Protection by Design' approach for all staff
- To provide subject matter expert guidance in a clear and understandable way to all staff across the Trust including senior leaders
- To support the IG Officer in managing interactions with complex requestors and complainants, dealing with the requesters directly if required
- To proactively develop and maintain links across all clinical and corporate teams
- To liaise with external agencies as required, including the Information Commissioner's Office (ICO), other NHS Trusts, local authorities, the police service, and solicitors
- To deal in a confidential manner with a wide range of issues and to independently exercise discretion both in information sharing and advising colleagues on information sharing protocol

Specific Responsibilities

- ***Information Requests***

- To assist in managing the statutory information requests function of the IG Team, including FOI, SAR, information rights requests, etc
- To ensure that the IG Officer maintains the Datix system appropriately, recording and managing all requests in an accurate and timely manner
- To provide subject matter expert guidance to services in respect of information requests, including the application of exemptions, time limits, fees, etc
- To provide high level guidance on any requests in relation to personnel records and liaise with Human Resources Business Partners, Assistant Director of Operations Service and corporate manager to ensure that appropriate action is taken to fully meet our legal obligations
- To identify trends and patterns in information requests performance data, to identify, isolate and address areas of risk and poor practice
- To notify the Head of IG of any significant risks associated with information requests which may require escalation to the IG Steering Group.

- ***Information sharing***

- To provide subject matter expert guidance to services across the Trust in respect of their data sharing requirements, including all compliance considerations, necessity for a DPIA, etc

- ***Information Incidents***

- To provide subject matter expert advice and guidance to service investigating and remediating information governance incidents, both during and after IG incidents, requesting reports from the Incident Manager/Reviewer where appropriate
- To highlight to the Head of IG any incidents which may need to be reported to the ICO, and prepare any required material for the report
- To ensure that IG incident figures and any details required for the IG Steering Group report and any additional reporting are collated in an accurate and timely manner, and that any updates on investigations are reported to subsequent meetings as appropriate.

- ***Performance Reporting***

- To produce the monthly IG report, providing quality assurance, as well as appropriate insights and recommendations
- To supervise the IG Officer in producing performance management data, as required
- To oversee and contribute to the production of performance management data for the IG report, including FOI and SAR compliance, IG training compliance, and IG/cyber security incidents
- To produce other reports and papers to go to the Trust's IG Steering Group and other groups as required, provide quality assurance on all reports, as well as appropriate insights and recommendations
- To be able to analyse and interpret performance figures, highlighting and interpreting trends, especially to identify early warnings of compliance issues and highlight these as part of the IG report
- To help determine actions to address identified compliance issues with the Head of Information Governance

- **Data Security & Protection Toolkit (DSPT)**

- To assist the Head of IG and the Trust's Cyber Security lead in the completion of all work associated with the DSPT
- To assist with the completion of the online DSPT submission
- To liaise with services throughout the Trust to promote the work associated with the DSPT

- **Other**

- Manage the relevant internal Trust information processing registers, including regular review and update of:
 - Information Asset Register
 - Data Sharing Register
 - Data Protection Impact Assessment register

- **Training**

- To create and deliver information governance and data protection training across the Trust.
- To maintain an up to date knowledge of internal and external information governance training options and to signpost alternatives for staff who require enhanced IG knowledge.
- To continue personal development through regular training, attendance at seminars and conferences, etc.

- **Policy and/or Service Development**

- To work with the Head of Information Governance to develop and implement action plans to improve compliance with key information legislation
- To have advanced, expert knowledge of the policy and procedural context for information compliance in the NHS
- To deliver and maintain policies covering Freedom of Information and Data Protection compliance which are applicable across the Trust
- Development of Policies for Trust Intranet.

- **Management**

- To provide line management to the IG Officer in the team, and support and assist in their development

- **Research and Development**

- To maintain an up to date knowledge of the information governance and data protection issues, both within and outside the NHS
- To maintain an up to date knowledge of all developments in data protection legislation, including the Data Protection Act (2018), UK GDPR, GDPR, etc specifically in relation to their interpretation in the NHS

- **Audit**

- To develop and undertake on-going audits of person identifiable data flows across the Trust and record and risk assess these appropriately, including dealing with low co-operation, lack of understanding, training and advising departments on an individual basis of any requirement to improve/secure such flows/transfers and by what deadline e.g. 6 month review.

PERSON SPECIFICATION

| Requirements | Essential/ Desirable | AF | I |
|---|-------------------------|----|---|
| <u>Education & Qualifications</u> | | | |
| - Good level of education – minimum 5 GCSE's Grade A-C (including maths and English) | E | X | |
| - On-going professional development in areas of data protection and information governance. | E | X | |
| - Recognised Data Protection Practitioner Training | D | X | |
| - Recognised Freedom of Information Practitioner Training | D | X | |
| <u>Knowledge</u> | | | |
| - Theoretical and specialised knowledge of relevant legislation and standards, including Data Protection Act 2018, Freedom of Information Act 2000, Caldicott Principles. | E | X | X |
| - Good understanding of the NHS applications. | E | X | X |
| - Good knowledge and understanding of the NHS policies and standards | E | X | |
| - Up-to date and relevant knowledge of Information Governance gained through work-shops, seminars and training events. | E | X | X |
| - Good working knowledge of NHS records management and Information Security management code of practice. | E | X | X |
| - Knowledge of the Information Commissioner's guidance and codes of practice. | E | X | X |
| <u>Experience</u> | | | |
| - Previous work in NHS | E | X | X |
| - Experience in an Information Governance role | E | X | X |
| - Experience in undertaking audits and writing reports | D | X | X |
| - Experience and ability to interpret complex data and translate into meaningful information. | E | X | X |
| - Research and data/process mapping experience. | E | X | X |
| - Experience in use of NHS IG Toolkit self-assessment and data mapping tools. | E | X | X |
| - Experience of delivering training to different levels of staff. | E | X | X |
| <u>Skills and Abilities</u> | | | |
| - Excellent organisation & communication skills | E | X | X |
| - Able to prioritise work under pressure using own initiative, with effective use of time and resources to meet challenging deadlines. | E | X | X |
| - Able to communicate effectively, orally and in writing, to users from a wide range of backgrounds. | E | X | X |
| - Able to develop user training material and train staff in aspects relating to role. | E | X | X |
| - Able to give attention to detail, maintaining high standards in all tasks undertaken. | E | X | |
| - Excellent problem solving and analysis skills. | E | X | X |
| - Able to develop policies and procedures and other written documents to a high standard. | E | X | X |
| - Able to undertake audits in areas of Information Governance and Data Protection. | E | X | X |
| - Able to negotiate, persuade and influence. | E | X | X |
| - Able to work with others to develop understanding of their requirements. | E | X | X |
| - Ability to manage change effectively. | E | X | X |
| - Ability to tackle difficult and sensitive issues, with diplomacy. | E | X | X |