JOB DESCRIPTION

Job Title: Information Governance Officer
Band: Band
Responsible To: Head of Information Governance
Accountable To: Head of Information Governance
Section/Department/Directorate: IM&T

Job Purpose:

The role of the Information Governance Officer is to ensure the Trust is compliant with Trust policy and all legislation and government directives relating to Information Rights and Responsibilities (principally, the Data Protection Act 1998 (DPA), The Freedom of Information Act 2000 (FOI), NHS Confidentiality Code of Practice and the Environmental Information Regulations 2004) (EIR).

The primary role of the post holder is to support the overall development, management and delivery of Information Governance Strategy and work programme and to assist the Head of Information Governance and Information Governance Sub-Groups.

To provide support on issues related to Data Protection and maintenance of the Trust’s Data Protection Registration. Assisting the Head of Information Governance, ensuring that all staff are aware and understand their responsibilities in respect of Data Protection and the confidentiality of person identifiable data.

To co-ordinate, publicise and monitor standards of information handling throughout the Trust. The post holder will responsible for answering first line enquiries and provide advice, guidance and interpretation on matters relating to Information Governance.

Context:
The Information Governance department supports the management of information and records to ensure compliance with legislation, standards and best practice. The department supports the access of approximately 4,500 staff at more than 35 Northern Devon Healthcare NHS Trust, Devon Partnership Trust and New Devon Clinical Commissioning Group (CCG) sites in Devon.

Under the guidance of the Head of Information Governance and the Caldicott Guardian, the post holder is expected to play a full part in the Information Governance agenda.

Expected to work with clinicians and managers and staff across all Trust sites to safeguard the confidentiality and legitimate use of patient and staff information in all formats.

The work is varied and will require someone with confidence and the ability to think on their feet. This is a very busy and demanding role.

Organisational Chart:

```
  Caldicott Guardian & SIRO
   | Head of IM&T
   | Head of Information Governance
   | Information Governance Officer
```

Key Result Areas/Principal Duties and Responsibilities

Administer the Information Governance (IG) Toolkit, including monitoring and co-ordination of activities to support it and the development and maintenance of improvement /action plans.

Co-ordinate the work of the Data Protection & Confidentiality Group, Information Security Group, Records Management & Data Quality Group. Assist in providing reports to the IG & IM&T Steering Committee.

Final JE ref:414M Sept 14
Liaise, where required, with Trust managers with IG responsibilities.

To promote the use of appropriate levels of information sharing agreements.

Act as a specialist adviser to various Trust groups.

To work to promote risk awareness and a culture of openness throughout the Trust so that IG is an integral part of daily work.

To deputise and act as lead expert on all aspects of IG in the absence of the Head of Information Governance, ensuring the Trust is compliant under current legislation. To respond to staff, patients and other professional bodies, on all issues relating to DPA, FOI and other relevant legislation.

**Communication and Relationship Skills**

Whilst this is not a patient-facing post, the post-holder will be responsible for preparing and issuing correspondence, on behalf of the Trust, to members of the public who have submitted Freedom of Information requests. From time to time the post-holder will also be required to communicate with all staff by means of Trust-wide communications, the intranet website etc.

This post involves working and liaising with multi-disciplinary teams including clinicians, managers, other administration staff and external stakeholders in a professional manner in written, verbal and electronic formats.

Communicate to Trust staff the importance of document control, negotiating implementation systems and motivating and supporting staff to achieve standards compliance.

Communicate sensitive information in a range of media that support confidentiality and compliance.

Organise and co-ordinate workshops, training awareness sessions and other corporate events around IG, DPA, FOI, EIR and other relevant legislation.

Communicate with tact, understanding and discretion with members of the public, staff at all levels when dealing with enquiries/complaints/information requests.

Maintain a high level of confidentiality and discretion at all times when dealing with corporate/clinical information

Provide advice and guidance to other staff in relation to interpretation of IG rules and regulations.

To be confident in persuading staff to respond to FOI requests and to draft responses based on information and data provided, gaining approval from Senior Information Risk Owner (SIRO)/Caldicott Guardian prior to release.

Delivers training programmes to relevant staff on IG matters including Data Protection, Freedom of Information, IT security, Records Management and Data Quality.

**Analytical and Judgement Skills**

Ability to analyse and interpret complex information. An example of this analytical skill would be ability to analyse data presented in variety of ways and interpreting/reporting on this in terms of a Freedom of Information request. Judgement skill would be to understand interpretation of guidance and how best it can be applied in terms of an Trusts perspective. This would be when the post holder has to give guidance.
and advice in relation to interpretation of IG rules and regulations and on an ad-hoc basis. There are straightforward choice options when the post holder has to decide what course of action to take, however these will be based on latest best practice.

Analysis of data to complete reports.

Assist with investigation of inappropriate access to information, in conjunction with HR managers.

Administer the process of investigations into complaints about Information Governance breaches relating to Records Management Statute, Information Security Standards and Data Protection, maintaining a log of the issues and actions taken.

Administer the process of appeals against refusal of Freedom of Information and Environmental Information Regulation request decisions, maintaining a log of the issues actions taken.

**Planning and Organisational Skills**

The post requires sound planning and organisational skills. FOI requests have to be scoped and responses monitored against statutory deadlines. The same applies to Subject Access Requests which require co-ordination across a number of departments.

A key organisational requirement is ensuring evidence to support the Trust’s IG Toolkit submissions is co-ordinated and monitored and, where necessary, escalated to senior management in the case of slow responses.

To manage and provide an efficient and effective service for processing Freedom of Information requests, liaise with management at all levels to ensure an accurate and timely response in line with the Acts.

Administer the process of appeals against refusal of FOI and EIR decisions, maintaining a log of the issues actions taken.

Plan and deliver occasional training programmes to small groups. Post holder is expected to deliver training at least once a month or as and when required by the Head of IG. To an audience between 6 – 15 people.

Action planning and monitoring of systems.

**Physical Skills**

Standard keyboard skills

**Responsibility for Patient and Client Care**

Occasional contact with patients in terms of Subject Access Requests via telephone or in person. Occasional being up to 5 – 6 times a year.

**Responsibility for Policy and Service Development**

To review, update, develop and maintain all IG policies, procedures, guidance documents and associated forms. Ensuring information governance legislation is incorporated into other Trust policies where appropriate.

To enable improvements to the current scheme and compliance with the Information Commissioners Office.

Final JE ref:414M Sept 14

**Responsibility for Financial and Physical Resources**

The postholder is not an authorised signatory but will receive and dispatch cheques to Finance for FOI and SAR. There is no budgetary responsibility.

**Responsibility for Human Resources -**

Ensure training required for the role is kept up-to-date.

Develop and deliver training programmes to relevant staff on IG matters including Data Protection, Freedom of Information, IT security, Records Management, Confidentiality and Data Quality. This training is in own discipline on a regular basis, in blocks or in bespoke training sessions and is an on-going requirement.

The post-holder will be required to contribute to the development and review of Information Governance training materials and programmes, and to assist with the delivery of such programmes, for example induction, mandatory training, e-learning, ad-hoc sessions, workshops and awareness raising activity.

**Responsibility for Information Resources**

This is a major job responsibility.

The postholder will be expected to be a competent user of desktop software applications. There is a requirement for the production of logs, performance dashboards and reports. Inputting data to national applications and local logs is also necessary.

Develop and implement mechanisms for monitoring internet, email usage and investigating evidence of misuse.

Support Information Asset Owners, Administrators (IAOs/IAAs) with planning system monitoring.

Review and update information risk register for all sub-groups identified above, ensure that risks are monitored and support risk management relevant.

Assist with the maintenance of the information asset register and with the training and development of IAOs/IAAS, and monitor IAO/IAA reporting and risk assessment activity.

Maintain a register of information mapping of external and overseas data flows and associated risk assessments.

To support systems for reporting incidents and risk, including action planning and monitoring
To develop and issue reports on the current status of FOI ensuring senior managers are informed of changes.

To assist in the production of key performance indicators related to FOI for data quality purposes.

To update and maintain a FOI Disclosure Log for use of by the general public.

**Responsibility for Research and Development**
Initiate regular Trust-wide audits by means of corporate IG checklists and monitor and report on the returns from all departments. Audits could be carried out 2/3 times a month.

**Decision Making**

Work is managed, acts independently within occupational guidelines, refers to Manager when necessary.

The Role is primarily focused on providing advice on statutory and local IG policy. This advice is provided so senior managers can make informed decisions around issues that include an IG perspective. Key decisions around the IG Toolkit or other IG matters would be escalated to the Head of IG.

To lead on Freedom of Information (FOI) across the Trust.

Support the updating, maintenance and monitoring the use and effectiveness of the Trust’s Publication Scheme.

**Physical Effort**

Occasional lifting of files, PC’s.

Sitting at a PC inputting data, producing reports, data analysis etc. for a substantial proportion of the working day.

**Mental Effort**

Frequent requirement to prioritise workload within unpredictable work pattern. Concentration is required for reading, data analysis and production of letters and reports. Ability to analyse and interpret complex information. Highly confidential at all times. Frequent interruptions

**Emotional Effort**

It is not expected that the postholder will have to impart any unwelcome news to staff/patients that would be considered distressing.

**Working Conditions**

Normal office environment, occasional site visits.

Required to use a VDU frequently.

**GENERAL**

This is a description of the job as it is at present constituted. It is the practice of this organisation periodically to examine employees’ job descriptions and to update them to ensure that they relate to the job as then being performed, or to incorporate whatever changes are being proposed. This procedure is jointly conducted by each manager in consultation with those working directly to him or her. You will, therefore, be expected to participate fully in such discussions. It is the organisations’ aim to reach agreement to reasonable changes, but if agreement is not possible management reserves the right to insist on changes to your job description after consultation with you.

We are committed to serving our community. We aim to co-ordinate our services with secondary and acute care.

Final JE ref:414M Sept 14
We aim to make all our services exemplary in both clinical and operational aspects. We will show leadership in identifying healthcare needs to which we can respond and in determining the most cost-effective way of doing so. We will share our knowledge with neighbouring healthcare agencies and professionals.

We recruit competent staff whom we support in maintaining and extending their skills in accordance with the needs of the people we serve. We will pay staff fairly and recognise the whole staff’s commitment to meeting the needs of our patients.

The Trust operates a ‘non smoking’ policy. Employees are not able to smoke anywhere within the premises of the Trust or when outside on official business.

All employees must demonstrate a positive attitude to Trust equality policies and Equality Scheme. Employees must not discriminate on the grounds of sex, colour, race, ethnic or national beliefs, marital status, age, disability, sexual orientation, religion or belief and will treat patients, colleagues and members of the public with dignity and respect.

If the post holder is required to travel to meet the needs of the job, we will make reasonable adjustments, if required, as defined by the Equality Act 2010.

SAFEGUARDING

To be fully aware of and understand the duties and responsibilities arising from the Children’s Act 2004 and Working Together in relation to child protection and safeguarding children and young people as this applies to the worker’s role within the organisation.

To also be fully aware of the principles of safeguarding as they apply to vulnerable adults in relation to the worker’s role, which will include recognising the types and signs of abuse and neglect and ensuring that the worker’s line manager is made aware and kept fully informed of any concerns which the worker may have in relation to safeguarding adults and/or child protection.

Everyone within the Trust has a responsibility for, and is committed to, safeguarding and promoting the welfare of vulnerable adults, children and young people and for ensuring that they are protected from harm, ensuring that the Trusts Child Protection and Safeguarding Adult policies and procedures are promoted and adhered to by all members of staff.

HEALTH AND SAFETY AT WORK

The employer will take all reasonably practical steps to ensure your health, safety and welfare while at work. You must familiarise yourself with the employer's Health & Safety policy, and its safety and fire rules. It is your legal duty to take care for your own health and safety as well as that of your colleagues.

CONFIDENTIALITY

You may not disclose any information of a confidential nature relating to the employer or in respect of which the employer has an obligation of confidence to any third party other than where you are obliged to disclose such information in the proper course of your employment or as required by law. Any failure to comply with this term of your employment will be treated as an act of misconduct under the employer's disciplinary procedure.

JOB DESCRIPTION AGREEMENT

Job holder’s Signature: .................................................................
Date: ........................................................................................................
Manager's Signature: ................................................................................
Date: ........................................................................................................
PERSON SPECIFICATION

POST: Information Governance Officer

<table>
<thead>
<tr>
<th>REQUIREMENTS</th>
<th>E/ D*</th>
<th>HOW TESTED?</th>
<th>INTERVIEW COMMENTS</th>
<th>SCORE (1 Low – 10 High)</th>
</tr>
</thead>
<tbody>
<tr>
<td>QUALIFICATIONS/SPECIAL TRAINING:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Educated to degree level or equivalent</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>management experience.</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Training certificate or equivalent</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>qualification.</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Evidence of continuous professional development</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data Protection or Freedom of Information</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>professional qualification (ISEB)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>KNOWLEDGE/SKILLS:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Knowledge and understanding in the principles of</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>the Data Protection Act, Freedom of Information</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Act, NHS Code of Confidentiality, EIR and other</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>IG legislation.</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Knowledge of Caldicott Principles, Patient</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Confidentiality, Information Security, Records</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Management, Information Sharing, NHSLA</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Experience of using DATIX management system.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Knowledge of Management processes.</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EXPERIENCE:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Previous experience in NHS Information Governance</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>setting.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Experience of development and delivery of training programmes to multi-disciplinary audiences.</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Experience of report preparation and delivery.</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proficiency in Microsoft office packages. Ability to communicate with all levels of an organisation.</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Excellent organisational and time management skills.</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Excellent oral, numerical and written skills. Ability to work to agreed timescales.</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Experience in dealing with complex and confidential issues.</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Successful change management and negotiation experience.</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Experience of project management skills.</td>
<td>D</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PERSONAL REQUIREMENTS:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ability to work in a team as well as on own initiative.</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Professional and confident manner.</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Self-motivated, dynamic and flexible.</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Enthusiasm, commitment, pro-active and forwarding thinking.</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tact and diplomacy, integrity, sensitivity and adaptability.</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Negotiation with senior professional, using persuasion skills.</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Frequent requirement to prioritise workload within unpredictable work pattern.</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Concentration is required for reading, data analysis and production of letters and reports.</td>
<td>E</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**HAZARDS:**

<table>
<thead>
<tr>
<th>Laboratory Specimens</th>
<th>N</th>
<th>Clinical contact with patients</th>
<th>N</th>
<th>Performing Exposure Prone Invasive Procedures</th>
<th>N</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proteinacious Dusts</td>
<td>N</td>
<td>Dusty Environment</td>
<td>N</td>
<td>VDU Use</td>
<td>Y</td>
</tr>
<tr>
<td>Blood/Body Fluids</td>
<td>N</td>
<td>Challenging Behaviour</td>
<td>N</td>
<td>Manual Handling</td>
<td>Y</td>
</tr>
<tr>
<td>Radiation</td>
<td>N</td>
<td>Driving</td>
<td>Y</td>
<td>Noise</td>
<td>N</td>
</tr>
<tr>
<td>Solvents</td>
<td>N</td>
<td>Food Handling</td>
<td>N</td>
<td>Working in Isolation</td>
<td>N</td>
</tr>
</tbody>
</table>

*Essential/Desirable

**OTHER REQUIREMENTS:**

The post holder must demonstrate a positive commitment to uphold diversity and equality policies approved by the Trust.

Ability to travel to other locations as required

---

Ability to analyse and interpret complex information.

Highly confidential at all times.

---

Interview Interview

Final JE ref:414M Sept 14