

## JOB DESCRIPTION

JOB DETAILS	
Job Title	Senior Information Governance Specialist
Reports to	Head of Information Governance
Band	7
Department/Directorate	Information Governance / Digital Services

### JOB PURPOSE

The post holder will be a subject matter expert on all Information Governance (IG) related matters. They are responsible for supporting the Head of Information Governance and Data Protection Officer in managing the IG agenda across the Trust. They will provide expert advice and guidance to the Trust on Confidentiality, Data Protection, Freedom of Information and Information Security.

The post holder will be responsible for compliance with UK data protection legislation such as the Records of Processing Activity (ROPA), including monitoring and reporting on compliance. They will provide expert advice and guidance in areas such as Data Protection Impact Assessments (DPIAs), data breach management, and data sharing across the complex areas of corporate and clinical services. The Senior Information Governance Specialist will have a sound understanding of current legislative requirements, and will monitor continually changing technology advances and national requirements.

The post holder will be responsible for providing evidence to meet the Data Security & Protection Toolkit.

The post holder may be responsible for managing other members of the IG Team to ensure legislative and organisational requirements are met, including compliance with the Freedom of Information Act and Environmental Information Regulation.

The post holder may deputise for the Data Protection Officer and Head of Information Governance as and when required.

### KEY RESULT AREAS/PRINCIPAL DUTIES AND RESPONSIBILITIES

- Be a subject matter expert on all IG matters within the Trust and as such provide an organisational wide advisory and guidance service, on highly complex information legislation matters where there can be differing opinions.
- Ensure appropriate evidence is captured for audit and submission for IG related assertions within the Data Protection Security Toolkit (DSPT) external assessment. Provide support to the Head of IG and Cyber Security Manager in co-ordinating the completion of the DSPT including identifying requirements, evidence and gaps, structuring the action plan, ensure appropriate evidence is available and that the assessment is submitted within the required deadline.
- Develop recommendations to resolve issues of non-compliance in the Trust offering a range of options which are suitable both for service provision and for legislative compliance.
- Monitor and audit compliance with policies and procedures across the Trust through site visits, including inpatient, outpatient and corporate areas, initiating actions to address areas of non-compliance and reporting on progress and risks to the Head of IG and governance groups.
- Write, implement, review and update Trust wide Information Governance policies, guidelines, protocols, procedures and processes to ensure safe and effective management of information across the Trust. Overall responsibility for IG policies remains with the Head of IG.

- Provide advice and monitoring on Data Protection Impact Assessments (DPIAs) and ensure that DPIAs are carried out on all relevant projects. Represent IG at projects across the Trust, providing subject matter expertise, giving advice and guidance on all aspects of IG including supporting the completion of DPIAs.
- Provide expert advice on the response to all IG incidents and security breaches, undertake appropriate audits and work closely with the investigating officer. Act as a subject matter expert for serious incidents that involve IG, ensuring appropriate action is taken and advising on breaches of policy for disciplinary action. Ensure ICO reportable incidents are escalated to the DPO and SIRO within the legal timeline and critical steps are taken to protect individual's data.
- To develop and maintain the Trust's Information Asset Register, maintain the Information Asset Owners register and educate them on their responsibilities including: Business Continuity Plans, Risk Assessments, Data Flow Mapping and System Level Security Policies, ensuring these are updated.
- Provide specialist support to ensure the Trust's Electronic Patient Record system is aligned to IG requirements creating documentation as necessary
- To be responsible for the development of training, delivery and oversee the on- going review of the IG training programme across the Trust.
- The Senior IG Specialists will lead on individual projects and areas of responsibility, working closely with the Head of IG and DPO providing a resilient and flexible IG resource to meet the demanding and variable IG requirements from the Trust.
- To undertake such duties as may be required from time to time as are consistent with the responsibilities of the grade and the needs of the Trust.

## KEY WORKING RELATIONSHIPS

Areas of Responsibility: Information Governance

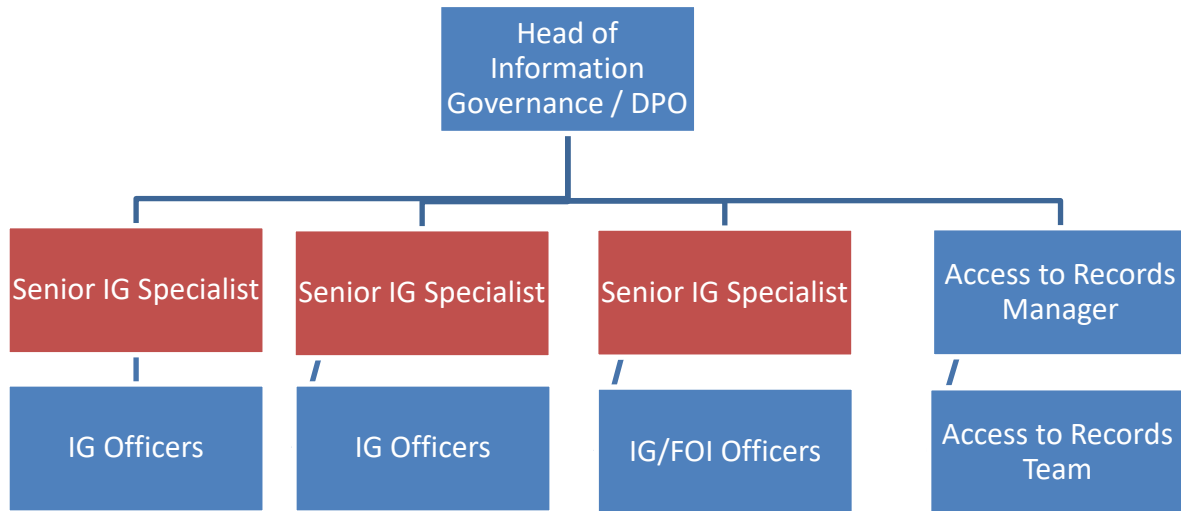
No. of Staff reporting to this role: TBC

The post holder is required to deal effectively with staff of all levels throughout the Trust as and when they encounter on a day to day basis. In addition, the post holder will deal with the wider healthcare community, external organisations, the regulator (ICO) and the public. This will include verbal, written and electronic media.

Of particular importance are working relationships with:

Internal to the Trust	External to the Trust
<ul style="list-style-type: none"> <li>• Chief Medical Officer / SIRO</li> <li>• Data Protection Officer</li> <li>• Caldicott Guardian</li> <li>• Chief Information Officer</li> <li>• Chief Clinical Information Officer</li> <li>• Cyber Security Manager</li> <li>• Digital Services Division</li> <li>• Divisional Directors</li> <li>• Information Asset Owners</li> <li>• Procurement Department</li> <li>• Internal Committees and Governance meetings</li> <li>• Trust User Base</li> </ul>	<ul style="list-style-type: none"> <li>• External Clients and Partners</li> <li>• NHS Digital and NHSx</li> <li>• NHS England</li> <li>• Information Commissioners Office (ICO)</li> <li>• Colleagues in other NHS and Social Care organisations</li> <li>• Third Party Service and Solution Providers</li> </ul>

## ORGANISATIONAL CHART



## FREEDOM TO ACT

The post holder will act as a lead IG specialist to the Trust with the appropriate knowledge to interpret and apply IG and data protection legislation and national guidance to provide specialist advice and guidance to staff, projects, third parties and patients both internal and external to the Trust without reference to manager.

They will work to agreed objectives with the freedom to do this in their own way, within legal and professional policies. They will manage the workload within their remit and will be required to make decisions on how results should be achieved, and risks managed escalating the most significant to the Head of IG, DPO, and Caldicott Guardian as required.

## COMMUNICATION/RELATIONSHIP SKILLS

The post holder will need to present highly complex, sensitive and potentially contentious information to staff, management, third parties, patients and the public in regards to IG in order to minimise risk to the Trust and to achieve legal requirements; this will require developed negotiation and motivation skills to deal with highly complex and highly contentious information. They will need to negotiate and communicate priorities to balance a demanding and rapidly changing workload.

The post holder will communicate with a range of senior stakeholders concerning their views in relation to the application of data protection legislation for complex projects/new systems and information assets.

The post holder will need to be able to communicate effectively with a wide range of people and will need to be able to present information, develop and deliver training in a variety of ways to both large groups as well as on a 1:1 basis. Training delivery could involve groups of greater than 20 people, and be in a formal classroom (physical or virtual) setting.

The post holder will need to communicate complex and sensitive information with staff, patients, and members of the public in response to data breaches, complaints, or concerns; maintaining confidentiality, offer reassurance, manage clear communication with potentially distressed or emotional individuals who have been affected.

## ANALYTICAL/JUDGEMENTAL SKILLS

The post holder will be required to analyse, investigate and resolve complex situations including areas such as breaches of security or confidentiality, data protection impact assessments and IG queries. The

role requires the subject matter expertise to interpret the information risks to the Trust and individuals, compare options, understand and apply legal requirements, and provide clear and appropriate advice and guidance.

- Act with a 'problem solving approach' in order to identify and communicate challenges within the system in a manner that facilitates successful resolution;
- Identify and interpret complex facts and scenarios to be presented to senior management and clinical staff;
- Maintain an in-depth understanding of system processes, internal configuration and how they relate to the experience of users to ensure that the system is best configured and optimised to support users in effective and efficient use of the system;
- Analyse and document new user requirements;
- Propose developed and purchased options, as appropriate, and participate in selection with user.

### **PLANNING/ORGANISATIONAL SKILLS**

The post holder will need to manage their own day to day activities as well as delegating and re-allocating work to team members.

The post holder will need to manage and balance a wide range of demanding and conflicting deadlines in a complex workload, to ensure legal and Trust deadlines are met. This requires planning and organising on-going activities, to meet annual and longer-term strategic plans, whilst reacting and responding to urgent critical requirements including;

- Planning and collating evidence for the NHS Data Security Protection Toolkit (DSPT) annual submission.
- Ensuring DPIAs are developed, reviewed, and approved within project timelines to minimise wider impacts.
- Creating and collating papers for various regular and ad-hoc governance meetings.
- Providing data breach response with 72 hours legal deadline.
- Ensuring FOI, EIR disclosures are released within the legal deadline.

The adjustments and formulation of these plans will have an impact beyond the post holder's own area of work.

### **PATIENT/CLIENT CARE**

The post holder is required to put the patient, as the first priority, at the centre of all activities.

The post holder will be required to support and communicate directly (usually by phone, email, or letter) with patients in relation to the use of their personal information, providing expert information, advice, and support.

### **POLICY/SERVICE DEVELOPMENT**

To support the Head of Information Governance in providing advice and guidance on Information Governance (IG) matters, ensuring all necessary procedures and processes, comply with current legislation, and propose changes and contribute to creation of Trust Information Governance policies and procedures to ensure that the Trust meets its statutory requirements.

The post holder will have responsibility for interpreting national and international IG and data protection legislation, codes of practice, policy, and guidance and will be required to propose policy and service changes, impacting on staff across the Trust. In respect of proposing policy changes, this will involve participating in working parties with other departments or divisions, acting as the subject matter expert. For context, proposals made in relation to IG have a Trust-wide impact.

To employ effective decision-making skills to address complex issues and use effective change management skills to implement these.

To use effective prioritisation, problem solving and delegation skills to manage time effectively.

## **FINANCIAL/PHYSICAL RESOURCES**

The post holder will work within a defined day to day operational budget.

Responsible for small financial payments (<£1,000 pcm) for office equipment used and will authorise time sheets and travel expenses for staff, who report into this role, up to Band 6.

## **HUMAN RESOURCES**

To be responsible for the effective delivery of specialist training and awareness sessions to clinical and non-clinical staff on information governance, freedom of information, and data protection.

The post holder has day to day management responsibility for staff with the Information Governance function and therefore will be involved in the management of staff issues, including work allocation, recruitment, appraisal, discipline, training and career development.

Support the Head of IG in the management and administration of the Information Governance Steering Group and other subgroups as required.

Act as a subject matter expert for serious incidents that involve IG, ensuring appropriate action is taken and advising on breaches of policy for disciplinary action.

The post holder will also deliver training sessions to relevant staff groups as a subject matter expert in IG. This training could be as part of a resolution package following an incident, or as part of a regular training package. However, it is not considered a major role responsibility.

## **INFORMATION RESOURCES**

The post holder will be responsible for designing and developing Information Governance systems to meet the legal and DSPT specifications, including the Trust Information Asset register and the IG Case Management System. The post holder will also be required to review Data Protection Impact Assessments to ensure that all major information systems used across the Trust meet the legal requirements and DSPR specification.

The post holder will manage the Trust Information Asset Register (IAR), developing the processes to support Information Asset Owners, maintaining, and developing the system and processes to ensure legal compliance. They will be required to analyse and interpret complex data to support the compliance and development of the IAR and provide quality information to auditors and as evidence to meet DSPT requirements.

The post holder will identify, review, and present information from across the Trust, applying complex legal exemptions as appropriate for release into the public domain, to meet the requirements of the Freedom of Information Act.

The post holder will use a wide range of computer systems e.g. Word, Excel and PowerPoint to create reports, documents, and presentations. The post holder will be responsible for sourcing and gathering information to produce presentations, informative reports, briefings, and papers for meetings.

## **RESEARCH AND DEVELOPMENT**

The post holder will undertake audit and development activities as a requirement of the job, to inform and develop IG plans, create evidence to meet DSPT requirements and take part in internal audits of the IG function, or ICO audits of the Trust legal compliance for data protection and FOI.

The post holder will be required to undertake regular DPO audits working with service areas following IG Healthchecks to advise, support development and monitor improvement plans. They will also undertake audits as part of data breach investigations on a frequent basis.

The post holder may be required to provide specialist IG advice to research projects to ensure legal compliance and support research funding IG requirements.

## **PHYSICAL SKILLS**

The post holder will be required to have a high level of data accuracy with good attention to detail and good keyboard skills.

### **PHYSICAL EFFORT**

A combination of sitting, standing, and walking with little requirement for physical effort. The post requires travelling, meetings in various venues and office-based work.

### **MENTAL EFFORT**

There will be frequent requirement for prolonged concentration when reading, interpreting, and developing DPIAs, documents, reports, and project plans. The post holder may be interrupted to deal with staffing or IG issues or to provide specialist advice to contain and investigate an IG incident.

### **EMOTIONAL EFFORT**

There will be occasional exposure to distressing or emotional circumstances where the post holder may have to part unwelcome news to staff or patients, review sensitive and distressing information, or effectively influence and negotiate with stakeholders in difficult circumstances.

The post holder will respond to concerns and questions from a wide range of people who may be anxious and distressed in relation to data breaches, disclosure of information, or how the Trust is using the information.

Ability to adapt to an unpredictable workload.

High level of mental effort when managing conflicting priorities, urgent IG concerns and immediate response to serious incidents.

Provide leadership and support to IG team and deal with poor performance. Managing conflict in the workplace and assist in dealing with crises/problems/ difficult circumstances within department teams/individuals as well as through disclosures.

Dealing with complaints and patient feedback

### **WORKING CONDITIONS**

Working conditions will be those which come with a job which requires travelling, but is predominately office based.

Occasional aggressive behaviour when dealing with complaints or data breaches.

### **OTHER RESPONSIBILITIES**

Take part in regular performance appraisal.

Undertake any training required in order to maintain competency including mandatory training, e.g. Manual Handling.

Contribute to and work within a safe working environment.

You are expected to comply with Trust Infection Control Policies and conduct him/herself at all times in such a manner as to minimise the risk of healthcare associated infection

As an employee of the Trust, it is a contractual duty that you abide by any relevant code of professional conduct and/or practice applicable to you. A breach of this requirement may result in action being taken against you (in accordance with the Trust's disciplinary policy) up to and including dismissal.

You must also take responsibility for your workplace health and wellbeing:

- When required, gain support from Occupational Health, Human Resources, or other sources.
- Familiarise yourself with the health and wellbeing support available from policies and/or Occupational Health.

- Follow the Trust's health and wellbeing vision of healthy body, healthy mind, healthy you.
- Undertake a Display Screen Equipment assessment (DES) if appropriate to role.

#### **APPLICABLE TO MANAGERS ONLY**

Leading the team effectively and supporting their wellbeing by:

- Championing health and wellbeing.
- Encouraging and supporting staff engagement in delivery of the service.
- Encouraging staff to comment on development and delivery of the service.
- Ensuring during 1:1's / supervision with employees you always check how they are.

#### **GENERAL**

This is a description of the job as it is now. We periodically examine employees' job descriptions and update them to ensure that they reflect the job as it is then being performed, or to incorporate any changes being proposed. This procedure is conducted by the manager in consultation with the jobholder. You will, therefore, be expected to participate fully in such discussions. We aim to reach agreement on reasonable changes, but if agreement is not possible, we reserve the right to insist on changes to your job description after consultation with you.

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.

Northern Services and Eastern Services continue to develop our long-standing partnership since becoming a single integrated organisation across Eastern and Northern Devon. Working together gives us the opportunity to offer unique and varied careers across our services combining the Eastern's track record of excellence in research, teaching and links to the university with Northern's innovation and adaptability.





<ul style="list-style-type: none"> <li>• Working knowledge of the Freedom of Information Act and Environmental Information Regulations</li> <li>• Proven experience of communicating with senior staff, ie consultants</li> <li>• Experience of writing and presenting reports and papers</li> <li>• Experience of Data Protection Impact Assessments, information risk assessments and data flow mapping</li> <li>• Extensive experience working in an Information Governance role</li> <li>• Experience of managing staff</li> </ul>	E E E E E	D
<p><b>PERSONAL ATTRIBUTES</b></p> <ul style="list-style-type: none"> <li>• Excellent interpersonal skills and communication (both verbal and written) skills</li> <li>• Exceptional commitment to detail/problem solving skills</li> <li>• Ability to prioritise between competing demands and allocate resources accordingly and deliver to tight deadlines</li> <li>• Demonstrable ability to interact with personnel at all levels of healthcare environment clinical and non clinical</li> <li>• Good presentation skills</li> <li>• Excellent organisational skills and the ability to manage time effectively and efficiently</li> <li>• Ability to motivate others</li> <li>• Enthusiastic “can do” attitude</li> <li>• Highest integrity</li> <li>• Professional approach of oneself and service</li> <li>• Good analytical skills and decision making</li> <li>• Willingness to learn, research, expand knowledge</li> </ul>	E E E E E E E E E E E E E	D
<p><b>OTHER REQUIREMENTS</b></p> <ul style="list-style-type: none"> <li>• The post holder must demonstrate a positive commitment to uphold diversity and equality policies approved by the Trust.</li> <li>• Ability to travel to other locations as required.</li> </ul>	E E	

		FREQUENCY			
		(Rare/ Occasional/ Moderate/ Frequent)			
WORKING CONDITIONS/HAZARDS		R	O	M	F
<b>Hazards/ Risks requiring Immunisation Screening</b>					
Laboratory specimens	N				
Contact with patients	N				
Exposure Prone Procedures	N				
Blood/body fluids	N				
Laboratory specimens	N				
<b>Hazard/Risks requiring Respiratory Health Surveillance</b>					
Solvents (e.g. toluene, xylene, white spirit, acetone, formaldehyde and ethyl acetate)	N				
Respiratory sensitisers (e.g. isocyanates)	N				
Chlorine based cleaning solutions (e.g. Chlorclean, Actichlor, Tristel)	N				
Animals	N				
Cytotoxic drugs	N				
<b>Risks requiring Other Health Surveillance</b>					
Radiation (>6mSv)	N				
Laser (Class 3R, 3B, 4)	N				
Dusty environment (>4mg/m3)	N				
Noise (over 80dBA)	N				
Hand held vibration tools (=>2.5 m/s2)	N				
<b>Other General Hazards/ Risks</b>					
VDU use (> 1 hour daily)	Y				X
Heavy manual handling (>10kg)	N				
Driving	Y		X		
Food handling	N				
Night working	N				
Electrical work	N				
Physical Effort	Y	X			
Mental Effort	Y				X
Emotional Effort	Y		X		
Working in isolation	N				
Challenging behaviour	Y		X		