

Date: 03/02/2020

FREEDOM OF INFORMATION REQUEST 015166 – DPO/IG Manager job roles

Can you please provide the following information

- 1 - JD/Band for DPO - see below
- 2 - JD/Band for IG Manager - see below
- 3 - JD/Band for joint post of DPO/IG Manager - see below
- 4 - Structure to show DPO route to Board (Also show all staff that support DPO role) - see below
- 5 - Structure to show IG Manager role identifying all staff who support IG Manager and IG agenda - below
- 6 - please list additional work load generated following implementation of DPO responsibilities - not additional, they are part of the role
- 7 - what if any areas of concern and potential conflict have been raised between the IG Manager/DPO role (please provide rationale why you feel there is a conflict) and how you have resolved - none
- 8 - Does FOI currently sit under your IG/DPO role within your organisation (if it does NOT) please state where this sits. - yes
- 9 - Please state lead areas for the IG Manager and lead areas for the DPO and how these differ. - see job description
- 10 - In your organisation can you provide your policy on completion for Data Privacy Impact Assessments and advise who completes them - The Trust does not hold a policy, the IG Manager/DPO and IT provide one to one support with Information Asset Owners to complete the DPIA

## Job Description

<b>Job Title:</b>	<b>Information Governance Manager/Data Protection Officer</b>
<b>Job Band:</b>	<b>Band 7</b>
<b>Hours:</b>	<b>37.5 hours per week</b>
<b>Tenure:</b>	<b>Permanent/Secondment</b>
<b>Department:</b>	<b>Information Governance</b>
<b>Responsible to:</b>	<b>Trust Secretary</b>

### Why join The Dudley Group?

Here at the Dudley Group our patients and staff are at the heart of all that we do to offer a high quality patient experience in a caring and supportive environment that aligns with our vision of providing safe, caring and effective services because people matter.

## Trust Strategy 2019 – 2021



## **Job Summary**

The Information Governance Manager/Data Protection Officer is an essential role supporting the Trust Secretary in managing the IG agenda across the entire Trust and will take a lead in the ongoing development and management of Information Governance Framework within The Dudley Group NHS Foundation Trust.

The post holder will be responsible for developing and implementing the Information Governance Strategy with responsibility and accountability for the development, implementation and delivery of the Trust's annual Information Governance work programme, incorporating Data Protection and Confidentiality, Corporate Records, Access to Health Records and, where appropriate, Information Security.

The Information Governance Manager/Data Protection Officer will advise on Freedom of Information and Access to Health Records requests; providing, receiving and analysing complex, sensitive and sometimes highly contentious information; guiding users to the correct course of action.

The post holder will provide specialist expert advice to the Caldicott Guardian and Senior Information Risk Owner (SIRO) and support the Caldicott and Information Governance Group ensuring that the Trust operates within legal and ethical frameworks, and will work closely with staff across the organisation to communicate Information Governance standards and issues; developing and delivering where appropriate formal training and presentations to groups of staff.

Reporting to the Trust Secretary, the post holder is responsible for the maintenance and development of the corporate information functions in line with the strategic objectives of the Trust.

The required Information Governance Manager/Data Protection Officer will provide specialist knowledge on all aspects of information governance and support the IG Manager and Data Protection Officer with the implementation of GDPR, cyber security essential and new emerging projects which require information governance intervention.

## **Principal Duties & Responsibilities**

- To ensure the Information Governance Strategy and associated policies and procedures meet statutory and legal requirements, including the requirements of the Data Security and Protection Toolkit
- Maintain and create the Information Asset in the Information Asset Management tool ensuring all Information Asset Owners (IAO) are adequately trained and maintain their information assets
- To have responsibility for supporting the management and coordination across the Trust of the various components of IG (Information Quality Assurance, Data Protection, Caldicott, Records Management, Information Security, Freedom of Information).
- To ensure the implementation and delivery of the Trust's annual IG work programme. This will Trust wide review of compliance and completion of action plans to address any areas which fall short of the Trust standard.
- To understand best practice and ensure that this is communicated clearly and acted upon effectively, in particular to interpret national guidance and legislation for implementation in the Dudley Group.
- To coordinate the management of and be responsible for the annual submission of the Data Security and Protection Toolkit assurance system, ensuring that there is an evidence base for audit purposes.
- To write and present paper to Committees as required
- To actively work with service managers and other stakeholders to ensure that the information governance processes meet the objectives of the Dudley Group as well as GDPR compliance.
- To undertake, or direct the design of local audits of compliance to Information Governance standards and coordinate all statutory and external audits of Information Governance topics.
- To be The Dudley Group's focal point for expert advice on Information Governance matters.
- To be specifically responsible for governance issues around Data Protection (GDPR), Information Security and Corporate Records.
- Draft and review Information Sharing agreements and contractual agreements taking the lead role in ensuring monitoring and completion of necessary objectives.
- To provide specialised knowledge, consultancy and expert advice to the Dudley Group staff in a consistent way across all aspects of Information Governance. The nature of the role demands that highly complex and

contentious, statutory and regulatory requirements are implemented across the Dudley Group and understood by all staff members.

- To be responsible for the development of training, delivery and oversee the on- going review of the IG training programme across the Trust.
- To provide and develop information, awareness material and some training on information governance and records management; including information rights, confidentiality and information security to groups of staff.
- To work with Managers and Heads of Service to identify any new working practices required and to support the change programme to implement these.
- Provide specialist support to ensure the Trust's EPR system is aligned to IG requirements creating documentation as necessary
- Advise on Data Protection Impact Assessments and address privacy issues
- To ensure compliance with the Freedom of Information Act; respond to queries regarding
- To advise on and develop processes to streamline the responses to requests for information.
- To liaise with the Information Commissioner and the Dudley Group solicitors where litigious issues arise.
- To support Trust Secretary in business planning of medium and long-term IG and to oversee IG initiatives and projects to ensure delivery of the strategy.
- To have management responsibility for the Information Governance supporting staff, as and when required, providing regular appraisal and feedback and ensuring delivery to agreed performance targets.
- To be an authorised signatory for travel expenses and other payments.
- To maintain key partnerships with key staff within the Trust and also external organisations, including, Chief Information Officer, Medical Director (Caldicott Guardian), Informatics, Risk, HR and NHS Digital.
- 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 Service.
- To provide expert knowledge and project management to ensure delivery of key IG projects and initiatives across the Trust including cyber security programme.
- Provide the necessary support in terms of managing incidents including serious data breaches where they are reportable to ICO.
- Lead and direct ICO Audits, as requested and required.
- Day-to-day management of data security & protection service provision to all users ensuring the Trust's compliance with the General Data Protection Regulation, Data Protection Act 2018, Access to Health Records Act 1990 and those regulations that supersede or supplement these from time to time.
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- 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 Service.
- This role description is intended as a basic guide to the responsibilities of the post and is not exhaustive and may be subject to review in consultation with the post holder.

There may also be a requirement to undertake other similar duties as part of this post in order to provide a quality service. These will be consistent with the level of responsibilities outlined above.

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

### **Location**

The Trust provides services from different sites. You may be expected to work at any of the Trust locations. These include Russells Hall Hospital, Dudley Guest Hospital and Corbett Hospital as well as various community based sites across the borough.

### **Code of Conduct**

It is expected that all staff would be able to demonstrate that they live our trust values in their work and that they will deliver the essential behaviours in their role.

Staffs are expected to adhere to Trust policies and procedures which establish standards of good practice as well as follow any codes of conduct which are relevant to their own profession.

**Improvement Practice**

The trust has a long-term commitment to its continuous quality improvement programme; “Dudley Improvement Practice”. As part of your role you will be asked to take part in improvement activity relevant to your post.

**No Smoking**

The Trust is a completely Smoke Free Organisation and all premises will be considered No Smoking Zones.

**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.

It is the individual employee’s responsibility, however, to manage their own health and wellbeing.

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.

<b>Prepared by:</b>	Liam Nevin
<b>Date:</b>	5 <sup>th</sup> December 2019

