

Trust Headquarters
Russell's Hall Hospital
Dudley
West Midlands
DY1 2HQ

Ref: FOI-062023-000130

Date: 19/6/23

Address / Email:

Dear

Request Under Freedom of Information Act 2000

Thank you for requesting information under the Freedom of Information Act

2000. Request

I would like to know the make up and size of your information governance function

Please provide

- job titles and bandings for each role within function
- job descriptions (current or draft)
- any structure chart which shows the function
- the same for your DPO if not part of this function

Please note where any of these are outsourced please advise which aspects are outsourced, who provides this service and annual spend for this service.

Response

Please see attached job descriptions.

There are structures are on the job descriptions but there has been a slight change as the IG Team have moved from the Trust Secretary. IG are still reporting to the Director of Governance as part of the Governance team and the team structure remains unchanged

None are outsourced.

If you are dissatisfied with our response, you have the right to appeal in line with guidance from the Information Commissioner. In the first instance you may contact the Information Governance Manager of the Trust.

Information Governance Manager
Trust Headquarters
Russell's Hall Hospital
Dudley
West Midlands
DY1 2HQ
Email: dgft.dpo@nhs.net

Should you disagree with the contents of our response to your appeal, you have the right to appeal to the Information Commissioners Office at.

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113
www.ico.org.uk

If you require further clarification, please do not hesitate to contact us.

Yours sincerely

Freedom of Information Team
The Dudley Group NHS Foundation Trust

Job Description

Job Title:	Information Governance Manager / Data Protection Officer
Job Band:	8a
Department:	Information Governance
Responsible to:	Trust Secretary

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.



Job Summary



This is a key strategic and operational role leading the Trusts Information Governance and Data protection frameworks. The Information Governance Manager is responsible for leading, developing and delivery of the Information Governance strategy across the entire Trust, incorporating Data Protection (UK GDPR and DPA 2018) and Confidentiality, Corporate Records, Caldicott Principles and, where appropriate data / cyber Security. A key aspect of the role is to ensure the Trust is compliant with the requirements of the GDPR and the DPA 2018.

Working both autonomously and as part of the Trust Secretary Division the post holder will be required to act independently, exercising significant discretion in respect of their lead area of specialism.

As an expert in the field of Information Governance, the post holder will develop and monitor the Information Governance Strategy across the complex areas of corporate and clinical services, based on a sound understanding of current legislative requirements, continually changing technological advances and national requirements.

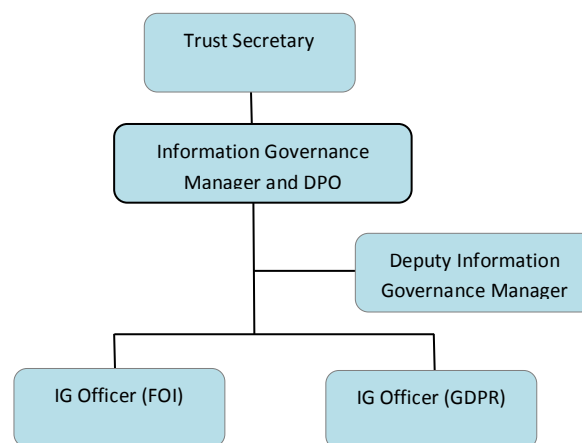
The post holder will provide specialist expert advice to Trust staff, in particular, the Caldicott Guardian and Senior Information Risk Owner (SIRO) ensuring that the Trust operates within legal and ethical frameworks, and will work closely with staff across the organisation to communicate Information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

The Information Governance Manager role is responsible for the successful delivery of the Data Security & Protection Toolkit and the agreed information governance framework for the Trust to meet its statutory obligations.

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 operationally manage the Caldicott and Information Governance Group.

Structure Chart



Principal Duties & Responsibilities



The Information Governance Manager is responsible for the day-to-day leadership and management of the Trust's Information Governance and Data Protection responsibilities. The Information Governance Manager is responsible for the running of the wider Information Governance Team.

Policy Development and Implementation

- Writing, implementing, reviewing and updating trust wide policies, guidelines, protocols, procedures and processes to ensure data protection compliance and the safe and effective management of information across the trust.
- Develop and maintain procedures in relation to data protection by design.
- Maintain a record of processing operations/activities in line with article 30 of the UK GDPR.
- To develop and provide a high level of specialist knowledge on Information Governance to the Trust Board, Senior Managers and staff, identifying and providing guidance and information regarding related issues.
- To ensure the Information Governance Strategy and associated policies and procedures meet statutory requirements, e.g., the requirements of the Information Governance Toolkit.
- Responsible for drafting, producing and ensuring appropriate policies, procedures and guidance are available for staff to carry out their roles in a compliant manner.
- To ensure the implementation and delivery of the Trust's annual Information Governance work programme. This will include a Trust wide review of compliance, liaison and completion of action plans to address any areas of concern.
- To understand current best practice and ensure that this is communicated clearly and acted upon effectively, in particular to provide expert interpretation of national guidance and legislation for implementation in the Trust.
- Where appropriate, lead the development and deployment, in conjunction with project managers and the Communications Lead, of a robust and responsive communications programme.
- Collate and analyse performance statistics on aspects of information governance to identify trends and areas for action and improvement.
- To manage the maintenance of the Information Asset Register, ensuring confidentiality, integrity and availability.
- Develop and maintain an Information Asset Policy and procedure and ensure that relevant asset owners are aware of their responsibilities.
- Provide leadership, support and guidance to the Trust's Information Asset Owners to ensure that IG provision is clearly understood and enables full integration of information governance across the whole Trust.
- Co-ordinate and lead the Information Governance Working Group to support Information Asset Owners.

Advice – Complex case work and drafting

- Be the recognised authority on all data protection and information governance matters within the Trust and as such provide an organisational wide advisory and guidance service.
- To inform and advise the organisation and its employees about their obligations to comply with the GDPR and other data protection laws.
- In performing the tasks of the DPO the postholder will have due regard to the risk associated with processing operations, and take into account the nature, scope, context and purposes of processing.
- Provide advice in relation to the completion of complex Data Protection Impact Assessments.
- Use Health Service policy and legislation and interpret them to advise on policy and standards within the organisation.



- To actively work with service managers and other stakeholders to ensure that the Information Governance processes meet the objectives of the Trust, Including setting up Data Sharing Agreements (DSAs) in accordance with legislation.
- Draft and review complex Information Sharing, confidentiality agreements and contractual agreements taking the lead role in ensuring monitoring and completion of necessary objectives.
- Undertake root cause analysis (RCA) investigations of Information Governance related breaches, incidents and complaints and where applicable produce detailed RCA reports including action plans and suggested changes to practice as a result.
- Conduct assessment on whether incidents are reportable to the ICO or the individuals concerned.

Regulatory and Compliance – DSPT, ICO responsibilities

- The DPO will be easily accessible as a point of contact for employees, individuals and the Information Commissioner's Office (ICO);
- to be the first point of contact for the Information Commissioner's Office (ICO), as the supervisory authority, for individuals whose data is processed (employees, patients, service users, etc);
- Lead the monitoring of information processing and conduction of audits by undertaking inspections and audits of information security and confidentiality arrangements within the organisation.
- Manage and co-ordinate completion of the data protection sections of the annual Trust Data Protection and Security Toolkit assessment with Trust leads, using the NHS DPS Toolkit.
- Manage complex complaints, raised by the Information Commissioner's Office.
- Liaise with the Information Commissioner's Office (ICO) on Data Protection matters and ensure that the ICO's guidance is made available to Trust employees.
- 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.

Auditing

- To monitor compliance with the GDPR and other data protection laws, and with the data protection policies, including managing internal data protection activities; raising awareness of data protection issues, training staff and conducting internal audits;
- Responsible for maintaining a data protection risk and assurance register, ensuring that all major risks are brought to the attention of CIGG and appropriate senior managers for action.
- To co-ordinate the management of and be responsible for the annual submission of the Data Security and Protection Toolkit (DSPT) assurance system, ensuring that there is a robust evidence base for audit purpose. This will include liaison with the Trust Auditors.
- Liaise with the Information Commissioner's Office (ICO) on Freedom of Information, Common Law Duty matters, incidents and complaints.
- Monitor and audit compliance with policies and procedures across the Trust, initiating actions to address areas of non-compliance and reporting on progress and risks to CIGG and/or sub-committees.
- Monitor arrangements to ensure that data access information requests, including requests for access to health records, are processed within the permitted timescales and assurance can be provided to the Trust as to compliance.



Groups and Committee Oversight

- IG lead for the Caldicott and Information Governance Group ensuring effective implementation of the Group's workplan.
- Leading CIGG in discussions of risks and providing expert advice and proposals in relation to mitigation.
- Setting an agenda for the Information Governance Framework and annual plan, which is focused on strategic matters, is forward looking and evaluates and oversees the Group's compliance with its data protection responsibilities.
- Present reports, implementation plans and progress reports to the CIGG and relevant sub-committees.
- Represent the Trust at regional and national Information Governance forums to ensure the trust benefits from work undertaken nationally and that awareness of developments in these fields are maintained
- To have responsibility, as the Chair of the Information Governance Working Group, for the overarching management and co-ordination across the Trust of the various components of the Information Governance agenda.
- Trust representative on various organisational, regional and national groups in determining and implementing national and local policies, protocols and procedures.

Team Management and Development

- To have management responsibility for the Information Governance Deputy Manager and administrative staff providing regular appraisal and feedback and ensuring delivery to agreed performance targets.
- To contribute to a culture of development, improvement and learning by actively participating in personal development and appraisal systems, with clear and explicit expectations and targets, to enable continuous improvement in performance standards, training and development.
- Participate in the recruitment process of support staff, where appropriate.
- To be an authorised signatory for travel expenses and other payments.

Training and Awareness

- Responsible for identifying Trust-wide Information Governance (IG) training needs, ensuring that IG statutory and mandatory, as well as recommended, learning requirements are clearly defined, that training courses and information material on IG available to staff meet those needs.
- Develop and deliver training / workshops where required.
- 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.

Freedom of Information

- Subject Matter Expert for Freedom Of Information
- Lead contact for all Freedom Of Information requests and ensuing the co-ordination of responses across the Trust within regulatory timescales.
- Provide updates on Freedom Of Information requests through reporting to CIGG and escalating issues as required.
- Liaising with Information Commissioners Office in relation to complaint investigations
- Responsible for approving application of exemptions and release of information for the Trust.



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.

Key Communications and Working Relationships

Internal: Caldicott Guardian, Trust Senior Information Risk Owner (SIRO) (Executive level), Executive Directors, Chief Clinical Information Officer, Clinical Coding/Data Quality Manager, Patient Access Department Manager, Head of Cyber Security and IT Governance, Head of Informatics, division management teams; clinical, service and administration managers and clinicians involved in clinical systems projects; IT managers and staff; other Trust staff as appropriate.

External: Service users, Solicitors, Local Authorities, CCGs/CSUs, Information Governance audit staff within other NHS organisations and regulatory bodies, NHS England, the Office of the Information Commissioner, auditors and suppliers of software, systems and services.

Organisational Values

The post holder will:

Care: You will listen, be respectful and treat others with compassion and kindness.

Respect: You will behave with respect to everyone you meet and encourage an inclusive culture where we respect the contribution everyone makes.

Responsibility: You will take responsibility for yourself and your team.

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

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Location

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Code of Conduct

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



Staff 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.

Equality, Diversity, and Inclusion

All Trust staff have a responsibility to embrace the diverse cultures of both our staff and the communities that we serve, and as such, all staff should ensure that equality, diversity, and inclusion are embedded in their work philosophy and reflected in their behaviour. Equality, Diversity, and inclusion are pivotal to the values and vision of the Dudley Group so that they shape everything that you do every single day.

Safeguarding Children and Adults

All Trust staff have a responsibility to ensure the safeguarding of children, young people, and vulnerable adults. This includes attending statutory and mandatory training, adhering to local Safeguarding Children and Adults policies and procedures and inter-agency guidance as showed in the Trust's Safeguarding policies and procedures.

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

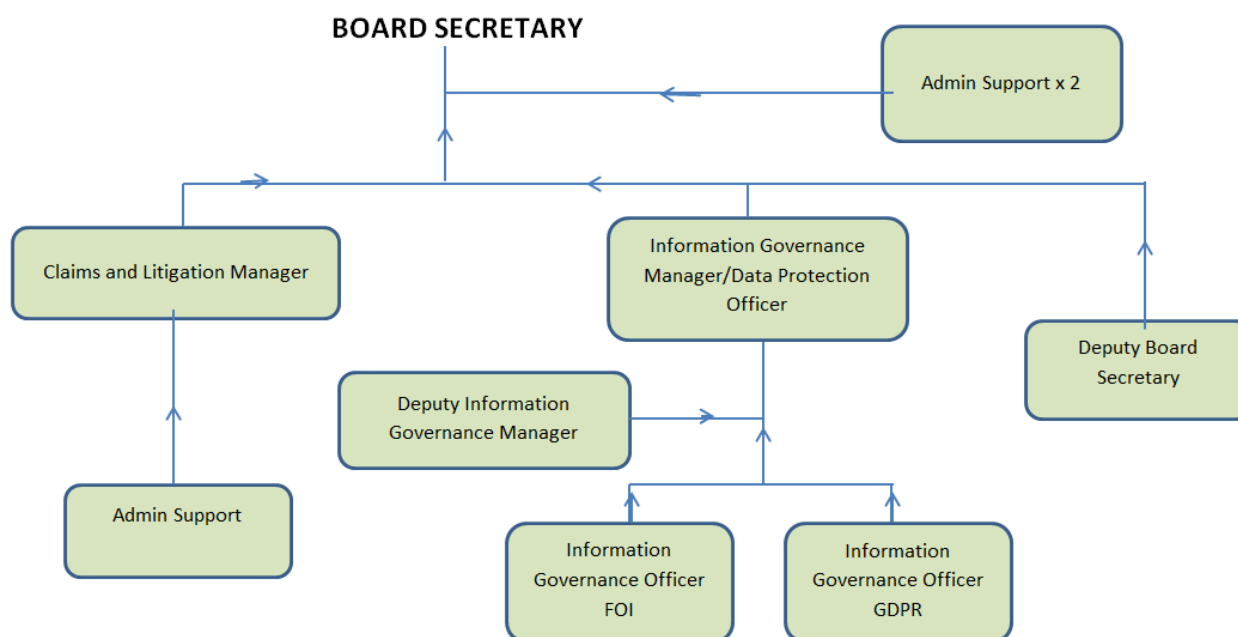
The Trust has a duty of care to employees and will ensure that, as far as is practical, adequate training, facilities and arrangements for risk avoidance are in place.

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

All Trust employees must follow relevant Health and Safety legislation and the Trust's policies relating to Health & Safety and Risk Management.

Prepared by:	Liam Nevin
Date:	March 2021
Job evaluation completed:	
Job evaluation reference number:	





CARE

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RESPECT

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RESPONSIBILITY

A WORKFORCE FOR NOW AND THE FUTURE: Making Dudley the place people want to be and stay because everyone has a role to play and takes responsibility for themselves and their teams.

Job Description

Job Title:	Information Governance Officer (GDPR)
Job Band:	Band 4
Department:	Information Governance
Responsible to:	Information Governance Manager / DPO

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Job Summary



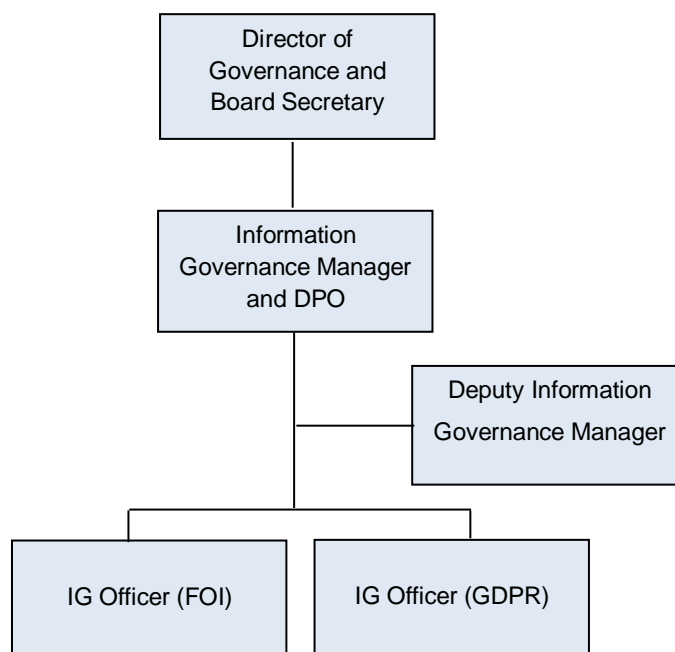
As a key member of the Information Governance team the Information Governance Officer will provide support and assistance to the Information Governance Manager in on-going development and implementation and raising awareness of the Information Governance agenda throughout The Dudley Group NHS Foundation Trust (DGFT).

The post holder will assist the Information Governance Manager and support compliance with current legislation, industry standards and Department of Health directives on information handling.

The post-holder also has responsibility for the management of the Data Security and Protection Toolkit within specified areas and related initiatives across the Trust. The post holder will also provide support, liaising with key stakeholders across the Trust in collating evidence to support the Data Security and Protection Toolkit (DSPT) and other regulatory requirements. The post holder will act as a first point of contact for information governance queries.

The Post Holder will also be required to provide cover for the Freedom of Information 2000/ Environmental Regulation (EIR) request process where cover is required.

Structure Chart



Principal Duties & Responsibilities

To provide support for the Trust's Information Governance requirements. The post holder must be flexible and have the ability to manage and prioritise his or her own workload and communicate/liase effectively with internal and external organisations.

The post holder is required to use initiative and have excellent interpersonal and communication skills to be able to deal with sensitive and confidential situations when liaising with Trust staff, external organisations and other NHS Trusts.

The post holder must have experience and a working knowledge of the Trust's Patient Administration System OASIS and the NHS Spine Portal, to process sensitive and confidential information/documentation returned to the Trust.

Duties will include but are not limited to the following:

- Perform Information Governance / Data Protection Audits, to include spot checks, with the support of the IG Manager/DPO
- To ensure on-going IG awareness of staff
- To highlight areas of Data Protection Risk
- To oversee action plans provided to wards/departments for improvement and learning
- Report continuing areas of risk to Directorate Leads for consideration for their Risk Registers
- Provide IG and Data Protection advice and raise awareness of information governance to promote risk awareness and a culture of openness throughout the Trust so that IG is an integral part of daily work
- Support the Information Governance Manager to ensure information governance policies and procedures are in place to comply with legislation and NHS guidance
- Collation of evidence to support the Data Security and Protection Toolkit submission
- Manage and respond to data protection officer mailbox (1st line response to queries)
- Deal with police requests and manage subject access requests to ensure these are dealt with in regulatory timescales
- Support Caldicott and information Governance Group and any relevant subgroups with agenda and papers
- Complete a stage one review of Datix incidents referring complex ones on to the DPO
- To provide support to the Caldicott Guardian where required
- To provide guidance to staff on Corporate Record Keeping issues
- Ensure the data sharing database remains up to date and that agreements coming up to their end date are reviewed and signed off or made redundant
- Arrange meetings as and when required, communicating with both Internal and external departments and organisations, to book venues, hospitality and audio-visual presentation aids
- Process confidential telephone, email and written enquires ensuring that appropriate action is taken
- To provide input and advice, from an Information Governance perspective, into any projects within the Trust as required, and consistent with the grading of the post, and support the development of Data Protection Impact Assessments (DPIAs) for any new Project and/or System Procurement



- Under supervision, to analyse, monitor and assess for risk the Action Plans, developed by departmental leads, against each assertion of the Data Security and Protection Toolkit (DSPT) and to provide advice and guidance and provide regular reports to the Information Governance Manager and the Information Governance Steering Group
- To look after the administration of the Trust's Information Governance Policies and ensure that they are up to date and in place
- To monitor the development of legislation and NHS guidance in relation to Information Governance, and to support the Information Governance Manager and the Deputy Information Governance Manager to produce Trust specific policies and guidance as required, monitor new initiatives, produce training tools and support staff where needed
- To assist the Information Governance Manager and Deputy Information Governance Manager with the review and development of service specific Data Sharing Agreements
- To assist in the preparation of reports for CIGG and other internal committees as requested
- To advise and educate asset owners who have systems containing personal identifiable information on their responsibilities as required
- To maintain the development of the Information Governance intranet site. Ensure the site provides all relevant information to staff on information governance issues and is maintained and kept up to date
- To assist in the development and maintenance of the Trust record of processing activities and information asset registers
- To assist in the conduct of investigations using Trust systems into any allegations of misuse of access privileges
- The post holder will deal with subject access requests and police request or information
- This job description may be reviewed from time to time in light of developments and may be amended 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.



Organisational Values

The post holder will:

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Location

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Improvement Practice

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No Smoking

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Health and Safety

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All Trust employees must follow relevant Health and Safety legislation and the Trust’s policies relating to Health & Safety and Risk Management.

Prepared by:	Andy Proctor
Date:	20/06/2022
Job evaluation completed:	
Job evaluation reference number:	



Job Description

Job Title:	Deputy Information Governance Manager
Job Band:	Band 6
Hours:	37.5 hours per week
Tenure:	Permanent
Department:	Information Governance
Responsible to:	Information Governance Manager / Data Protection Officer (DPO)

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Trust Strategy 2019 – 2021



Care better every day



Job Summary

The post holder will act as a source of expertise on Information Governance (IG) issues, including Data Protection, Freedom of Information (FOI) and any related legislation and be able to analyse complex information to present in a clear format appropriate to different levels of staff and knowledge; this will include translating relevant law and national regulation and guidelines and best practice into Trust strategy and policy to ensure that the Trust is compliant

To undertake Information Risk Assessments (to include the review and analysis of complex and/or highly sensitive information) and provide advice and guidance to managers investigating any IG risks and incidents such as breaches of confidentiality, liaising closely with the Information Governance Manager/Data Protection Officer (DPO), Senior Information Risk Owner (SIRO) and Caldicott Guardian and providing specialist advice and support as necessary. The post-holder will be required to lead on any complex serious incidents relating to IG risks.

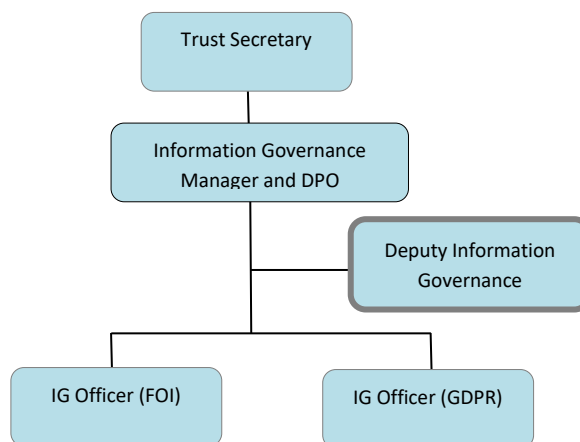
To assist the Information Governance Manager in the development in the development of policy and procedural documents, the undertaking of Information Governance audits and the design and delivery of training.

To be responsible for the development and maintenance of the Trust's Information Governance intranet resources.

The post-holder will also deputise for the Information Governance Manager/DPO, undertaking the associated responsibilities when necessary

The successful candidate will have an excellent prior knowledge of information rights law, ideally within a health and care setting.

Structure Chart



Principal Duties & Responsibilities

Within the overall remit of the job role, the post-holder must be capable of making decisions in an autonomous manner.

Duties will include:

- The post holder will assist the Information Governance Manager/DPO in ensuring the Trust is compliant with data protection regulations including the development, implementation and maintenance of a full record of processing activities, information asset owners and information asset registers.
- The post holder will assist the Information Governance Manager/DPO in ensuring that there is a comprehensive education and awareness plan in place to ensure that Trust staff are aware of their responsibilities and that the outcome of the Trusts Learning Needs analysis is followed.
- Leading on the Trust's Information Risk Assurance work, including development of the Trust's Information Asset Register.
- Developing the Trust's Information Governance work plan to include clinical and corporate functions, based on sound understanding of the Data Security and Protection Toolkit (DSPT) requirements.
- Leading on Information Governance policy consolidation, implementation and development across the Trust.
- Ensure that Data Protection Impact Assessments are completed as required in relation to new and existing services, systems and processes and draft complex data sharing agreements.
- The post-holder will assist the Information Governance Manager/DPO to ensure that information is managed and used effectively, efficiently and ethically across the Trust.
- The post-holder will assist the Information Governance Manager/DPO to ensure that the Trust's Information Governance Toolkit submissions are prepared to a high standard, verified and submitted on time.
- The post-holder will assist the Information Governance Manager/DPO in developing/reviewing/and maintaining the suite of policies under Information Governance ensuring all current legal requirements are covered and, in addition, assist the Information Governance Manager/DPO in ensuring all IG and related policies are both available and communicated to all staff.
- The post-holder will assist the Information Governance Manager/DPO in developing guidance documents to inform staff, patients and the public of their rights relating to Information Governance legislation.
- To act as a source of expertise on Information Governance issues to all relevant areas of the Trust.
- Advise on Information Governance issues, and in particular Data Protection, record handling, confidentiality, Caldicott principles and Freedom of Information.
- To provide advice and support in the investigation and management of Information Governance incidents including national reporting and incident-management for more serious cases as appropriate.
- To work with and support the Trust leads for other aspects of Information Governance ensuring the Trust works towards the highest possible attainment level



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for data security and protection governance standards as evidenced by the Data Security and Protection Toolkit.

- Work proactively with operational managers and other stakeholders to ensure that the Trust's information governance processes meet the business requirements of the organisation.
- Responsibility for developing Trust procedures and processes relating to all areas of Information Governance, in particular those covering record keeping, records transfer, information security and information sharing.
- Provide face to face training to Trust staff members as and when required.
- To support programmes and initiatives that involve the development of new or innovative information processes on the need for data protection impact assessment (DPIA).
- Development of materials to support staff in conducting data protection impact assessment, and system implementations
- To be a first point of contact for the Information Commissioner's Office (ICO).
- To cooperate with the ICO in any matters relating to data protection compliance including provision of evidence of compliance, and in relation to breach management.
- Develop and maintain currency of the Trust's Freedom of Information (FOI) publication scheme in conjunction with the Information Governance Officer.
- To be responsible for advising on and signing off the use of legal exemptions in relation for FOI requests.
- The post-holder will work closely with and support (as appropriate) the Trust's Caldicott Guardian and the SIRO in relation to any confidentiality/risk and data security issues arising internally that require resolution.

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

Key Communications and Working Relationships

Internal: Caldicott Guardian, Trust Senior Information Risk Owner (SIRO) (Executive level), Executive Directors, Chief Clinical Information Officer, Clinical Coding/Data Quality Manager, Patient Access Department Manager, Head of Cyber Security and IT Governance, Head of Informatics, division management teams; clinical, service and administration managers and clinicians involved in clinical systems projects; IT managers and staff; other Trust staff as appropriate.

External: Service users, Solicitors, Local Authorities, Clinical Commissioning Groups (CCG)/Commissioning Support Units (CSUs) Information Governance audit staff within other NHS organisations and regulatory bodies, NHS England, the Office of the Information Commissioner, auditors and suppliers of software, systems and services.



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Safeguarding Children and Adults

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Improvement Practice

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Prepared by:	Liam Nevin
Date:	March 2021
Job evaluation completed:	13/04/2021
Job evaluation reference number:	21/133



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A CARING, KIND AND COMPASSIONATE PLACE: We will support people to have joy in work and to treat each other with compassion and kindness.



RESPECT

A PLACE WHERE COLLEAGUES RESPECT ONE ANOTHER: We will behave with respect towards everyone we meet to encourage an inclusive culture where we all believe in and live by our Trust values.



RESPONSIBILITY

A WORKFORCE FOR NOW AND THE FUTURE: Making Dudley the place people want to be and stay because everyone has a role to play and takes responsibility for themselves and their teams.