

## JOB DESCRIPTION

<b>JOB TITLE:</b>	Information Governance Manager
<b>BAND:</b>	AfC Band 7
<b>HOURS:</b>	37.5
<b>REPORTING TO:</b>	Head of Information Governance
<b>ACCOUNTABLE TO:</b>	Associate Director of Information Governance
<b>LOCATION:</b>	The Green

### Purpose of the Job

The post holder will play a key part in raising awareness of information governance and ensuring best practice that helps the Trust meets its national and legal requirements for information governance. The post holder will ensure the Trust meets its legal and statutory obligations for information governance, with a focus on information rights (subject access and FOI), standards and compliance.

### Key Relationships

#### Internal:

- Members of the Information Governance Steering Group, Quality Committee and Quality Assurance Committee
- Risk and governance leads
- Complaints and Legal Services leads
- Safeguarding leads
- ICT, Informatics and Performance & Information staff
- Clinical systems project teams
- Staff at all levels within the Trust

#### External:

- External organisations such as NHS Digital
- Other Trusts and organisations
- Contractors and service providers
- Solicitors
- The Courts
- Police
- Service users and their families

## KEY RESPONSIBILITIES

### Information governance

- Promote an effective information governance and risk culture that embeds information governance principles in Trust activities, ensures individual responsibilities are understood and supports good working practices throughout the Trust
- Proactively be a source of information and expertise on information governance

including EU and national legislation, Information Commissioner Directives, Department of Health targets, local policy etc, and translate into strategy and policy that impact across the Trust

- Ensure the Trust is compliant with all relevant legislation and codes of practice for Information governance
- Develop key information governance policies and procedures
- Represent the Trust at local, regional and national information governance meetings and ensure any relevant developments and issues are communicated and acted upon within the Trust
- Provide high quality, responsive and customer focussed advice in response to often complex, contentious and sensitive requests from a wide range of stakeholders including staff, contractors and the public

### **Training**

- Develop training, awareness and communications programmes for all levels of staff aimed at raising information governance awareness and compliance throughout the Trust, where there may be resistance to change
- Proactively deliver information governance training on a wide range of information governance related functions to ensure the Trust is compliant with the mandatory requirements of the Data Security & Protection Toolkit

### **Data Security & Protection Toolkit**

- Project manage and coordinate the delivery of action plans and improvement programmes to support Data Security & Protection Toolkit compliance. This will require liaison with all levels of staff throughout the Trust, service users, contractors and other agencies
- Communicate regularly with key stakeholders so that issues and risks are identified early on and action taken to address
- Coordinate and take ownership of specific Assertions including information rights and training
- Ensure that management tools such as folders, spreadsheets and reporting mechanisms are in place to ensure effective management of the Data Security & Protection Toolkit
- Ensure Data Security & Protection Toolkit and internal audit submissions are made correctly, within timescales, are signed off and that evidence is available to support the attainment levels submitted

### **Information rights**

- Proactively embed an inclusive culture that encourages patients, their families and the public to engage with the Trust
- Coordinate the management of subject access requests across the Trust

- Provide direct leadership and line management for the corporate information rights team
- Ensure that the Trust-wide devolved access to records leads are effectively supported to manage requests to high standards and on time. This will involve the provision of expert advice and direction, and may involve direct contact with requesters
- Manage the production of routine key performance indicators, alerting the Data Protection Officer where targets are not met
- Manage the monthly access to records leads meeting, ensuring there is a dynamic programme of learning and exchange of good practice
- Manage processes for Freedom of Information requests, ensuring that requests are responded to on time. There is a necessity for expert and detailed knowledge of the Trust's business to ensure requests for information are appropriately and speedily processed on receipt
- Provide expert advice regarding exemptions and FOI law generally to Trust-wide FOI leads
- Draft high quality, detailed responses within deadlines, often in response to complex requests for information

#### **Records management**

- Manage and coordinate regular meetings for Trust-wide records managers
- Manage and be the point of contact for external archiving providers, ensuring that processes for retrieval are appropriate and cost effective
- Manage routine processes for the review, retention and destruction of records that have reached their review date
- Manage the Trust's project for reducing the number of archived records currently with external suppliers

#### **Audit**

- Ensure the programme for information governance locality audits is set out in advance, managers are advised prior to the audit and pre audit information is collected from services to enable the best possible audit to take place
- Undertake locality information governance audits, making observations regarding best practice, where improvement is needed and generally raising the profile of information governance
- Support the Data Protection Officer to ensure internal audit and focussed information governance audits are managed, that communication channels are kept open and that recommendations are acted upon

#### **Information Governance Steering Group**

- Provide coordination for Information Governance Steering Group to ensure papers are obtained and distributed on time, that agendas are prepared and minutes and action logs effectively managed

#### **Staff management**

- Provide direct leadership and line management for the information rights team and general information governance functions

#### **Budgets**

- Effectively manage a small operational information governance team budget

#### **General**

- All members of the information governance team are required to provide cover which may require answering the telephone, routine administration, unlocking Smartcards, taking minutes or undertaking any other information governance related duties.

## **TRUST POLICES**

### **Confidentiality & Data Protection**

All employees must abide by the principles outlined in the Data Protection Act 2018 and the Freedom of Information Act 2000, as per the Trust's Information Security Policy.

In the course of your employment you may become aware of information, including medical information, relating to patients, visitors or members of staff. Such information is confidential, and must not be passed on to anyone other than those authorised to receive it in the course of their duties. Staff are reminded that a breach of their duty of confidentiality could lead to disciplinary action up to and including dismissal.

All information and data, made or received by you and kept in whatever form, concerning the business of the Trust shall be the property of the Trust. When required, or on the termination of your employment you shall give all such information and data to your manager. You shall also return all Trust equipment issued to you during the course of your employment.

You must not remove any documents, computer disks/tapes or other electronic storage device containing any confidential information from any of the organisations premises at any time without proper advanced authorisation. Where authorisation is granted and the documents are in electronic format, you must transport them in an encrypted format to current NHS standards. For paper copies, these must be transported in a secure, robust envelope/container.

All records, both paper and electronic, must not be left unattended or in an unsecure location at any time. All such documents, computer disks/tapes or other electronic storage devices and copies are the property of the employer, as is any other material whatsoever in your possession relating to the organisation or its personnel, suppliers, clients or affairs.

### **Data Protection – Your Data**

As part of your employment we will need to maintain personal information relating to your work on your personal file. You have a right to request access to your personal file via the Human Resources Department.

### **Health & Safety**

Under the Health & Safety at Work Act (1974), it is the responsibility of individual employees at every level to take care of their own health and safety and that of others who may be affected by their acts and omissions at work. This includes co-operating with management in complying with health and safety obligations to maintain a safe environment and particularly by reporting promptly any defects, risks or potential hazards.

You must co-operate with Management in discharging its responsibilities under the Health and Safety at Work Act 1974 and ensure the agreed safety procedures are carried out to maintain a safe environment for patients, employees and visitors.

### **Equal Opportunities**

The post holder must comply with and promote the organisation's Equal Opportunities Policy and avoid any behaviour which discriminates against colleagues, potential employees, patients or clients on the grounds of gender, sexuality, age, race, ethnic or national origin, religion, disability or social class.

You are at all times required to carry out your responsibilities with due regard to the Trusts Equal Opportunities Policy and to ensure that staff receive equal treatment throughout their employment with the Trust.

### **Conflict of Interests**

You are not precluded from accepting employment outside your position with the Trust. However

such other employment must not in any way hinder or conflict with the interests of your work for the Trust and must be with the knowledge of your line manager.

### **Risk Management**

Risk Management involves the culture, processes and structures that are directed towards the effective management of potential opportunities and adverse effects. Every employee must co-operate with the Trust to enable all statutory duties to be applied and work to standards set out in the Risk Management Strategy.

### **Personal and Professional Development/Investors in People**

The Trust is accredited as an Investor in People employer and is consequently committed to developing its staff. You will have access to appropriate development opportunities from the Trust's training programme as identified within your knowledge and skills appraisal/personal development plan.

### **Infection Control**

Infection Control is everyone's responsibility. All staff, both clinical and non clinical, are required to adhere to the Trusts' Infection Prevention and Control Policies and make every effort to maintain high standards of infection control at all times thereby reducing the burden of all Healthcare Associated Infections including MRSA. In particular, all staff have the following key responsibilities: Staff must observe stringent hand hygiene. Alcohol rub should be used on entry to and exit from all clinical areas. Hands should be washed before and after following all patient contact. Alcohol hand rub before and after patient contact may be used instead of hand washing in some clinical situations.

Staff members have a duty to attend infection control training provided for them by the Trust as set in the infection control policy.

Staff members who develop an infection that may be transmissible to patients have a duty to contact Occupational Health.

### **Safeguarding Children and Vulnerable Adults**

To carry out responsibilities in such a way as to minimise risk of harm to children or young people and promote their welfare in accordance with the Children Act 2004 and Working Together to Safeguard Children, HM Government 2010.HM Government 2010.

### **Smoking/Alcohol**

The Trust provides a smoke-free work environment and has a No Smoking Policy in all its premises. Staff must not be on duty under the influence of alcohol.

### **Service User and Carer Involvement**

ELFT is committed to developing effective user and carer involvement at all stages in the delivery of care. All employees are required to make positive efforts to support and promote successful user and carer participation as part of their day to day work

**This Job Description is not meant as an exhaustive description of all aspects of your role as duties will vary according to the needs of the service. All such variations will be by reasonable request and agreement with your line manager and will be commensurate with the status and banding of the post.**

**Person Specification: Information Governance Manager**

<b>Requirements</b>	<b>Essential</b>	<b>Desirable</b>	<b>Method of assessment</b>
<b>Education &amp; Qualifications</b>	Educated to degree level in a relevant subject or have equivalent experience		<b>A</b>
	BCS (ISEB) qualification in data protection or similar or have equivalent experience		
		Prince 2 Project Management qualification or similar or equivalent experience	<b>A</b>
<b>Experience</b>	Extensive experience of governance within an NHS environment		<b>A / I</b>
	Experience of information governance within an NHS environment		<b>A / I</b>
	Experience of managing high volumes of records or documentation		<b>A / I</b>
	Experience of Data Security & Protection Toolkit management		<b>A / I</b>
	Experience of working at a management level in an NHS compliance role		<b>A / I</b>
	Excellent track record of managing multiple concurrent projects and deliverables against conflicting priorities.		<b>A / I</b>
	Experience of working effectively within a political environment		<b>A / I</b>
	Experience of managing relationships with contractors / suppliers		
	Experience of effectively managing budgets		<b>A / I</b>
	Considerable experience of effectively managing staff		<b>A / I</b>
<b>Skills / Abilities</b>	Excellent interpersonal skills including relationship building, negotiation & diplomacy with managers & staff at all levels		<b>A / I</b>
	Well developed ability to weigh up a range of options to give information governance advice in what may be a contentious situation or be in response to legal action		<b>A / I</b>
	Ability to deal with highly complex or sensitive facts or situations requiring analysis, interpretation, and comparison of a range of options, often where there is no precedent		<b>A / I</b>
	Ability to deliver training to a wide range of individuals who may be resistant or have a lack of understanding		<b>A / I</b>
	Excellent written and oral communication skills		<b>A / I</b>
	Excellent Office skills		<b>A / I</b>
	Ability to deal with an unpredictable work pattern, maintain composure under pressure, deal with frequent interruptions and work to tight deadlines		<b>A / I</b>
	Ability to demonstrate motivation and integrity		<b>A / I</b>
Ability to manage and cope with high levels of change		<b>A / I</b>	

Requirements	Essential	Desirable	Method of assessment
	Emotional intelligence and personal resilience to remain effective in complex and often stressful circumstances		A / I
<b>Knowledge</b>	Extensive knowledge and understanding of the information governance legislative framework		A / I
	Knowledge of general compliance requirements for NHS Foundation Trusts		
	Excellent understanding of the functions and services provided by a mental health Trust		A / I
<b>Other Requirements</b>	Knowledge and understanding of the importance of equal opportunities		A / I
	Adaptability and responsiveness regarding the need for extended or revised working hours in certain circumstances		A / I
	Willing to travel across Trust sites and occasionally wider to undertake the requirements of the job		A/I
	Able to balance the need for prolonged concentration against frequent interruptions		A / I