

JOB DESCRIPTION

Job Title:	Information Governance Lead Officer	<i>HR use only</i> Job Reference Number
Report to:	Head of Corporate Governance	
Accountable to:	Company Secretary and Foundation Trust Programme Director (Senior Information Risk Owner)	

Job Purpose

The main purpose of this role is to ensure that the Trust has in place an effective and embedded 'Information Governance Framework' spanning the breadth of the Trust and where appropriate beyond in relation to partnership or collaborative working.

The Information Governance Framework will include:-

- Clear and effective management and accountability structures.
- Information governance processes, including committee and other meeting structures for assurance and performance management.
- Documented strategies, policies, procedures and where appropriate guidance for staff to follow.
- Trained staff, including a robust Training Needs Analysis setting out the specific training requirements associated with particular roles, and ensuring that training packages are or a sufficient standard.
- Adequate resources are deployed to the agenda including, trained Information Asset Owners, who are discharging their duties effectively.

The post holder will ensure that this 'Information Governance Framework' satisfies current legislative requirements, and can be evidenced through the annual Information Governance Toolkit self-assessment process, which must be reviewed on a quarterly basis through the Information Governance Steering Group. They will also be required to demonstrate that the Framework in place is effective and efficient and makes best use of available resources.

The post-holder, will provide advice and guidance to the Trust, therefore ensuring its ongoing compliance with legislation and best practice.

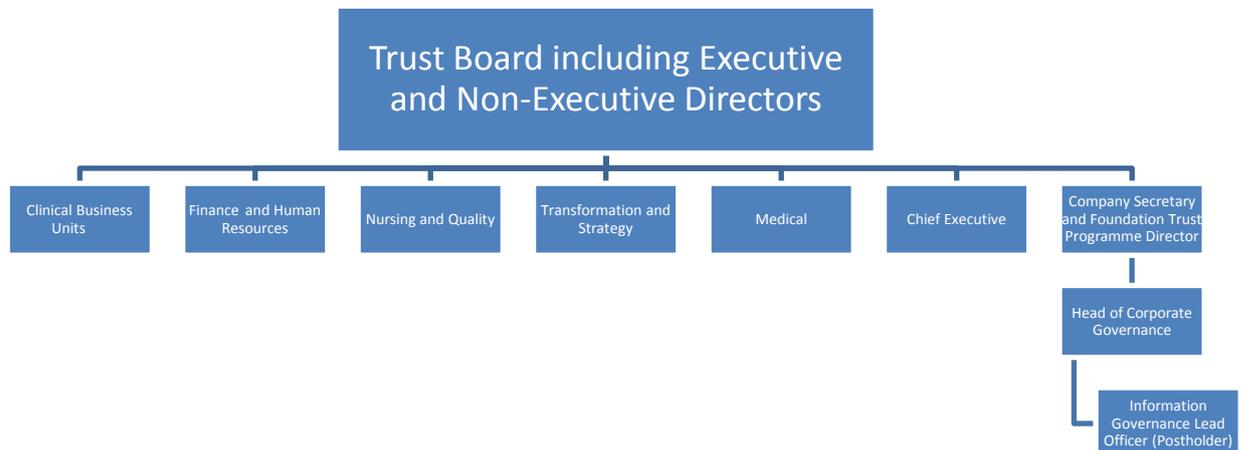
Job Statement

The post-holder will ensure that the Trust has in place an effective Information Governance Framework, which ensures compliance with Information Governance requirements, including but not limited to:-

- The Data Protection Act
- The Freedom of Information Act

- The IG Toolkit annual self-assessment requirements.

Organisational Chart



1. Communication and Relationships

The post-holder will be required to have excellent verbal communication skills as they will be liaising extensively on behalf of the Trust with, patients, service users, staff, carers, legal representatives, the Information Commissioners Office and other key stakeholders, and other providers. It is imperative that the post-holder is therefore able to communicate with people in a confident, clear and concise manner.

The post-holder will also be expected to have excellent written communication skills, as they will write training packages, produce strategies, reports, policies, leaflets for staff and other stakeholders and other documentation, and must ensure that they do so in plain English, that can be understood by all.

The post-holder will be expected to maintain the information governance pages on both the Trust intranet site and the Trust website to ensure that, patients, staff, carers and other stakeholders are informed about steps they need to take when making a or processing a request for information. Both these sites should be kept up to date and provide information to support people in taking the right course of action.

As the Lead Officer for Information Governance for the Trust, the post-holder will provide specialist information governance advice and guidance to staff at all levels across the Trust, including where appropriate the Chief Executive, the Senior Information Risk Owner, the Caldicott Guardian, and Information Asset Owners in order to safeguard the Trust and where appropriate wider health and social care economy.

The post-holder will attend, and where appropriate chair internal and external meetings at various levels, to ensure that the Trust is adhering as appropriate to

information governance requirements and that the Information Governance agenda is championed as appropriate.

The post-holder will be expected to develop excellent relationships with other providers to ensure that best practice initiatives can be shared across a range of providers.

They will attend local and national Information Governance meetings, courses and events as necessary and feedback related issues to the Information Governance team, ensuring that the Trust maintains an effective Information Governance Framework.

The post holder will report directly to the Head of Corporate Governance, however, as the lead IG Officer for the Trust they will be expected to work highly autonomously and drive forward the IG agenda for the Trust, seeking improvements as appropriate.

They will act as the first point of contact for advice and support from the information Governance team in dealing with problems and issues.

They will also raise concerns in a constructive manner to ensure that staff and the wider organisation learn from previous incidents, complaints or claims.

The post-holder will be expected to devise and deliver appropriate training, to staff at all levels across the Trust, and be able to assess competency in relation to Information Governance.

The post-holder will be required to liaise extensively with the Information Commissioners Office in relation to Information Governance matters, seeking their advice and support as appropriate.

The post-holder will be required to liaise with patients, staff and others acting on behalf of those wishing to make a request for information such as legal representatives in an appropriate manner, and ensuring that there is a robust audit trail of all communication.

To undertake or manage investigations and report on Information Security/confidentiality breaches to Trust senior staff, to include reports and recommendations/action plans for appropriate corrective and or preventive action as requested by the Trust.

To oversee the work of the Trust Information Asset Owners (IAO) and ensure they are both equipped and delivering the requirements of their role, escalating matters of concern as they arise.

2. Analysis and Judgement

As the lead officer for Information Governance the post-holder will be required to work autonomously, and make professional judgements, based on sound analysis on a regular basis.

They will be responsible for analysing highly complex inter-linked and inter-dependant records management issues, taking into account all legal and statutory guidance (e .g request for information under the Freedom of Information Act which can be impacted upon by the Data Protection Act and may require the need for an

exemption to be considered which may involve a public interest test) and ensuring that they are resolved effectively.

They will be required to analyse incidents, and ascertain whether they should be reported as an IG SIRI. They will also identify when other internal investigations are required.

They will also be required to analyse, incidents data, complaints, claims, or risks identified by Information Asset Owners to identify IG risks that need to be reported, and where appropriate ensure that these are being mitigated effectively or escalated as appropriate.

The post-holder will be expected to drive continuous improvement in relation to the Information Governance agenda, in part through the analysis of incidents, claims, complaints, stakeholder feedback in relation to the Trust Information Governance systems and processes and ensuring that lessons are learned as appropriate. The post-holder will be expected to shape training and other promotional materials to further embed and effective IG Framework across the Trust.

3. Planning and Organising

The post-holder will need excellent planning and organising skills, and be able to prioritise competing demands and priorities on a regular basis.

The post-holder will need excellent project management skills, and be able to plan, deliver and review projects. For example, the post-holder will need to annually review the requirements of the IG Toolkit and devise an appropriate forward plan to ensure all requirements are met or exceeded, and evidence is collated in a timely manner in order to support the Trust in achieving compliance. This will include the production of strategies, policies, protocols, and reports to support the IG Framework.

The Post-holder will also need to support decision making in relation to the deployment of resources to achieve competing priorities, such as the achievement of Subject Access Request, or Freedom of Information Request deadlines, whilst also maintaining an effective Information Governance Framework, including ensuring that training available to staff is of an exemplary standard and available to meet demand.

The post-holder will need to ensure that FOI, SAR, IG Toolkit, Death list, Archive Record Information Assets are robust and comply with necessary IG requirements.

To ensure that Subject Access requests made under the Data Protection Act and Access to Health Records Act are processed in accordance with the legal timeframes and rights of the Data Protection Act including establishing and maintaining a system to recover income.

To produce and implement Information Governance Action plans to continually improve the service provided.

To support the Trust in achieving its strategic priorities, by embracing change and partnership ventures as appropriate.

4. Patient and Client Care

The post-holder will be expected to liaise with patients, carers or other family members in relation to IG matters and support them to submit appropriate requests for information as required. The post-holder will investigate incidents, claims and complaints relating to Information Governance matters and must endeavour to ensure that the Trust learns lessons from any investigations undertaken. In addition they will be required to liaise with patients, carers or their family members and explain the impact of relevant legislation on how their complaint, or claim has been handled.

The post-holder will play a key role in to ensuring that patient, staff or other commercially sensitive information held by the Trust is held legally, securely and is only accessed by staff that have a legitimate reason to view the information. This will be achieved through providing relevant training to all staff, including specific training for Information Asset Owners.

5. Service and Policy Development

As the lead officer for Information Governance for the Trust, the post-holder will be expected to drive forward service developments to ensure that the Information Governance service provided by the Trust meets all legislative requirements in the most efficient and effective way.

The post-holder will be expected to strive for continual improvement, through liaising with other professionals spanning a range of providers. They will be responsible for ensuring their own continuous professional development.

They will be responsible for producing, strategies, policies, protocols and guidance documents in relation to IG and ensuring that these documents remain fit for purpose at all times.

They will also be responsible for ensuring that these documents are embedded across the Trust through various communication methods and training or briefing sessions.

6. Managing Financial Resources

The post-holder will not have any specific budgetary responsibilities, other than to ensure that fees associated with Subject Access or Freedom of Information Requests are processed in a timely manner.

They will also need to ensure that any fees associated with legal advice accurately reflect the work undertaken on behalf of the Trust.

7. People Management and Development

As the lead officer for Information Governance for the Trust the post-holder will, provide 'professional supervision', support and advice to staff delivering an Information Governance role, in particular those working within the Corporate Governance team, and Information Asset Owners operating across the breadth of the Trust. The post-holder will also offer advice, support and guidance to other Trust employees at all levels.

The post-holder will be responsibilities devising and delivering a suite of information governance training across the Trust, to ensure the continuing development of staff

and continued adhered by the Trust to changes in legislation and best practice in relation to Information Governance.

The post-holder will be required to undertake an annual Training Needs Analysis (TNA) of the organisation to ensure that there is sufficient skill and expertise in place to deliver the IG requirements successfully, this will include the need for business resilience planning.

The TNA must include the following:-

- Training for clinicians
- Training for non-clinical staff
- Training for Information Asset Owners
- Training for Information Asset Administrators
- Training for the SIRO and deputy SIRO
- Training for the Caldicott Guardian and deputy Caldicott Guardian

The post-holder will support the review of Job Descriptions for staff working within the Corporate Governance Team, and Job Descriptions addendums for Information Asset Owners.

They will support in the appraisals of staff working within the Corporate Governance Team.

The post-holder will be responsible for devising training packages to develop a broader understanding of the IG agenda across the Trust.

The post-holder will be required to lead by example in relation to IG matters, and must operate a clear desk policy and exemplary record keeping systems and processes.

The post-holder will be required to act as 'professional supervisor' for each of the Trusts Information Asset Owners (IAO), providing professional group supervision on a quarterly basis. This professional supervision will include, supporting the IAO's to undertake reviews of their information assets and systems to identify and mitigate risks or incidents relating to information governance.

The post-holder will also review the IAO adherence to the IAO Job Description addendum, to ensure that the IAO's are discharging their duties effectively.

The post-holder will need to ensure that all IG risks are recorded on the Trusts risk management system and comprehensively review them to ensure that risks are being mitigated effectively. The post-holder will escalate matters of concern to the Senior Information Risk Owner, or their line manager.

8. Information System use and management

The post-holder will be the Primary Information Asset Owner (IAO) (see IAO addendum) for a number of systems within the Corporate Governance Department as listed below, and as such will be required to ensure the business continuity of these systems and that all information risks are assessed and mitigated as appropriate:-

1. Subject Access Request logs

2. Freedom of Information Request logs
3. Death List
4. Archive Records logs
5. IG Toolkit evidence log and action plans
6. Information Asset Register
7. Information Risk Management Schedule

NB this list is not exhaustive

As the Trust lead officer for IG they will also oversee the information Asset Register, and provide professional supervision on a group-work basis to other IAO's to ensure they are discharging their duties effectively.

The post-holder will regularly use computer software to develop or create reports in various formats, i.e. word, statistical, diagrammatical etc to submit to meetings at various levels across the Trust, and will ensure that all required reports are submitted in a timely manner

1. Monthly IG reports for the Clinical Business Units
2. Quarterly IG reports for TEC, FIIWC,
3. Monthly reports for the IGSG.

NB this list is not exhaustive and is subject to change

Reports will require spreadsheet and report writing skills including basic statistical analysis and interpretation of information.

In order to discharge these functions effectively the post-holder will need to maintain exemplary records.

9. Involvement in Surveys and Research

The post-holder will be required to, scope, undertake and participate in regular audits, and service reviews to ensure that information governance expectations and requirements are being met across the breadth of the Trust. They will also be responsible for ensuring that IAO's are coordinating audits within their own departments.

The post-holder will be required to undertake investigations into Information Governance incidents, complaints, and claims to ensure that the Trust is operating safely, seeking to protect the interests of the Trust at all time.

This will include continuous review and evaluation of relevant Information Governance legislation and best practice to ensure that the Trust adheres with all national requirements.

They will need to participate in surveys and research and in particular support the work of the internal auditors in relation to audits which span the remit of IG. In addition the post-holder will be required to respond on behalf of the Trust to consultation exercises being undertaken in relation to Information Governance.

10. Freedom to Act and Autonomy

The post-holder will have a high degree of autonomy and freedom to act, and must champion IG even when the professional challenge may be contentious or relate to a more senior manager.

They will be expected to interpret legislation, and national policies and ensure that the Trust complies with all requirements

The post-holder will be responsible for producing strategies, policies, protocol, guidance and leaflets that all staff across the Trust must follow.

General compliance:

1. To comply with all Trust Policies and Procedure, with particular regard to
 - Risk Management
 - Health and Safety
 - Confidentiality
 - Data Quality
 - Freedom of Information
 - Equal and Diversity and Dignity at Work
 - Information and Security Management and Information Governance
 - Counter Fraud and Bribery
2. The Trust has designated the prevention and control of healthcare associated infection (HCAI) as a core patient safety issue. As part of the duty of care to patients, all staff are expected to:
 - Understand duty to adhere to policies and protocols applicable to infection prevention and control.
 - Comply with key clinical care policies and protocols for prevention and control of infection at all time; this includes compliance with Trust policies for hand hygiene, standards (universal) infection precautions and safe handling and disposal of sharps.
 - All staff should be aware of the Trust's Infection Control policies and other key clinical policies relevant to their work and how to access them.
 - All staff will be expected to attend prevention and infection control training, teaching and updates (induction and mandatory teacher) as appropriate for their area of work, and be able to provide evidence of this at appraisal.
3. To perform your duties to the highest standard with particular regard to effective and efficient use of resources, maintaining quality and contributing to improvements.
4. Ensure you work towards the Knowledge and Skills Framework (KSF) requirements of this post. KSF is a competency framework that describes the knowledge and skills necessary for the post in order to deliver a quality service.
5. Your behaviour will demonstrate the values and vision of the Trust by showing you care for others, that you act professionally as part of a team and that you will continually seek to innovate and improve. **Our vision, values and behaviours** have been designed to ensure that everyone is clear about expected behaviours and desired ways of working in addition to the professional and clinical requirements of their roles.
6. Perform any other duties that may be required from time to time.
7. Patients come first in everything we do. Every post holder can make a difference to a patient's experience. You will come across patients as you walk around the hospital; we rely on all our staff to be helpful, kind and courteous to patients, visitors and each other.
8. Ensure you adhere to and work within local and national safeguarding children legislation and policies including the Children Act 1989 & 2004 , Working Together to Safeguard Children 2013, 4LSCB guidance and the IOW Safeguarding Policy.
9. Ensure you adhere to and work within the local Multiagency safeguarding vulnerable adults policies and procedures

This job description may be altered to meet changing needs of the service, and will be reviewed in consultation with the post holder.

Key Skills required undertaking this role.	On Appointment (Essential)	After 12 months in post	At 2 nd Gateway (Desirable on appointment)	How this will be measured.
Qualifications and role specific knowledge*	<ul style="list-style-type: none"> • Highly developed specialist knowledge of Information Governance practice and legislation, underpinned by theory and experience. Professional knowledge of information governance, including information governance risk management acquired through training and qualifications at Masters' level equivalent. • Evidence of further education in the application and principles of the Data Protection Act 1998 • Excellent understanding of the Data Protection Act 1998 and Caldicott Principles • Excellent understanding of the Freedom of Information Act 2000 and Records Management • Evidence of working towards further education in application and principles of Freedom of Information Act 2000 			

	<p>communication skills with staff at all levels.</p> <ul style="list-style-type: none"> • Ability to prioritise between competing demands and allocated resources accordingly and deliver to tight deadlines • Excellent analytical skills and decision making • Change management skills • Ability to motivate others • Excellent presentation skills • Ability to solve problems and use initiative to secure desired outcomes • Ability to manage time effectively and efficiently 			
Communication Skills	<ul style="list-style-type: none"> • Excellent communication skills required (verbal, written, delivery of training) 			

* = State knowledge required in terms of level of competence NOT X years' experience, as this is age discriminatory.

** indicate the level of mandatory Safeguarding Children Training this post needs 1,2 or 3.

When submitting a job description for evaluation, it must be accompanied by a Job Description Risk Assessment form.

SUPPLEMENTARY JOB DESCRIPTION INFORMATION

Post Title:

Ward/Dept and Site:

Date Completed:

1. General Information about the post.

Location	%	Location	%	Location	%
Office based	91	Home	6	Outpatients Clinic	0
Laboratory	0	Kitchen	0	Community based	1
Ward area	0	Stores	0	Workshop	0
In a vehicle	2			Theatre environment	0

Indicate below if any of these apply

Location	%	Location	%	Location	%
Isolated locations	0	Outdoors	0	Works on their own	5
Works with patients in isolation e.g. in their own home	1	Works with patients – assistance is accessible.	0	Required to be in a building on their own for periods of time	5
Working hours					
Full time	Yes	Part time			
Office hours	Yes	Hours worked as a shift		Hours worked at night	
Concentration and Levels of Interruptions					
Required to concentrate for long periods of time	yes	Required to concentrate for short periods of time			
Interruptions throughout the day		Constant		Occasional	Yes

All criteria require a indication of whether the post holder will be expected to work in or be directly exposed to the following factors. Please use the comments box to provide details including frequency (e.g. how many times per shift)

2. Working Conditions	Frequency				
	Certain	Likely	Possible	Unlikely	Rare/Not at all
Working in bad weather e.g. when it is windy or/and raining.					Y
Excessive temperatures					Y
Unpleasant smells/odours					Y
Noxious fumes					Y
Excessive noise &/or vibration					Y
Use of VDU more or less continuously	y				
Unpleasant substances/non-household waste					Y
Infectious Material/Foul Linen					Y
Body fluids, faeces, vomit, blood					Y
Dust/dirt					Y
Humidity					Y
Contaminated equipment or work areas					Y
Driving/being driven in normal situations					y

Driving/being driven in emergency situations					Y
Fleas or lice					Y
Exposure to dangerous chemicals/substances in/not in containers					Y
Exposure to aggressive verbal behaviour where there is little/no support			Y		
Exposure to aggressive physical behaviour where there is little/no support			y		
Exposure to risks that could result in an acute traumatic injury					y
Undertaking exposure prone procedures					y
Comments: Please use this section to provide any additional details you feel are relevant for the role (e.g. how many times per shift)					
The post holder will be primarily office based working a 37.5 hour week in normal office hours, there may be occasions when they work outside of normal office hours but this would largely be in the office.					
3. Emotional Effort	Frequency				
	Certain	Likely	Possible	Unlikely	Rare/Not at all
Processing (e.g. typing/transmitting) news of highly distressing events	Y				
Giving unwelcome news to patients/ clients/carers/staff			Y		
Caring for the terminally ill					y
Dealing with difficult situations/circumstances			y		
Designated to provide emotional support to front line staff					y
Communicating life changing events					y
Dealing with people with challenging behaviour					y
Arriving at the scene of an accident					y
Comments: Please use this section to provide any additional details you feel are relevant for the role (e.g. how many times per shift)					
4. Physical Effort	Frequency				
	Certain	Likely	Possible	Uncertainty	Rare/Not at all
Working in uncomfortable/unpleasant physical conditions					Y
Working in physically cramped conditions					Y

Lifting weights, equipment or patients using mechanical aids					Y
Lifting weights/ equipment or patients without mechanical aids					Y
Making repetitive movements	VDU/Typing				
Climbing or crawling					Y
Manipulating objects					Y
Manual digging					Y
Running					Y
Standing/sitting with limited scope for movement for long periods		y			
Kneeling, crouching, twisting, bending or stretching					Y
Standing/walking for substantial periods of time					Y
Heavy duty cleaning					Y
Pushing/pulling trolleys or similar					Y
Working at heights					Y
The job requires to be trained in control and restraint.					y

Comments: Please use this section to provide any additional details you feel are relevant for the role (e.g. how many times per shift)

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5. Mental Effort	Frequency				
	Certain	Likely	Possible	Uncertainty	Rare/Not at all
Carry out formal student/trainee assessments					Y
Carry out clinical/social care interventions					Y
Analyse statistics		Y			
Operate equipment machinery for more than ½ a shift					Y
for less than a shift					
Give evidence in a court/tribunal/ formal hearings			Y		
Attend meetings (describe types of meeting and post holders role)	Y IG related, groups, assurance committees, and partnership meetings				
Carry out screening tests/ microscope work					Y
Prepare detailed reports	y				
Check documents	Y				

Carry out calculations	Y				
Carry out clinical diagnosis					Y
Carry out non-clinical fault finding		y			

Signed by post holder*: _____

Date

Signed by line manager: _____

Date

* in the case of new jobs this will have to be an 'estimate' of the demands of the role.