

# Information Governance Manager

## Job Description & Person Specification –

A summary of the role responsibilities and person specification



University Hospitals  
Bristol and Weston  
NHS Foundation Trust

### Why Our Trust?

#### Terms and conditions

**Post – Information Governance Manager**

**Division – Trust Services**

**Department – Corporate Governance**

**Band – 8a**

**Salary – £45,753 - £51,668**

**Location – Trust Headquarters**

**Hours of work – 09:00 – 17:00**

**Contract length – Permanent**

**Annual leave – Up to 33 days dependant on NHS Service**

**Pension - The NHS Pension Scheme is a defined benefit scheme. Further details and outline of benefits can be found at: [www.nhsbsa.nhs.uk/pensions](http://www.nhsbsa.nhs.uk/pensions)**

#### What you'll love about working here

**We are outstanding!** The CQC rated the organisation as Outstanding for services being caring and well-led. The Trust was the first in the country to go from Requires Improvement to Outstanding in 2017, and is now the first to do this and then retain this rating. The Trust is currently one of only seven in the country to have been rated Outstanding twice, and one of only three general acute Trusts to achieve this.

**A digital exemplar-** Being appointed as a Global Digital Exemplar means we can realise this vision by implementing digital technologies that will help us to transform the way we work and how we relate to our colleagues, patients and partner organizations.

**Sustainable healthcare -** We have joined the international movement to declare a climate emergency, recognising the impact climate change is having on the world. Climate change is labelled as the greatest threat to health in the 21st century, with a range of conditions related to heat, cold, extreme weather and air pollution predicted to rise. To lead the way in healthcare the Trust has set ambitious goals to become carbon neutral by 2030.

#### Access to further opportunities with the Trust

Apprenticeships are a great way to learn and earn on the job. UH Bristol and Weston provides a range of apprenticeships to support a huge number of career opportunities in clinical and non-clinical support services with apprenticeships starting at level 2 through to level 7.

As an organisation we encourage further development of all employees to progress upward within their chosen field.

#### About us

**Our mission** is to improve the health of the people we serve by delivering exceptional care, teaching and research every day.

#### Diversity & Inclusion

A core principle of the Trust is to ensure that patients and staff are treated with dignity and respect. Promoting equality, diversity and human rights and challenging any form of inequality, discrimination, harassment or abuse are central to the Trust's Values.

'Committed to inclusion in everything we do' is the ambition set out in the Trust's Workforce Diversity & Inclusion Strategy.

The Trust will not tolerate discrimination, harassment or bullying under any circumstances and particularly because of a characteristic protected by the Equality Act 2010.

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Embracing change  
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### Main Duties and Responsibilities

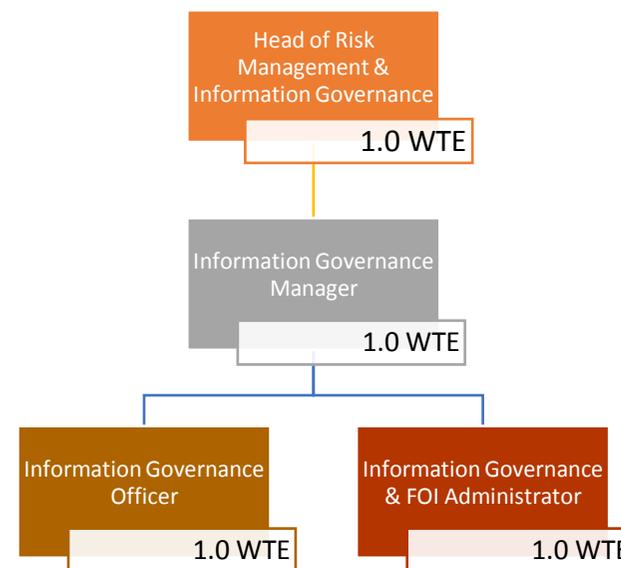
The role of the Information Governance Manager is to support the Head of Risk Management & Information Governance in the development of the Trust's Information Governance Framework, ensuring that any action plans, policies and procedures are fully implemented. The nature of the role demands that highly complex and contentious, statutory and regulatory requirements are implemented across the Trust and understood by all staff members.

The post holder will be responsible for ensuring the Trust complies with all relevant legislation in relation to information governance, including the European General Data Protection Regulation, Data Protection Act 2018, Access to Health Records Act 1990, Freedom of Information Act 2000, Environmental Information Regulation, common law duty of confidentiality, Caldicott recommendations, National Information Security Directive, Record Management Codes of Practice and all other guidance and best practice published by the Department of Health and Social Care, NHS Digital or the Information Commissioner's Office.

The post holder will:

- Act as the expert in the field of Information Governance leading on the development and management of the Information Governance agenda for the Trust
- Provide expert advice to the Senior Information Risk Owner (SIRO), Caldicott Guardian and other senior managers.
- Ensure Data Privacy Impact Assessments are carried out in line with Trust policy and monitor progression of all associated action plans and audits.
- Support Digital Services with the establishment and maintenance of a programme of confidentiality audits, providing advice and taking action, where necessary, in response to audit findings and recommendations.
- Be responsible for drafting and managing data processing/sharing agreements between the Trust and other organisations.

### Organisational Structure



### Key Relationships

Divisional governance leads  
Department managers  
Corporate leads  
SIRO  
Caldicott Guardian  
Digital Services

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- Support the Head of Risk Management & Information Governance in the development of the Trust's Information Governance Framework in support of statutory and regulatory requirements (e.g. Data Security and Protection (DSP) Toolkit).
- Act as the lead for information requests under current Data Protection Legislation (SAR's) and the Freedom of Information Act/Environmental Information Regulations, ensuring that requests are dealt with in accordance with legislation and within agreed timescales.
- Ensure that the Trust has a compliant FOI Publication scheme which is up to date and includes all categories of information as required under the ICO guidance document.
- Carry out training needs analysis, develop and raise awareness of the importance of Information Governance throughout the Trust and ensure appropriate information governance training is delivered to all staff within the Trust as part of the mandatory training programme, corporate induction, and other induction programmes as may be agreed.
- Maintain a comprehensive suite of policies and procedures to ensure the Trust has a comprehensive Information Governance Framework, monitor progress against IG plans and targets and report progress to the IRMG or any other group as may be required.
- Ensure the Trust has an accurate, complete and maintained data protection registration with the Information Commissioner's Office and that the certificate is uploaded to the Corporate Governance Workspace each year.
- Coordinate the management of and be responsible for the annual submission of the DSPT to NHS Digital, ensuring the final assessment is completed and submitted by the appropriate deadline.
- Lead on and monitor the DSPT action plan to ensure there is an evidence base for audit purposes by collating evidence for each DSPT standard.
- Maintain the annual cycle and administration for the Information Risk Management Group (IRMG) and Information Governance Working Group (IGG) and any other group as may be required.
- Support the Head of Risk Management & Information Governance in providing assurance to the Trust Board on Data Protection issues, including the Annual Governance Statement, the DSP Toolkit submission and any Well-led review.
- Ensure appropriate risk assessments are conducted in relation to personally identifiable information held by Trust suppliers and seek advice from Digital Services in relation to cyber security and general IT security risks.
- Establish and maintain an evaluation process for the responses to IG compliance for new systems and suppliers in conjunction with procurement.
- Develop, maintain and publicise appropriate fair processing notices on the Trusts websites.
- Maintain the Trusts IG incident reporting regime ensuring compliance with the requirements of the General Data Protection Regulations 2016, the Network and Information System (NIS) Directive and the DSP Toolkit.
- Oversee the Trust's Data Mapping exercise in conjunction with Digital Services, ensuring appropriate tools are developed and utilised and results are reported to the appropriate committees.
- Provide expert advice to the Trust's Caldicott Guardian on all legislative and policy matters relating to confidentiality, privacy and security of patient information.
- Promote good practice for Information Governance, providing advice and guidance on information governance issues and standards to all staff and raise awareness of Information Governance issues throughout the Trust.
- Keep abreast of changes in legislation relevant to information Governance and ensure that the necessary updates to Trust policies and procedures are proactively addressed.
- Be responsible for the 'day to day' line management of the Information Governance Team, agreeing their work program, monitoring their progress against agreed timescales and ensuring that the post holders discharge their responsibilities effectively.
- Be responsible for monitoring and review of all aspects of organisational information governance and contribute towards the continuous improvement of the Trusts information management arrangements.
- Provide support and guidance to clinicians and managers in all aspects of information governance and ensure that the Trust's commitment to managing information risk in a coordinated, systematic, transparent and focused way is achieved. Contribute to the development of the Trust's information governance framework and provide expert advice on strategic direction for information governance within the Trust.
- Be responsible for the continuous development of a positive and proactive incident reporting culture throughout the organisation in relation to data protection breaches.
- Oversee divisional information governance systems and processes and produce regular information risk reports for presentation to the Information Risk Management Group and the overarching Risk Management Group.

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### Communication & Relationship Skills

- Communicate effectively at all levels and produce concise user friendly written documentation.
- Be required to provide and receive highly complex, sensitive and sometimes contentious information to obtain agreement and the co-operation required to formulate action plans to mitigate information risk.
- Be required to present complex information formally to large diverse groups such as the Information Risk Management Group, Information Technology Management Group and Trust Governors etc.
- Be required to use communication skills and experience to systematically persuade and reaffirm to senior managers of the importance of the Trusts information governance framework and information governance processes.
- Be required to negotiate with and motivate senior managers in relation to project delivery, across multiple services that may have the potential to impact upon various initiatives both divisional and corporate. This may include communication of very sensitive information about performance and change management.
- Utilise their excellent communication skills to diplomatically challenge, advise, persuade, negotiate, coach and influence on a broad spectrum of information governance issues, including where there may be high personal emotions or resistance to change
- Establish and maintain effective communication with multi professional teams, individuals and groups about highly sensitive or complex information risks.

### Knowledge, Training & Experience

- Use their highly developed specialist information governance knowledge to assist and advise on best practice across a range of information management procedures underpinned by knowledge of theory and personal experience.
- Have significant knowledge of a range of data protection tools and techniques, acquired through post graduate diploma level study and training and have the ability to effectively pass this on through formal and informal training programmes across the Trust.
- Possess specialist project management knowledge to enable them to support the delivery of projects through ensuring effective management of information risks and issues relating to project delivery.

### Analytical & Judgemental Skills

- Be required to analyse complex facts and situations when advising on data protection by interpreting and comparing a range of options available and consideration of highly complex facts or situations that may affect outcomes.
- Support and advise managers on risk based decision making on a range of highly complex issues where there may be conflicting priorities (e.g. service development versus data protection).
- Be responsible for the interpretation of national and international guidance (e.g. ISO standards) on best practice in information governance and be an expert in their field, keeping abreast of developments and changes to guidelines and global approaches to information governance and data protection.
- Analyse problems where the root causes are multifactorial and where there may be a range of complex outcomes, coaching and encouraging staff to think for themselves and account for their actions with logical, precise and factual evidence based decision making, thus improving information management and the transparency of information risks and their consequences.

### Planning & Organisational Skills

- Plan, organise and adjust plans and long term objectives that have a Trust wide impact.
- Develop a range of plans and processes to improve information governance in new and existing areas across the organisation and participate in the continuing improvement of services in line with the Trust objectives.
- Plan regular departmental 'walkarounds' to monitor and report on compliance with the Trusts information governance policy and processes.
- Undertake regular reviews to identify and link interdependent risks throughout the Organisation, from departments, through divisions to a corporate level.

### Physical Skills

- Be highly literate with information systems and technology
- Have a good standard of keyboard skills

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### Responsibility for Policy/Service Development

- Be responsible for the implementation of the Information Governance Policy.
- Develop and implement processes for monitoring compliance with the Information Governance Policy.
- Collaborate with Digital Services on service development for information security, developing and implementing policy to drive change.
- Be responsible for regular review and revision of Trustwide information governance guidance and their publication on the DMS and Intranet pages.
- Undertake horizon scanning activities to enable early identification and assessment of emerging information risks.

### Responsibility for Financial & Physical Resources

- Act as budget holder for information governance projects and programmes
- Order and maintains stock levels of printed guidance documents and other educational and training materials.

### Responsibility for Human Resources

- Assume line Management of the information governance function.
- Develop and deliver training and development programmes for the wider corporate governance team and associated functions

### Responsibility for Information Resources

- Ensure patient, staff and witness information is accurately recorded in Datix and is reviewed regularly for completeness.
- Ensure that staff records for completion of training are updated and maintained.
- Support Digital Services with the development and review of completeness of the information asset register.

### Responsibility for Research & Development

- Undertake surveys and audits to inform risk based decision making and provide evidence of the adequacy of controls and assurance around data protection arrangements.
- Undertake research activities to support information risk assessment rationale.

- Assist Internal Audit in the completion of the annual review of the NHS Digital Data Protection & Security Toolkit through collation, development and upload of complex and extensive evidence of compliance.

### Freedom to Act

- Interpret and comply with all relevant Trust policies.
- Interpret national guidelines and compare and contrast Trust documentation to ensure continuation of best practice.

### Physical Effort

- Be required to visit all areas of the Trust estate as well as spending prolonged periods of time desk based and subject to VDU usage.
- Be required to exert light physical effort.

### Mental Effort

- Be subject to frequent and extended periods of concentration
- Be flexible and able to adapt to an unpredictable and changing work pattern.
- Be able to focus and demonstrate the high level of attention to detail required for proof reading and checking documents, reports and policies and analysing statistics.
- Effectively manage conflicting priorities.

### Emotional Effort

- Occasionally be exposed to emotional or distressing circumstances relating to clinical incident investigation and any analysis of potential risk outcomes.
- Be required to inform senior manager when information governance performance targets have not been met, and diplomatically agree recovery arrangements

### Working Conditions

- Be required to commute between the Trusts sites on a frequent basis either walking, using hospital or public transport or use of own vehicle.
- Be required spend a high proportion of the working use office/desk based at Trust Headquarters.

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Personal Profile - (E) = Essential (D) = Desirable

### Knowledge and Experience

- Expert knowledge of information governance in a range of corporate disciplines, including business, strategy, clinical and operational service delivery (E)
- Significant knowledge and experience of the practical application of the fundamental principles of information governance (D)
- Significant experience of working as an autonomous IG practitioner (E)
- Significant experience identifying, collecting, and analysing, comparing and interpreting highly complex data from numerous different sources to produce information risk intelligence reports (E)

### Qualifications and Education

- Diploma in Information governance or equivalent relevant masters or Post-graduate level qualification (E)
- IG/GDPR Practitioner (E)
- PRINCE 2 or equivalent project management qualification (E)
- ICSA qualification in corporate Governance (E/D)

### Analytical & Judgemental Skills

- Ability to assimilate, assess and communicate analyses of highly complex, and sometimes contentious or contradictory information to a variety of audiences where potentially differing and opposing opinions and barriers to understanding will require tact and diplomacy (E)
- Excellent interpersonal and presentation skills; able to effectively interact with and influence directors, senior managers, and clinical staff (E)
- Excellent organisational skills and an ability to prioritise workload within rigid and challenging deadlines (E)
- Excellent IT skills – databases, excel, word, outlook and internet (E)
- Ability to apply critical thinking (E)
- Excellent problem solving skills (E)
- High level of attention to detail and accuracy in producing and reviewing reports and data (E)

Version Issued: June 2020

### Transforming Care

Delivering sustainable healthcare services to our patients, which are effective, efficient and driven by excellence, is at the heart of our organisation. Transforming Care is the Trust's overarching programme of transformational change. It enables staff to use a structured approach to continuously improve and innovates their services, strengthen our capability, and deliver our Trust's mission to improve the health of the people we serve by delivering exceptional care, teaching and research, every day.

Our Quality Improvement Academy is open to all staff and leaders across the Trust, and provides training to lead or take part in improvement and transformation activities in their departments and across the Trust. We will support staff to develop the skills and tools to improve services to deliver the best care to our patients and public.

### Information Governance

It is the responsibility of all staff to respect the confidentiality of patients and staff, as specified in the Caldicott Principles, Data Protection Act 2018 and the Human Rights Act. It is the duty of every employee to:

- Only access person identifiable information as required in the execution of their duties.
- Disclose information appropriately, in line with the Data Protection Act 2018.
- To ensure good quality data by recording, promptly and accurately, clinical and non-clinical information within agreed timescales to PAS, the health record or the appropriate clinical or non-clinical information system
- Always trace patient notes on the Patient Administration System

Maintain the confidentiality of their passwords / usernames and if in possession of a 'Smartcard' abiding by the terms and conditions of its use.

### Workplace health and wellbeing

The Trust Workplace Health and Wellbeing Framework applies to all employees, students and volunteers who are encouraged to take responsibility for their individual health and wellbeing and to promote the wellbeing of colleagues. Line managers must recognise the importance of health and wellbeing and take it into account when planning tasks and designing jobs.

### Safeguarding Children and Vulnerable Adults

The Trust is committed to safeguarding and promoting the welfare of all children, young people and vulnerable adults, and as such expects all staff and volunteers to share this commitment.

### Quality and Clinical Governance

Quality in the NHS has three core dimensions: Patient Safety, Patient Experience and Clinical Effectiveness. Clinical Governance is about the systems, processes and behaviours to ensure that high quality services are provided to patients. Every member of staff has a role to play in striving for excellence: it is important that everyone is aware of and follows policies and procedures that govern their work; and if something goes wrong, everyone has an obligation to report it so lessons can be learned from mistakes, incidents and complaints. If any member of staff has concerns on any clinical governance matters, they should raise them with their line manager, professional adviser, or a more senior member of management. Reference should be made to the Trust's guidance on Raising Concerns about provision of patient care.

### Health and Safety

Under the provisions contained in the Health and Safety at Work Act 1974, it is the duty of every employee to:

- Take reasonable care of themselves and for others at work
- To co-operate with the Trust as far as is necessary to enable them to carry out their legal duty
- Not to intentionally or recklessly interfere with anything provided including personal protective equipment for Health and Safety or welfare at work.

Everyone has a responsibility for contributing to the reduction of infections.

Senior Management is responsible for the implementation throughout the Trust of suitable arrangements to ensure the health, safety and welfare of all employees at work and the health and safety of other persons who may be affected by their activities. Where health and safety matters cannot be resolved at Senior Management level the appropriate Executive Director must be notified.

Line Managers are responsible for the health and safety management of all activities, areas and staff under their control. This includes responsibility for ensuring risk assessments are completed and implementation of suitable and sufficient control measures put in place. Health and safety issues are dealt with at the lowest level of management practicable. Where health and safety matters cannot be resolved at a particular management level the appropriate Senior Manager must be notified.