

JOB TITLE **Senior Information Governance Officer**

BAND 6

Job Summary

The Senior Information Governance (IG) Officer supports the Data Protection Officer, Head of IG and the IG Managers to ensure that the Health Board meets its obligations under Data Protection legislation, information governance and Caldicott and ensures general awareness and encouraging good practice compliance throughout the Health Board on IG matters.

The post-holder will:

- Take the lead on IG breaches/ breach management, reviewing and managing the process from initial report to closing the incident. They will also support the IG Breach Lead in the management of high-level IG breaches. Also, the post-holder will provide advice and support on the management of data breaches including recovery, containment actions and lessons learned.
- Have responsibility for supporting and approving Data Protection Impact Assessments, identifying data processing risks and mitigating actions, recognising when escalation to the line manager is required.
- Take the lead on conducting and following up on ICO reported and IG breach related audits across the Health Board, providing reports to the IG Manager, IG Lead and Information Governance Sub-Committee (IGSC). The post holder will support the IG Team to ensure that staff, stakeholders, contractors and members of the public are aware of their responsibilities and rights under Data Protection legislation.

Responsible to

Reporting: Information Governance Manager	Accountable: Information Governance Manager	Professionally: Head of Information Governance
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Responsibilities and Duties

1. Provide expert IG advice to staff at all levels, departments and corporate / clinical functions, on various aspects of IG
2. Draft, source and provide information when required, to include report production, collation and statistics. In addition to managing breaches, they will provide operational support with the completion of data sharing agreements, privacy notices, Information Asset Register entries, Subject Access Requests and other IG related tasks as required.

3. Identify and report on breach trends and produce statistics for IGSC, Senior Information Risk Owner (SIRO) Report, and similar. Create improvement plans and identify new ways of working, training and influencing staff at all levels and departments across the Health Board to change poor practice.
4. Support the implementation of the IG Incident Management and Near Miss Procedures and other relevant IG documentation and processes.
5. Aid staff in reporting IG incidents on Datix when required, following already developed guidance.
6. Review and maintain local IG systems to ensure accurate reporting figures, along with the analysis of systems across the Health Board to ensure they are compliant with data protection legislation, and to take appropriate action if they are non-compliant.
7. Assist in reporting data breaches to the ICO and informing data subjects, where appropriate.
8. Support and advise other departments across the Health Board with completion of Data Protection Impact Assessments, asking poignant questions to identify data processing risks and to advise the departments concerned how to mitigate those risks. Work with project teams to enable them to become and remain legally compliant. Take responsibility for identifying & assessing complex and detailed data protection risk assessments on all proposed new flows of information and new systems across the Health Board.
9. Work autonomously as a data protection expert to improve data protection practice across the Health Board. This involves ad hoc and occasional formal training of staff at all levels, with exemplary communication skills to impart complex legislative knowledge in a way that can be interpreted and put into practice by all staff
10. Recognise gaps in data being given in order to ensure a situation or proposal can be fully analysed against legislation and good practice guidance
11. Review, update and monitor policies and procedures developed to ensure compliance with Data Protection legislation, Caldicott, Information Security, Records Management and other related national and local standards. This will require the application of legislation comprehension as well as practical experience and knowledge via audit.
12. Use available resources to keep abreast of IG matters, Cybersecurity, Information Security, Health Informatics & Technology topics (Intranet, internet, reading materials, conferences etc.).
13. Keep up to date with legislation in relation to data protection, Caldicott principles, confidentiality, Human Rights Act, Freedom of Information Act etc. and the latest policies and good practice guidance,
14. Provide operational support for the Health Board's annual IG assessment, Strategic Work Plan, collate evidence and create improvement plans, and provide updates as required.
15. Assist in devising and reviewing the IG audit plan and audit checklist for the Health Board, providing audit figures and reports for IGSC quarterly.
16. Continually review practice and apply lessons learnt to future work, providing recommendations to Departments on necessary IG improvements.
17. Support the department with the work required on the key Information Governance deliverables such as the Information Asset Register, Data Protection Impact Assessments, data sharing documentation, privacy notices and Subject Access Request support.
18. Supporting the Subject Access Requests (SARs), Individual rights, Third Party requests and requests under the Access to Health Records Act for Health Records within Hywel Dda University Health Board (HDUHB). Collaborate closely with Access to Health Records Clerks,

providing guidance and advice to ensure compliance with relevant legislation and policies. Key responsibilities include processing these requests efficiently, maintaining accurate records, and facilitating timely responses to requests. Playing a crucial role in training and supporting clerks, fostering a cooperative environment to enhance the overall management of health records.

19. Responsible for the operation of the Access to Health Records Information Request system, ensuring all information is recorded, response times are highlighted and any failures to respond are logged with reasons for non-compliance with statutory timescales. This post will also be responsible for adapting the system to meet any service delivery changes or changes in legislation.
20. Participate in the preparatory work and support when the IG Team or Health Board is audited by Internal Audit and External bodies, e.g. ICO.
21. Accurately produce reports, utilising databases as well as other systems such as Datix and Electronic Staff Record (ESR), to aid in reporting to the IGSC.
22. Maintain concentration for long periods of time in order to analyse, redact and interpret complex information in new knowledge areas, as well as to present complex reports on behalf of the IG Team, IGSC or senior managers where there may be barriers to understanding and interpretation.
23. Redaction of complex, sensitive medical information, when compiling a Subject Access Request and or Third-party Disclosure. This will involve reading sensitive or highly distressing information held in medical / mental health records and applying redactions in accordance with exemptions in Data Protection legislation.
24. Draft guidance documents, using research and own expert knowledge.
25. Offer advice and guidance on retention periods, following published recommendations, contributing to relevant updates and reviews as required.
26. Update IG Intranet pages / Share Point regularly to ensure they are current, accurate and relevant.
27. Write and publish newsletters for HDUHB's intranet site.
28. Ensure that all areas of own work are carried out in an economic and efficient way thereby contributing to the control of limited resources. Ensure stock/supplies are monitored and re-ordered in a timely manner to ensure all staff within the service have resources available to enable them to perform their role.
29. Make decisions in line with policies and procedures, or regarding workload priorities and use personal judgement to ensure that any problems arising are dealt with appropriately and recognise when issues require escalation
30. Ensure all equipment used within the team is working effectively, monitoring maintenance logs and reporting any issues.

Communication

31. Positively engage with stakeholders in the delivery of key tasks associated with requests for information.
32. Maintain a range of communication methods to ensure Health Board staff have access to up to date information about IG projects and services.
33. Answer enquiries, including those from members of the public and other organisations, in a professional and courteous manner, deploying diplomacy and sensitivity. Be able to deal with irate members of staff and/or the public, whether by telephone or email. Adapt

- communication style ensuring that the caller can understand the content and outcome of the call. Use initiative to know when to direct the call to a more senior member of the IG team or elsewhere. Ability to understand the complex nature of some queries and complaints.
34. Provide guidance to staff when requests for information include highly sensitive, complex or contentious information, this may involve meeting with staff to explain the use of the Serious Harm exemption within the Data Protection legislation, which will require negotiation on what information can be released.
 35. Utilise high levels of communication when liaising directly with external third parties, e.g. other Health Boards, Local Government Officers, Police, contractors, ICO and Welsh Government to obtain or process requests for information and create effective working relationships. Act with tact and discretion when nature of the subject is sensitive or contentious. Represent HDUHB on relevant IG and Security local and national groups.

Human Resources

36. Provide specialist IG training to staff within service as and when required. This role will also provide training in Information Rights annually to Departments/Medical Secretaries/ Patient Support and other services who regularly get requests from patients or staff.
37. Responsible for day-to-day line managing of IG officers and Access to Health Record Clerks, ensuring staff mandatory training is up-to-date and that their progress against PADR objectives is on target.
38. Ensure IG Officers / Access to Health Records clerks are trained in the safe use of all specialist equipment and software.

Be flexible and embrace change, adapting to the Department's and Organisation's evolving requirements where the focus of the role is likely to change over time and responsibilities reprioritised.

Undertake other duties appropriate to the nature of the role, as may reasonably be required of you, commensurate with your grade or general level of responsibility.

PERSON SPECIFICATION

Qualifications and Knowledge (Assessment method: application form)

Essential

- Degree level or equivalent management experience
- Further knowledge to postgraduate diploma level e.g:
 - Data Protection professional qualification e.g. BCS Foundation Certificate / Practitioner Certificate in Data Protection
 - Expert knowledge and understanding in the principles of the DPA, GDPR, FOIA and NHS Code of Confidentiality,
 - Expert knowledge in the areas of Caldicott, patient confidentiality, WASPI and information sharing, privacy notices, Data Protection Impact Assessments and information security
- Evidence of continuous professional development

Desirable

- Knowledge of risk management processes
- Knowledge of Health and Care Standards

Experience (Assessment method: application form and / or interview)**Essential**

- Previous information governance experience
- Previous breach/complaint management experience
- Previous Data Protection Impact Assessment support & approval experience
- Previous experience of report preparation and delivery
- Previous experience of dealing with complex and confidential issues

Desirable

- Previous information/IT security experience
- Previous auditing experience
- Previous project management experience
- Previous experience of working within the NHS or other healthcare setting
- Successful change management and negotiation experience
- Previous experience of risk assessment
- Experience of using Datix system

Skills and Attributes (Assessment method: interview)**Essential**

- Can demonstrate HDUHB values

Communication and Accuracy:

- Ability to communicate well with all levels of staff, patients and external organisations on a face-to-face basis, electronically and over the telephone
- Excellent oral, numerical and written skills

Analytical and Judgement Skills:

- Ability to make decisions in accordance with agreed departmental protocols
- Ability to work to agreed timescales

- Ability to analyse and interpret complex information

Planning and Organisational Skills

- Excellent time management skills, with the ability to re-prioritise as necessary in a changing environment, meeting agreed timescales

Professional Development

- Willingness and ability to learn new facts and put them into practice

Microsoft skills

- Word, Excel, PowerPoint, Outlook, Teams

- Ability to work both autonomously and as part of a team.

Desirable

- Database updating and web page maintenance, SharePoint

Other (Assessment method: application form and / or interview)

Essential

- Ability to work in a busy, sometimes stressful environment, and to deal with interruptions and changing priorities
- Professional and confident manner
- Self-motivated, dynamic and proactive
- Adaptable and flexible to meet any changing service needs with enthusiasm
- Highly confidential always
- Ability to deal positively with difficult situations e.g. verbal abuse from patients / staff on an occasional basis
- Commitment to embedding excellent information governance practices into all levels of staff and the organisation as a whole
- Ability to work effectively at home or away from agreed base but still within HDUHB's region
- Ability to travel within HDUHB's geographical area

Desirable

Welsh Speaker (*Level 1*)

Listening/Speaking: Pronounce Welsh words, place names, department names, etc. Greet and understand a greeting. Use basic every day words and phrases, e.g. thank you, please, excuse me, etc. Understand / pass on simple verbal requests of a routine / familiar / predictable kind using simple language, e.g. 'May I speak to...'. State simple requests and follow up with extra questions / requests in a limited way.

Reading/Understanding: Understand simple key words and sentences on familiar / predictable matters relating to own job area, e.g. on signs, in letters.

Writing: Fill in simple forms, note down simple information, e.g. date and venue of a meeting, Welsh address, etc.