

## JOB DESCRIPTION

<b>Job Title:</b>	<b>SWL ICB Head of Patient Information * includes Data Protection Officer (DPO)</b>
<b>Band</b>	<b>8C</b>
<b>Vacancy Reference Number</b>	<b>SWLCA17</b>
<b>Responsible to:</b>	<b>Deputy Director of Corporate Affairs</b>
<b>Accountable to:</b>	<b>Deputy Director of Corporate Affairs</b>
<b>Hours:</b>	<b>37.5</b>

### BACKGROUND:

NHS South West London Integrated Care Board works with partners from across the South West London Integrated Care System (ICS) to develop plans to meet the health needs of the population and secure the provision of health services, and is directly accountable for NHS spend and performance in South West London.

Integrated Care Systems (ICSs) are partnerships of health and care organisations that come together to plan and deliver joined up services and to improve the health of people who live and work in their area. Each ICS consists of two statutory elements:

- an Integrated Care Board, bringing the NHS together with its partners locally to improve health and care services
- an Integrated Care Partnership (ICP): the broad alliance of organisations and representatives concerned with improving the care, health and wellbeing of the population, jointly convened by the ICB and local authorities in the area.

ICBs are statutory NHS bodies responsible for planning and allocating resources to meet the four core purposes of integrated care systems (ICSs):

- to improve outcomes in population health and healthcare;
- tackle inequalities in outcomes, experience and access;
- enhance productivity and value for money and;
- help the NHS support broader social and economic development.

NHS South West London Integrated Care Board decides how the South West London NHS budget is spent and develops plans to improve people's health, deliver higher quality care, and better value for money.

NHS South West London Integrated Care Board as part of South West London Integrated Care System, is a partnership of organisations that come together to plan and deliver joined up

health and care services to improve the lives of people in our six boroughs: Croydon, Merton, Kingston, Richmond, Sutton and Wandsworth

## **Job purpose**

The post holder will be responsible for leading the ICB Patient Information team, which incorporates both the Information Governance (including Freedom of Information and Subject Access) and PALS & Complaints functions.

This is a key role within the Department, you will be a strong leader, with the ability to set and articulate a clear vision, goals, and priorities for your team.

In leading the Patient Information team, you will ensure the ICB delivers both an efficient, effective, high quality, professional and well-coordinated Information Governance service capable of meeting all statutory, regulatory and NHS Requirements and a high-quality PALS and Complaints service, that meets the needs of patients, carers, their families, our statutory responsibilities and which meets industry best practice.

The postholder will exercise sound judgement, providing advice that is routed in robust evidence and experience. They will build strong relationships across the ICB and ICS and become a trusted member of the team.

The postholder will be required to have regular contact with both internal and external stakeholders and will often need to engage with them over sensitive, complex, contentious, and confidential issues, to achieve agreement or co-operation and remove barriers to understanding.

## **Duties and Responsibilities**

The post holder will:

- Lead the SWL ICB Patient Information function to ensure that the organisation meets all its statutory and NHS responsibilities.
- Act as the SWL ICB Strategic lead on all matters relating to Information Governance and Data Protection. This includes Information Governance advice to projects, Subject Access Requests, Freedom of information Act requests, Data Security and Protection Toolkit and oversight of the management of SWL ICBs breach reporting process. The post holder will be a subject expert in field.
- Act as the SWL strategic lead for the PALS & Complaints function. This includes ensuring the team meets internal and external KPIs and statutory timeframes, that the PALS and Complaints processes meet regulatory requirements and that responses to complaints are appropriately drafted and have been correctly approved.
- Own and develop the strategic vision for SWL ICBs IG & Patient Information function securing support from senior business stakeholders.

- Work closely with the Heads of other Departments or Directorates to ensure that staff across SWL ICB understand and adhere to information management and governance rules and standards, intervening as appropriate.
- Work closely with the Heads of other Departments or Directorates to ensure that staff across SWL ICB understand and adhere to PALS & Complaints policies, standards and best practice, intervening as appropriate.
- Deal with complex and conflicting Information Governance subject matter problems and provide specialist expert advice and support to SWL ICB' Senior Information Risk Owner (SIRO) Caldicott Guardian and their deputies.
- Receive, Provide and Present highly complex information on all aspects of IG & Patient Information function in a clear, understandable and audience-appropriate manner to achieve cooperation, and eliminate barriers to understanding for senior management and board level groups, together with the wider ICS. Expert in the ICB
- Provide oversight, management and leadership to the provision of the GP DPO service.
- Transfers expertise and knowledge as appropriate regarding innovation issues throughout the team, department, directorate and ICB – including developing and delivering formal briefing/training to promote innovation.
- Be responsible for the development of and oversee the delivery of Information Governance training within the ICB. Promote and report innovative approaches to education and training, particularly their impact on service.
- Be responsible for relevant information management systems used in the Information Governance and PALS & Complaints processes, including but not exclusively the SWL ICB aspects relating to DSPT, Freedom of Information Requests, Subject Access requests, Information Governance Projects. Complaints, MP Enquiries and Patient enquiries (PALS).
- Provide support to the wider ICS partnership to meet their own obligations as required.
- This role will also include the **Data Protection Officer (DPO)** responsibilities:
  - Undertake the statutory function of the Data Protection Officer for SWL ICB
  - Informing and advising the ICB about complying with UK General Data Protection Regulation (GDPR) and other data protection legislation
  - Monitoring compliance with GDPR and data protection laws including staff training and internal audits
  - Cooperating with the ICO
- The job description and person specification are an outline of the tasks, responsibilities and outcomes required of the role. The job holder will carry out any other duties as may reasonably be required by their line manager.

- The job description and person specification may be reviewed on an ongoing basis in accordance with the changing needs of the Department or Directorate and the Organisation.

## **Key Working Relationships**

The post holder will be required to have regular contact internal and external stakeholders and will often need to engage with them over sensitive, complex, contentious and confidential issues.

They will need to:

- Participate in relevant internal and external working groups/projects, services and initiatives to provide project, information and analytical advice and expertise.
- Present Information Governance and Data Protection information and issues, explaining complexities, to a wide range of internal and external stakeholders.
- Liaise with other Managers to share best practice.
- Develop close collaborative working relationships with:
  - Deputy Director of Corporate Affairs.
  - Director of Corporate Affairs.
  - SWL ICB Senior Information Risk Owner (SIRO).
  - SWL ICB Caldicott guardian and deputies.
  - Data Protection Officers within SWL ICS Organisations.

## **Financial and Physical Resources**

Although the post holder will not have specific budgetary responsibilities, they will be expected to:

- Understand impacts of financial position in own area and that of the organisation.
- Balance policy aspiration and delivery, outline risk and benefits of different options to achieve value for money.
- Weigh up priority and benefits of different actions and activities to consider how to achieve cost effective outcomes.
- Be responsible for maintenance of all physical assets or supplies for the IG Service

## **Staff Management**

The post holder will be a key senior member of the Corporate Affairs department, as such they will be expected to demonstrate the following in their work and interactions across the ICB:

- Provide strong leadership, support and manage the SWL ICB IG & Patient Information team, ensuring that all statutory and legal timeframes are met as well as providing long term strategic leadership.
- Deliver, manage, and assure the quality of service delivered by the SWL IG & Patient Information Team. Contribute to the setting the standards for performance monitoring, reporting, KPIs and objectives for both the team and individual members.
- Manage, motivate and develop staff within the team and consider welfare and safety matters, taking into account instructions and guidelines issued.
- Create the long-term strategic plan for within the SWL ICB IG & Patient Information Team, clearly identifying links to wider Directorates within SWL ICB.
- To recruit for and performance manage the SWL ICB IG & Patient Information Team in the delivery of their responsibilities in a new and challenging environment.
- Develop and implement strategies for improving performance and setting the strategic direction for the team.
- Drive and lead development and improvement of processes.

### **Strategy/Policy and Service Development**

The post holder will be expected to:

- Lead the development of information governance strategies, policies and procedures.
- Be accountable for compliance with corporate policies and interpreting broad occupational policies.
- Develop plans, mitigate threats, and deliver strategic objectives.
- Contribute to the review and development of existing information management systems and contribute to the development of an integrated approach to project management.

### **Analytical and Judgment Skills**

- Deal with Highly complex facts or situations requiring analysis, interpretation, comparison of a range of options.

### **Other**

All members of the Corporate Affairs department will work on a flexible and matrix working basis. This may mean that, although the main elements of the job are included within this job description, you are asked to cover other areas of the Team's responsibilities. For example,

supporting SWL corporate meetings, the corporate helpline, or our FOI, complaints, and PALs responsibilities.

## **GENERAL DUTIES AND RESPONSIBILITIES**

### **Confidentiality**

In the course of employment staff will have access to confidential information relating to the ICBs business, patients, and staff. All members of staff are required to exercise due consideration in the way such information is used and should not act in any way, which might be prejudicial to the organisation's interests. If in any doubt advice should be sought from an appropriate manager before communicating information to a third party.

Confidential information should always be treated according to the ICB's rules on confidentiality. Any inappropriate disclosure may be subject to the ICB's disciplinary procedures.

### **Raising Concerns**

Staff may on occasion have genuine concerns about healthcare matters and consequently the ICB endorses the principle that these must be raised in a responsible and appropriate manner, and if necessary using the ICB's 'Raising Concerns (Whistleblowing)' policy.

### **Data Protection**

The ICB is registered under the Data Protection Act 1984. Staff are responsible for ensuring that they maintains the integrity and quality of both computerised and manual data. Personal data held by the ICB must not be used other than for legitimate purposes. If in any doubt advice must be sought from an appropriate manager.

### **Health and Safety**

Employees must be aware of the responsibility placed on them under the Health and Safety at Work Act (1974) to maintain a healthy and safe working environment for both staff and visitors. Employees also have a duty to observe obligations under the ICB's Health and Safety policies and to maintain awareness of safe practices and assessment of risk in accordance with the Risk Management Strategy.

### **Infection Control**

ICB staff are responsible for protecting themselves and others against infection risks. All staff regardless of whether clinical or not are expected to comply with current infection control policies and procedures and to report any problems with regard to this to their managers. All staff undertaking patient care activities must attend infection control training and updates as required by the ICB.

### **Financial Regulations**

All staff are responsible for the security of the property of the ICB, avoiding loss or damage of property, and being economical and efficient in the use of resources. Staff should conform to the requirements of the Standing Orders, Standing Financial Instructions or other financial procedures including the Code of Conduct and Accountability and the Fraud and Anti Bribery

Policies.

## **Safeguarding Children & Vulnerable Adults**

All employees are required to act in such a way that at all times safeguards the health and wellbeing of children and vulnerable adults. Compliance with mandatory and statutory training requirements is an essential requirement of all employees.

## **Risk Management**

Managers are responsible for implementing and monitoring any identified and appropriate risk management control measures within their designated area(s) and scope of responsibility. Responsibilities of staff with regard to risk management are outlined more fully in the Risk Management Strategy. Staff are responsible for ensuring that they are aware of those responsibilities.

## **Code of Conduct**

The Department of Health's Code of Conduct for NHS Managers has been adopted by the ICB for all Director-level and senior management posts. This requires the post-holder to comply with the Code and for his/her actions to demonstrate a commitment to the Code. In particular, the post-holder must:

- a) make the care and safety of patients his/her first concern and act quickly to protect patients from risk;
- b) respect the public, patients, relatives, carers, NHS staff and partners in other agencies;
- c) be honest and act with integrity;
- d) accept accountability for his/her own work, the performance of those he/she manages and of his/her own organisation;

Demonstrate their commitment to team working by co-operating with all colleagues in the NHS and in the wider community

## **Acceptance of Gifts and Hospitality**

The conduct of staff in the public service should be scrupulously impartial and honest and in this context any offers of gifts or hospitality should be discussed with your manager, prior to acceptance.

## **Equal Opportunities**

The post holder must at all times carry out his/her responsibilities with due regard to the ICB's Equality and Diversity Policies. The ICB is committed to ensuring equality of opportunity for all irrespective of their age, colour, creed, ethnic or national origin, marital status, nationality, physical or mental disability, race, religious belief, sex or sexual orientation.

## **No Smoking**

Smoking by staff, patients and visitors, will not be permitted anywhere on ICB premises.

### **General**

- The post holder may be required to work at any of the ICB's sites in line with the service needs.
- This job description provides an outline of the tasks, responsibilities and outcomes required of the role. The post holder will undertake any other duties that may be required which are consistent with the grade and responsibility of the post.
- This job description describes responsibilities, as they are currently required. It is anticipated duties will change over time and the job description may need to be reviewed in the future.
- All staff have a responsibility to participate in the ICB's Appraisal Scheme and to contribute to their own development and the development of any staff that they are responsible for appraising.



## Person Specification

### Head of Patient Information– Band 8c

#### Supporting Evidence

In the supporting evidence of your application form, you must demonstrate your experiences by giving specific examples for the criteria within the person specification.

Factors	Essential	Desirable	Assessment Method
<b>Education / Qualifications</b>			
Educated to masters level or equivalent level of experience of working at a senior level in specialist area.	√		A/I
Specialist in Data Protection, UK GDPR practitioner, Freedom of Information or master's in information governance	√		A/I
Should have an appreciation of the relationship between the Department of Health, the Strategic Health Authority and individual provider and commissioning organisations	√		A/I
In depth specialist knowledge around Information Governance	√		A/I
Practitioner certificate in Data Protection or Certified Data Protection Officer	√		A/I
ISEB Information Security Management Principles qualification or equivalent	√		
Evidence of continued professional development	√		A/I
Member of relevant professional body	√		A/I
<b>Knowledge and Experience</b>			
Significant experience of delivering Information Governance and DPO services at a senior level within a large public sector organisation	√		A/I
Previously responsible for a budget, involved in budget setting and working knowledge of financial processes	√		A/I

Significant experience in managing the delivery of DPO & Information Governance including complex FOI and Subject Access Requests at a senior level	√		A/I
Demonstrated senior experience of working in a PALS and Complaints role.		√	
Experience of undertaking complaints or adverse incident investigations		√	A/I
Knowledge of NHS Complaints regulations	√		A/I
Significant experience managing organisational Information Governance incidents and ICO reporting at a senior level	√		A/I
Experience of coordinating projects in complex and challenging environments	√		A/I
Expert level for completing the Data Security and Protection Toolkit return	√		A/I
Experience of managing stakeholders at all levels and across organisational boundaries	√		A/I
Experience working with the Information Commissioner and ombudsman	√		A/I
Experience of drafting briefing papers and correspondence for a senior audience	√		A/I
Experience of successfully setting up and managing internal processes and procedures	√		A/I
Experience of setting up and implementing internal processes and procedures.	√		A/I
Experience of managing and motivating a team and reviewing performance of the individuals.	√		A/I
<b>Skills and Abilities</b>			
Able to provide and receive highly complex, sensitive and contentious information, negotiate with senior stakeholders on difficult and controversial issues, and present complex and sensitive information to large and influential groups.	√		A/I

Ability to persuade board and senior managers of the respective merits of different options, innovation and new market opportunities.	√		A/I
Knowledge of NHS information requirements	√		A/I
Knowledge and understanding of NHS policy and Data Security and Protection toolkit	√		A/I
Knowledge of Freedom of Information Legislation & Data Protection Act	√		A/I
Knowledge of the UK General Data Protection Regulation (GDPR)	√		A/I
Highly developed specialist knowledge and understanding of with the field of IG	√		A/I
Ability to negotiate on difficult and very complex and detailed issues	√		A/I
Intermediate (or advanced) Keyboard skill – ability to use Microsoft Office package at intermediate (or advanced) level.	√		A/I
Ability to analyse highly complex facts and situations and develop a range of options	√		A/I
Ability to carry out procurements for highly detailed, high value contracts that require analysis, comparison and assessment	√		A/I
Ability to make decisions autonomously and on difficult and contentious issues where there may be a number of courses of action.	√		A/I
Ability to anticipate and resolve problems before they arise.	√		A/I
Skills for delivering results through managing through others and using a range of levers in the absence of direct line management responsibility.	√		A/I
Skills for managing relationships with a range of different stakeholders.	√		A/I
<b>Other</b>			
Ability to work as part of a team and work flexibly to provide support to other departments and teams as and when necessary	√		A/I

Demonstrates commitment to NHS and organisational values and behaviours	√		A/I
Demonstrate commitment and role model behaviours and actions that support equality, diversity, belonging and inclusion	√		A/I
Strong compassionate and inclusive leadership	√		A/I

#### Assessment Method

A = Application	I = Interview	C = Certificate	T = Test
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