

JOB DESCRIPTION

Job Title:	Information Governance Lead and Data GP Protection officer
Band	Band 8B
Vacancy Reference Number	SWLPIT03
Responsible to:	SWL ICB Head of IG and Patient Information
Accountable to:	Deputy Director of Corporate Affairs
Hours:	37.5

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 the delivery of the Data Protection Officer role for GP practices (Including Primary Care Network and GP Federations) and will deputise for the Head of Patient Information as required.

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.

This role will provide thought leadership on data protection legislations requirements in the context of emerging Integrated Care Systems (ICS). To include projects concerned with interoperability, large scale analytics, and citizen facing digital solution ensuring individuals rights and privacy of their personal data is respected processed in line with the latest data protection legislation.

In deputising for the head of department in their IG function the post holder will assist to 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.

The role will be responsible for work that is highly complex in nature and will have involvement from a range of organisations, services, stakeholders at a regional and national level. Responsible for the development and management of data protection legislation agenda and work collaboratively across the health landscape with PCNs, GP Practices and other organisation to provide a professional and effective Data Protection Officer role.

Leading on the development and delivery of policy, strategy, guidance to provide advice and guidance to support compliance with the following legislation:

- General Data Protection Regulation (GDPR) and UK GDPR
- Data Protection Act 2018
- The Freedom of Information Act 200 (FOIA)
- Environmental Information Regulations 2004 (EIR)
- Re-use of Public Sector Information Regulations 2015 (RPSI (R)

In all aspects of this work, you will exercise sound judgement, providing advice that is routed in robust evidence and experience. You will build strong relationships across the ICB and become a trusted member of the team.

The post holder will need initiative and a proactive approach to be able to identify and access the relevant information required.

The post holder will be able to demonstrate an ability to communicate with a wide range of people and circumstances.

Duties and Responsibilities

The post holder will work as part of a dynamic team in delivering an effective service supporting staff to manage incoming requests and cases in relation to Information Governance projects, breaches, Freedom of Information requests, Subject Access requests, MP Enquiries, Complaints and PALS, with a focus on managing the Information Governance service.

The post holder will ensure that their work stream is planned and managed effectively and take the lead in assuring successful delivery, they will:

- Deputise for the Head of Department and support them in leading the SWL ICB Information Governance (IG) function to ensure that the organisation meets all its statutory and NHS responsibilities
- Be the named Data Protection Officer for GP practices (including Primary Care Networks) providing expert knowledge and advice to deliver all statutory aspects of the mandatory Data Protection Officer role required to fulfil the ICB GP IT contract responsibilities.
- Provide expert knowledge engaging and co-ordinating data protection compliance programmes with other third-party ICS organisations, PCNs, GP Federations, care homes, voluntary sector and local authorities, with specialist knowledge regarding the NHS Digital Data Security and Protection Toolkit.
- Act as the first point of contact for the Information Commissioner's Office and responding to concerns raised in relation to data protection matters for the organisations supported.
- Provide expert knowledge, advice and recommendations to support the ICB, Information Governance service desk function and staff in relation to co-ordinating and handling general and complex areas of data protection legislation.
- Be responsible for escalating any relevant risks, serious matters to the SIRO/Deputy SIRO in relation to data protection legal responsibilities.
- Provide GP practices and other third-party organisations supported by the ICB DPO service opportunity to discuss and progress Data Security and Protection toolkit compliance by offering bespoke assistance and documentation.
- Consult and review on Data Protection Impact Assessments (DPIAs) for proposed new processes and systems for the processing of personal data. Providing guidance and templates for undertaking DPIAs, making recommendations for improvement and risk mitigations for final review and agreement by the ICB partners/board and the services supported.

- Provide reports in relation to DPO activities to the designated ICB committee/s, GP community and other third-party ICS organisations as required. (Including to board level and SIRO reporting, at least annually).
- Co-ordinate meetings with the Deputy SIRO and other ICT and IG officers within the directorate to progress work plans and updates on the DPO business activities.
- To produce and maintain IG policies, procedures and templates tailored especially for GP practice and/or other third-party ICS organisation services supported by the ICB. Ensuring they are promoted and made available to organisation to support Data Security compliance.
- Provide guidance on information incidents (including personal data breaches) management and investigations in accordance with national policy. Supporting the GP practice/clients with escalation process and queries on recommendations and lessons learnt which should be incorporated within the process.
- Provide tailored training to meet the needs of the Data Protection Officer service provided by the ICB.
- Raise awareness in relation to data protection legislation across the GP community and third-party ICS organisations via webinars, meetings, training sessions, bulletins, and other media.
- Work in conjunction with the designated ICB Data Protection Officer, other IG leads, ICT staff and wider ICB colleagues to promote and deliver a high standard DPO service on behalf of the organisation.
- Maintain evidence in the form of documentation and logs of DPO service provisions and the advice provide.
- Develop policies, procedures, templates and communications and engagement material and plans for programmes work relating to data protection legislation and information governance activities.
- Ensure that the ICB, directors, senior managers and staff have the right information and advice to inform effective decision making to provide Data Protection Officer services.
- Produce and present critical and timely programme progress updates/reports/ presentations.
- Communicate priorities to GP practices, and wider ICS community to motivate people to change pathways and other ways of working.
- To inspire colleagues and ICS partners towards continuous improvement and the delivery of excellent service through encouraging and supporting individual ideas and initiative.

- Effectively engage with a wide range of internal and external stakeholders, at ICB, provider and third-party level, to facilitate the Data Protection and Information governance priorities.
- Prepare reports and undertake presentations to groups of staff and stakeholders, as required.
- Carry out one to one or group training and presentations to CCG staff or wider stakeholders.

Key Working Relationships

- SWL ICS General Practice
- Relevant members of staff and subject matter experts across the ICB
- 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.

Staff Management

The post holder will lead the team and take responsibility on the development, implementation and on-going management of any relevant data protection legislation changes or transformation schemes, including the delivery of an annual programme of works to improve the Data Protection Officer service to deliver substantial benefits for the organisations supported by the ICB DPO service.

- Build strong relationships and collaboration working effectively with colleagues, GP Practices and ICS organisations to provide complex data protection advice and guidance in line with current local and national guidance.
- To provide expert advice, guidance and training on relevant aspects of data protection and information governance compliance monitoring and maintenance in respect of the service functions supported by the Data Protection Officer.
- To support the Head of Information Governance and Patient Information by being actively involved in strategic planning and Data Protection legislation compliance.
- To actively engage with GP practices and third-party organisations to gain feedback and learning from them to improve procedures and service delivery.

- Ensure that the data protection officer maintains business focus, have clear authority and that the context, including risks are actively managed in alignment with the strategic priorities of the NHS
- Actively support and contribute to the development of service improvement initiatives for successful assessment of performance for the Data Protection Officer service.
- Take the lead in supporting GP practices and third-party organisations, coordinating training and engagement sessions as necessary to improve knowledge and provide evidence for the organisations Data Security and Protection Toolkit.
- Continually communicate with staff, helping to clarify goals and activities and the links between these and Departmental strategy.
- Recognise, respect and reward the contribution and achievements of others, valuing difference.
- Act as a team player, investing time to generate a common focus and genuine team spirit.
- Readily share resources to support higher priority work, showing pragmatism and support for the shared goals of the organisation
- Deal with conflict in a prompt, calm and constructive manner including dealing with performance and work allocation issues as necessary.
- Encourage collaborative team working within own team and across the ICB.
- Identify and address team or individual capability requirements and gaps to deliver current and future work including managing staff recruitment.
- Develop and promote quality assurance and continuous improvement initiatives within the team.
- Identify and develop all talented team members to support succession planning, devoting time to coach, mentor and develop others.
- Continually seek and act on feedback to evaluate and improve their own and team's performance.
- Actively promote diversity and equality of opportunity inside and outside of the
- Role model the values and behaviours of the organisation

Financial and Physical Resources

Although this post has no specific budgetary responsibilities, the post holder 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.
- Understand that all actions have a cost and choose the most effective way to do something in a resource efficient way.
- Ensure that recognised control procedures and practices are maintained.

Strategy/Policy and Service Development.

- Responsible for policy and procedure development and implementation in relation to the GP practice Data Protection Officer service, ensuring that they remain up to date in line with the latest guidance and legislation.
- To develop a systematic approach to information governance with clear systems of prioritisation, change management and control.
- Development and management of standardised information governance assurance framework and associated risk management framework. Ensure frameworks are tailored to meet specific requirements.
- Development of bespoke policies, protocols, and procedures. With supporting intranet pages, guidance and training.
- Propose changes to the Information Governance function and make recommendations for more effective delivery.
- Change management and process development, develop and deliver a change management framework, including risk assessments and Data Protection Impact Assessments (DPIAs) to cover new/changed systems and processes. Support Senior Responsible Officers through the process to deliver change to the required standard.
- Contribute to the review and development of existing project information management systems and contribute to the development of an integrated approach to project management.

Analytical and Judgmental 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 ICB's 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 maintain 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

All staff are expected to comply with their responsibilities as set out in the NHS Constitution. All senior management and director level posts are required to abide by the Code of Conduct for NHS Managers. Equally the ICB will protect your rights and honour the NHS pledges to you as set out in the Constitution.

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

GP Data Protection Officer and Information Governance Lead– Band 8b

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
Education / Qualifications			
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			
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
Knowledge and Experience			
Must be able to provide and receive highly complex, sensitive or contentious information, negotiate with senior stakeholders on difficult and controversial issues, and present complex and sensitive information to large and influential groups	√		A/I
Significant experience of delivering Information Governance and DPO services at a senior level	√		A/I
Demonstrable experience of managing Information Governance, Freedom of Information Act requests and Data Subject Access requests in a complex organisation	√		A/I
Demonstrated senior experience of working in a PALS and Complaints role.	√		A/I
Significant experience of communicating with a wide range of people and in varied, sometimes challenging. Circumstances	√		A/I
Significant experience of successfully operating in a	√		A/I

politically sensitive environment			
Problem solving skills and ability to respond to sudden unexpected demands	√		A/I
Previously responsible for a budget, involved in budget setting and working knowledge of financial processes	√		A/I
Demonstrated experience in a Healthcare environment	√		A/I
Expert level for completing the Data Security and Protection Toolkit return	√		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
Skills and Abilities			
Developed communication skills for delivering key messages to a range of stakeholders both internal and external (including outside the NHS) to the organisation, some at very senior level	√		A/I
Good presentational skills for conveying complex concepts and use persuasion to influence others	√		A/I
Ability to understand a broad range of highly complex information quickly and making decisions where opinions differ/no obvious solution	√		A/I
Intermediate (or advanced) Keyboard skill – ability to use Microsoft Office package at intermediate (or advanced) level.	√		A/I
Ability to identify risks, anticipate issues and create solutions and to resolve problems in relation to project or service delivery	√		A/I
Demonstrated capability to plan over short, medium and long-term timeframes and adjust plans and resource requirements accordingly;	√		A/I
Ability to work without supervision, providing specialist advice to the organisation, working to tight and often changing timescales Interpreting national policy for implementation	√		A/I
Other			
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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