

## Working for North London Mental Health Partnership

The partnership between **Barnet, Enfield, and Haringey Mental Health NHS Trust (BEH)** and **Camden and Islington NHS Foundation Trust (C&I)** is going from strength to strength since it was originally established in 2021 forming the **North London Mental Health Partnership**.

### Why choose to join the Partnership?

- We believe that by working together, our two Trusts can achieve more for the residents of North Central London and our patients than we can by working apart.
- Deliver the best care using the most up-to-date practice in supporting those with mental health illnesses.
- Transforming and creating a positive environment for our service users, staff, and visitors.
- Creating and working together to become a great place to work for all our staff.
- We offer flexible working, a wide range of health and wellbeing initiatives, NHS Pension and so much more.
- Generous Annual Leave Allowance
- NHS Discounts in a large variety of retail stores and services.
- We have excellent internal staff network support groups.

The postholder will need to be comfortable working in an environment of complex matrix management arrangements and will at all times behave and align with our Trusts' values and cultural pillars:



## JOB DESCRIPTION & PERSON SPECIFICATION

<b>Job Title</b>	Information Governance Compliance Manager
<b>Band</b>	8a
<b>Hours Of Work</b>	Full time
<b>Location (BEH, C&amp;I, Both)</b>	Both
<b>Specialty/Department</b>	Digital and Information
<b>Accountable To</b>	Partnership Head of Information Governance and DPO
<b>Responsible To</b>	Chief Digital and Information Officer

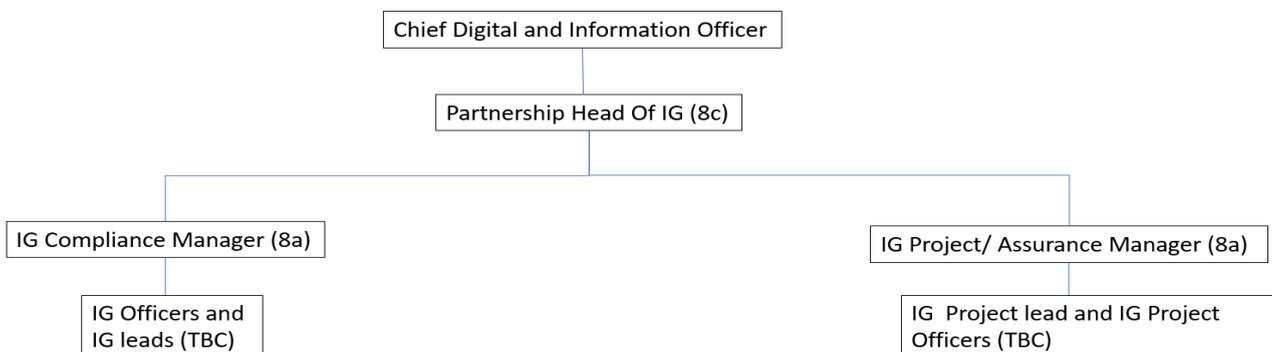
### 1. Job summary

The post holder will be responsible for managing compliance with the Information Governance and Data Protection agenda across the partnership and will take the lead in the development and management of compliance with the Information Governance Framework, and for delivering the Trust's annual Data Security and Protection Toolkit each year.

The post holder will be responsible for developing, implementing, monitoring, and auditing Information Governance compliance incorporating Data Protection, Confidentiality and, where appropriate, Information and Cyber Security.

The post-holder is responsible for the effective management and coordination of medical records and information requests and will provide leadership in the appropriate management of Subject Access Requests and Freedom of Information request to meet legislative timeframes.

### Organisational Position



## **2. Relationships/Communications**

The postholder is expected to establish and maintain positive interpersonal relationships with other staff members characterised by trust, mutual respect, and open, honest communication.

### **Internal Relationships**

Digital senior management team, Executive Directors, SIRO, Caldicott Guardian, Clinical Divisions, Risk and Incident team, Partnership Head of Information Governance & DPO and the Information Governance Project Manager, IG Officers

### **External Relationships**

Partner organisations across NCL and Greater London, Information Commissioner's Office, London IG forum, NHS Digital, third party suppliers, Police, Internal Audit

## **3. Key Responsibilities**

- Develop and co-ordinate effective Information Governance compliance within the organisation and with partner organisations.
- Be responsible for the overarching management and coordination across the Trust of the various components of compliance across the Information Governance agenda.
- Understand best practice within the field of Information Governance and Data Protection compliance and ensure that this is communicated clearly and acted upon effectively, in particular to implement compliance with national guidance and legislation across the partnership.
- Research and keep up to date with legislation to ensure all advice on compliance is in line with the requirements of the DPA.
- Ensure the organisation successfully manages the risk associated with Information Governance through Trust-wide standards and compliance with those standards and associated audits.
- Establish procedures for reporting and investigating IG breaches across the Trust; co-ordinating with divisional, corporate and team leads, where necessary to assess the level and impact of the breach and provide guidance to staff appropriately, ensuring correct reporting in line with Data Protection and NHS guidelines and ensuring investigation recommendations are implemented.
- Provide advice and guidance to members of staff and other stakeholders on compliance with information governance legislation.

- Promote the value and importance of effective information governance throughout the organisation through regular reports and communications on information governance matters.
- Undertake, or direct the design of local audits of compliance to Information Governance standards and coordinate all statutory and external audits of Information Governance topics.
- Develop, manage and evaluate stakeholder relationships to enable the delivery of IG compliance.
- Manage compliance with information governance related legislation and standards including the appropriate design, and effective monitoring of KPIs and metrics.
- Investigate and respond to complaints relating to Data Protection and other areas of Information Governance
- Produce regular reports and updates for the Trust Information Governance Group and other groups as required.
- Lead on the Information governance training agenda including specialist training as specified in the Training need analysis (TNA).
- Lead on the cyber security agenda working with various subject matter experts across the organisation.
- Support implementation and delivery of the Trust's annual IG work programme. This will include a Trust wide review of compliance and completion of action plans to address any areas which fall short of the Trust standard.
- Support the Head of IG with the Trust's Information Governance Steering Group, write papers and organise relevant content for the Group. Deputise meeting as and when required.
- Actively work with service managers and other stakeholders to ensure that the information governance processes meet the objectives of the Partnership and UK GDPR compliance.
- Undertake or direct the design of local audits of compliance to Information Governance standards and coordinate all statutory and external audits of Information Governance topics.
- To be the Partnership's focal point for expert advice on Information Governance matters.

- Deputise for the Head of IG and Data Protection Officer as and when required.
- To provide specialised knowledge, consultancy and expert advice to Partnership staff in a consistent way across all aspects of Information Governance. The nature of the role demands that highly complex and contentious, statutory and regulatory requirements are implemented across the organisation and understood by all staff members.
- To be responsible for the development of training, delivery and oversee the on-going review of the IG training programme across the Trust.
- To provide and develop information governance awareness material and to provide training on information governance and records management; including information rights, confidentiality and information security to groups of staff.
- To liaise with the Information Commissioner and the partnership solicitors where litigious issues arise.
- Undertake such duties as may be required from time to time as are consistent with the responsibilities of the grade and the needs of the Service.
- Support the Information Governance in terms of managing incidents including serious data breaches where they are reportable to ICO.
- Support with the various internal and external audits including ICO audits.
- Day-to-day management of data security & protection service provision to all users ensuring the Trust's compliance with the General Data Protection Regulation, Data Protection Act 2018, Access to Health Records Act 1990 and those regulations that supersede or supplement these from time to time.
- This role description is intended as a basic guide to the responsibilities of the post and is not exhaustive and may be subject to review in consultation with the post holder.

#### **4 Financial responsibilities**

- Budget holder for the Information Governance Medical Records and FOI team
- Manage the contracts for off-site records storage, ensuring best value and continued appropriateness for Trust requirements

#### **5 Responsibility for Human Resources**

- Line Management of teams responsible for FOI and SAR compliance providing leadership, direction and motivation through objective setting, regular performance reviews, training, and development in line with appropriate policies, procedures, working practices and guidelines, ensuring all resources are deployed to maximise an efficient and effective delivery of support services to patients and users.
- Responsibility for our own staff for appraisals; sickness absence; disciplinary; grievance matters; recruitment and selection decisions; personal and career development.
- Lead the training programme for the training of confidentiality, information security and other information governance subjects, in conjunction with the Trust's Learning and Development team.
- Develop and deliver face-to-face training sessions to staff as required.

## **6 Responsibility for Administration**

- Support with various Information Governance meetings including the Trust's Information Governance Steering and writing papers. Deputise meetings as and when required.
- Support with high level KPI reports for the Board and Executive Directors.

## **7 Responsibility for IT and Digital Systems/Services**

- Work with the IG Projects Manager to administer the Trust's Information Governance Group, working with the Head of IG to ensure robust agendas and adequate assurance of Trust compliance to the Trust Board.
- Be responsible for the annual submission of the NHS Data Protection and Security toolkit, delivering plans to meet all mandatory assertions and ensuring that there is a robust evidence base for audit purposes.
- Keep up to date with relevant technologies, new techniques and developments that might occur and provide training to others if required.

## **8 Clinical Responsibilities**

- Responsibilities for establishing and maintaining communication and relationships both internally and externally.
- Use of analytical and judgmental skills

- Responsible for the effective management and coordination of medical records and information requests and will provide leadership in the appropriate management of Subject Access Requests and Freedom of Information requests to meet legislative timeframes.
- Support patients with access request, complaint resolution and any data compliance concern within the legislative timeframe.

## **9 Operational Responsibilities**

- As stated in the key responsibilities.

## **10 Policy / Service Development**

- Lead on the formulation, implementation, and refresh of a robust Trust-wide Information Governance compliance framework with associated suite of Information Governance documentation including Policies; Standard Operating Procedures (SOPs); Codes of Practice (CoPs); Guidance Notes, Registers and Templates.
- Develop, maintain, and deliver the Trust's annual IG compliance work programme. This will include a Trust-wide review of compliance and monitoring of action plans to address any areas which fall short of Trust standards.
- Support the Head of Information Governance in developing and implementing a Trust wide medical records archive strategy.
- Contribute to the development of a culture of openness allowing appropriate information to flow freely.
- Develop strategies and plans to promote and develop good information governance practices across the organisation.

## **11 Research And Development**

- Support with internal and external audits of compliance in information governance.

## **12 General**

- All staff are responsible for continual compliance with CQC standards and outcomes.

- The postholder must be aware of, and work in line with, the Trust's Safeguarding Adults and Children procedures.
- Use of physical effort
- Use of mental effort
- Use of emotional effort
- Working conditions such as extreme heat/cold, noise, fumes, spills of harmful chemicals, dealing with aggressive patients, client, relatives, or carers
- Plus, any other duties not previously included in previous categories

### **13 Personal Development**

All staff are required to be appraised by their line managers at least once a year at a personal development review meeting where progress made over the last year is discussed and agreed. Focus on the following year's departmental and personal objectives will be identified, discussed, and agreed. Where necessary, help and support will be provided, and development opportunities agreed in line with service provision and the knowledge and skills competency framework.

### **Mandatory Trust Responsibilities**

#### **Amending The Job Description**

This is a newly created role, and it is expected that as the organisation develops and changes, it may be necessary to vary the tasks and/or the responsibilities of the postholder. This will be done in consultation with the postholder, and it is hoped that agreement can be reached on any reasonable changes.

#### **Probationary Period**

This post is subject to the requirements of a six-month probationary period scheme for new staff only.

#### **Confidentiality**

The post holder must always maintain complete confidentiality of the material and information that they handle. Any matters of a confidential nature, in particular, information relating to diagnoses and treatment of patients and individual staff records must not, under any circumstances, be divulged or passed on to any unauthorised person or persons. The postholder must respect patient named confidentiality in keeping with “**Caldicott principles**”.

## **Code Of Conduct**

North London Mental Health Partnership has a code of conduct for all non-registered staff in a direct care role. As an employee of the Partnership, you are expected to always comply with this code, and any breach of it whilst in practice will be investigated by the Trust.

Copies of the code of conduct can be obtained from the Human Resources Department and it is also available on the Camden and Islington NHS/Barnet Enfield and Haringey intranet.

## **Data Protection**

All staff who contribute to patients’ care records are expected to be familiar with, and adhere to, the Trust’s Standards of Records Keeping Policy. Staff should be aware that patients’ care records throughout the Trust will be subject to regular audit.

All staff who have access to patients’ care records have a responsibility to ensure that these are maintained efficiently, and that confidentiality is protected in line with the Trust’s Confidentiality of Health Records Policy.

All staff have an obligation to ensure that care records are maintained efficiently, and that confidentiality is protected. Staff are also subject to this obligation both on an implied basis and also on the basis that, on accepting their job description, they agree to maintain both patient / client and staff confidentiality.

In addition, all health professionals are advised to compile records on the assumption that they are accessible to patients in line with the Data Protection Act.

## **Professional Registration**

If you are employed in an area of work which requires membership of a professional body in order to practice (e.g., Nursing & Midwifery Council for nurses), it is a condition precedent of your employment to maintain membership of such a professional body. It is also your responsibility to comply with the relevant body’s code of practice. Your manager will be able to advise you on which, if any, professional body of which you must be a member.

You are required to advise the Trust if your professional body in any way limits or changes the terms of your registration.

Failure to remain registered or to comply with the relevant code of practice may result in temporary downgrading, suspension from duty and/or disciplinary action, which may result in the termination of your employment.

If you are required to have registration with a particular professional body or to have specific qualifications you must notify your manager on appointment of such fact and provide him or her with documentary evidence of them before your employment commences or, at the latest, on your first day of employment. Furthermore, throughout your employment with the Trust, you are required on demand by your manager to provide him or her with documentary evidence of your registration with any particular professional body or in respect of any required qualifications.

## **Risk Management**

All Trust employees are accountable, through the terms and conditions of their employment, professional regulations, clinical governance and statutory health and safety regulations, and are responsible for reporting incidents, being aware of the risk management strategy and emergency procedures and attendance at training as required.

All staff have a responsibility to manage risk within their sphere of responsibility. It is a statutory duty to take reasonable care of their own safety and the safety of others who may be affected by acts or omissions.

All managers throughout the organisation have a responsibility to ensure that policies and procedures are followed, that staff receive appropriate training, that a local risk register is developed and monitored on a quarterly basis and any changes reported to the Clinical Governance Committee and Risk and Assurance Committee.

Managers are responsible for implementing and monitoring any identified risk management control measures within their designated area/s and scope of responsibility. In situations where significant risks have been identified and where local control measures are considered to be potentially inadequate, managers are responsible for bringing these risks to the attention of the Clinical Governance Committee or Risk and Assurance Committee if resolution has not been satisfactorily achieved.

## **Policies & Procedures:**

The post holder will be expected to comply with all statutory legislation, Trust Financial Framework Guidance and approved national and local policy. The postholder is also expected to be aware of the Trust's Risk Management Strategy which includes the responsibilities placed on them by Health & Safety at Work etc. Act (1974) and the Clinical Governance Framework. All employees are expected to comply with all Trust Policies and Procedures.

## **Safeguarding**

The Trust is committed to safeguarding and promoting the welfare of children, young people, and vulnerable adults. All staff are expected to implement the Trusts' Safeguarding policies and procedures, act promptly on concern, communicate effectively and share information appropriately.

### **Health And Safety**

Employees must be aware of the responsibilities placed on them by the Health & Safety at Work etc. Act (1974) to ensure that the agreed safety procedure is carried out to maintain a safe environment for the other employees and visitors.

### **Infection Control**

Employees must be aware of the responsibilities placed upon them by The Health Act (2007) to ensure they maintain a safe, infection-free environment. This includes the knowledge and understanding of the management of infected patients and the principles of Standard Infection Control Precautions including the correct technique for Hand Washing and the appropriate use of Personal Protective Equipment (PPE)

### **General**

The post holder will be expected to comply with all statutory legislation, Trust Financial Framework Guidance and approved national and local policy.

The postholder will be expected to be responsible for his/her continuing professional development and to take a proactive approach to maintaining personal and professional effectiveness in an evolving role.

The duties and responsibilities described in this Job Description are intended to be indicative but not exhaustive of the responsibilities of the postholder. As the Trust develops, the requirements of the job may change and the postholder is expected to adapt to these changes.

### **Equal Opportunities Policy**

The Trust operates in a multi-ethnic area. All members of staff are expected to take into account the need for equality in all areas of work.

All employees are expected to abide by the Trust's equal opportunities policy, failure to do so could result in disciplinary action up to and including dismissal.

## Person Specification

<b>Post Title:</b>	Information Governance Compliance Manager	<b>Grade:</b>	Band 8a	<b>Review Date:</b>	TBC
<b>Specialty</b>	Information Governance	<b>Division</b>	Digital and Information		
<b>Org Name</b>	North London Mental Health Partnership				

REQUIREMENTS	ESSENTIAL	DESIRABLE	Assessment Type Interview (I) /Test (T) /Application (A)
<b>EDUCATION AND QUALIFICATIONS</b>	<ul style="list-style-type: none"> <li>Master's level degree or equivalent proven experience in Information Governance</li> <li>Industry recognized and accredited training/qualification in Information Security Management and/or Data Protection</li> </ul>	<ul style="list-style-type: none"> <li>First degree or equivalent qualification in an IT/IG related subject</li> </ul>	A / I

	<p>For instance:</p> <ul style="list-style-type: none"> <li>• Specialist in Data Protection GDPR training, Freedom of Information, or master's in information governance</li> <li>• In depth specialist knowledge around Information Governance</li> <li>• Certified Auditor qualification e.g., ISACA</li> <li>• Information systems qualification</li> <li>• Cyber Security</li> <li>• Project Management qualification/ experience</li> </ul>		
<p><b>EXPERIENCE AND KNOWLEDGE</b></p>	<ul style="list-style-type: none"> <li>• In-depth knowledge and practical application of current Data Protection legislation and NHS Caldicott Principles</li> <li>• Practical experience in the application of the Freedom of Information Act 2000, Environmental Information Regulations 2004, Access to Health Records Act and associated codes of practice.</li> <li>• Practical experience of implementing the Information Governance agenda.</li> <li>• Practical experience of developing and delivering interactive training sessions</li> <li>• Experience of records management and archiving, preferably within the NHS</li> <li>• Knowledge of information security principles</li> <li>• Budget management</li> <li>• Expert knowledge, understanding and application of the NHS Data Security and Protection Toolkit</li> <li>• Proven experience of line managing staff</li> <li>• Experience in information asset management</li> </ul>	<ul style="list-style-type: none"> <li>• Management experience in the NHS or equivalent environment</li> <li>• Awareness of NHS structures and working practices</li> <li>• Practical experience of implementing the Information Governance agenda within an NHS setting.</li> </ul>	<p>A/I</p>

<b>SKILLS AND ABILITIES</b>	<ul style="list-style-type: none"> <li>• In depth knowledge of IG and use of information within the Health and Social Care sector</li> <li>• In-depth knowledge of MS office, Excel, Word, Access, Outlook etc.</li> <li>• Highly developed specialist knowledge of Microsoft environments</li> <li>• Line Management skills</li> <li>• Knowledge of NHS Information requirements, including Monitor Compliance Framework.</li> <li>• Knowledge and understanding of NHS policy.</li> <li>• Expertise in completion of Data Security and Protection Toolkit</li> <li>• Demonstrate the ability to solve problems and make decisions within the parameters of the job role e.g., assessing and dealing with queries relating to Information Governance</li> <li>• Demonstrate the ability to plan, organise and prioritise workload according to the demands of conflicting and unpredictable requests.</li> <li>• Knowledge of data and cyber security</li> <li>• Possess excellent communication skills in order to provide and receive information which may be</li> </ul>		A/I

	<p>complicated.</p> <ul style="list-style-type: none"> <li>• Ensure information is accurate, consistent and of the best quality, with internal and external clients.</li> <li>• Create reports to summarise and analyse data from various sources and to then present this to a wider audience.</li> <li>• Knowledge of the General Data Protection Regulation (GDPR)</li> <li>• Knowledge and understanding of cyber security.</li> <li>• Knowledge of Service Level Agreements, policies, and procedures</li> <li>• Experience of drafting information sharing agreements</li> <li>• Experience of drafting and completing data protection impact assessments (DPIAs)</li> </ul>		
<p><b>PERSONAL QUALITIES</b></p>	<ul style="list-style-type: none"> <li>• Excellent communication skills both written and oral.</li> <li>• Ability to work with and influence senior colleagues including negotiation and persuasion skills.</li> <li>• Ability to foster and maintain positive working and customer relationships.</li> </ul>		<p><b>A/I</b></p>

	<ul style="list-style-type: none"><li>• Ability to work in a confidential manner.</li><li>• Ability to recognise own and others development needs and find appropriate solutions.</li><li>• Ability to respond effectively to changing priorities, to manage timeframes with the ability to meet deadlines.</li><li>• Self-motivation and ability to motivate others.</li><li>• Excellent planning and organisational skills.</li><li>• Ability to think creatively and identify solutions to overcome problems.</li></ul>		
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