



## JOB DESCRIPTION

### 1. JOB IDENTIFICATION

<b>Job Title:</b>	INFORMATION GOVERNANCE & CYBER ASSURANCE MANAGER
<b>Responsible to:</b>	Head of IM&T/eHealth Lead
<b>Department &amp; Base:</b>	IM&T
<b>Job Reference Number:</b>	052400
<b>Band &amp; Salary:</b>	Band 8B

### 2. JOB PURPOSE

To lead, direct, and develop the strategic and operational management functions of Information Governance, Data Protection (Data Protection Officer for organisation), Cyber Assurance and Records across NHS Borders; including with the Health and Social Care Partnership and the South East Region.

To provide highly specialised and complex advice and leadership to ensure that NHS Borders is able to meet its legislative obligations and operate within the overarching NHS Scotland and Scottish Government Information Governance policies and principles to protect patient, staff and organisational information. This includes all relevant Scottish, UK and European legislation, including the Data Protection Act and Civil Contingencies Act, Network Information Systems Regulations 2018 as well as professional requirements and guidelines such as Caldicott Guidelines.

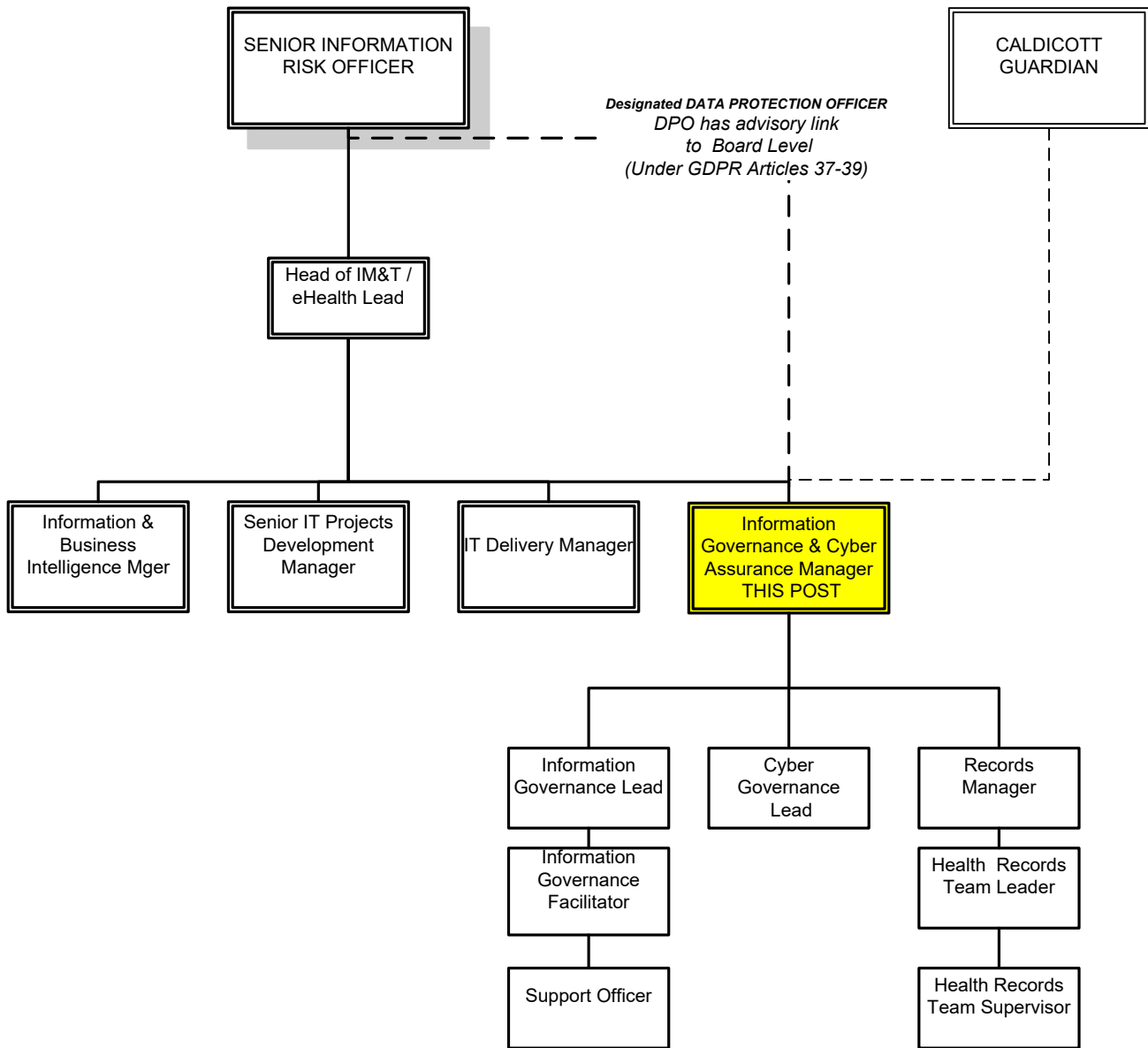
To minimise any identified risks to patient, staff and organisational information, reporting regularly to the Caldicott Guardian and Senior Information Risk Owner (SIRO) on Information Governance and Security issues

To ensure that appropriate governance information systems and process are in place, operated, maintained and configured to protect NHS Borders information collateral including patient, staff and corporate information assets.

### OUR VALUES IN ACTION

Care and Compassion- Quality and Teamwork - Dignity and Respect – Openness -Honesty and Responsibility

### 3. ORGANISATIONAL POSITION



Note –Details of Information & Cyber Governance Team are still being finalised

#### 4. SCOPE AND RANGE

Working as a senior manager within the IM&T / eHealth services team, the postholder will operate within the framework of the eHealth and Information Strategies, NHS Borders local priorities, as well as regional and national priorities as guided by the Scottish Government.

As a member within the senior management team, the Information Governance & Cyber Assurance Manager will inform influence and drive the information governance agenda creating effective working relationships with Partner Agencies including the Police, Local Authorities, Suppliers and 3rd Sector on all aspects of Information Governance.

The post holder is accountable to the Head of IM&T and will deputise in their absence as and when required.

<u>Budget ( 2020'21)</u>	
Staffing ( 40 WTE) :-	£1,180,000
Supplies & Services:-	<u>£66,350</u>
	<u>1,246,350</u>

Information & Cyber Governance:-The role requires the creation, implementation and management of NHS Borders Information Governance and Cyber Security Strategy which will include the delivery of policies, procedures and staff training. Implementation is through clear agreed objectives as set out in a work plan that is constantly monitored and evaluated.

The postholder will function as the Board's Data Protection Officer and will provide advice, guidance, support, training and interpretation of the Data Protection Act 2018 (DPA2018 and the General Data Protection Regulation (GDPR). This will require a detailed knowledge of the legislation as well as the skills to interpret it according to good practice.

Medical Records:- To oversee the delivery of the operational medical records service including clinical coding and the strategic management of casenote storage.

Corporate Records:- To develop, maintain and implement corporate records management policies, procedures and guidance so that NHS Borders corporate records are managed in accordance with the legislative framework (Public Records (Scotland) Act 2011) The postholder will function as the Board's Public Records (Scotland) Act (2011) Lead and will provide advice, guidance, support, training and interpretation of the Public Records (Scotland) Act (2011). This will require a detailed knowledge of the Act as well as the skills to interpret the Act according to good practice.

## 5. MAIN DUTIES/RESPONSIBILITIES

The main duties of the post include developing, implementing and managing information governance, cyber security, corporate and medical records functions across NHS Borders to help safeguard information and service delivery.

- Manage and lead on the continued development and implementation of NHS Borders Information Governance Strategy in order to achieve a whole system approach to ensuring systems and processes are in place to safeguard information within the Board.
- Responsible for ensuring provision of in depth specialist advice, guidance and scrutiny on information governance, cyber security and medical records matters to both clinical and non-clinical staff.
- Responsible for having in place a range of regular and ad-hoc reports on information governance matters and compliance with the Network and Information Systems (NIS) Directive (Directive (EU) 2016/1148). To lead on corporate reporting to providing regular reports on progress to the Audit Committee, Board Executive Team, Clinical Boards, Senior Managers and Clinicians to ensure that senior management are made aware of NHS Borders level of exposure to risk from any non-compliance in these areas.
- Providing professional leadership for Information Governance and Cyber Scrutiny functions ensuring these are effectively developed, organised, integrated and managed; to fully support the strategic aims of the board. Responsible for ensuring arrangements are in place so that the Information Governance Committee business is conducted to a high standard.
- Responsible for the management of the Information & Cyber Governance budget.
- To support the development and maintenance of corporate records management policies, procedures and guidance so that NHS Borders corporate records are managed in accordance with the legislative framework (Public Records (Scotland) Act 2011).
- Responsible for ensuring the delivery of records management, information governance and cyber security educational training materials for use by NHS Borders staff to help ensure that all data subjects rights both staff and patients are maintained and respected throughout NHS Borders.
- Responsible for management of Information Governance and Medical Records functions. The post holder will operationally line manage allocated information governance and medical records management staff, taking responsibility for staff development, objective setting, appraisals, review of staff performance and motivation, supervision, ensuring appropriate application in accordance with NHS Borders policies and guidelines. The post holder will ensure that robust processes are in place to monitor Information Governance and Medical Records service delivery performance to support interpretation of expenditure reports on departmental budget.
- To lead work in partnership with Senior Officials within Health and Partner Agencies to develop where appropriate joint working in information governance, to determine the local need and agreed priorities, within the context of Information Governance & Information Security.
- Participate on various organisational and National groups (Including Information Governance Forum, Information Security Forum, Records Management Forum and Public Benefit Privacy Panel) in determining and implementing national and local policies, protocols and procedures.
- To provide operational support to the Head of IM&T on service-related issues, linking in with operational managers to enact business continuity and recovery plans.
- Provide a service which efficiently and effectively responds to all Data Protection Act Subject Access Requests and ensures that responses are treated in a secure and sympathetic manner in compliance with the requirements of the Act.

- To lead assessments to identify associated risks within the areas of information, cyber and records, to implement reasonable control measures to remove or reduce the risk and to ensure that significant risks are recorded on the corporate risk register.
- To participate in the IM&T Senior Manager on-call rota.

## 6. SYSTEMS AND EQUIPMENT

Regular and proficient use of PC and laptop with full Microsoft Office package/applications including Outlook, Word, Excel, and PowerPoint.

FairWarning - monitoring appropriate user access of systems

NHS Scotland - Scottish Information Sharing (IS) Toolkit / One Trust

Other appropriate software applications e.g. Mind manager, Visio, Publisher, Adobe Acrobat, TopDesk etc.

Email, telephone, MS Teams and video conferencing equipment

Understand and comply with NHS Scotland policies including Information Governance & security

## 7. DECISIONS AND JUDGEMENTS

The Information Governance & Cyber Assurance Manager will manage NHS Borders Information Governance & Cyber Assurance Services, deciding on the most effective use of resources, undertaking evaluation audits of service effectiveness and performance in order to improve IM&T / information services and makes judgments on a wide range of issues and priorities underpinning healthcare service delivery.

The post holder will be expected to lead on particular, complex IM&T / Information Service activities or situations on behalf of NHS Borders and to use their expert knowledge and initiative in managing issues where there is no precedent and where leading opinions may conflict. A significant degree of autonomy will therefore be required to contribute to and make decisions, using problem solving skills, comparison of options and best practice evidence to facilitate a good outcome and ensure correct actions are taken.

When performing the Data Protection Officer role the applicable rules expressly provide that the DPO shall not receive any instructions regarding the performance of her duties and as such has a significant level of autonomy.

The postholder will lead and drive progress within a broad sphere of legislation and standards and within the parameters of established national and local priorities, policies and procedures which the postholder requires to interpret in order that strategic design decisions are taken based on best information available. The post operates autonomously within this framework and is expected to function as a source of expertise and advice at the highest level especially assisting with the adoption of new technologies and systems.

This lead professional role results in the postholder having considerable freedom to act, and to operate, in the absence of direct supervision. Review of performance in the post is undertaken through the agreement of performance objectives and individual performance appraisal by the Head of IM&T. Formal appraisal is undertaken on an annual cycle.

The post holder reports to the Head of IM&T working within the structure of the IM&T senior management team.

## **8. COMMUNICATIONS AND RELATIONSHIPS**

Communicates with a wide range of internal and external staff, including the following key working relationships:

- Board Executive Team
- The Clinical Executive Team, Lead Clinicians and General Managers within the service
- IM&T Senior Management Team
- Other information staff (e.g. within Planning & Performance and Clinical Governance) to ensure efficient working across services and organisational boundaries
- With colleagues in partner organisations, most notably: external NHS Boards, the Health & Social Care Partnership, Scottish Borders Council and the Scottish Government
- Liaison with the National Information Governance, Security and Records Groups, Scottish Government eHealth Directorate, and National Information Security Competent Authority.
- Liaison with outside consultants employed by NHS Borders for service redesign or other initiatives, supplying information to aid these procedures.
- Information Commissioners Office

The post holder needs to be able to communicate to service users on IM&T / information governance, cyber assurance and records issues, having the ability to convey concepts clearly and guiding them to take appropriate course of action.

The post holder will be expected to demonstrate sensitivity and awareness of “politically” difficult issues in relation to information governance and confidentiality matters particularly when dealing with patients / public in the event of an information breach or concerns about how person identifiable information is being used / shared.

The post holder needs to be highly skilled in a wide range of communication skills i.e. ability to develop and deliver formal presentations to large groups, skills in negotiation, persuasion and facilitation to obtain agreement and co-operation, skills in active listening, managing change and difficult behaviours, ability to provide reassurance and motivation and support effective management of dynamics of teams and groups.

## **9. PHYSICAL/ MENTAL/EMOTIONAL DEMANDS OF THE JOB**

- Frequent requirement for a high level of concentration and accuracy while analysing and interpreting complex information and statistics, often managing competing priorities and tasks
- The post involves regular and sustained use of a PC and/or laptop on a day to day basis with post holder being asked to manipulate complex data at speed
- The post involves normal office conditions with a combination of sitting, standing and walking. Light physical effort will be required for moving equipment such as briefcases/laptops, projectors for presentations and PCs
- Work pattern can often be unpredictable, requiring the ability to adapt to a regularly changing agenda including immediate adjustment of priorities/tasks to meet new demands (internal or external)
- Work must be accurate and to deadline. The post holder can occasionally deal with distressing or emotional circumstances in relation to staff performance and disciplinary issues.

- Occasionally responding face to face / virtually with patients / public in the event of an information breach or them having acute concerns about how their person identifiable information is being used / shared.
- Occasional car driving, as driving/travelling between base and other areas including regional/national meetings will be required

#### **10. MOST CHALLENGING/DIFFICULT PARTS OF THE JOB**

- Persuading and influencing services on the importance of information governance in the face of other service challenges. i.e. Information Asset Register development and maintenance; records management including culling / archiving as appropriate
- Ability to explain and present multi-faceted and high complex governance issues in a clear manner
- Working under pressure and balancing multiple demands in complex/changing environments.
- Occasionally deal with conflict situations, e.g., at emotionally charged meetings. Dealing regularly with challenging problems requires sustained emotional energy/resilience.
- Conducting incident investigations and interviews, in particular in readiness for disciplinary hearings, can be emotionally and mentally draining and the postholder has to be able to respond immediately assuming the role of an Expert Witness where required.

## **11. KNOWLEDGE, TRAINING AND EXPERIENCE REQUIRED TO DO THE JOB**

### **Education and Training**

Essential Criteria:

- The postholder must hold a Masters Degree or equivalent qualification in Information Governance (or a related discipline), or have equivalent experience compatible with these formal qualifications.
- Highly specialist knowledge of IM&T / information governance, cyber security and records, acquired through expertise working within IM&T or other appropriate service;
- Evidence of Commitment to Continuing Professional Development (CPD);

### **Knowledge and Skills**

Essential Criteria:

- Evidence of ongoing and relevant professional or personal development;
- Highly developed theoretical and practical knowledge/experience of information governance, data protection and data sharing procedures with a good working knowledge of the relevant legislation.
- Highly developed skills in communicating and presenting complex and or sensitive/contentious information at Board and senior management level and with clinical and non-clinical service managers;
- Well-developed strategic and technical skills combined with a supportive and visible leadership style;
- Possess team working and team development skills, having the ability to motivate others to provide a highly respected, quality service leading to enhanced job satisfaction.
- Current driving licence for attending NHS Borders premises.

Desirable Criteria:

- Knowledge of the organisation structures within the NHS or similar public sector organisation including knowing when to escalate issues, understanding issues that affect more than one service.
- Ability to consider the wider healthcare policy agenda, and support strategic and operational change, familiar with policy review and service development;
- Working knowledge of NHS Borders policies and procedures;
- Good knowledge of project management and business case development processes;
- Knowledge of improvement techniques.

## **Experience**

### Essential Criteria:

- Experience of working 5 years within IM&T and / or Information / records functions within the NHS or similar large and complex organisation;
- Proven track record of effective leadership and handling of complex agendas;
- Excellent interpersonal and communication skills;
- Skills of negotiation, conflict resolution and ability to influence decision making at a senior level;
- Demonstrable experience of collaborative working with other senior managers;
- Evidence of experience of working in an environment with competing and conflicting priorities, deadlines and workloads.
- Management of service delivery, staff performance, budgets with effective service planning to secure the required resources.