**eHealth Job Pack 2023**

**NHS GREATER GLASGOW AND CLYDE**

****

**Post: Information Governance Manager / Deputy Data Protection Officer**

**Tenure: Permanent**

**Directorate: eHealth**

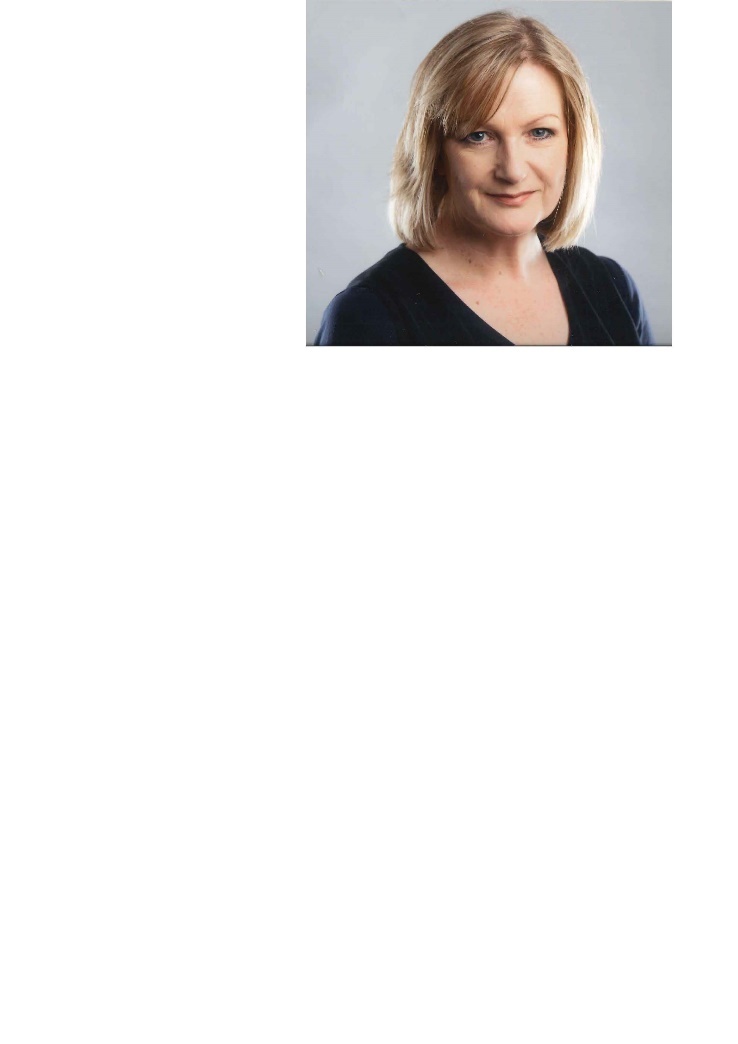
**Grade: Agenda for Change Band**

**Salary: Band 7**

**Hours: Full time 37.5 hours per week**

**Location: 1 Smithhills Street, Paisley, PA1 1EB**

**Closing Date: 23rd June 2023**

**Welcome from Denise Brown, Director of Digital Services**

Thank you for expressing an interest in the key role of Information Governance Manager / Deputy Data Protection Officer. NHS Greater Glasgow and Clyde (NHSGGC) has the largest eHealth department in NHS Scotland and is at the forefront of digital transformation across the Health Service in Scotland. This role is an exceptional development opportunity for an experienced and dynamic manager to join a highly motivated senior management team whose role it is to support clinical and other staff to deliver the best possible care. NHSGGC is a Board which values and develops its people and joining the team provides many potential opportunities to grow and develop your career over time.

**About NHS Greater Glasgow and Clyde Health Board**

NHSGGC is the largest healthcare provider in Scotland, serving a population of approximately 1.3m, through the provision of a comprehensive range of Acute, Mental Health and Community Care services. The Board also provides cross-border and Regional services.

**About the Directorate**

The eHealth Directorate has 1,640 staff of which 6 staff work in Information Governance. The Directorate has a revenue budget of approximately £70m (including annual Scottish Government funding), an annual capital budget of circa £7m and other non-recurring budget of approximately £13m.

The eHealth Directorate comprises of the following departments:

* **Operations** – responsible for the overall IT and Telecommunication service delivery to NHSGGC including the delivery of the underpinning technical infrastructure and applications to support the health and corporate directorates across NHSGGC to agreed KPI’s and SLA’s. In addition, Information security and compliance.
* **Strategy and Programmes** - responsible for the development of the medium to long term eHealth Strategy and the delivery of a large number of highly complex programmes and projects including significant service reconfiguration and System development.
* **Innovations** – responsible for development and delivery of eHealth enabled Innovation Programmes, linking with Innovators such as clinicians, R&D, industry and SME's within NHSGGC, West of Scotland, and the broader Innovation community.
* **Information Management** – responsible for the collection and analysis of information, information governance and delivery of knowledge management services. This service comprises Knowledge Services (Libraries), Clinical Coding and Business Intelligence.
* **Health Records** - delivery of Health Records services across NHSGGC, including provision of outpatient clinics and ward clerk services
* **Business and Resource Management** – responsible for financial management, procurement & contract management, audit, risk management, Programme Management Office (PMO), Information Governance, FOI responses and overarching aspects of staff governance and organisational development, Health & Safety, general Directorate wide governance and facilities management activities.

The Directorate is fortunate to have in place strong governance structures to enable us to manage and effect change at pace and scale. The success of the Directorate is down to the way that teams work flexibly to deliver the support that’s required. A key element of the progress that we’ve been able to also down to the strong clinical leadership roles which are now embedded within the Directorate structure. Our clinical colleagues are aligned to key programmes and operate as a clinical reference group too.

Additionally, we place a big emphasis on staff development and retention and attracting new talent and we do this through a mature performance development framework, robust workforce and succession planning and role-based training which is pivotal overall.

**About the Role**:

The post holder will work to reduce the risk of non-compliance across the Board with regard to the Data Protection Act 2018, UK General Data Protection Regulation, Caldicott Principles, Access to Health Records Act 1990 and other associated legislation and policies. The Post Holder will also advise on aspects of the Public Records (Scotland) Act 2011.

The post holder is expected to inform, influence and direct the NHS Board and its Partner Agencies including the Police and Local Authorities on all aspects of Information Governance and deal with a range of complex IG issues which will require interpretation. The post holder will advise on completion of Data Protection Impact Assessments, Information Sharing Agreements, as well as the application of data protection principles to research and innovation projects and the wider data processing carried out by the Board. The post holder will act as Deputy Data Protection Officer.

**Digital Strategy and other Transformation Programmes**

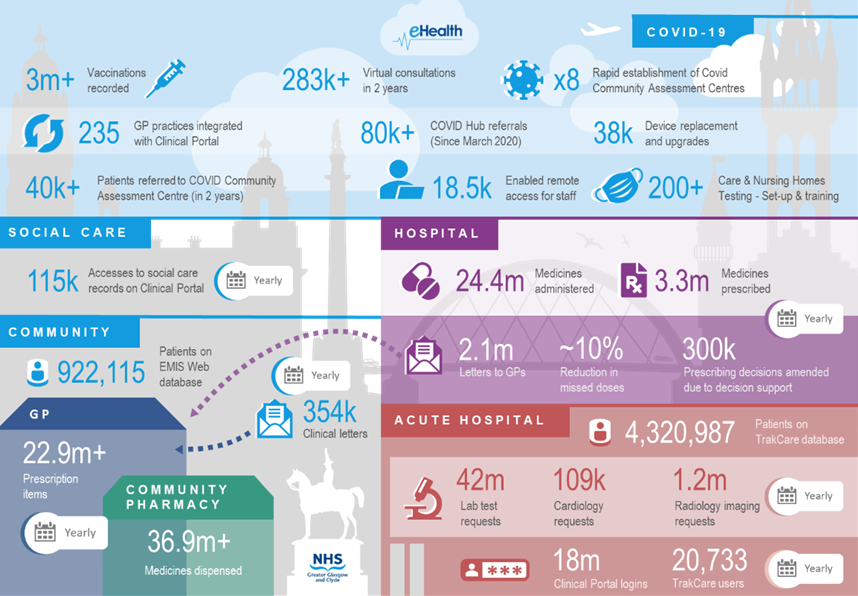
NHSGGC has an ambitious 2023-2028 Digital Strategy ([LINK](#)) which sets out all of the strategic themes and programmes. Information Governance is pivotal to supporting the delivery of transformational change with some examples of the key programmes of work the department is involved in set out below.

|  |  |
| --- | --- |
| **Programme** | **Description** |
| Digital Health & Care Record - Active Clinical Notes | NHSGGC has a rich and well-established Digital Health & Care Record. This programme delivers the final stage of digitising remaining inpatient paperwork (“continuation notes”) |
| Dental Electronic Patient Record | Delivering the benefits of digital tools to oral health services |
| Unified Care Record | Enhancing data available to clinicians by further joining up health and care information across Scotland |
| Citizen Access | Delivering large-scale digitalising of existing communications with patients (e.g., letters) and new capabilities such as patient-reported-outcomes and patient-reported-experience-measures (PROMs/PREMs), and working with national citizen access projects |

**Moving Forward Together (MFT)**

Launched in 2018, the NHSGGC Moving Forward Together programme is a whole-system approach to planning services covering acute hospital care, community services and primary care in order to improve care and outcomes. The MFT Portfolio of Projects comprises a range of short-, medium- and longer-term initiatives including development of new ways of working which provide safe, effective, and patient-centred care. The Digital Strategy aligns with MFT over the coming five years, making best use of available resources and the opportunities created by innovation and technology. More information on the Moving Forward Together Programme can be found via the [LINK](#).

**COVID Remobilisation**

Launched in 2020, the NHSGGC [remobilisation plan](#) was formulated in collaboration with Health and Social Care Partnerships to support the recovery of planned care, mental health, primary and community care services post COVID. The infographic below gives some insight to the type of activities eHealth has enabled over the last few years including the rapid scale up of new services, care pathways and virtual patient management:

**Appendix 1 – Job Description**

|  |
| --- |
| * **JOB IDENTIFICATION** |
| **Job Title:** Board Information Governance Manager/Deputy Data Protection Officer  **Responsible to:** Data Protection Officer  **Department:** Information Governance  **Directorate:** eHealth |
| **2. JOB PURPOSE** |
| To provide leadership, support, training, guidance and effective management of all aspects of the Data Protection and the UK General Data Protection Regulation and Public Records (Scotland) Act functions across NHS Greater Glasgow and Clyde (NHSGGC). This role incorporates GP services.  The post holder is responsible for the management and for the performance of data protection requests received across NHSGGC, including the NHS elements of the 6 Health and Social Care Partnerships. This includes promoting best practice, dealing with exemptions under the legislation and ensuring continuous improvement. The post holder produces an Annual Report for the NHS Audit Committee and Information Governance Steering Group and provides the performance information for the Scottish Information Commissioner and liaises with the Information Commissioner’s Office.  The post holder ensures that the Board meets its obligations under and complies with the UK General Data Protection Regulation, the Data Protection Act 2018, the Public Records (Scotland) Act, Caldicott Principles and associated relevant and supporting legislation and guidance.  To ensure that all staff in NHSGGC have access to appropriate support relating to data protection and public records and are aware of their duties in relation to legal, policy and professional responsibilities for all aspects of data protection and public records compliance by developing and implementing training and other resources.  The IG Manager fulfils a deputy role for the Data Protection Officer. |
| **3. ROLE OF DEPARTMENT** |
| The overall aim of the eHealth Directorate is to deliver and maintain a comprehensive integrated information, technology and record management strategy in order to ensure that the right information is provided in the right place at the right time, to support highest possible levels of diagnosis, treatment and care of patients and clients, to support continuous improvement of the health of the populations we serve and to achieve more effective integration between Health and the care services of our Local Authority partners.    This includes patients’ case notes and other information for clinicians working in the community and primary care, in outpatient clinics, on the point of admission for inpatients/day cases and for review after discharge: it includes developing and supporting electronic information systems for clinical and management use: and it includes collection and analysis of data required by the Scottish Executive Health Department, for local monitoring of activity or performance, and for surveillance and protection of the health of our populations.  The eHealth has approximately 1,480 staff, a revenue budget of approximately £57m (incl annual Scottish Government ring fenced funding), annual capital budget ranging between £3-5m and non-recurring eHealth budget of approximately £15.8m.  The eHealth Directorate comprises the following departments:   * **Operations:** responsible for the overall IT and Telecommunication service delivery to NHSGGC including the delivery of the underpinning technical infrastructure and applications to support the health and corporate directorates across NHSGGC to agreed KPI’s and SLA’s * **Strategy and Programmes:** responsible for the development of the medium to long term eHealth Strategy and the delivery of a large number of highly complex programmes and projects including significant service reconfiguration * **Information Management:** responsible for the collection and analysis of information, information governance and delivery of knowledge management services. This service comprises Knowledge Services (Libraries), Information Governance and Business Intelligence * **Health Records:** delivery of Health Records services across NHSGGC, including provision of outpatient clinics * **Business and Resource Management:** responsible for financial management, procurement & contract management, audit & FOI responses and overarching aspects of Human Resource and Organisational Development, Health & Safety, general Directorate wide governance and facilities management activities |
| **4. ORGANISATIONAL POSITION** |
| **Director of Digital Services**  **Strategic Development & Programme Manager**  **Data Protection Officer**  **IG Manager / Deputy DPO (this post)** |
| **5. SCOPE AND RANGE** |
| To provide overall management, support, training and guidance on all aspects of data protection, including subject access requests and how they are handled across NHSGGC.  To offer an expert knowledge and understanding of GDPR, DPA and Public Records and disseminate that to the whole organisation.  To liaise with the Information Commissioner’s Office and staff.  To produce for scrutiny, performance related data for the NHS Board. |
| **6. MAIN TASKS, DUTIES AND RESPONSIBILITIES** |
| Provision of expert advice to all members of staff within NHSGGC and the 6 Health and Social Care Partnerships, including Chief Executive, Directors, Heads of Service and Senior Managers, on the interpretation and implementation of Data Protection, GDPR and Public Records.  Day to day management of all aspects of data protection requests and processes across NHSGGC, and provision of expert advice and guidance to all staff regarding responding to a subject access request (including the 6 Health and Social Care Partnerships and GPs), including liaising with relevant health professionals to determine any possible harm resulting from the release of the information.  Understand and comply with the complexities of the Data Protection Act 1998 (DPA) and how this interacts with the Freedom of Information Act Scotland (FOISA) when a request for personal information is made under FOISA ensuring that the correct response is made in accordance with the relevant legislation.  Liaise with Directors and Heads of Service to embed and develop data protection, security and confidentiality of information within the culture of the organisation so that staff are aware of their own obligations, and those of NHSGGC, under the legislation.  Provide appropriate advice and assistance to applicants in describing the information requested and, where necessary, negotiate clarification so that the correct information can be supplied. Consider implications of Disability Discrimination Act when providing information to applicants, and provide information in alternative formats as appropriate.  Advise the Caldicott Guardian / SIRO in relation to high profile or sensitive cases, ensuring that an appropriate strategy is formulated prior to the release of such information. This may include liaison with the Board’s Media Relations team.  Compile responses to requests for information, including assessing the information being provided and any possible harm resulting from its release, and making judgements on the application of exemptions contained within the Act.  Provide advice on and apply the Exemption Clauses of the DPA and GDPR and provide adequate explanations to the applicant of why Exemption Clauses may have been used, and ensure absolute compliance with the legislation.  Develop and maintain systems for recording requests for information, and other associated information such as Requirements for Reviews by the Board’s Data Protection Officer and ensure data quality and consistency.  Develop and manage the preparation of regular monitoring information on key performance indicators including appropriate accurate and timely reporting, both internal and external, to the NHS Board, IG Steering Group, and local management teams, including wider dissemination where appropriate.  Provide expert support to all staff including providing detailed guidance and advice on the application of GDPR and DPA legislation and assisting with data breach investigations.  Develop a strategy, and lead the implementation for the development and improvement of good GDPR / DPA practice in NHSGGC, encompassing relevant areas of records management, information governance and data protection rights as appropriate and in compliance with legislation and relevant Codes of Practice.  Provide and deliver up to date and appropriate training to all staff within NHSGGC, including the development of training tools and resources such as Learn-Pro e-Learning, guidance and reference information as required, and promote the use of these within the organisation.  Review poorly handled responses across the Board to subject access requests and design and deliver bespoke training to target specific parts of the organisation as required.  Develop and manage the content of Information Governance resources on the Staff Intranet to ensure that this is relevant, current and appropriate to staff needs.  Ensure that the outward facing organisation provides relevant information to the public on their rights and expectations of NHSGGC in relation to data protection and records management, including developing and managing the content of the IG micro-site on the NHSGGC external website.  Promote and develop awareness and content of the publicly available information published by NHSGGC and ensure compliance in this respect. Liaise with senior staff to promote and develop proactive publication of information.  Manage and respond to requests/complaints from the ICO regarding potential data breaches, including conducting investigations within NHSGGC.  Develop sound justification in response to refusal to provide personal data and provide detailed submissions in justification of the Board’s position in respect of its handling of requests for information.  Maintain an overview of national developments in data protection and records management and communicate these to relevant parts of the organisation.  Identify and implement changes to Board policies and procedures through a regular review of national developments and case law in relation to GDPR / DPA and Records Management by regularly reviewing financial penalties and improvement notices issued by the ICO, and ensuring that appropriate changes are incorporated into working practices.  Organise and manage papers for the Board’s IG Steering Group. This includes providing regular performance monitoring reports on the Board’s performance against legislative timescales and updating the group on current national development in GDPR/DPA and Records Management and related legislation.  Identify and undertake any changes to local policies and procedures and ensure that any changes made are incorporated into working practices.  Develop and maintain the Board’s Records Management Plan in line with the requirements of the Public Records (Scotland) Act and submit this for re-approval to the Keeper of Records.  Undertake training and further education as necessary for self-development and development and maintenance of expertise in relation to data protection and records management and related legislation.  Manage the staff within the IG team including their training and development, implementation of relevant policies and procedures, for example attendance policy, performance appraisal, personal development planning and e-KSF. |
| **7a. EQUIPMENT & MACHINERY** |
| Desktop computer including display screen, keyboard, mouse  Network photocopier / printer  Filing systems  Telephone and voicemail  Video/tele-conferencing facilities |
| **7b. SYSTEMS** |
| **Datix** - for responding to SARs and for investigating data breaches  **Metacompliance** -for providing communications and policies to staff  **FairWarning** -for auditing staff access to clinical information  **Information Asset Register** -for recording the Board’s information  **Microsoft Outlook** -for effective, efficient email communications and diary management;  **Word** - for the provision of written communication across all strands of work  **Excel** - to create, store and produce data to enable the generation of reports and record keeping  **PowerPoint** - for the creation and delivery of presentations  **NHS.net** - for effective, efficient email communications and diary management  Maintaining shared drive directory  **Internet** -Content Management System for NHSGGC website   * Information gathering and research   **Intranet** (NHSGGC StaffNet) - Create and manage content  **ICO website** -Statistics portal, data input |
| **8. DECISIONS AND JUDGEMENTS** |
| The post holder is required to exercise a high level of initiative, judgement and discretion in deciding what personal information to release to applicants, including requests from Police Scotland, considering data protection exemption categories. This requires an expert understanding of the GDPR/Data Protection legislation, the ability to accurately interpret that legislation and the ability to convince the Chief Executive, Directors and members of the senior management team in relation to the disclosure of information.  The post reports to the Data Protection Officer but will provide expert knowledge and advice across the whole organisation. The post operates autonomously within this framework and is expected to function as a source of expertise and advice at the highest levels, with the freedom to act on behalf of NHSGGC in relation to external and internal issues. The post-holder is expected to use their own initiative in making decisions when prioritising their own and the team’s deadlines and workloads.  Sound judgement, flexibility and the ability to maintain performance under consistent pressure of short timescales are essential in the performance of duties.  The post holder is accountable for leading and driving progress in identified areas of responsibility.  The Data Protection Officer undertakes the review of performance through the agreement of performance objectives and individual performance appraisal. Formal appraisal is undertaken annually, but there are more frequent reviews on an informal basis. |
| **9. COMMUNICATIONS AND RELATIONSHIPS** |
| The post holder is expected to develop working relationships and communicate regularly with a wide range of senior clinical and non-clinical staff across NHSGGC, professional and partner organisations, media, patients, public and staff at all levels. Including the post holder’s line manager, the Data Protection Officer, the following are key working relationships involving regular contact:  **Internal:**   * Caldicott Guardian * Senior Information Risk Officer (SIRO) * Directors and Senior Managers * Clinicians * Heads of Departments * Heads of Administration Business Managers and Senior Managers in IJBs / HSCP * Staff within NHSGGC * The post holder will potentially be required to communicate with any service or department within NHSGGC depending on the nature of requests   **External:**   * Information Commissioner Office * Scottish Government Health Directorates * NHS Scotland IG Leads Forum * NHS Scotland Record Management Forum Information Governance leads in other NHS Board * Members of the public * Any individual or organisation who submits a request for information to NHSGGC * Other NHS Boards * Other public bodies |
| **10. PHYSICAL, MENTAL, EMOTIONAL AND ENVIRONMENTAL DEMANDS OF THE JOB** |
| |  | | --- | | **Physical:**   * Use of computer equipment for the majority of the working day for word processing, email, internet research and data input, resulting in frequent sitting in a restricted position, prolonged typing and use of VDU screen * Work takes place in an open plan environment where there are frequent interruptions from telephone calls, managers’ requests, office noise and visitors   **Mental:**   * Frequent concentration required for production of responses to requests for information often to meet tight deadlines. High levels of concentration required for responses where complex arguments may be developed, for example in compiling submissions to appeal investigations * High levels of concentration required when attending meetings * Unpredictable work pattern with changing and competing priorities * Keeping up-to-date with the evolving nature of data protection legislation and other information rights legislation * Maintaining understanding of the NHS landscape in NHSGGC, Scotland and the UK and how it impacts on patient experience in NHSGGC * Retention and communication of knowledge and information * Need to communicate clearly and persuasively with staff at all levels, public, patients and other external contacts   **Emotional:**   * The resilience to cope with difficult and demanding members of the public, some of whom will inundate the organisation with frequent and multiple data protection requests which can include those of a frivolous and vexatious nature * The ability to meet tight deadlines and maintain high standards of work whilst dealing with persistent interruptions, resulting in the constant reprioritisation of work * Mental endurance to cope with the many and varied aspects of the post and the need to be able to respond to new developments in data protection practice where there is little or no previous guidance * Emotional resilience in making requests direct to Directors/Senior Managers and convincing and influencing them to provide the information required by the deadline. This includes reiterating or escalating these requests if no response received * Constant pressure of always working to statutory deadlines in order to comply with legal requirements   **Environmental:**   * Occasional travel to various sites across the NHSGGC area and beyond to national meetings and events | |
| **11. MOST CHALLENGING/DIFFICULT PARTS OF THE JOB** |
| Regular negotiation with Directors/Senior Managers particularly when faced with resistance or reluctance. The post-holder may be required to personally challenge standards and/or practice that may compromise or be detrimental to NHSGGC’s compliance obligations.  Convincing Directors and Senior Managers across NHSGGC of the requirements of data protection legislation and the need to share/provide information, especially when they are reluctant to share this. Ensure staff across the organisation take information requests seriously.  Work with external organisations e.g. contractors to ensure appropriate use of the exemption clauses of the Act and protect the reputation of the organisation.  Deal with the complexities and requirements of meeting the needs of different legislation and the interface between them, i.e. UK General Data Protection Regulation, Data Protection Act 2018, Freedom of Information (Scotland) Act 2002, Public Records (Scotland) Act 2011, Access to Health Records Act 1990 and the duty of confidentiality regarding patient confidentiality issues.  Dealing with frivolous and vexatious individuals who make multiple requests for information. Exposure to information which can be distressing around individual cases.  Frequent liaison with the Information Commissioner’s Office and staff on complex cases and data breach investigations.  The post holder must be able to prioritise a busy workload where there will be competing demands. This will involve the successful delivery of local and national targets as well as meeting the expectations of individual members of the public.  The post holder is expected to provide professional leadership and training to the IG team. |
| **12. KNOWLEDGE, TRAINING AND EXPERIENCE REQUIRED TO DO THE JOB** |
| **Qualifications:**  Educated to degree level or equivalent professional qualification or clear evidence of previous work experience at a similar level.  Hold the GDPR Practitioner Certificate or other relevant data protection qualification.  **Experience:**  Expert knowledge of the Data Protection Act, 2018, the UK General Data Protection Regulation and the Public Records (Scotland) Act and other related legislation including the Caldicott principles.  Demonstrable management experience within a large complex organisation, preferably in the NHS or other public sector organisation.  Ability to demonstrate integrity and effective leadership and management skills together with a proven track record of achievement in strategy and policy development and implementation.  A proven track record in problem solving and the provision of creative and innovative solutions to meet organisational requirements and motivate staff.  Skilled writer with ability to provide effective, credible communications and ability to operate effectively under extreme pressure.  Ability to develop and maintain effective, positive relationships with senior Directors, clinicians, managers and key partners, providing a key role model for collaborative working within NHSGGC.  High-level abilities in written and oral communication and in the presentation of information.  Staff management, development and training experience. |

**Useful Links and Information**

* NHSGGC Digital on Demand Strategy 2023 - 2028 – [https://www.nhsggc.scot/staff-recruitment/staff-resources/ehealth/digital-strategy/](#) & Video [https://youtu.be/tUNDKYsYfE4](#)
* NHSGGC Twitter - [https://twitter.com/nhsggc](#)

**Key Strategic Drivers**

* National Digital Health & Care Strategy - [https://www.gov.scot/publications/scotlands-digital-health-care-strategy/pages/1/](#)
* National Workforce Strategy for Health and Social Care in Scotland - [https://www.gov.scot/publications/national-workforce-strategy-health-social-care/](#)
* Fairer Scotland Duty - [https://www.gov.scot/publications/fairer-scotland-duty-guidance-public-bodies/](#)
* Meeting the Requirements of Equality Legislation (2020-24) - [https://www.nhsggc.org.uk/media/260193/eih-a-fairer-nhs-accessible.pdf](#)
* NHSGGC Stakeholder Communications and Engagement Strategy (2020-23) - [https://www.nhsggc.org.uk/media/264466/comms\_engagement\_strategy.pdf](#)
* NHSGGC Healthcare Quality Strategy 2019/2023 - [https://www.nhsggc.org.uk/media/253754/190219-the-pursuit-of-healthcare-excellence-paper\_low-res.pdf](#)
* Scotland’s Digital Health and Care Data Strategy (in development) - [https://www.gov.scot/groups/digital-health-and-care-data-strategy-working-group/](#)
* NHSGGC Moving Forward Together (MTF) programme - [https://www.movingforwardtogetherggc.org/](#)
* NHSGGC “Growing Our Great Community” Workforce Plan 2022-25 - [https://www.nhsggc.scot/downloads/workforce-plan-2022-2025/](#)

**Other Useful Links**

* NHSGGC Health Records Flow Navigation Centre - [https://www.nhsggc.scot/your-health/right-care-right-place/virtual-accident-emergency-ae/](#) & Video [https://www.youtube.com/watch?v=72YiUpDYJ6w](#)
* NHSGGC Vaccination Contact Centre – [https://www.nhsggc.scot/your-health/general-vaccinations/](#)
* West of Scotland Innovation Hub (hosted by NHSGGC)
* [https://www.woshealthinnovation.scot/](#) & Twitter [https://twitter.com/wosinnovation](#)
* Meet the NHSGGC Board Members – [https://www.nhsggc.scot/about-us/nhs-board/meet-the-board](#)