

1. JOB IDENTIFICATION

Job Title	Information Governance Officer
Reporting to	Deputy Head of Information Governance and Deputy Data Protection Officer
Department(s)/Location	Information & Communications Technology (ICT)
Job Reference number (coded):	

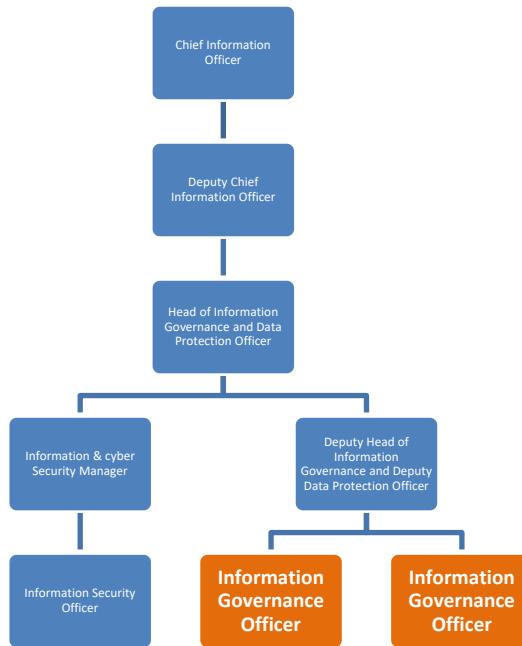
2. JOB PURPOSE

The role of the Information Governance Officer is to ensure that NHS 24 is compliant with board policy, all legislation and government directives relating to information rights and responsibilities. Principally, though not limited to, the UK General Data Protection Regulations, the Data Protection Act 2018, The Freedom of Information (Scotland) Act 2002 and the Public Records (Scotland) Act 2011 and the Access to Health Records Act 1990.

The post holder(s) will provide professional, efficient, and confidential support as part of the Information Governance and Security Team, ensuring that Information Governance requests, such as Data Subject Access and Freedom of Information or Environmental Information requests are processed in accordance with NHS 24 policies and procedures and relevant national guidance and legislation.

The post holder(s) will process requests and enquiries from service users, Police Scotland, the Courts, solicitors, NHS 24 staff and others providing advice and assistance as required.

3. ORGANISATIONAL POSITION



4. SCOPE AND RANGE

NHS 24 provides the population of Scotland with access to clinical assessment, healthcare advice and information and aims to ensure that those contacting NHS 24 are given the assistance and advice they require in order to meet their health needs via the omni channel access. NHS 24 mental health services receive calls 24 hours a day seven days a week.

NHS 24 provides telehealth and telecare services to the people of Scotland. The Board employs approximately 2,000 staff throughout Scotland.

The function of the Information Governance and Security team within NHS 24 is to deliver and support and deliver on NHS 24's statutory information governance duties and security across the organisation.

The Information Governance and Security team:

- Provides leadership in Records Management
- Provides the interface to the legislative competent authorities such as the UK Information Commissioner (ICO), the Scottish Information Commissioner (SIC), the Scottish Government Health Competent Authority, and the National Records of Scotland (NRS).
- Ensures that all statutory obligations under the Data Protection, Freedom of Information, Records Management and Information Security legislation are met.
- Develops and delivers training and guidance on all aspects of data protection, information security, freedom of information and records management across the organisation.
- Ensures that NHS 24 protects the confidentiality, integrity and availability of staff, patient and service user information and enables appropriate information sharing.
- Establishes relationships with other Health Boards and partner organisations in relation to data protection, information security and records management legislation relevant to NHS 24.
- Delivers the Information Governance and Security objectives within the NHS 24 Programme of Work on behalf of the NHS 24 Executive Team.

The Information Governance Officer, as part of the Information Governance and Security Team will provide support to the development and maintenance of an advice and reporting service in respect of all Freedom of Information, Data Protection and Access to Health Records requests.

The Information Governance Officer(s) will be part of the Information Governance and Security Team. They will report directly to the Deputy Head of Information Governance and Deputy Data Protection Officer.

The role will work closely with colleagues across all NHS 24 directorates as well as other external suppliers and health board partners.

5. MAIN DUTIES/KEY RESPONSIBILITIES

The post holder(s) are the organisational point of contact for all internal and external requests for data subject access requests, freedom of information, and environmental information requests. This requires the post-holder to:

- Receive and record, acknowledge and collate the information required to answer information requests within the requirements of the relevant legislation such as, but not limited to, the Freedom of Information (Scotland) Act 2002, Environmental Information Regulations (Scotland) 2004 and the Data Protection Act 2018. Due to the specific timelines for responding to these statutory requests the post holder is required to plan and organise the collation of responses. This can be complex in nature as information may come from different contributors who have conflicting priorities.
- Liaise with NHS 24 staff in relation to retrieving all appropriate records including: Medical, CCTV footage and call recordings. The post holder(s) will listen to the call recordings; to ensure that, if required the recordings are referred for senior clinical or medical legal review of the recordings; to dispatch the information requested to the applicant. Ensuring that the data subject access requests are typically transferred through a secure transfer mechanism.
- They will be required to ensure that processes are formally documented, reviewed and maintained and to assure that they are effective, proposing changes to working practices in relation to the working area.
- To support the development of policy and guidance to promote and develop good practice.
- Contribute to the development and implementation of policies and procedures to support the delivery of compliance with information governance.
- To maintain an accurate and up to date register of requests including details of any disclosures, refusals, fees, advice and guidance.
- To produce regular reports for the relevant Committees or groups and monitor and track the progress of requests.
- To ensure that master copies of Information Governance and Security materials are kept up to date and accessible and appropriately published.
- To prepare and provide accurate monthly Key Performance Indicators in relation to all Information Governance & Security areas of responsibility, such as Data Subject Access, Freedom of Information and Environmental Information Requests. These reports will form part of the information reported through the Deputy Chief Information Officer (DCIO) and the Chief Information Officer (CIO) to the NHS 24 Executive Management Team. This information will also be provided for the Information Governance and Security Quarterly reports which are presented to the Information Governance and Security Group (IGSG) and onwards to the relevant sub-committees of the Board.
- The post holder(s) will co-ordinate, and when required present, necessary documentation for Information Governance and Security Group meetings.
- Provide advice, guidance and interpretation to staff on Information Governance enquiries.
- Provide Information Governance training and awareness sessions to new staff inductions in conjunction with the Organisational Development Leadership and Learning Team and to groups of NHS 24 staff including, but not limited to, nurse practitioners, call operators and call handlers.
- Provide refresher Information Governance training to existing colleagues on a cyclical basis.
- Provide coaching to individual members of staff who are to be interviewed by Police Scotland in relation to service user call recordings.

- Liaise with service users or their representatives by letter, email, phone, or other communication mechanisms as deemed appropriate with regard to subject access and freedom of information requests. These requests can be sensitive and/or emotional in nature.
- Liaise with Police Scotland officers and staff from the Procurator Fiscal's office by letter, email, phone, or other communication mechanisms as deemed appropriate in regard to subject access or access to health records requests.
- Provide formal statements to Police Scotland and the Procurator Fiscal where required.
- Appear in court representing NHS 24 when required by Police/Procurator Fiscal/ Children's Reporter.
- Function as an eDiscovery Manager when assigned to an investigation case by the Information Security Manager. This will entail searching, managing and exporting data from electronic systems such as NHS 24 mailboxes and Teams sites to support information requests internally and externally.
- Lead on the quarterly information asset directorate reviews to assure the accuracy of the directorate information asset register, record of processing activities.
- Assist with the assessment of data protection impact assessments (DPIA) via the DPIA Panel.
- Assist with maintaining a register of data processing agreements and data sharing agreements.

6. SYSTEMS AND EQUIPMENT

The post holder is expected to have a good working knowledge of and use the following:

General Equipment – Use of personal computer or laptop, telephone, multi-function device and audio-visual equipment. The post holder will, daily, use standard software packages [Microsoft 365], e-mail, the internet, and NHS 24's intranet, in performing the main duties and responsibilities associated with this post.

Specific Systems included in the Microsoft 365 suite such as:

- Microsoft Word: For general day-to-day use including report and document updates.
- Microsoft Excel: To create, store and produce data for report generation & record keeping.
- Microsoft PowerPoint: For producing presentations to update stakeholders.
- Microsoft Outlook: For effective and efficient communication with everyone in the organisation and external stakeholders as well as diary management.
- SharePoint Online: Resource and project planning.
- MetaCompliance: For providing communications and policies to staff.
- Respond: For request and incident tracking and recording.
- Microsoft eDiscovery as a manager/investigator.

The Information Governance Officer will support and maintain the tracking systems in place by inputting and updating information to ensure that NHS 24 complies with the response timelines in respect of Freedom of Information and Data Protection requests.

The SAP and Verint systems when required for access to service user information in relation to subject access requests.

7. DECISIONS & JUDGEMENTS

The post holder is required to work within the legal, organisational and professional frameworks that NHS 24 adheres to. The post holder reports to the Deputy Head of Information Governance and Deputy Data Protection Officer (DPO) and, when required directly to the Head of Information Governance and Security and DPO.

The post holder is required to use own initiative to prioritise and plan their own workload within the objectives set for the post and with the agreement of the Deputy Head of Information Governance and Deputy DPO.

As the first point of contact for Freedom of Information, Environmental Information, Data Protection and Access to Health Records requests the post holder will be expected to analyse and interpret the request and to liaise with the relevant information providers to ensure timelines are met.

8. COMMUNICATIONS AND RELATIONSHIPS

The Information Governance Officer(s) will be expected to communicate in an effective and professional manner at all times. Their role will involve representing NHS 24 in interactions internally with NHS 24 staff, with other health boards, as well as with service users, their representatives, Police Scotland, and the Procurator Fiscal.

The type of communication interactions the post holder(s) will encounter can be complex, sensitive and emotional in nature. Given this, the post holder(s) will require strong listening skills, a commitment to being understanding, patient and diplomatic.

The postholder(s) are expected to conduct themselves with a degree of flexibility given there may at times require negotiation with the applicant and/or NHS 24 staff in relation to a request. For example, some requests may be complicated and require more time for a full response. In these instances, the postholder(s) will require to explain to the requester why further time might be required and to ensure they are appropriately appraised of next steps.

Core to the role will be the development of positive and effective working relationships with colleagues across NHS 24. Strong networking is key to ensuring that the team will be able to access information timeously required to comply with information requests. This will require negotiation and diplomacy. In addition, strong written and presentation skills are required for responding to requests.

The post holder(s) may be required to provide training to new members of staff with regard to information governance.

- Consult with the Information Security Manager and Information Security Officer in relation to requests received for access to CCTV footage held by the organisation.
- Consult with Service Support Teams and frontline clinical and non-clinical staff in relation to subject access requests.
- Consult with the Medical Director, Associate Medical Director and other senior clinicians in relation to subject access requests.

- Consult with the Freedom of Information Leads in relation to freedom of information requests.
- Consult with Information Asset Administrators across NHS 24 to ensure accuracy of items such as the Information Asset Register and the Record of Processing Activities.
- Consult with National Records of Scotland in relation to records management elements and updates to the NHS 24 Records Management Plan.

9. PHYSICAL DEMANDS OF THE JOB

Mental Effort

The post holder requires to maintain levels of concentration and attention to detail while dealing with what can be complex, challenging requests within tight statutory timescales whilst being subjected to frequent interruptions.

Emotional Effort

There will be occasional indirect exposure to highly emotional and upsetting calls from the public which reference distressing scenarios.

There will be occasional direct exposure to emotional situations e.g., requests from relatives for copies of records for family members who may have died. In all circumstances, the post holder(s) will be expected to act with understanding, patience, diplomacy and impartiality. Given the access to these types of calls, the postholder(s) may be invited to, and required to convey these as a witness at Court appearances. These circumstances are infrequent, but always a possibility.

Working Conditions

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 visual display unit (VDU) screen.

There will be occasional travel to various sites across the NHS 24 estate and beyond to national meetings, training and events.

10. MOST CHALLENGING/DIFFICULT PARTS OF THE JOB

The postholder(s) will be in contact with a broad spectrum of people, some of whom are experiencing highly distressing circumstances. This means that there will at some stage be exposure to callers who are potentially anxious, stressed, angry, frustrated and/or potentially in real need of help.

Diplomacy, patience, and understanding are crucial to engagement at all times no matter how challenging the caller is.

Sometimes calls will be requested by the Police, legal professionals or the Courts. In these instances, this can mean that the postholder(s) will require to engage with and appear at Court appearances.

There are two post holders, and on occasion there will be high levels of requests. These requests have statutory deadlines, and many requests can be due at any given time. Requests for information are often dependent upon colleagues in other team supplying this

information timeously. Strong relationship building and organisational skills are crucial for responding to challenging response timelines, for example, a Court Order must be responded to within seven days.

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

Qualification

- Degree in Data Protection, Records Management, Freedom of Information and Environmental Information or relevant equivalent experience and knowledge in an information governance capacity.

Knowledge

- Excellent working knowledge of current legislation, policies and procedures relating to Information Governance, Freedom of Information, Environmental Information, Records Management and Information Security specifically within the NHS in Scotland.
- Knowledge of data analysis and associated software/computer systems, acquired through qualification and/or experience of Microsoft 365 packages (including Word, PowerPoint, Outlook, Excel).

Experience

- Demonstrable experience of working at an appropriate level in the information governance field.
- Relevant experience in Data Protection and Information Governance matters: DPIA, Sharing Agreements; Data Subject Rights, Records Management and FOI.
- Experience in general administration.
- Working with a broad range of stakeholders.
- Experience of working with senior management.

Skills

- Providing information governance support and/or working in an information management role.
- Strong interpersonal, verbal and communications skills.
- Excellent planning skills for organising formal meetings, preparing agendas and following up actions.
- Ability to work on own initiative and as part of a team.

12. JOB DESCRIPTION AGREEMENT

A separate job description will need to be signed off by each jobholder to whom the job description applies.

Job Holder's Signature:

Date:

Head of Department Signature:

Date: