

| JOB DESCRIPTION | |
|------------------------------|---|
| Job title | Information Governance Officer |
| Department | Legal Services – Information Governance Team |
| Location | Civic Centre |
| Job summary | Ensure the Council meets its statutory obligations in terms of the Freedom of Information Act 2000, The Environmental Information Regulations 2004, the General Data Protection Regulations, Access to Health Records Act 1990 and the Reuse of Public Sector Information Regulations 2005. |
| Short term objectives | Strategically develop the Information Management System and access to information framework as part of the Council's information governance methodology. |
| Long term objectives | To work with and support Directorates across the Council to put in place formal access to information standards - based on the supervisory authority standards and legal frameworks. |
| Main tasks | <p>Ensure compliance with the Freedom of Information Act and the Environmental Information Regulations and related provisions, ensuring that the statutory responsibility placed upon the Council is fully discharged.</p> <p>Provide advice and assistance to members of the public with accessing official documentation held by the Council and develop and implement a communications plan to make the public aware of their rights under the Act and Regulations.</p> <p>Develop, implement and enforce suitable and relevant procedures for responding to requests, providing advice and assistance to all internal departments, Chief Officers and Members.</p> <p>Provide advice and assistance relating to access, disclosure and refusal of documentation and act as a consultant on other projects, advising on matters relating to freedom of information and environmental information.</p> <p>Assist in the creation and the maintenance of the Publication Scheme identifying information that should be included in the Publication Scheme and making this information available to members of the public.</p> <p>Maintain a log of all requests received which will detail the outcome i.e. whether the information was supplied or if the request was exempt, partly exempt, withdrawn and on what basis the decision was reached. Ensure the Council's disclosure log is maintained and regularly updated.</p> <p>Ensure that all responses to requests for information are thoroughly researched, collating information from a wide range of sources within the Council's departments and systems also ensuring all requests are responded to within the statutory timeframes.</p> <p>To prepare and submit exemption forms for consideration by a Solicitor, detailing the rationale behind the decision making process. To draft detailed public interest test arguments demonstrating the reasons for and against disclosure of information ensuring they relate to the relevant exemptions included within the relevant legislation and ensure the Council remains compliant with the legislation and supervisory authority's guidance.</p> <p>On receipt of an internal review or appeal, prepare and submit to the Data Protection Officer detailed decision logs explaining the harm the release of the information would pose, the exemptions that flow from the harm, arguments used for the public interest test and the rationale behind the use of such exemptions, taking cognisance of departmental guidance, statutory provisions the statutory guidance available and all relevant decision notices and tribunal decisions.</p> |

Assist with internal reviews and appeals against refusal of request decisions and undertake reporting/remedial action as required. Maintain a log of any incidents and remedial recommendations and actions.

To liaise and consult with the relevant Council departments in relation to high profile or sensitive cases, ensuring that an appropriate strategy is formulated prior to any release of such information. Ensure that the Data Protection Officer is consulted prior to the disclosure of any high profile or sensitive requests and that any issues are highlighted and discussed.

To initiate effective consultation with external organisations and authorities in relation to requests/reviews and ensure that all meetings and correspondence are appropriately recorded as part of this process.

Develop and implement freedom of information awareness and a training programme to be included in induction. Ensure that training is made available to all staff.

Provide oversight and co-ordination of data subject access requests and other information requests pursuant to individual rights under data protection and privacy legislation within prescribed statutory timeframes. Ensure compliance with the Access to Health Records Act 1990.

Report all compliance issues relating information governance, including any complaints and breaches of the legislative framework to the Data Protection Officer. Where appropriate assist the Data Protection Officer in the administration of investigations relating to breaches of information governance.

Administer legal agreements relating to the processing of personal information for use with external organisations and between departments on behalf of the Data Protection Officer.

Assist the Data Protection Officer in any legal claims issued against the Council for damage relating to breaches of Data Protection.

To provide advice and assistance regarding the redaction of personal information from official documentation.

Conduct legal research into various complex information governance matters on behalf of the Data Protection Officer and where appropriate the Legal Department.

Log and administer complaints received under the Human Rights Act.

Compile benchmarking data using a statistical analysis of all requests received on a quarterly basis and identify trends in requests. Submit this statistical analysis to the Data Protection Officer for it to be placed before the Deputy Chief Executive for consideration during Senior Management Meetings.

Liaise with the Data Protection Officer in order to develop and implement a comprehensive Data Protection Plan and provide assistance in this area.

Raise awareness of records management including the development, maintaining and implementation of the records management strategy for the Council.

Consider all requests for the reuse of official documentation in accordance with the Reuse of Public Sector Information Regulations and draft all licences as required for approval by the Data Protection Officer.

| | |
|-----------------|-------------------------|
| Reporting to | Data Protection Officer |
| Managed by | Data Protection Officer |
| Responsible for | N/A |

| PERSONAL SPECIFICATION | |
|---|--|
| Job Title | Information Governance Officer |
| Department | Legal Services – Information Governance Team |
| Location | Civic Centre |
| <u>Personal attributes</u> | |
| 1. Amount of experience required | <ul style="list-style-type: none"> ▪ At least 1 year experience within information governance, or in a similar role. However, positive consideration will be given to potential candidates who have the potential to develop the appropriate skills and experience necessary. ▪ Understanding of the role and functions of Local Government. ▪ Clear understanding of information governance related policies and issues within a large organisation. ▪ Understanding of the implications of introducing access to information standards and procedures within a large organisation. ▪ Demonstrable experience of compliance within a similar role in a large, complex organisation ▪ Experience of applying and considering the implication of complex information governance legislation ▪ Experience of applying or awareness of the exemptions listed within the information governance legislation. |
| 2. Technical skills required | <ul style="list-style-type: none"> ▪ Ability to learn and apply new knowledge quickly. ▪ Proven and demonstrable decision making and writing skills within demanding and evolving environment. ▪ Willing to act on own initiative in resolving issues, which arise. ▪ Ability to provide specialist advice clearly to an audience that does not have prior knowledge of this subject. ▪ Strong analytical and problem solving skills. ▪ Advanced knowledge of Data Protection, Freedom of Information Act and the Environmental Information Regulations is essential. ▪ Experience of applying these complex legislative regimes ▪ Evidence of exercising independent judgement ▪ Excellent communication, presentation and inter-personal skills and the ability to work as part of a small, flexible team. ▪ Experience of computer software packages e.g. Microsoft Word, Excel, Outlook etc. |
| 3. Formal qualifications | <ul style="list-style-type: none"> ▪ 5 GCSE's grade c and above ▪ Degree in a relevant discipline is desirable ▪ BCS/ISEB Certificate in Data Protection and Freedom of Information is desirable, however on the job training will be provided. |
| 4. Personality and Competencies required | <ul style="list-style-type: none"> ▪ The successful candidate must be personable, approachable, diplomatic, tactful, enthusiastic, flexible and reliable. Must be a team player. ▪ Must be able to prioritise workload and manage multiple deadlines. ▪ Must be highly organised and ability to work to tight deadlines under pressure. ▪ Must demonstrate a very positive attitude to the work in hand. ▪ A strong Customer Focus outlook & excellent Communication Skills. |
| 5. Special requirements (i.e. car driver) | <ul style="list-style-type: none"> ▪ Car driver and owner with Full Licence desirable. ▪ A Disclosure and Barring Service Check is an essential requirement for this post. |
| Manager's signature | |
| Head of Department | |

| | |
|-------------|---------------|
| signature | |
| Date | 26 July 2016 |
| Prepared by | Lisa Richards |