

Ref: FOIA Reference 2019/20-623

Royal Stoke University Hospital
Quality, Safety and Compliance Department
Newcastle Road
Stoke-on-Trent
Staffordshire
ST4 6QG

Date: 3rd February 2020

Email foi@uhnm.nhs.uk

Dear

I am writing in response to your email dated 28th January 2020 (received into our office 29th January) requesting information under the Freedom of Information Act (2000) regarding DPO/IG job roles, structure and support.

As of 1st November 2014 University Hospitals of North Midlands NHS Trust (UHNM) manages two hospital sites – Royal Stoke University Hospital, and County Hospital (Stafford). Therefore the response below is for the two sites combined from that date where appropriate.

Q1 Can you please provide the following information?

1 - JD/Band for DPO

A1 I can confirm that the Trust holds information regarding JD/Band for DPO, but feel this information is exempt under section 21: information reasonably accessible by other means. This is because the information is available via the Trust's public website at the following link: (FOI ref 603-1920 January 2019-20)

<http://www.uhnm.nhs.uk/aboutus/Regulatory-information/Statutory-Policies-and-Procedures/FOIdisclosurelog/Pages/default.aspx>

Q2 JD/Band for IG Manager

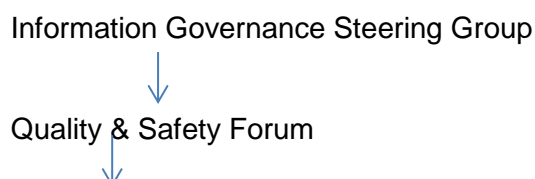
A2 As answer 1

Q3 JD/Band for joint post of DPO/IG Manager

A3 There is no joint IG Manager/ DPO role. These are two separate posts. Refer to Q1 and Q2 for the JD and band

Q4 Structure to show DPO route to Board (Also show all staff that support DPO role)

A4 This is currently under review but at this present time the structure is as below:



Quality Governance Committee



Trust Board

Q5 Structure to show IG Manager role identifying all staff who support IG Manager and IG agenda

A5 As answer 1

Q6 Please list additional work load generated following implementation of DPO responsibilities.

A6 This depends on your definition of additional workload.
The remit and awareness of DSP has increased, following GDPR, DPA (2018) and WannaCry. DSP toolkit has re-launched to reflect the requirements of the regulations and recent reviews (Caldicott). The focus is ensuring staff are aware of their responsibilities, robust documentation and processes are in place to meet the organisational and technical requirements of legislation.

The main observations:

- Increasing awareness of patient rights; SARs have increased, particularly for information not held within the health record.
- Increased scrutiny by Board – hence increased reporting to Board and sub-committees
- Audit framework for DSP toolkit - evidence requirements to demonstrate compliance is increasing – hence this leads me back to my original statement that robust documentation and processes need to be in place

Q7 What, if any, areas of concern and potential conflict have been raised between the IG Manager/DPO role (please provide rationale why you feel there is a conflict) and how you have resolved.

A7 As the IG Manager and DPO roles are separate this question is not applicable.

Q8 Does FOI currently sit under your IG/DPO role within your organisation (if it does NOT please state where this sits).

A8 Yes

Q9 Please state lead areas for the IG Manager and lead areas for the DPO and how these differ.

A9 Refer to question 1. The JDs outline responsibilities

Q10 In your organisation can you provide your policy on completion for Data Privacy Impact Assessments and advise who completes them.

A10 DPIAs are completed by the service lead with support from the IG team.

*Please note that any individuals identified do not give consent for their personal data to be processed for the purposes of direct marketing.

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An anonymised copy of this request can be found on the Trust's disclosure log, please note that all requests can be found at the following link: <http://www.uhnm.nhs.uk/aboutus/Statutory-Policies-and-Procedures/Pages/Freedom-of-Information-Disclosure-Log.aspx>

This letter confirms the completion of this request. A log of this request and a copy of this letter will be held by the Trust.

If you have any queries related to the response provided please in the first instance contact my office.

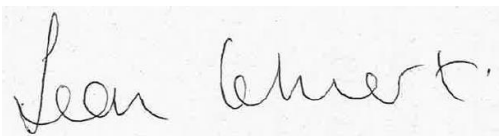
Should you have a complaint about the response or the handling of your request, please also contact my office to request a review of this. If having exhausted the Trust's FOIA complaints process you are still not satisfied, you are entitled to approach the Information Commissioner's Office (ICO) and request an assessment of the manner in which the Trust has managed your request.

The Information Commissioner may be contacted at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or via www.ico.org.uk.

If following review of the responses I can be of any further assistance please contact my secretary on 01782 676474.

Yours,



Jean Lehnert
Information Governance Manager



University Hospitals
of North Midlands
NHS Trust

