



Head of Information Management Unit & Data Protection Officer

Service Unit	Directorate of Standards and Ethics
Team	Directorate of Standards and Ethics
Responsible to	Head of Standards and Ethics
Scale and Salary Range	MG4
Vetting Status	MV
Politically Restricted	Yes
CVF Level	Level 3

Job Purpose

To lead and manage the Force's Information Management functions including but not limited to, Data Protection, Vetting, Information Security and Data Quality under the wider Directorate of Standard and Ethics command.

The post holder will act independently and without influence in decision making or assessment and be directly accountable to the Chief Constable as the Data Controller.

The post holder will lead upon any strategies that fall under Information Management directed by legislation including the Data Protection Act 2018 which incorporates both GDPR and the Law Enforcement Directive and adherence to Information Rights. This is to ensure the Force is compliant with all relevant legislation.

Responsibility will also be to ensure the Force is compliant with the National Vetting Code of Practice and the Management of Police Information (MOPI).

Principal Duties and Responsibilities

- To act as the force expert providing professional and technical advice and guidance to the organisation on compliance with the Data Protection Act 2018 and GDPR. Informing and advising the data controller and SIRO of the forces obligations under DPA and represent the Chief Constable on Data Protection matters.
- Manage an on-going programme of audits to ensure compliance with Data Protection law and in particular GDPR ensuring the organisation maintains compliance and that information and systems comply with relevant legislation.
- To ensure that security arrangements are in place to protect information including where necessary contracts relating to third parties processing information as stated in Article 39(1)(b).
- The post holder provides independent oversight and is the point of escalation for Data Protection appeals and reviews.
- Act as Cleveland Police's representative for all interactions with the Information Commissioners Office (ICO) on data protection issues managing all requests and co-operating with the ICO as mandated by GDPR. This will involve investigating and resolution of complaints made into personal information, preparing statements, producing evidence and



Head of Information Management Unit & Data Protection Officer

appearing as an expert witness in court when required. Assist where appropriate in investigating disciplinary and criminal matters relating to data protection.

- Investigate and risk assess data protection breaches reporting those which meet the appropriate threshold to the Information Commissioner within 72 hours of being notified of the breach. Continue to act as the point of contact for the ICO through their investigation process collating information from within the Force and responding with required timescales.
- Following the investigation of a data breaches the post holder will make recommendations on prevention and changes to current processing arrangements. This will be monitored and reviewed to ensure recommendation have been implemented timely.
- Develop, review and update local data protection strategies, policies, processes and procedures. Monitoring compliance with policies of the data controller in relation to protection of personal data.
- In order to maintain and monitor compliance with policies the post holder will assign responsibilities under those policies, raise awareness, train or arrange training of staff involved in processing operations, and manage audits required under these policies.
- Strategically lead and co-ordinate the Force's information sharing agreement (ISA) process, providing advice enabling staff to develop ISA, ensuring they have a lawful basis, are reviewed in a timely manner and comply with relevant legislation and the minimum defined security standards.
- Provide advice and guidance on the completion of Privacy Impact Assessments and Privacy by Design documentation, acting as the Reviewing Officer of the documents on completion in accordance with section 62 of the DPA.
- Ensure the Force complies with the National Vetting Code of Practice.
- Make risk based decisions on complex vetting applications and implement and monitor effective aftercare plans. Ensuring the priorities of the Force is taking into account for any decision making around workloads for the wider vetting team.
- Manage the Data Quality and MOPI functions within the Force ensuring compliance with legislation.
- Develop and maintain strategies to improve data quality and compliance throughout the Force.
- Manage the Information Security Function providing advice and guidance to the SIRO whilst ensuring any tasks are completed providing comprehensive and accurate advice back to the SIRO.
- Create a working environment which motivates staff to deliver a quality service and a drive towards continuous improvement.

Note



Head of Information Management Unit & Data Protection Officer

The above list is not exhaustive and other duties commensurate with the grade and general nature of the post may, from time to time, be required. In addition, there may be some variation and/or development of the above duties and responsibilities without changing the general nature of the post.

All employees are to comply with confidentiality laid down in the General Data Protection Regulation (GDPR), the Management of Police Information (MOPI), and the Official Secrets Act (which you will be bound for, for life).

All employees are expected to demonstrate a commitment to the principles of equality of opportunity and fairness of treatment for all within Cleveland Police.



Head of Information Management Unit & Data Protection Officer

Person Specification	
Essential knowledge, skills, and experience (E)	Desirable knowledge, skills, and experience (D)
Knowledge and Qualifications	
Broad knowledge of the Data Protection Act 2018, both GDPR and the Law Enforcement Directive	Hold an accredited qualification/ or working towards an accredited qualification in Data Protection
Understanding of the Human Rights Act and how it applies to vetting and data protection	Knowledge of MoPI
Accredited qualification in managing investigations or relevant experience in data protection	Knowledge of CAFCASS procedures
Experience	
Experience in working as a Data Protection Officer.	
Proven ability to interpret legislation and introduce changes to working practices	
Previous line management experience	
Experience of working in an intelligence environment	
Experience of working successfully with partner agencies	
IT systems including word and excel	
Skills and Abilities	
Professional attitude to work and able to communicate in a confident manner with people of all levels within and outside the Force	
Able to communicate at all levels within the organisation and participate in meetings and briefings	
Excellent customer service skills	
Able to work as both part of a team and independently	



Head of Information Management Unit & Data Protection Officer

Be self-motivated, assertive and able to use initiative to make decisions	
Be able to work under pressure	
Possess the ability to work to strict deadlines	
Good motivator and team leader	
Excellent Verbal / written communication skills	
Possess the ability to organise, develop and motivate staff and develop processes to meet anticipated demands	
Must have a flexible approach to work with the ability to develop new ideas and be willing to adapt to and accept change	
Actively seeks to find solutions to problems	
Other	
Interest in the Privacy Rights of individuals.	
Adhere to the Nolan Principles of Public Life	
Must be flexible to meet challenging and tight deadlines	
Must be adaptable to change to fulfil business demands	

All applicants who identify themselves on the equal opportunities section of the application form as having a disability under the Equality Act 2010 and who meet the essential criteria for the post will be guaranteed an interview.

Version Control	
Reason for Version Change	Version date
Revised job description	02/11/20



Head of Information Management Unit & Data Protection Officer

Competency and Values Framework (CVF) for Policing: Level 3 – Senior Manager/Executive

Set out below are Cleveland Police Leadership Behaviours (2017) drawn from the College of Policing's Competency and Values Framework for Policing (2017). A candidate's behaviours/values will be measured at interview.

Competency	Level 3 – Senior Manager / Executive
Emotionally aware	<ul style="list-style-type: none">• I seek to understand the longer-term reasons for organisational behaviour. This enables me to adapt and change organisational cultures when appropriate.• I actively ensure a supportive organisational culture that recognises and values diversity and wellbeing and challenges intolerance.• I understand internal and external politics and I am able to wield influence effectively, tailoring my actions to achieve the impact needed.• I am able to see things from a variety of perspectives and I use this knowledge to challenge my own thinking, values and assumptions.• I ensure that all perspectives inform decision making and communicate the reasons behind decisions in a way that is clear and compelling.
Taking ownership	<ul style="list-style-type: none">• I act as a role model, and enable the organisation to use instances when things go wrong as an opportunity to learn rather than blame.• I foster a culture of personal responsibility, encouraging and supporting others to make their own decisions and take ownership of their activities.• I define and enforce the standards and processes that will help this to happen.• I put in place measures that will allow others to take responsibility effectively when I delegate decision making, and at the same time I help them to improve their performance.• I create the circumstances (culture and process) that will enable people to undertake development opportunities and improve their performance.• I take an organisation-wide view, acknowledging where improvements can be made and taking responsibility for making these happen.
Collaborative	<ul style="list-style-type: none">• I am politically aware and I understand formal and informal politics at the national level and what this means for our partners. This allows me to create long-term links and work effectively within decision-making structures.• I remove practical barriers to collaboration to enable others to take practical steps in building relationships outside the organisation and in other sectors (public, not for profit, and private).• I take the lead in partnerships when appropriate and set the way in which partner organisations from all sectors interact with the police. This allows the police to play a major role in the delivery of services to communities.• I create an environment where partnership working flourishes and creates tangible benefits for all.
Deliver, support and inspire	<ul style="list-style-type: none">• I challenge myself and others to bear in mind the police service's vision to provide the best possible service in every decision made.• I communicate how the overall vision links to specific plans and objectives so that people are motivated and clearly understand our goals.• I ensure that everyone understands their role in helping the police service to achieve this vision.• I anticipate and identify organisational barriers that stop the police service from meeting its goals, by putting in place contingencies or removing these.



Head of Information Management Unit & Data Protection Officer

	<ul style="list-style-type: none"> I monitor changes in the external environment, taking actions to influence where possible to ensure positive outcomes. I demonstrate long-term strategic thinking, going beyond personal goals and considering how the police service operates in the broader societal and economic environment. I ensure that my decisions balance the needs of my own force/unit with those of the wider police service and external partners. I motivate and inspire others to deliver challenging goals.
Analyse critically	<ul style="list-style-type: none"> I balance risks, costs and benefits associated with decisions, thinking about the wider impact and how actions are seen in that context. I think through 'what if' scenarios. I use discretion wisely in making decisions, knowing when the 'tried and tested' is not always the most appropriate and being willing to challenge the status quo when beneficial. I seek to identify the key reasons or incidents behind issues, even in ambiguous or unclear situations. I use my knowledge of the wider external environment and long-term situations to inform effective decision making. I acknowledge that some decisions may represent a significant change. I think about the best way to introduce such decisions and win support.
Innovative and open-minded	<ul style="list-style-type: none"> I implement, test and communicate new and far-reaching ways of working that can radically change our organisational cultures, attitudes and performance. I provide space and encouragement to help others stand back from day-to-day activities, in order to review their direction, approach and how they fundamentally see their role in policing. This helps them to adopt fresh perspectives and identify improvements. I work to create an innovative learning culture, recognising and promoting innovative activities. I lead, test and implement new, complex and creative initiatives that involve multiple stakeholders, create significant impact and drive innovation outside of my immediate sphere. I carry accountability for ensuring that the police service remains up to date and at the forefront of global policing.

Values	All Levels
Integrity	<ul style="list-style-type: none"> I always act in line with the values of the police service and the Code of Ethics for the benefit of the public I demonstrate courage in doing the right thing, even in challenging situations I enhance the reputation of my organisation and the wider police service through my actions and behaviours I challenge colleagues whose behaviour, attitude and language falls below the public's and the service's expectations I am open and responsive to challenge about my actions and words I declare any conflicts of interest at the earliest opportunity I am respectful of the authority and influence my position gives me I use resources effectively and efficiently and not for personal benefit
Impartiality	<ul style="list-style-type: none"> I take into account individual needs and requirements in all of my action.



Head of Information Management Unit & Data Protection Officer

	<ul style="list-style-type: none"> • I understand that treating everyone fairly does not mean everyone is treated the same • I always give people an equal opportunity to express their views • I communicate with everyone, making sure the most relevant message is provided to all • I value everyone's views and opinions by actively listening to understand their perspective • I make fair and objective decisions using the best available evidence • I enable everyone to have equal access to services and information, where appropriate
Public Service	<ul style="list-style-type: none"> • I act in the interest of the public, first and foremost • I am motivated by serving the public, ensuring that I provide the best service possible at all times • I seek to understand the needs of others to act in their best interests • I adapt to address the needs and concerns of different communities • I tailor my communication to be appropriate and respectful to my audience • I take into consideration how others want to be treated when interacting with them • I treat people respectfully regardless of the circumstances • I share credit with everyone involved in delivering services
Transparency	<ul style="list-style-type: none"> • I ensure that my decision-making rationale is clear and considered so that it is easily understood by others • I am clear and comprehensive when communicating with others • I am open and honest about my areas for development and I strive to improve. • I give an accurate representation of my actions and records • I recognise the value of feedback and act on it • I give constructive and accurate feedback • I represent the opinions of others accurately and consistently • I am consistent and truthful in my communication • I maintain confidentiality appropriately

Further detailed information on the CVF can be located by clicking on the following link:

<https://skillsforjustice-ppf.com/competency-values/>