



CLONTARF HOSPITAL

Blackheath Park, Clontarf, Dublin 3.

Position:	Data Protection/Freedom of Information Officer
Contract:	Permanent Part-time - Onsite
Hours:	21 hours per week
Salary range:	HSE Consolidated pay-scale (Current Applicable Scale)
Reporting to:	Chief Executive Officer
Closing date:	19 October 2026

ORGANISATIONAL CONTEXT

Clontarf Hospital is a 160-bed Voluntary Hospital providing rehabilitation Services under Section 38 of the Health Act 2004 for Adults and Older Persons. At Clontarf Hospital, our committed, expert and compassionate staff provide excellent care to patients on their rehabilitation journey. Our goal is to work in partnership with patients, providing care that is tailored to their unique needs, empowering them to achieve their optimum level of independence at home and in their communities. The patient pathways include:

- Older Persons Rehabilitation
- Step-up beds and hospital avoidance pathways with the Integrated Care Team for Older Persons (ICPOP Team)
- Specialist Rehabilitation Services including neuro-rehabilitation and rehabilitation after trauma for adults and older persons
- Orthopaedic Rehabilitation

The Hospital has close links with the Mater Hospital, Beaumont Hospital, The National Orthopaedic Hospital, HSE Services and our Community Partners.

ROLE SUMMARY

The Data Protection / Freedom of Information Officer holds primary operational and statutory responsibility for overseeing Clontarf Hospital's adherence to data protection laws and the Freedom of Information (FOI) Act 2014. The post holder reports directly to the Chief Executive Officer, maintaining the professional independence required to act as the formal statutory Data Protection Officer (DPO) and formal Information Decision Maker.

ESSENTIAL CRITERIA

- Hold a 3rd Level qualification in a relevant field e.g., Data Protection, Information Compliance, Law, Records Management or a related discipline.
- Have a minimum of 2 years' experience in the area of Data Protection, Information Management and/or Records Management or similar role.
- Experience managing GDPR and FOI processes.
- Strong knowledge of Irish and EU Data Protection legislation.
- Excellent organisational, analytical and decision-making skills.
- High standard of integrity, professional judgement and communication skills.
- Ability to work with multiple internal and external stakeholders.
- Fluent command and understanding of the English language to include spoken and written word.

DUTIES AND RESPONSIBILITIES

DATA PROTECTION ADVISORY & COMPLIANCE

- Act as the principal point of contact for the Data Protection Commission (DPC) on all data protection issues and monitor all ongoing responses to regulatory requests.
- Serve as the formal point of contact for internal and external regulatory organisations, patients, and staff regarding the processing of personal data.
- Act as the first point of contact for data subjects wishing to make a formal complaint in relation to their rights and freedoms.
- Work with the hospital's ICT manager to develop ICT policies and procedures as they relate to GDPR, privacy laws, and data protection.
- Assist and advise on corporate business decisions that carry data protection implications, ensuring that decisions are designed with data protection and privacy in mind.
- Provide structured GDPR and Data Protection Act compliance planning and advisory support to Heads of Services/Departments in the hospital as necessary.
- Assist and advise on the development, enhancement, and revision of Hospital policies, procedures, standards, guidelines, best practices, templates, and checklists. Ensure materials reflect changes in laws, regulatory mandates, or Hospital standards to drive operational consistency.
- Prepare and communicate comprehensive reports regarding data protection compliance breaches and other relevant compliance updates to the CEO, the Executive Management Team, the Hospital Board and the Data Protection Commissioner.
- Provide structured monthly updates directly to the CEO on all matters relating to data protection and GDPR compliance.
- Ensure the timely adoption and execution of all GDPR and data privacy compliance requirements across all hospital departments.

DATA GOVERNANCE OPERATIONS & REGISTERS

- Centralise, maintain, and formally audit the organisational Record of Processing Activities (RoPA) under Article 30 of the GDPR.

- Maintain a centralised register of signed Clontarf Hospital Data Sharing Agreements (DSAs)
- Provide ongoing advice to Heads of Departments regarding GDPR compliance to ensure that formal agreements are actively in place for all existing and new contracts with third parties who process (view, access, store, or process) identifiable patient or employee data.
- Actively review and assess any reported data protection incidents recorded on the Hospital's Data Breach Log. Direct notifications to the Data Protection Commission as appropriate, and provide technical advice alongside letter templates to departments for formal breach notifications to affected data subjects.
- Act as an advocate for data protection and privacy within Clontarf Hospital. Promote compliance by designing, updating, and delivering GDPR awareness and education training courses to hospital staff regarding the foundational importance of data protection in a rehabilitation hospital environment.

DATA PROTECTION IMPACT ASSESSMENTS (DPIAS)

- Undertake and systematically review completed Data Protection Impact Assessments (DPIAs) submitted by internal departments and external stakeholders.
- Audit all newly proposed data processing activities, including new ICT systems, new mobile applications, research ethics applications, and new Electronic Referral Systems etc.
- Recommend clear mitigating steps to reduce data risks if they are not initially identified by stakeholders. Risks must be deemed entirely acceptable under statutory frameworks for the post holder to formally sign off on the activity from a GDPR perspective.

FREEDOM OF INFORMATION (FOI) DECISION MAKER

- Responsibility for the end-to-end management of the hospital's FOI process.
- Recording of requests, open communication with requesters, and adherence to statutory timeframes.
- Co-ordinate and cross-reference records with relevant colleagues, hospital departments, and external agencies as appropriate.
- Review and assess records, applying relevant legal exemptions appropriately to ensure strict adherence to the provisions of the FOI Act 2014.
- Formulate and issue legally sound, timely decisions in line with the provisions of the FOI Act.
- Maintain FOI files documenting the underlying decision and all relevant procedural matters to demonstrate institutional compliance with the Act and to aid internal or external reviews.
- Liaise directly with the Appeals Officer when required. Prepare submissions to the Office of the Information Commissioner (OIC) when required.

GDPR DECISION MAKER (INFORMATION REQUESTS / DSARS)

- Lead the management of the GDPR process for all information requests, acting as the primary point of contact for Subject Access Requests under Article 15 of the GDPR.
- Ensure the logging of requests, transparent communication with the requester, and adherence to strict statutory timelines.
- Apply relevant restrictions or exemptions in line with GDPR and the Data Protection Acts 1988–2018.
- Maintain files documenting the decision and all relevant procedural matters to demonstrate full compliance with GDPR and to aid independent reviews.
- Compile and provide formal statistical information on SAR data for reporting to the EMT, Hospital Board and HSE Consumer Affairs.
- Prepare formal submissions to the Office of the Data Protection Commission where required.

COMPETENCIES

LEADERSHIP, TEAMWORK AND WORKING WITH MULTIPLE INTERNAL AND EXTERNAL STAKEHOLDERS

- Inspires commitment from a range of teams, brings complex matters to conclusion, regularly demonstrates unique insight and is an effective decision maker.
- Have the ability to work on own initiative, be approachable and available for advice and support.
- Motivates others individually and in teams to deliver high-quality work and develops effective and productive workplace relationships.
- Maintains absolute focus, provides clarity and advice on all matters related to GDPR and data protection.
- Demonstrates commitment to professional development.
- Excellent evaluation, decision making, organisational and time management skills with the ability to work to deadlines.
- Leads by example in terms of commitment, flexibility and a strong patient service ethos to achieve desired outcomes.
- Harnesses resources to deliver on longer-term goals, manages resistance and setbacks as they arise.
- Gathers information from enough sources and other people to make well-informed decisions.
- Recognises when it is appropriate to refer issues to senior management.
- Effectively introduces change, fosters a culture of creativity in employees and overcomes resistance to change.
- Demonstrates flexibility and an openness to change and keeps abreast of new regulations and laws.

- Good communication and team working capability, and an ability to take necessary actions and responsibility for the same.
- Assist the Executive Management Team in achieving the hospital's strategic objectives as it relates to GDPR and data protection.

COMMUNICATION

- Demonstrate excellent interpersonal and communicative skills across all clinical, administrative, and executive groups in the hospital
- Provide reports for the CEO and Board as required.
- Establish and maintain effective communication networks within service groups, wards and departments within the Hospital.
- The post holder will work collaboratively with medical, nursing, pharmacy, health and social care professionals, administrative, ICT and support departments across Clontarf Hospital to establish and maintain effective corporate and departmental systems to ensure that all personal and sensitive health information is handled, processed, stored, and retained in line with Hospital policies, procedures, national healthcare standards, and applicable legislation.
- Maintain effective liaison with the Data Protection Commissioner, relevant HSE personnel and other external stakeholders as required.

LEARNING AND EDUCATION

- Promote and support a learning and continuous improvement culture across the Hospital
- Lead, attend and participate in relevant staff development programmes on an ongoing basis and share knowledge with other staff members
- Lead in the training of colleagues as required.
- Identify training and professional development requirements across the Hospital

RISK MANAGEMENT AND COMPLIANCE

- Ensure compliance with all relevant guidelines, policies, procedures and relevant legislation and regulatory requirements.
- Participate in the continuous review and evaluation of policies, guidelines and existing practices through regular audit programmes and review engaging with the multi-disciplinary team where required.
- Assist in promoting a culture of continuous quality improvement across the Hospital.
- Participate in the requirements of the Hospital's risk management programme.
- Support the delivery of a high standard of care to all patients.
- Ensure compliance with the obligations required by the Data Protection Acts, GDPR and Freedom of Information (FOI) Acts.

CONFIDENTIALITY

In the course of your employment you may have access to, or hear information concerning, the medical or personal affairs of patients and/or staff, or other health service business. Such records and information are strictly confidential and, unless acting on the instructions of an authorised officer, on no account must information concerning staff, patients or other health

service business be divulged or discussed except in the performance of normal duty. In addition, records must never be left in such a manner that unauthorised persons can obtain access to them and must be left in safe custody when no longer required.

The above role profile is not intended to be a comprehensive list of all duties involved and consequently the post holder may be required to perform other duties as appropriate to the post which may be assigned to him/her from time to time and to contribute to the development of the post while in office. This role profile will be subject to review in light of changing circumstances.

GARDA CLEARANCE

Arrangements have been introduced, on a national level, for the provision of Garda Clearance in respect of candidates for employment in areas of the Health Services, where it is envisaged that potential employees would have substantial access to children or vulnerable individuals. Each candidate will be required to complete a Garda Clearance form.

INFECTION CONTROL:

Have a working knowledge of Health Information and Quality Authority (HIQA) Standards as they apply to the role, for example, Standards for Healthcare, National Standards for the Prevention and Control of Healthcare Associated Infections, Hygiene Standards etc. and comply with associated HSE and Hospital protocols for implementing and maintaining these standards as appropriate to the role.

BENEFITS AND OPPORTUNITIES

- Supportive, inclusive and collegial working environment that values staff wellbeing and mutual respect
- Opportunity to gain broad and meaningful clinical experience across a diverse range of rehabilitation cases, supporting both professional confidence and career development
- Strong collaborative working within a multidisciplinary team, promoting shared learning and best practice
- Active support for Post-Graduate Education and Continuous Professional Development, with a strong emphasis on ongoing learning and professional growth
- Flexible working arrangements, where possible, to support work–life balance
- Access to free on-site car parking
- Subsidised staff canteen
- Membership of a public sector pension scheme
- Access to Occupational Health Services
- Staff support and counselling services, reflecting our commitment to employee wellbeing and psychological safety

OTHER REQUIREMENTS SPECIFIC TO THE POST

The post holder may be required to perform other duties as appropriate to the post, which may be assigned to him/her from time to time, and to contribute to the development of the post while in office.

This job description will be subject to review in the light of changing circumstances.

It is not intended to be exhaustive but should be regarded as providing guidelines within which individuals work.

The duties and responsibilities detailed above reflect the present service requirements and may be subject to review and amendment to meet the changing needs of the service.

Short listing may be carried out on the basis of information supplied in your Application Form. The criteria for short listing are based on the requirements of the post as outlined in the 'eligibility criteria' and 'skills, competencies and/or knowledge section of this job specification. Therefore, it is very important that all experience is outlined in light of those requirements. **Failure to include information regarding these requirements may result in you not being called forward to the next stage of the selection process.**

PLEASE NOTE THIS COMPETITION CAN BE CLOSED EARLY IN THE EVENT OF LARGE VOLUME OF APPLICANTS.