

Job Description and Person Specification

Data Protection Officer - ICT (Grade VII Officer)

Full-Time Permanent

Reference: HR21E233

Closing Date for Applications: Tuesday, 18th May 2021

HR Business Services,
St Vincent's University Hospital,
Elm Park,
Dublin 4.

Contact: +353 (1) 221 6062 or recruitment@svuh.ie

Job title / Grade: Data Protection Officer (ICT) / Grade VII Officer

Reports to: Director of ICT and Head of Systems Management

Role Summary:

The Data Protection Officer - ICT will in accordance with the EU's General Data Protection Regulation (GDPR), be responsible for monitoring compliance with the GDPR and other European and national data protection laws and SVHG policies. The DPO reports to the Head of Systems Management and works with the Legal, Quality and Compliance teams, as well as with local authorities to provide updates on compliance with data protection and privacy laws.

General Responsibilities:

- Act as a point of contact for internal and external regulatory organisations, patients and staff, with respect to how SVHG processes personal data and supports the right of the data subject.
- Be the first point of contact for a data subject who wishes to make a formal complaint to SVHG in relation to their rights and freedoms of the data subject.
- Act as an advocate for data protection and privacy within SVHG, by providing inputs to internal training courses and building awareness around the hospitals.
- Act as the point of contact for the Data Protection Commissioner on all data protection issues and monitor responses to requests.
- Provide advice on the completion of data privacy impact assessment and review completed assessments to identify challenges and improvements.
- Monitor compliance with data protection and privacy laws, including implementation of SVHG's privacy and data protection policies, internal audits and other relevant data protection activities.
- Consulting and building strong relationships with relevant data protection authorities.
- Assist and advise towards business decisions that pose data protection implications including ensuring decisions regarding products and services are designed with data protection and privacy in mind.
- Assist and advise in the build and enhancement to SVHG policies, procedures, standards, procedures, guidelines, best practices, templates and checklists to enable SVHG to meet data protection obligations and ensure consistency across the Group.
- Prepare and communicate data protection compliance, breaches and other relevant updates to senior management and the Data Protection Commissioner.
- Assist and advice in the periodic revision of data protection materials to reflect changes in laws, regulatory or company policy and standards.
- Ensure timely adoption and execution of all GDPR and data privacy compliance requirements.

Internal

- GDPR and Data Protection Act compliance planning and advisory support function to key departments and Heads of Departments in key areas including; HR, Research, ICT, Finance, Quality and the key business directorates (Diagnostics, Medical and Peri-operative)
- Subject access requests (Art 15 GDPR) - DPO point of contact for subject access requests. DPO to work with Release of Information Department in relation to progress on execution of subject access requests in line with time limits under GDPR.

- Maintaining organisational Records of Processing Activities in a central location (Art 30 GDPR).
- Maintaining register of signed SVUH Data Sharing Agreements (Controller to Processor and Controller to Controller) centrally - ongoing advice to Heads of Departments in relation to GDPR compliance need to have these agreements in place for all existing and new contracts with 3rd parties that process (view, access, store, process) identifiable patient or employee data
- Data breach management - review and assess any reported data protection incidents reported on DATIX (internal risk management system) and report to the Data Protection Commission as appropriate. Provide advice to departments and letter templates for breach notification to data subjects.
- GDPR awareness and education - promote awareness in relation to GDPR compliance within the hospital using available channels - all user email, intranet, posters, pull up banner stands, meetings.
- GDPR course on MyView (internal HR system) - promote availability of this course and link in with key Heads of Departments in relation to compliance levels in their areas.
- SVHG Data Governance Committee - DPO reports into this Committee.
- SVUH Quality and Patient Safety Committee (QPSE) - prepare reports as required.
- Data Protection Impact Assessments (DPIA's) - DPO reviews completed DPIA's by internal departments and stakeholders in relation to any newly proposed data processing activities (e. new ICT system, new mobile application, high risk research ethics applications). DPO to recommend mitigating steps to reduce risks if not identified by stakeholders. Risks must be deemed acceptable for DPO to sign off on activity from a GDPR point of view.
- SVUH Data Protection policies - update as appropriate.
- External data sharing agreements provided by other health agencies (HSE, NTPF etc) review from a GDPR point of view and advise internally as appropriate.

External

- Stakeholder engagement and management.
- Membership of the Dublin Acute Teaching Hospital's (DATH) DPO Network (monthly meetings).
- Membership of the VHARMF Data Protection Sub Committee (quarterly meetings).
- Engagement with the Data Protection Commission (DPC) breach investigation team, complaints team and Health team as appropriate.
- Engagement with HSE Data Protection Office and related HSE teams in relation to new processing activities under Sláinte Care (Acute Strategy Team, HSE).
- Engagement with 3rd party vendors/companies/processors in relation to any GDPR queries (including queries in relation to data processing agreements and any data protection incidents).

Research Ethics

- Monthly review of SVHG Research Ethics applications (monthly SVHG Research Ethics Committee)
- DPO attendance at monthly SVHG Research Ethics Committee.
- DPO clarification on any arising queries from submitted applications in relation to the Health Research regulation and GDPR.
- Membership of the Health Research Data Protection Network (HRDPN) (monthly meetings).

Leadership

- Inspires commitment from a range of teams, brings complex matters to conclusion, regularly demonstrates unique insight
- Ability to work on own initiative

- Is approachable and available for advice and support
- Motivates others individually and in teams to deliver high quality work.
- Develops effective and productive workplace relationships.
- Maintains absolute focus, provides clarity and energy, compares and contrasts individual and team performance to drive business goals
- 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
- Proven Privacy experience and knowledge
- Keeping abreast of new regulations and laws
- Good judgement on when to consult and escalate to management.
- Good communications and team working capability
- Effective decision making
- Ability to take necessary actions and responsibility for same.
- Crisis management.
- Strategic planning.
- Development of ICT policies and procedures

The above Job Description 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 document must be regarded as an outline of the major areas of accountability at the present time, which will be reviewed and assessed on an on-going basis.

The Hospital Structure is currently under review and therefore, reporting relationships may change.

Informal Enquiries or Role Specific Enquiries:

Ms Bridie Dunne, PA to the Director of ICT Email: bridie.dunne@svuh.ie

Person Specification

Factors	Essential	Desirable
Qualifications	<ul style="list-style-type: none"> Relevant 3rd level qualification 	<p>IAPP Certification or other related data protection or legal qualification</p> <p>Strong data protection and privacy experience and knowledge</p>
Experience (length and type)	<ul style="list-style-type: none"> Privacy experience or actual experience as a DPO within the Healthcare or equivalent industries. Detailed knowledge of European data protection and privacy practices and the regulatory and legislative frameworks, including GDPR and the practicalities of implementation Experience and proven record in engaging with Data Protection Authorities Excellent written and oral communication skills Ability to work with and across multiple teams throughout an the organisation, with the ability to maintain independent Strong leadership and relationship management skills, with the ability to influence at all levels Certified Information Privacy Professional (CIPP) Certification is a plus 	<ul style="list-style-type: none"> Working knowledge of Health ICT Projects management experience in a Health environment Broad knowledge of Health service. Experience in compliance leading business alignment with changing laws and applicable regulations for data protection Understanding of data protection compliance in a healthcare context
Core Competencies	<p><u>Managing the service</u></p> <p>Knowing the health service and how it works.</p> <p>Planning and managing resources.</p> <p>Evaluating information and judging situations.</p> <p>Setting standards.</p> <p>Delivering quality and fairness for service-users.</p>	

	<p><u>Managing people</u> Influencing people and events. Managing individual performance. Being the communication channel. Creating team spirit. Supporting personal development.</p> <p><u>Managing yourself</u> Being a role model. Maintaining composure and quality of working life.</p> <p><u>Managing change</u> Integrating the service. Embracing the change agenda.</p>	
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Particulars of Office:

The appointment is: Wholetime, Permanent, Pensionable

Annual Salary Scale Pro-Rata (€): 01/10/2020 PSPP (Grade VII Clerical)*.

1	2	3	4	5	6	7	8	9	10	11	
50,834	52,074	53,527	54,982	56,444	57,748	59,077	60,369	61,653	63,864	66,081	LSIs

These particulars are subject to change in line with overall public pay policy.

***Candidates should expect to be appointed on the minimum of the salary range and in accordance with the Department of Finance guidelines.**

Probationary Period: The appointee shall hold office for a probationary period of six months – The Hospital's Probation and Induction policy will apply.

Pension Scheme: The candidate will be entered into one of the Hospital Superannuation Schemes.

Working Hours: The person appointed will work a **basic 37 hour week**. You will be required to work the agreed roster / on call arrangements advised to you by your line manager. Your contracted hours of

work are liable to change between the hours of 8am – 8pm over seven days to meet the requirements for the extended day services in accordance with the terms of the Framework Agreement. (Reference HSE HR Circular 003/2009). Flexibility on hours of attendance in response to service needs will be a requirement.

Annual leave entitlement: 30 days per annum pro-rata each year. Annual leave accrued must be taken within the duration of the contract or calendar year and as agreed between the candidate and the Head of Department.

Additional Information

Confidentiality:

During the course of employment staff may have access to, or hear information concerning the medical or personal affairs of patients, students, staff and / or other health service business. Such records and information are strictly confidential and unless acting on the instruction of an authorised officer, such information must not 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 kept in safe custody when no longer required

Hygiene:

During the course of employment staff are required to ensure that the hospital's hygiene and infection control policies are adhered to at all times. All employees have responsibility to prevent transmission of infection by adhering to and implementing optimal hand hygiene and adhering to the Hospital's Hygiene processes. Hygiene is a fundamental component of St Vincent's University Hospital's quality system to ensure the safety and well-being of its patients and staff and plays a role in the prevention and control of healthcare associated infection.

Policies / Legislation:

All Hospital policies and procedures form an integral part an employment contract and may be subject to update and revision, from time to time, in consultation with union representatives as appropriate. Employees are required to comply with all hospital policies, procedures (e.g. Dignity at Work, Trust in Care, Computer Usage Policy) and the Hospital's ethical codes of practice.

Employees are required to abide by the hospital's code of behaviour and the code of practice as defined by their relevant professional body.

Please note the following:

- The Hospital Board is not responsible for loss or theft of personal belongings
- Fire orders must be observed and staff must attend the fire lectures periodically
- All accidents within the department must be reported immediately.
- In line with the Safety, Health and Welfare at Work Act (2005), smoking within the Hospital Building is not permitted.
- All staff are advised to avail of Hepatitis B Vaccination with Occupational health
- The use of personal mobile phones is prohibited.
- St. Vincent's University Hospital buildings and grounds are **smoke-free**.

Application Process: St. Vincent's University Hospital is an equal opportunities employer and is committed to promoting an environment free from discrimination in accordance with the Employment Equality Acts 1998 and 2004. The Hospital values diversity and recognises the benefits of having a workforce that reflects the community we serve. We are committed to equality of access to positions within the Hospital. All recruitment activity and documentation will encourage applications from all potential candidates without discrimination.

Interested candidates should apply for vacancies of interest by visiting the Hospital Careers pages: <http://www.stvincents.ie/Home/Careers.html>

- Note the closing date(s) for the submission of on-line applications are specified on the list of vacancies. St. Vincent's University Hospital are not able to accept late applications.
- It is the applicant's responsibility to ensure that they apply well in advance of the closing date.
- Any applications which are still in progress but have not been submitted after the closing date will not be registered by our Web Recruitment System.
- Applications for St. Vincent's University Hospital job vacancies will only be accepted through our Web Recruitment System.
- St. Vincent's University Hospital may only take into account technical issues raised by an applicant if advised to our Human Resources Department prior to the advertised closing date.

Non-European Economic Area Applicants: While St. Vincent's University Hospital is an equal opportunities employer, in line with current Department of Jobs, Enterprise and Innovation Employment Permit requirements, applications from non European Economic Area (EEA) will only be considered in the event that an EEA citizen cannot be found to fill the vacancy. Please note that if you are a NON-EEA applicant and are unable to supply documents (listed on www.djei.ie), you are not entitled to participate in this recruitment competition. This is in accordance with the EU Community Preference Rule. Further information is available at www.djei.ie.

Former Public Service employees: Eligibility to compete may be affected where applicants were formerly employed by the Irish Public Service and previously availed of an Irish Public Service Scheme including:

- Incentivised Scheme for Early Retirement (ISER)
- Department of Health and Children Circular (7/2010)
- Collective Agreement: Redundancy Payments to Public Servants

Applicants should ensure that they are not precluded from re-engagement in the Irish Public Service under the terms of such Schemes. This is a non-exhaustive list and any queries should be directed to an applicant's former Irish Public Service Employer in the first instance.

Shortlisting: Shortlisting will be carried out on the basis of information supplied on your curriculum vitae. The criteria for shortlisting are based on the requirements of the post as outlined in the Person Specification. Failure to include information regarding these requirements on your CV may result in you not being called forward to the next state of the recruitment process.

All overseas qualifications must be validated. No candidate can work in the Hospital without validated qualifications. If professional registration is also a requirement, candidates must provide documentation of same.

Canvassing will automatically disqualify.

Please note that you will be contacted mainly by mobile phone and email. It is important that your mobile phone number, postal address and email address are correct. It is your responsibility to ensure that you have access to your mobile voice mails and emails. We recommend that you use an email address that you have regular access to.

Competency based interviews follow the shortlisting stage of the recruitment process. Credit is awarded by the interview panel to candidates who demonstrate at interview that they possess the experience, competencies and skills listed in the person specification. Candidates will normally be given at least one week's notice of interview. Interviews are held in person only, no subsequent or alternative dates to dates given will be offered to candidates. All interviews are held in the HR Department of St. Vincent's University Hospital, Elm Park, Dublin 4 unless it is specifically noted otherwise in the Job Description. All posts are located in St. Vincent's University Hospital, Elm Park, Dublin 4 unless it is specifically noted otherwise in the Job Description.

Disability: Please let us know if you need any special assistance at interview, e.g. if you have difficulty in moving up or down stairs or have hearing or speech difficulties.

Candidates are notified of the result of their interview at the earliest possible date after the interview. The recommendation of the interview panel does not constitute a job offer. The process continues after the interview and includes clearance checks such as references, Garda clearance, occupational health clearance, validation of qualifications and experience. A job offer is made pending satisfactory clearances. SVUH reserves the right to remove candidates from specific recruitment panels and retract job offers if satisfactory clearances cannot be obtained or are deemed unsatisfactory.

For some recruitment competitions a panel of successful candidates may be formed as a result of the interviews. Candidates who obtain a place on the panel may, (within the life of the panel), be considered for subsequent approved vacancies. Candidates are placed on a panel in order of merit. A panel is typically live for 6 months.

It is normal procedure that candidates be placed on the first point of the relevant salary scale in accordance with the Department of Finance guidelines.

Declaration: Please read your application carefully and check for any errors or omissions. False declaration or omission in support of your application will disqualify you from appointment.

This document must be regarded as an outline of the major areas of accountability at the present time, which will be reviewed and assessed on an on-going basis.

Date: April 2021

