

Data Protection Officer Job Description

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DPO Tasks

- To provide information about GDPR compliance to MRC Print Limited and its employees
- To monitor GDPR compliance (This includes managing data protection activities, providing advice on data protection impact assessments, training staff and conducting internal audits)
- To be an initial point of contact for supervisory authorities and individuals whose data is being processed

A DPO reports to the highest management level, operates independently and must be provided with adequate resources to carry out their designated tasks.

Duties: Managing data protection compliance

- To implement, enforce and review a data protection policy
- Establish a data protection steering committee, tasked with ensuring oversight of privacy requirements. It must have a terms of reference and be sponsored by a Member of the Executive
- For personal data processing, must update procedures and guidance
- Act as a contact point for the ICO, including collating information if required for an investigation
- Manage requests for information or action, (checking validity, coordinate and approve responses, maintain a log of requests and produce summaries)
- Maintain a register documenting personal information processing activities, define and maintain information flow maps
- Produce a register of information owners for different categories of information, educate information owners on responsibilities
- Maintain a log of data protection incidents, recommendations and actions
- Produce or advise on the production of new policies on data sharing, represent MRC Print Limited as appropriate
- Ensure data protection impact assessments are performed and advise as necessary
- Develop solutions for issues to do with personal data, information quality and security
- Ensure that personal data processing is included in the annual audit programme

Assess data protection compliance

- Review compliance with legislation (must include third-party data processors)
- Provide reports to the board on MRC Print Limited compliance, training and awareness, in relation to data protection

Training and Awareness

- Provide advice and training to staff about their responsibilities regarding data protection

- Produce a data protection training programme
- Maintain own knowledge of data protection issues, information management and related legislation
- Provide advice on related law and other issues
- Ensure the availability of written data protection information
- Provide consultation to all departments (assessing problems, queries, procedures and practices)
- Stay knowledgeable of data protection and inform data protection steering committee of new developments

Qualifications and Experience

- An appropriate qualification or significant relevant experience
- A comprehensive understanding of the practical application of relevant legislation (including the GDPR) and official guidance relating to processing of personal data
- Able to assess data management systems
- Able to manage information collection and produce a professional response
- Communicate effectively at all levels
- Confidence in providing advice to staff
- Able to provide advice and training regarding data protection
- Basic IT knowledge regarding data storage, retrieval and security

Article 37

1. The controller and the processor shall designate a data protection officer in any case where:
 - the processing is carried out by a public authority or body, except for courts acting in their judicial capacity;
 - the core activities of the controller or the processor consist of processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale; or
 - the core activities of the controller or the processor consist of processing on a large scale of special categories of data pursuant to Article 9 and personal data relating to criminal convictions and offences referred to in Article 10.
2. A group of undertakings may appoint a single data protection officer provided that a data protection officer is easily accessible from each establishment.
3. Where the controller or the processor is a public authority or body, a single data protection officer may be designated for several such authorities or bodies, taking account of their organisational structure and size.
4. In cases other than those referred to in paragraph 1, the controller or processor or associations and other bodies representing categories of controllers or processors may or, where required by Union or Member State law shall, designate a data protection officer. The data protection officer may act for such associations and other bodies representing controllers or processors.
5. The data protection officer shall be designated on the basis of professional qualities and, in particular, expert knowledge of data protection law and practices and the ability to fulfil the tasks referred to in Article 39.
6. The data protection officer may be a staff member of the controller or processor, or fulfil the tasks on the basis of a service contract.
7. The controller or the processor shall publish the contact details of the data protection officer and communicate them to the supervisory authority.

Article 38

1. The controller and the processor shall ensure that the data protection officer is involved, properly and in a timely manner, in all issues which relate to the protection of personal data.
2. The controller and processor shall support the data protection officer in performing the tasks referred to in Article 39 by providing resources necessary to carry out those tasks and access to personal data and processing operations, and to maintain his or her expert knowledge.

3. The controller and processor shall ensure that the data protection officer does not receive any instructions regarding the exercise of those tasks. He or she shall not be dismissed or penalised by the controller or the processor for performing his tasks. The data protection officer shall directly report to the highest management level of the controller or the processor.

4. Data subjects may contact the data protection officer with regard to all issues related to processing of their personal data and to the exercise of their rights under this Regulation.

5. The data protection officer shall be bound by secrecy or confidentiality concerning the performance of his or her tasks, in accordance with Union or Member State law.

6. The data protection officer may fulfil other tasks and duties. The controller or processor shall ensure that any such tasks and duties do not result in a conflict of interests.

Article 39

1. The data protection officer shall have at least the following tasks:

- To inform and advise the controller or the processor and the employees who carry out processing of their obligations pursuant to this Regulation and to other Union or Member State data protection provisions;
- To monitor compliance with this Regulation, with other Union or Member State data protection provisions and with the policies of the controller or processor in relation to the protection of personal data, including the assignment of responsibilities, awareness-raising and training of staff involved in processing operations, and the related audits;
- To provide advice where requested as regards the data protection impact assessment and monitor its performance pursuant to Article 35;
- To cooperate with the supervisory authority;
- To act as the contact point for the supervisory authority on issues relating to processing, including the prior consultation referred to in Article 36, and to consult, where appropriate, with regard to any other matter.

2. The data protection officer shall in the performance of his or her tasks have due regard to the risk associated with processing operations, taking into account the nature, scope, context and purposes of processing.

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