

URM's Virtual DPO Service

Why Do You Need a DPO?

For some organisations, it is now a mandatory requirement to appoint a data protection officer, namely if you:

- Are a public authority
- Conduct large scale systematic monitoring of individuals
- Conduct large scale processing of special categories of data or data relating to criminal convictions and offences.

However, irrespective of any mandatory / legal requirement, employing a DPO demonstrates to the Information Commissioner's Office (ICO) and your business partners your commitment to a data protection framework that is compliant with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA). Equally, having someone to oversee your approach and to be there, in the background, as and when you need them for advice, guidance and support, is invaluable. A DPO resource will enable your organisation to adopt a proactive approach to managing personal information.

Benefits of URM's Virtual DPO Service

- Enables you to access not just one, but a team of experienced and qualified data protection practitioners, each with their area of specialism, e.g. dealing with the regulator (ICO), advising on challenging SARs, conducting data protection impact assessments (DPIAs), managing personal data breaches, improving information security, developing awareness presentations
- Provides you with expert practical advice, guidance and support, as and when needed
- Ensures there is no 'conflict of interest' between the DPO and other business activities i.e. the DPO should not be a company director or HR representative
- Provides a practical and cost-effective solution to achieving compliance with the GDPR and the DPA
- Ensures you are able to respond confidently to requests and comply to the latest regulatory and legal developments, as URM's team closely monitors any clarifications/interpretations on the GDPR/DPA from sources such as the ICO.

What does URM's Virtual DPO Service consist of:

Initial Review and Kick Off Meeting

With the initial review, URM will establish an acceptable baseline/starting point for the Virtual DPO Service and verify your current GDPR compliance status. The review may identify improvement opportunities and we can mutually agree who will own any resulting actions and timescales for completion. This will be undertaken before the service commences and will ensure that the GDPR framework is established and that the appropriate governance is in place. This is followed by a kick off meeting where the exact nature of the DPO service, along with roles and responsibilities, will be defined and a service summary will be prepared for joint sign off.

On-site Days

A key component of URM's Service are the days spent on your site and which occur on a frequency that meets your requirements, e.g. weekly, fortnightly, monthly, quarterly. Typically, the on-site days involve the DPO:

- Attending management meetings
- Reviewing and providing oversight of compliance monitoring (including a review of progress against actions)
- Reviewing training delivery including material, frequency, attendees and supporting metrics such as completion rates
- Reviewing data protection impact assessment (DPIAs) and data flows for new/changed activities
- Reviewing findings of audits and proposing remediation activities
- Providing expertise to respond to questions/queries
- Providing assurance and oversight
- Providing updates on any clarification /interpretations received from the ICO on the GDPR/ DPA 2018
- Developing your incident management plan
- Assessing the impact of any planned business changes on the GDPR compliance programme.

Ad hoc Advice and Guidance

Another key element of the Virtual DPO Service is providing you with advice and guidance on all aspects of data protection including:

- Performing DPIAs of new systems or services (mandatory within the new Regulation)
- Updating or providing training material for all employees to ensure they are fully aware of their DP responsibilities
- Fulfilling data subject rights requests, including accessing, correcting and erasure
- Managing or providing an escalation point for any personal data breach and will act as the liaison and incident manager with the ICO
- Preparing responses to the ICO following a formal complaint from a data subject
- Developing 'privacy information notices' and advising where they apply
- Providing guidance on supporting legislation such as the Privacy in Electronic Communications Regulations (PECR) and Codes of Practice
- Assisting you to certify to BS 10012:2017
- Responding to questions/queries that require immediate attention i.e. cannot wait until the next site visit.

Annual DP Audits

In order to provide the necessary assurance to the Board/Senior Management Team on your overall compliance with the GDPR/DPA 2018, URM is able to conduct an annual audit. With the audit, the DPO will review various DP activities including:

- DPIAs conducted
- Training delivered to staff
- Internal audits carried out
- Roles and responsibilities established
- Governance structures.

With each activity, the DPO will seek evidence/records of processing activities.

If you would like to discuss how URM's Virtual DPO Service can be tailored to your organisation's requirements, please click [here](#) or call **01189 027 450**