

March 2021

Charting the UK Data Protection Profession



Foreword

Welcome to the latest research findings from the UK Data Protection Index, brought to you by [Data Protection World Forum](#) and [The DPO Centre](#).

Every quarter we quiz our panel of Data Protection Officers from around the United Kingdom on the same set of questions, allowing us for the first time to track changing attitudes and opinions over time in the ever-shifting privacy landscape.

We also added several new questions this month for our panel of 334 DPOs to tackle, including finding out a bit more about what a minimum qualification level for a protected DPO title should look like.

We also bring you insight on expected budgets, spending priorities, challenges to compliance and changing attitudes following the end of the Brexit transition period.

Nick James, Founder of the Data Protection World Forum, said: “This unique project is already giving us insight into the shifting priorities and concerns of DPOs and will only become more valuable over time as we track sentiment further.”

Rob Masson, CEO of The DPO Centre, said: “Two and a half years ago the GDPR was introduced to help provide individuals with more control over how their data is used, the Index is now confirming that privacy professionals are still seeking more clarity on key elements of the legislation like breach reporting and marketing guidance.

The next survey results will be published in June. If you are a privacy professional and you would like to join the panel and add your voice to future surveys, please [click here](#).



The UK Data Protection Index: Q1 2021 Report

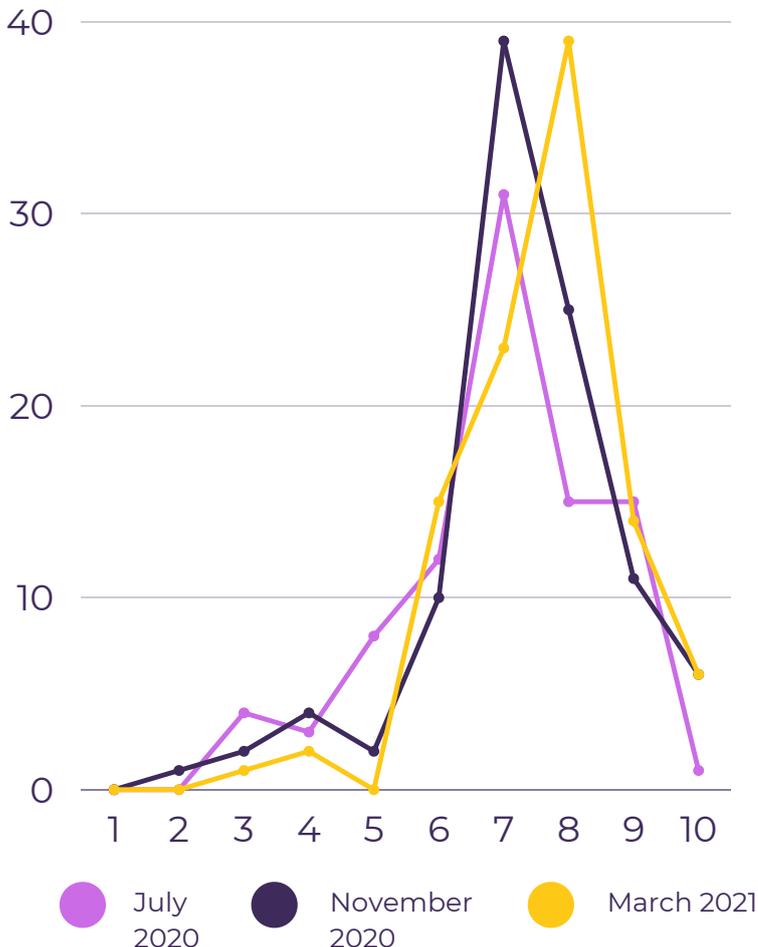
Who is on the panel?

Since the Index launched last July, 334 DPOs spread across every part of the United Kingdom have taken part. This includes 5.7% from Scotland, 1.2% from Northern Ireland and 3% from Wales. London & the South East combined account for 36.8% of the respondents.

More than three-quarters of the DPOs (78.1%) are full-time, in-house employees, 15.9% consultants or outsourced, and 4.8% are employed in-house on a part-time basis.

Nearly a quarter (23.1%) work for companies that have between 1,001-5,000 employees.

However, there is representation from all sizes of companies, from firms with just 10 employees or less (3.6%) to businesses with a 10,000+ workforce (15.6%).



Key results:

- The average number of DSAR requests received in the last 30 days was 16.07, down from the 18.04 recorded the last time around, following an increase from the 11 recorded last July.
- Just 7% of DPOs think their data is becoming much more protected over time, compared to 15% in November.
- DPOs perception that the UK's data laws are more advanced than other countries increased for the second quarter running, with the average score out of 10 increasing to 7.55, from 7.32 in November 2020 and 7.12 last July 2020.

Fig. 1: DPOs' confidence in their organisation's data protection compliance has risen for the second successive quarter. 59% gave a score of eight or more, up from 42% in November and 31% in July

Key results continued:

- Just 19% of DPOs now think Brexit will have a major impact on their organisation's data compliance requirements, down from 32% in November 2020.
- Nearly half (48%) gave a score of four or under when asked how concerned they are about the risk of class group actions in the event of a data breach, indicating it is not of huge concern.



Fig 2: International data transfers are now seen as the biggest challenge when trying to comply with GDPR, cited by 21% of respondents

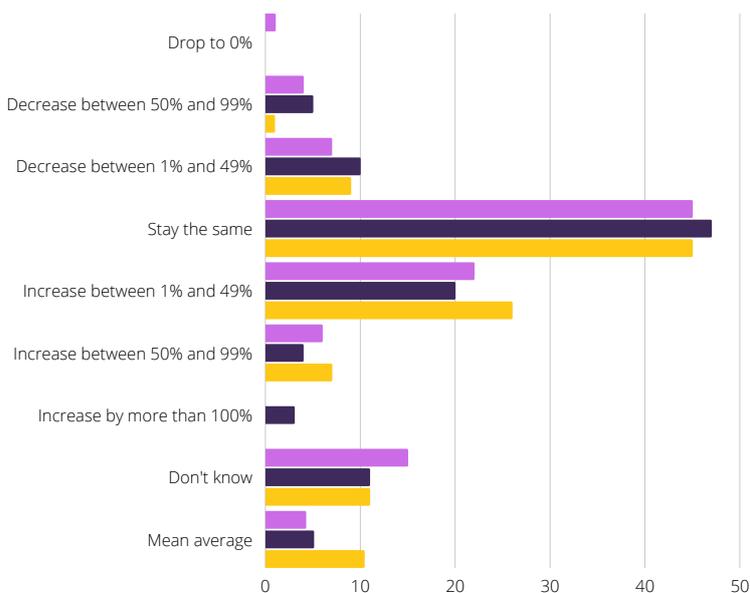


Fig 3: The average data protection budget is expected to increase 10% over the next 12 months, more than double the 5% increase anticipated in November 2020.



Fig 4: A greater proportion of DPOs told us they would prioritise privacy software (21%) and staff training (23%) if their organisation's data protection budget increased 20% the next quarter. Both these categories increased by seven percentage points.

Budgets are expected to increase and confidence is rising

Our panel, on average, said they expect their organisation's data protection budget to increase 10% over the next 12 months. This is a doubling on the expected increase of 5% panellists they were expecting in our last Index poll in November and suggests companies are looking to put more investment into data protection.

And what would our DPOs look to spend an enlarged data protection budget on? We asked the panel what their spending priority would be in the next quarter if their data protection budget were to increase by 20%.

There were large increases in the proportion of respondents who would prioritise spending on training (23% compared to 16% in November) and on privacy software and platforms (21% up from 16%).

However additional interim resources were still the most picked option, cited by 30% of respondents.

The expected budgetary increases may in part explain why DPOs' confidence in the organisation's data protection compliance has risen for the second successive quarter, with 59% giving a score of eight or more, up from 42% in November 2020 and 31% in July 2020.

The findings also show that the average number of Data Subject Access Requests (DSARs) received in the last 30 days has fallen from 18.04 to 16.07. This is in part a reversion after the number leapt up from 10.85 recorded in July 2020.



International Data transfers are now the biggest concern...

As this is the third time we have carried out our Index poll, we can now begin to map trends over three successive quarters.

International data transfers are now seen as the biggest challenge for GDPR compliance. This topic was mentioned by 4% of respondents as the biggest concern in July, before leaping to 14% in November and then to 21% in March. It leapfrogs the previous most cited issue of accountability/demonstrating compliance, which nevertheless remains a major concern, cited by 17% of DPOs.

Data retention (18%) and organisational acceptance/change management (12%) were also of great concern to significant numbers of DPOs.

...even as Brexit fears fade

Concern over Brexit's impact on GDPR compliance appears to have faded, perhaps unsurprisingly in the short term, given the adoption of a draft data adequacy decision last month. The percentage of respondents picking Brexit as their biggest concern has plummeted, from 15% last July, to 2% currently.

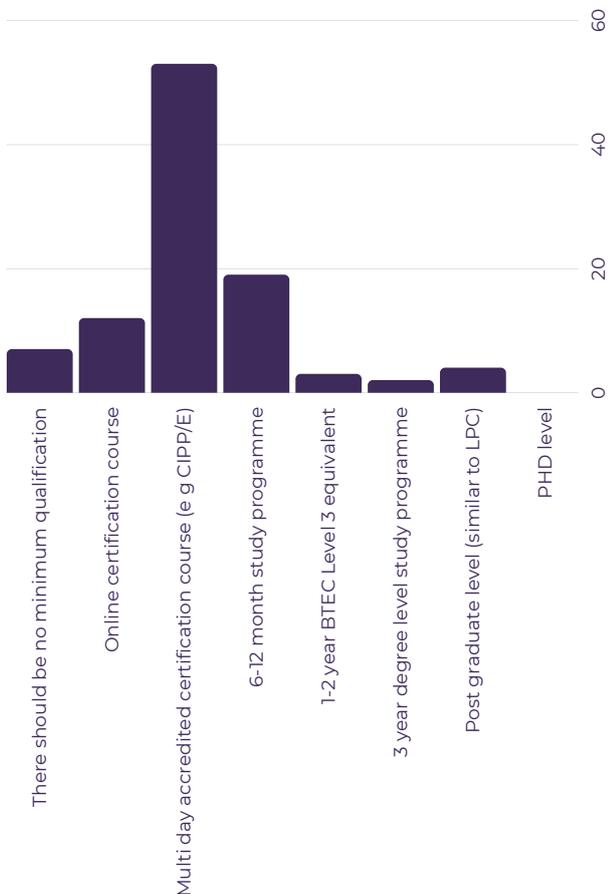


Fig 5: More than half of DPOs (53%) think the minimum level qualification for a protected DPO role should be a multi-day accreditation course

As we move forward into the post-Brexit landscape, DPOs broadly expect the UK to strike its own agreement with the US to allow for the free flow of personal data between the countries within the next three years.

Asked to give a mark on a scale from one to ten (one indicating strong disagreement and ten agreement with a statement that a deal will be struck), DPOs gave an average score of 6.47. 72% of DPOs gave a score of six or higher, indicating agreement.

DPOs are less convinced that the UK will relax personal data restrictions with other third countries following the adoption of an adequacy agreement, with an average score of 4.9 and just 36% giving a score of 6 or more.

Training and accreditation

84% of panellists believe DPO should become a protected title with minimum qualification requirements, up from 80% in November.

For the first time, though, we asked what this minimum level of qualification should be. More than half of DPOs (53%) said it should be a “multi-day accredited certification course”, and 12% said it should be an online certification course.

Fewer panellists wanted a requirement to do a more extended qualification. Just 3% said it should be a BTEC Level Three equivalent, 2% a three-year degree and 4% postgraduate level qualification.

[For More Information](#)

If you are a privacy professional and you would like to join the panel and add your voice to future surveys:

[Join the Data Protection Index](#)

