

June 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](#).

Over the past 12 months, we have sought the opinion of our panel of Data Protection Officers from around the United Kingdom on a quarterly basis, asking a consistent set of baseline questions. Crucially, in the ever-shifting privacy landscape, this has allowed us to track changing attitudes and opinions for the first time.

This quarter we have also added several new questions for our panel of 401 DPOs to tackle, including asking how many Full-Time Equivalent (FTE) dedicated resources DPOs have, as well as quizzing respondents on when they expect a federal (rather than state) US privacy law to come into effect.

We also bring you insight on expected budgets, spending priorities, challenges to compliance and attitudes around training and accreditation.

Nick James, Founder of the Data Protection World Forum, said: "For me it's results like this which showcase the importance of conducting such research. Throughout these turbulent times it's difficult to stay abreast of the drivers within our industry. This research is proving a valuable barometer to indicate how the sector is fairing and which challenges are front of mind."

Rob Masson, CEO of The DPO Centre, said: "Now with a full year of results, the Index is providing ever more valuable and unique insight into the role and responsibilities of DPOs and the privacy sector in general. This quarter has revealed a marked change in DPO's immediate concerns, migrating away from Covid, Brexit and Schrems II and back to the core issues DPOs face, such as data retention and vendor risk management."

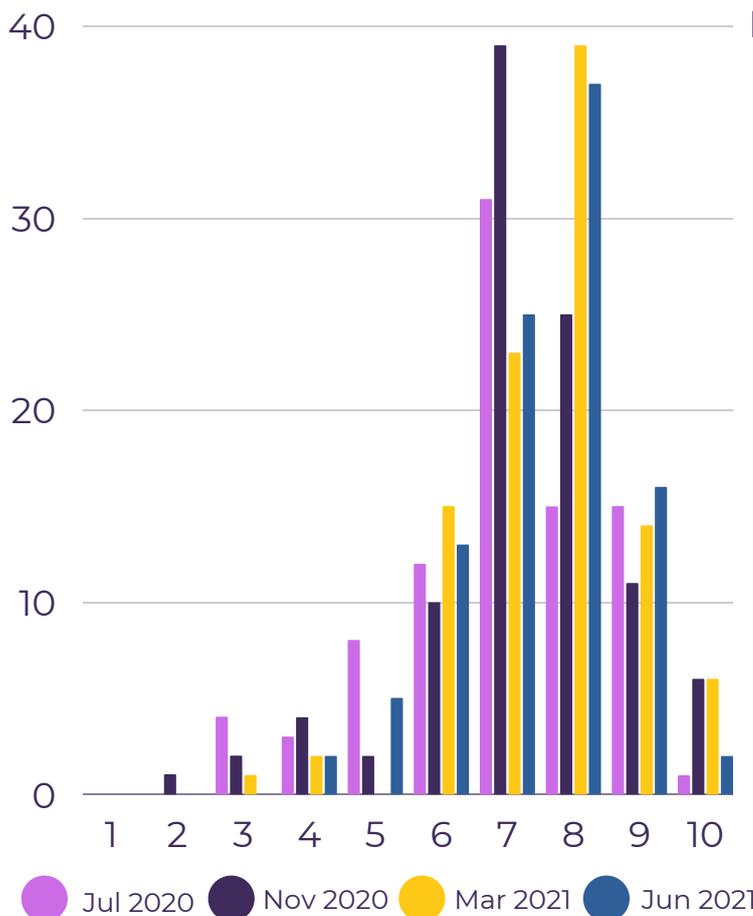
The next survey results will be published in September. If you are a privacy professional and you would like to join the panel and add your voice to future surveys, please [click here](#).



# The UK Data Protection Index: Q2 2021 Report

## Who is on the panel?

Since the Index launched last July, 401 DPOs spread across every part of the United Kingdom have taken part. This includes 5.2% from Scotland, 1.2% from Northern Ireland and 2.7% from Wales. London & the South East combined account for just under 40% of the respondents. More than three-quarters of the DPOs (77.1%) are full-time, in-house employees, 15.5% are consultants or outsourced, and 6% are employed in-house on a part-time basis. Nearly a quarter (23.4%) 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 (4.2%) to businesses with a 10,000+ workforce (14.7%).



## Key results:

- There has been a jump in confidence regarding the effectiveness of the ICO (Information Commissioner's Office). When asked to rate their confidence in the effectiveness of the regulator, half of respondents gave a score of 8 or more out of 10, up from 38% in March 2021.
- Again, DPOs reported a quarter-on-quarter decline in DSARs (Data Subject Access Requests) received over the past 30 days. The average number of DSAR requests fell to 13.37, down from 16.07 in the last quarter, and well below the 18.04 recorded in November 2020. However, this latest figure remains ahead of the average 11 requests recorded in our initial survey in July 2020.
- For the first time DPOs were asked how many Full-Time Equivalent (FTE) dedicated resources they had to deal with DSAR requests, in addition to themselves. 43% of respondents said that it was only themselves, with only 16% saying there were 3 or more FTE resources.

Fig. 1: DPOs' confidence in their organisation's data protection compliance has fallen slightly compared with last quarter. March 2021 saw 59% give a score of 8 or more, with this now decreasing to 56% for June 2021. This is however, still well ahead of findings last summer, where less than a third (35%) of DPOs placed their confidence at 8 or above.

## Key results continued:

- DPOs' perception that the UK's data protection laws are more advanced than other countries fell slightly to a mean average of 7.47 out of 10, compared with 7.55 in March. However, this remains ahead of the average score of 7.12 recorded last July.
- When analysing the impact of the Coronavirus pandemic on the importance of complying with privacy and data protection laws, our latest data suggests this is at its highest level since our index started. Almost one in ten DPOs (9%) said this had significantly increased and gave a score of 10 out of 10, compared with just 4% in July 2020. In addition, 40% gave a score of 8 or higher, compared with just 20% a year earlier.



Fig. 2: Whilst DPOs report that international data transfers remain one of the biggest challenges for GDPR compliance, this quarter saw data retention become their leading issue, up 8 percentage points compared with March 2021.

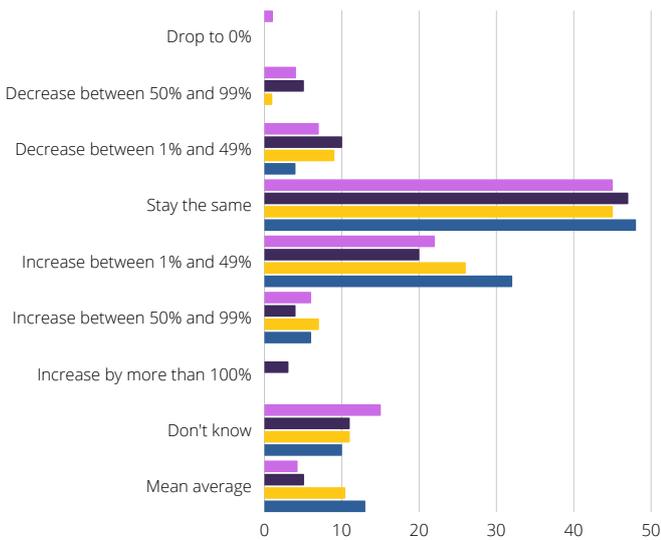


Fig 3: The average data protection budget is again expected to increase, with this now forecast to grow by an average of 12.5% over the next 12 months, compared with just 4% a year prior.



Fig 4: June saw DPOs place higher priority on additional external and internal resources when asked which areas they would focus on with an increased budget.

## Optimism around budgets and DPOs are eager for increased resources

With well over half (56%) giving a score of 8 or more out of 10. Given less than a third (31%) of respondents scored this highly last July, it is still very encouraging. The ICO (Information Commissioner's Office) has also seen an uptick in DPO confidence, this time around the regulator's effectiveness. When asked to rate this, half of respondents (50%) gave a score of 8 or more out of 10, a strong increase from 38% in March.

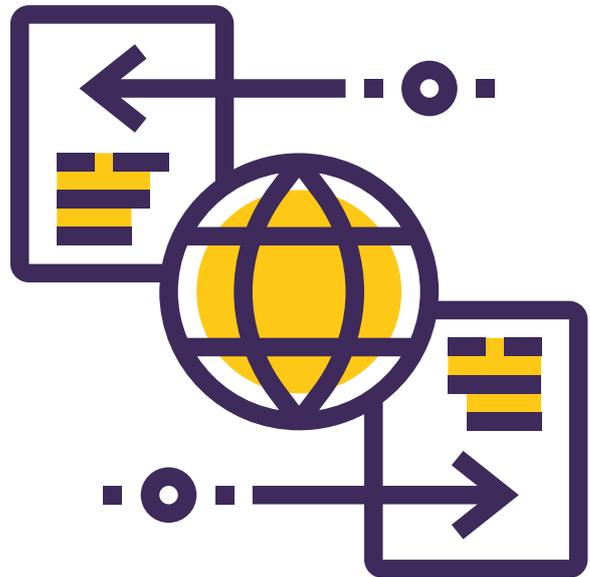
As with last quarter, we again saw optimism around budgets, with our survey data showing that the average data protection budget is expected to increase by 12.5% over the next 12 months, compared with 10.4% in March (this is up from 4.3% a year earlier, in July 2020).

Whilst our previous quarterly update saw DPOs eager to add training, as well as expenditure on software and platforms to their shopping list (when asked how they would spend a budget increase of 20%), this quarter we have seen prioritisation increase for both external advice & resources, as well as additional internal resources.

Together these categories increased by seven percentage points. Interestingly, this ties in with a new question added for June, how many Full-Time Equivalent (FTE) dedicated resources DPOs had to deal with DSAR requests, in addition to themselves. Most respondents (43%) said that it was only themselves.

Further to the above, we saw 'improved cyber/info security' gain priority for budgeting, with this up 3 percentage points compared with March 2021. Areas which saw a quarter-on-quarter decline include staff training and personal professional development.

Once again, we saw the average number of Data Subject Access Requests (DSARs), received in the last 30 days, decline. The average number of DSAR requests sat at 13.37 for June 2021, down from 16.07 in the last quarter, yet this data remains ahead of an average of just 11 requests recorded in our initial survey back in July 2020.



## Data transfers remain one of the biggest challenges for GDPR compliance

Whilst DPOs still report that international data transfers remain one of the biggest challenges for GDPR compliance (with 20% of results), this quarter saw data retention leapfrog international transfers to become the leading issue, up 8 percentage points compared with March 2021, to 26%. Brexit continues to pose less of a concern, flat quarter on quarter with just 2% of respondents saying this is the biggest challenge for their organisation.

In terms of international transfers, DPOs are more inclined to agree that they expect the UK to relax the requirements around personal data transfer restrictions to 3rd countries should the EU award the UK adequacy. In March, the average score sat at 4.9 out of 10 (1 indicating strong disagreement and 10 agreement that restrictions will be relaxed), this has increased to 5.7, with 56% giving a score of 6 or higher (compared with 36% in March).

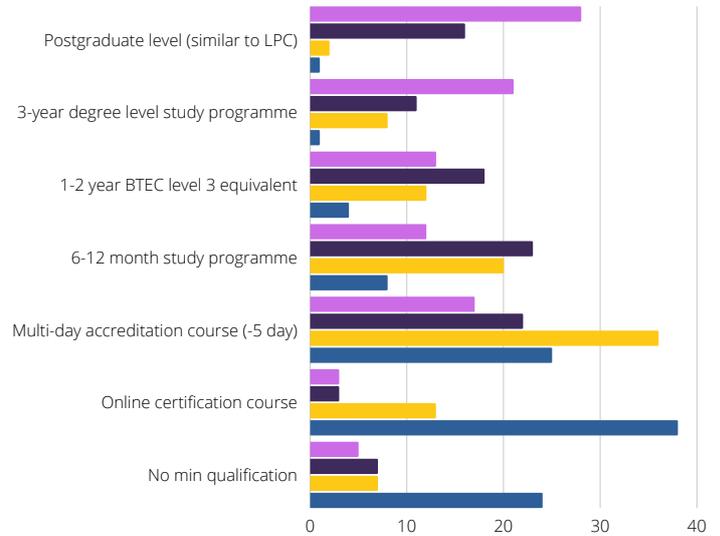
# DPOs continue to broadly expect the UK to strike its own agreement with the US to allow for the free flow of personal data between the countries within the next three years.

Asked to give a mark on a scale from one to ten, regarding the likelihood that the UK will strike a deal with the US, this quarter DPOs gave a slightly higher average score of 6.54. Additionally, 78% of DPOs gave a score of six or more, up from 72% in March. On the US specifically, we also asked our panel when they expect a federal (rather than state) US privacy law to come into effect. Overwhelmingly it is felt that this will come into play before the end of the decade, with the majority (53%) believing this will occur sometime between 2024-2026. Only 13% said they believed a federal privacy law would come into effect post 2030.

## Training and accreditation

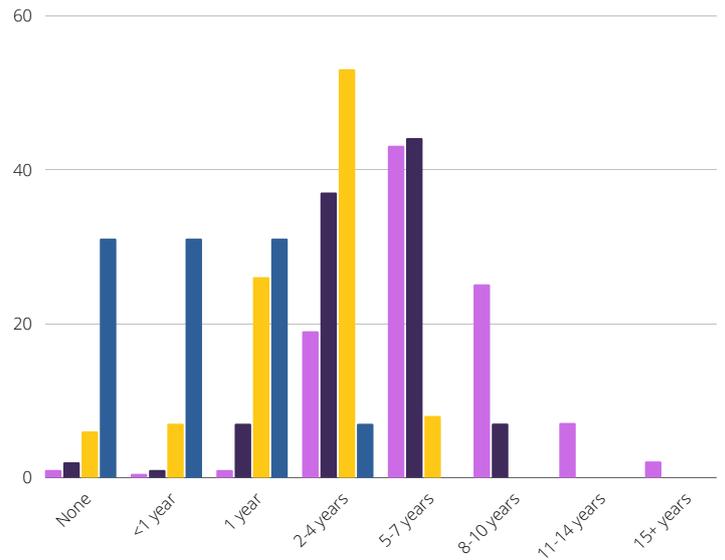
Last quarter we questioned our panel on the minimum qualification requirements for roles within the data protection industry. For the first time, we now delve a little deeper, separating the data out by different job roles. Those in more senior roles are far more likely to feel that a higher educational standard is required. CPOs & DPOs on average favoured a post graduate level qualification, compared with DP analyst/admin workers who overwhelmingly felt an online certification course would suffice. We also asked how many years' experience in a data protection should be required for each role. For Data Protection analysts/admin this was scored an average of 6 months, and for CPO, an average of 6.5 years.

In your view, looking ahead, what do you think the minimum data protection educational standard should be to demonstrate the capability to fulfil the following roles?



- Chief Privacy Officer
- DPO
- DP Manager / Deputy DPO
- DP Analyst / Administrator

In your view, how many years' experience in a data protection role should be required to qualify for the following positions?



- Chief Privacy Officer
- DPO
- DP Manager / Deputy DPO
- DP Analyst / Administrator

[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](#)

