

THE COMPLETE GUIDE TO HIRING A DPO IN-HOUSE OR OUTSOURCE?



When it comes to appointing a data protection officer, many businesses struggle to find a solution that fulfils their needs whilst remaining affordable.



Under GDPR, certain organisations are legally required to appoint a Data Protection Officer (DPO). However, that doesn't mean they have to be internal full-time employees. There is also the option to outsource this role.

There may be situations where your organisation would benefit from the data protection knowledge a DPO has to

offer, but does not require a full-time, dedicated member of staff. For example, an organisation might be proud of their web presence and require the data protection knowledge to ensure it's adhering to data protection laws. This is an important area to consider, but would hardly

warrant a full-time member of staff.

Alternatively, a business might be processing such large amounts of data that managing the associated risks is a full-time job. Whatever the situation, the good news is there are different options available. For

some businesses, a DPO is mandatory under GDPR, but this doesn't mean filling the role has to be costly.

Since GDPR came into effect,

regulatory authorities (such as the Information Commissioner's Office (ICO)) have been given the power to impose fines of up to €20,000,000 or 4% of annual turnover, which makes a DPO more essential for the day-to-day running of a business.

KEY CONSIDERATIONS	
Level of expertise	Access to resources
Communication efficiency	Costs
Data visibility	Conflict of interest

For some businesses, a DPO is mandatory under GDPR, but this doesn't mean filling the role has to be costly.

HIRING IN-HOUSE: A FULL TIME DPO FOR YOUR BUSINESS

THE BUSINESS ADVANTAGES

Data access requests have been rising steadily over the last year. For organisations processing large amounts of data, responding to these alone might warrant a full-time position. The main advantages of hiring a full-time data protection officer are:

No communication delays

Whilst outsourcing relies on the contact times of a third party, having your own in-house DPO means an immediate response. This is critical if dealing with a breach.

Greater visibility

An in-house employee will have greater visibility over processes and are in a better position to assess their day-to-day effectiveness.

Better access

Your in-house DPO will have easier access to the data, policies, notices and other resources required to carry out their duties, streamlining their processes.



Dedicated data protection expert

Having an expert who knows the ins and outs of your business who'll be focussed solely on your data is an obvious benefit.



THE DOWNSIDES TO FULL TIME

Cost

With the average wage for a data protection officer sitting at £48,000 a year, it can be a pricey investment that puts a strain on the budgets of SMEs. You will still have to take holidays and sickness into account as the business will be obligated to respond to data subjects in a timely fashion and react to data breaches immediately.

Can't have a conflict of interest

Whilst it may seem tempting to appoint an existing member of staff as the DPO, you must ensure that there is no conflict of interest. This may seem a little vague, but this essentially means that your chosen DPO cannot audit data management, if their existing role involves using said data.

Must work independently

A DPO must report to top level management and should not have any other duties than those related to data protection. All other departments must provide assistance when needed. When working in a busy company, it's easy to get distracted by or pulled into other projects.

OUTSOURCED DATA PROTECTION OFFICERS: EXPERTISE ON TAP

THE BUSINESS ADVANTAGES

Access to independent DPO expertise, not available inside your organisation, can prove to be a cost effective solution to achieve GDPR compliance.

Saves time and resources

Approaching a third party will drastically reduce the amount of time required to find the right member of staff, as a reputable company will have several data protection experts on hand. Outsourcing also takes care of holidays and sickness, as your business will always be covered.

Removes the conflict of interest problem

Outsourcing your DPO simultaneously removes the conflict of interest problem as well as seeing to the GDPR requirements that they work independently. As a third party, they will have no part in the actual processing of data.

Wide range of threat data

Whilst an outsourced DPO won't be dedicated solely to your business, they will have the advantage of working with a number of businesses across different industries, giving them a wide knowledge of the current risks.



Cost

Perhaps the biggest, most obvious advantage to outsourcing the data protection officer role comes down to cost. With outsourcing, businesses only have to pay for the time required. This is particularly beneficial for smaller companies that may only require a number of days per month, rather than having to pay a full yearly wage.



THE DOWNSIDES TO OUTSOURCING

Chance of delayed response times

The main issue with outsourcing is that you are reliant on the response times of third parties. Whilst this will vary from company to company it will never be as instantaneous as with an in-house member of staff.

Operates outside of your business

An outsourced DPO will not be entrenched within your business and will likely have less knowledge of how it operates and the industry it operates in compared to an employee in-house.

Limitations to regular monitoring

It can prove difficult for a remote DPO to conduct regular and systematic monitoring of the company compliance processes, especially within an allocated time quota.

QUALIFICATIONS

GDPR does not specify any particular qualifications for a DPO. However, they will need to have an expert knowledge in data protection law, and it's advisable that they have a working knowledge of cyber security.

BULLETPROOF DATA PROTECTION OFFICERS – QUALIFIED, EXPERIENCED AND TRUSTED

At Bulletproof, our DPOs are EU certified GDPR practitioners, CISSP certified and ISO 27001 implementors. Working within the cyber security industry means they have great technical knowledge as well as data protection expertise. It also gives them the edge when reacting to a cyber incident. They work closely with organisations from a variety of sectors including finance, retail, education and health.

The cost of an outsourced service can vary from company to company, but at Bulletproof, rough estimates are:

	SMALL BUSINESS PACKAGE	MEDIUM BUSINESS PACKAGE	ENTERPRISE PACKAGE
Suitable for	Businesses with up to 20 employees	Businesses with 21-200 employees	Businesses with over 200 employees
DPO time	Up to 4 hours per month	Up to 1 day per month	Customised to suit your requirements
Monthly progress call	✓	✓	✓
Portal access	✓	✓	✓
Price	From £595 cpm	From £995 cpm	£POA

A good data protection officer can help you avoid huge fines and costly data breaches. Our DPO as a service gives you access to certified EU GDPR experts as and when you need them, providing you with reliable and cost-effective support for all your data privacy needs.

MAKE A POSITIVE IMPACT TO YOUR DATA PRIVACY MANAGEMENT

Learn more about our DPO as a service and talk to one of our certified EU GDPR practitioners today

