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| **Role title:** | Group Data Protection Officer (DPO) | **Responsible to:** | Chief Risk Officer |
| **Division:** | Chief Executive Office | **Department:** | Risk |
| **Direct Reports and Level:** | 0 direct reportsIndirect reports of Data Protection Ambassadors and Champions from across MPS | **Scope:** | Global Data Protection compliance |
| **Scale:** | 0 People£xxx Budget |
| **Regulated Function:** | Yes – Data Protection Office (article 37-39 of GDPR) |
| **Evaluation Level:** | Guide 1 | **Role Family:** | Group Corporate Functions |

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| **Overall Role Purpose** |
| The nature of MPS’s business means that we have access to highly personal and confidential data. The good management of this data is key to ensuring the ongoing confidence of our members and stakeholders.This role is to ensure MPS is compliant with all requirements under GDPR - The Subject Matter Expert advising Council, Boards, the Executive Committee and colleagues on GDPR matters.Ensuring MPS is compliant across the geographies and jurisdictions in which MPS operates or considers operating in; all third-party relationships and arrangements; and all systems or processes.To ensure appropriate governance, systems and controls are in place to ensure the ongoing protection and management of our member’s personal data and our employee’s data. |

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| **Accountabilities (RACI)** | **Measures of Success/KPI’s** |
| **Strategic Leadership** * Define, set and oversee the delivery of the MPS data protection strategy, the Group Data Protection Policy, Data Protection Control Framework and all supporting standards to ensure compliance with all requirements under GDPR and other data protection laws in all jurisdistictions, systems and process, including third party relationships.
* As the legal and regulatory landscape changes, keep abreast of evolving legislation and best practice and lead on the development, implementation and governance of new policies and procedures
* Provide independent and expert advice to the Executive, leaders and colleagues on all applicable data protection obligations and on how these responsibilities must be discharged to ensure compliance
* Report to the Chair, MPS Council, boards and Council sub-committees on MPS’ compliance of GDPR and related matters
* Oversee, monitor and provide advice on Data Protection Impact Assessments undertaken in the jurisdictions in which we operate
* Assist and advise the data controllers/processors on all matters related to the protection of personal data and ensure they fully understand their obligations under data protection laws
* Act as first point of contact with the Information Commissioner’s Office (ICO) and other equivalent data protection offices in relevant jurisdictions.
 | * GDPR compliance from audit outcomes
* Executive feedback
* Council feedback.
* Quality of DPIA
* ICO investigation outcomes
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| **Financial*** Oversee investigations into data breaches and monitor any remedial actions to ensure future breaches are avoided and business risks mitigated
* Set and deliver the Data Protection operational budget.
 | * Data breach / incident outcomes
* Opex Vs Budget
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| **Member*** Act as a contact point for request from individuals regarding the processing of their personal data and the exercise of their rights.
* Support colleagues to ensure fair treatment and outcomes for members and compliance with associated policies and standards set out by Council, its committees and delegated authorities.
 | * Subject Access Requests vs SLAs
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| **People**  * Advise on learning content to build capability across MPS on our obligations to comply with the UK GDPR and other data protection laws
* Build a strong succession of Data Protection Champions / Ambassadors providing opportunities for talented colleagues to develop and build data protection expertise.
 | * GDPR audit on competence of colleagues

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| **Risk*** Consider the nature, scope, context and purpose of the data being processed and ensure a risk-based approach to the advice and approach to actions and activities is given.
* Ensure appropriate governance, business processes and controls are in place to manage GDPR handling within risk appetite; comply with policies and regulatory requirements (as applicable).
* Undertake / oversee audits to ensure compliance with GDPR and other data protections laws, our data protection policies and GDPR related competence of colleagues
* Actively contribute to the identification and management of business risks and issues together with mitigating actions.
 | * Risk & Control Self- Assessments
* Audit Actions
* Data incidents
* Reputation with regulators
* Reputation with ICO
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| **Responsibilities (RACI)** |
| * Undertaking other duties and tasks that from time to time may be allocated to the role holder that are appropriate to the level or role.
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| **Key Governance Responsibilities** |
| * Report to Governance meetings such as Audit and Risk Committee, we required by Council / any of its Sub-Committees / the Executive.
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| **Leadership Framework Competencies** | **Level** |
| Fresh Thinking | Leading the Organisation |
| Building Capability in Self and Others | Leading the Organisation |
| Influencing Others | Leading Others |
| Collaborating for Results | Leading Others |
| Leading Self and Others | Leading Others |
| Commercial and Risk Thinking  | Leading the Organisation |

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|  | **Knowledge and Qualifications** | **Skills** | **Experience** |
| **Essential** | * Understanding of the UK GDPR, PECR and European General Data Protection Regulation (GDPR).
 | * Ability to foster and embed a strong risk culture
* Excellent attention to detail
* Confident to engage and challenge at all levels
* Able to influence at Executive and Board level
* Communicate clearly and effectively (oral and written) adapt methods to suit audiences, both in terms of seniority, business area and location
 | * Previous Data Protection Officer post-holder
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| **Desirable** | * Knowledge of cybersecurity risks and other information security standards
 |  | * Experienced DP practitioner in the Lloyd's of London market / Financial Services
* Global Data Protection
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