

# MY DATA PROTECTION OFFICER



## Greater Manchester Police

Greater Manchester Police (GMP) is the territorial police force in Manchester responsible for and providing a policing service to the people within the metropolitan county of Greater Manchester in North West England. Given the scale of criminal activity and responsibilities the force has, there is a requirement to store, manage and process information carrying varying levels of sensitivity and protective marking, and it is fully committed to maintaining the confidentiality, integrity and availability of its information assets in all their forms.

GMP were mandated to have a Data Protection Officer (DPO) with the onset of GDPR and the Data Protection Act 2018. GMP fully acknowledge the role of a DPO and took the opportunity to review how the function needed to work within the force to ensure compliance with the legislation, as well as deliver the data protection support services it needed.

GMP understand how important managing people's personal information is. The force are used to working with sensitive data on a daily basis as business as usual. When the new Data Protection legislation came into effect, GMP had a dedicated Information Management function to ensure they were best placed to be accountable as an organisation. GMP also had processes in place for things such as data protection impact assessments (DPIAs) and breach reports. The changes in legislation meant measures were reviewed to ensure they were fit for purpose.

GMP anticipated that there was going to be a growth in demand on this area of the organisation, as data protection was going to become much more of a focus and people were becoming increasingly aware of their information rights.

GMP considered what they would require to fulfil their obligations as an organisation. At the time of Data Protection and GDPR legislation change, it was a challenge to recruit a genuine expert and also to have a DPO function which ensured that the role was covered in the absence of one individual i.e. for annual leave etc.

As such, GMP looked at service model contract options to try to source a DPO who had the knowledge, skills and experience in the legislation, but also able to operate at the appropriate level in terms of management experience. The requirement was for a specialist advisor for data protection matters, which is exactly what Advent IM is.



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To choose a supplier, GMP went through a procurement exercise and the relevant governance procedures to procure a supplier, which was heavily weighted towards quality. GMP asked questions of each of the suppliers as part of the process, evaluating those responses and specifically considering; experience, expertise, qualifications. The supplier also needed to have a deep understanding of how data protection matters impact policing. It was incredibly important for GMP that the supplier had a great appreciation and understanding of how good Data Protection and GDPR practices would support law enforcement.

“It was clear to me that Advent had a holistic understanding of the GDPR legislation and the challenges that it placed on policing in particular. We felt that Advent would provide us with an outsourced DPO who was not just going to tell us what we wanted to hear, but they were genuine, independent became embedded in our team and wider force as a go to expert”. - Stephanie Beirne, Greater Manchester Police, Assistant Head Information Services – Information Management.

As well as the importance of independence and expertise, GMP needed a DPO who was able to report to chief officers about incredibly sensitive and complex data protection matters. GMP needed a supplier who was able to hit the ground running and were comfortable and experienced in communicating at that level of management. Advent IM’s knowledge of policing was extensive having worked with this sector for nearly 20 years at a strategic governance level, providing risk management and accreditation support and developing Senior Information Risk Owner (SIRO) training with the then ACPO, which has since been delivered to practically every UK police force at this senior engagement level.

Since GMP and Advent IM embarked on the outsourced DPO service we have supported changes in culture and governance through mentoring and training, improved existing processes and procedures, provided direct liaison with the ICO and supplemented the internal knowledge already existing within the team. GMP’s Data Protection Team has benefited from mentoring by our outsourced DPO and is better able to respond to queries, requests and breaches than ever before. Input on development of data protection across the force has also been provided at a strategic level.

“The Data Protection legislation and GDPR have a lot of general information on data protection matters, but there are specific requirements around law enforcement. It was really important that GMP had somebody working with us who had an appreciation of the positive impact on Police Forces and wider law enforcement that this legislation would have. From Advent’s perspective, it is clear from the advice that we receive that Advent IM has a holistic understanding of the legislation and can apply it to policing” – Stephanie Beirne, Greater Manchester Police, Assistant Head Information Services – Information Management



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GMP believes they have started on a great footing and have an effective and embedded partnership and working relationship with Advent IM as the outsourced DPO is very much seen as part of the team at GMP. Due to this working relationship, the team at GMP are very confident with the advice they receive Advent IM.

Over the next 12 months, GMP have the opportunity to build on what they have already done, more work on policy, training, team structure and the foundations of what is an excellent service in terms of data protection. This will not only help operationally in terms of policing matters but ensure GMP continue to provide a service for individuals and their rights in terms of data protection. GMP have a great team who manage data protection matters who are incredibly dedicated and knowledgeable and Advent IM's outsourced DPO service is seen as a great addition to the team.

GMP see the future in a very positive light, with a great opportunity to improve on what they already have in place and improve the culture within the organisation. As GMP are an operational police force, they are keen to develop understanding within the organisation and ensure data protection is seen as an enabler in terms of policing, as well as continue to fulfil their obligations to individuals and their information rights. There are a large number of people who work at GMP and Advent IM will continue to work with the Data Protection Team and others to help the wider force to understand how data protection fits into their day to day working practices as part of business as usual.



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