

*“opinionway* for



**CEDPO**

CONFEDERATION OF EUROPEAN  
DATA PROTECTION ORGANISATIONS

# In the DPO's Own Words: “Trends and Challenges beyond 2024”

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# **CEDPO DPO SURVEY: OVERVIEW**

# Who completed our online questionnaire?

- **1,120 DPOs** completed CEDPO's online questionnaire
- **German** (42%) and **French** (36%) DPOs were the most active
- Organisations were split with small/medium (<500 employees = 46%) medium/large (>500 employees = 54%) → **82% of the organisations were above 50 employees**
- **69% of DPOs were from private organisations**, 30% public sector
- Other than the public sector, DPOs work in Finance, IT/Technology/Defence, Agriculture/Industry/Transports and Commerce sectors
- Nearly **half** are a **member of a CEDPO affiliate**
- **72%** DPOs are **internal** and **28%** **external** (i.e. service contract)

# Who participated to the French and EDPB's studies?

- 3,625 respondents
- Majority of **internal DPOs** and **internal shared DPOs**
- Survey also makes a difference between **organization size**

EDPB CEF 2023: 25 participating DPAs

145 audits



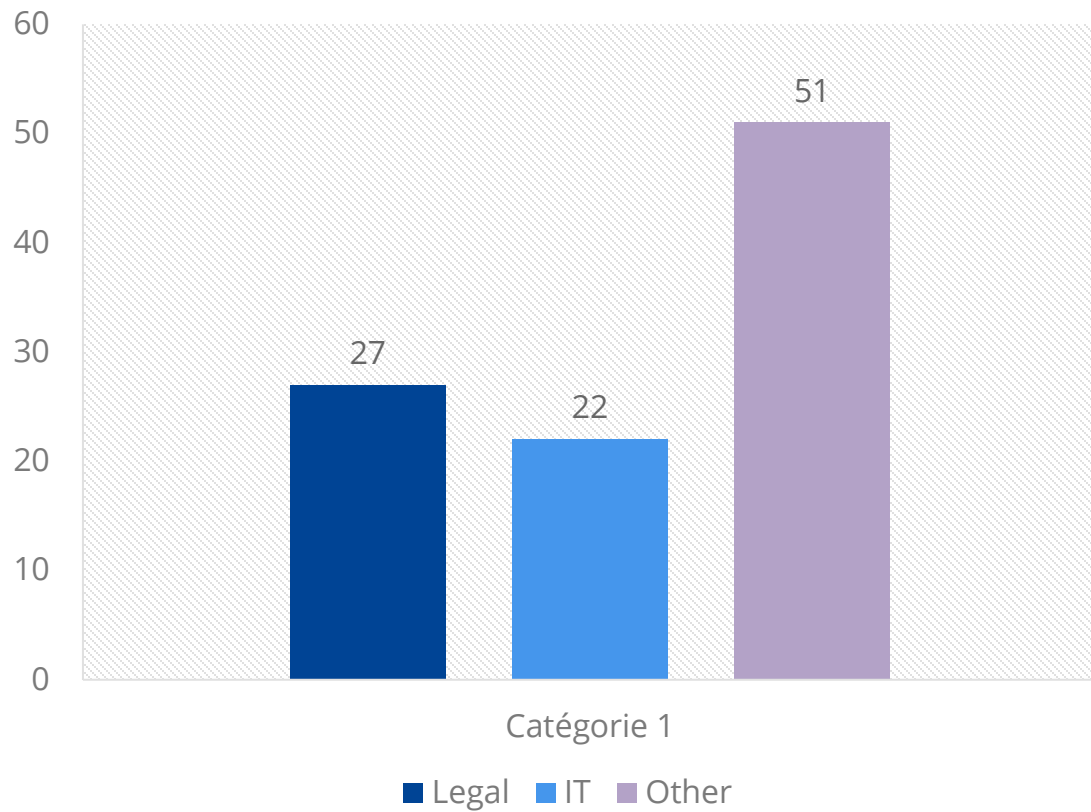
17 345  
answers

# What are the role and position of the respondents of the CEDPO's survey?

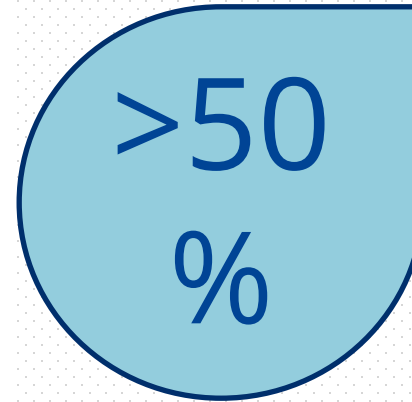
- **21%** DPOs are attached directly to the **highest level of management** with the remainder belonging to spread of function heads e.g. **legal (21%)**, **compliance (15%)**, or other areas
- DPOs are **mostly data protection subject matter experts and also have expertise in other areas** e.g. information security, business processes, specific legislation concerning their organisation's industry or field
- Respondents tend to be **experienced DPOs** (33% doing it for more than 8 years and 88% for more than 3 years)
- **Nearly half of DPOs** are acting **as joint DPO** on behalf of a group of undertakings or for several organisations
- **Requirements for DPOs recruitment:** expert knowledge of data protection regulation (**63%**) whereas DPO Certification (**46%**) or DPO Diploma (**33%**) are less used as requirements

# Role and position of the French survey & EDPB CEF

## Profile of DPOs



## EDPB CEF 2023



5+ years of experience as DPOs and in the field

DPOs have knowledge about information security

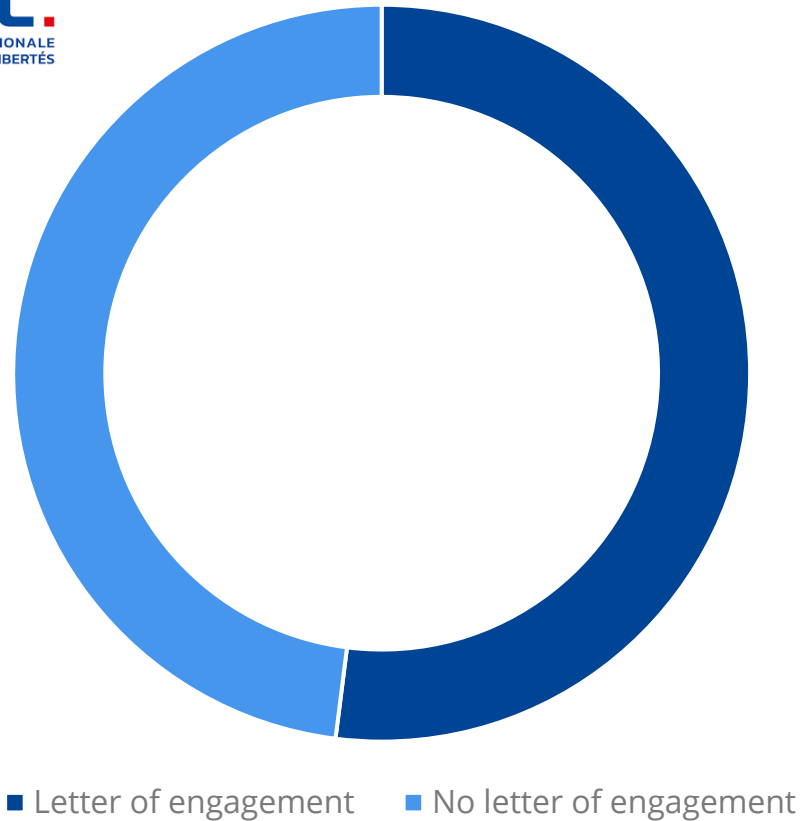
# What challenges do DPOs face?

- **22% of DPOs don't have a written description of their tasks**
- Where their tasks have been written down (77%) almost a third report
  - that **these are not shared with the rest of their organisation (29%)**
  - the **written tasks do not represent all of their tasks (32%)**
- DPOs carry out their mandatory tasks under GDPR (art. 39(1), 38(3), 38(4) and 38(6))
- But many **DPOs (86%) are involved in data protection tasks that are not required under the GDPR from DPOs**, such as:
  - Drafting and negotiating contracts, such as DPAs (63%)
  - Fulfilment of data rights requests (62%)
  - Developing data protection processes (57%)
  - Drafting and carrying our data protection impact assessments (57%)
  - Responsibility for the lawfulness of the processing of personal data (28%)

# DPOs Challenges



## DPOs having written instructions



## EDPB CEF 2023

- DPOs are not always tasked with all the GDPR-required responsibilities
- Lack of clearly defined and written description of DPOs' tasks
- Description not always communicated internally





# What resources are given to DPOs?

- Only **42%** of internal DPOs work exclusively on data protection tasks
- **A third** of internal DPOs **allocate less than 50% of their working times to their DPO's tasks**
- The **resources given to DPOs are mostly “best guess” (53%)** and prior experience – with few based on benchmarking with other organisations (6% only)
- **42% of DPOs work on their own with no support**, 19% have one support person (FTE) and 19% have 2 FTE
- 45% of DPOs think this is sufficient with **55% needing more**
- **Only 24% have their own budget that they can manage** – the average budget is €54k (*but only 30% of the DPOs who have a budget answered to that question*)
- **Nearly half of the DPOs has no budget at all**

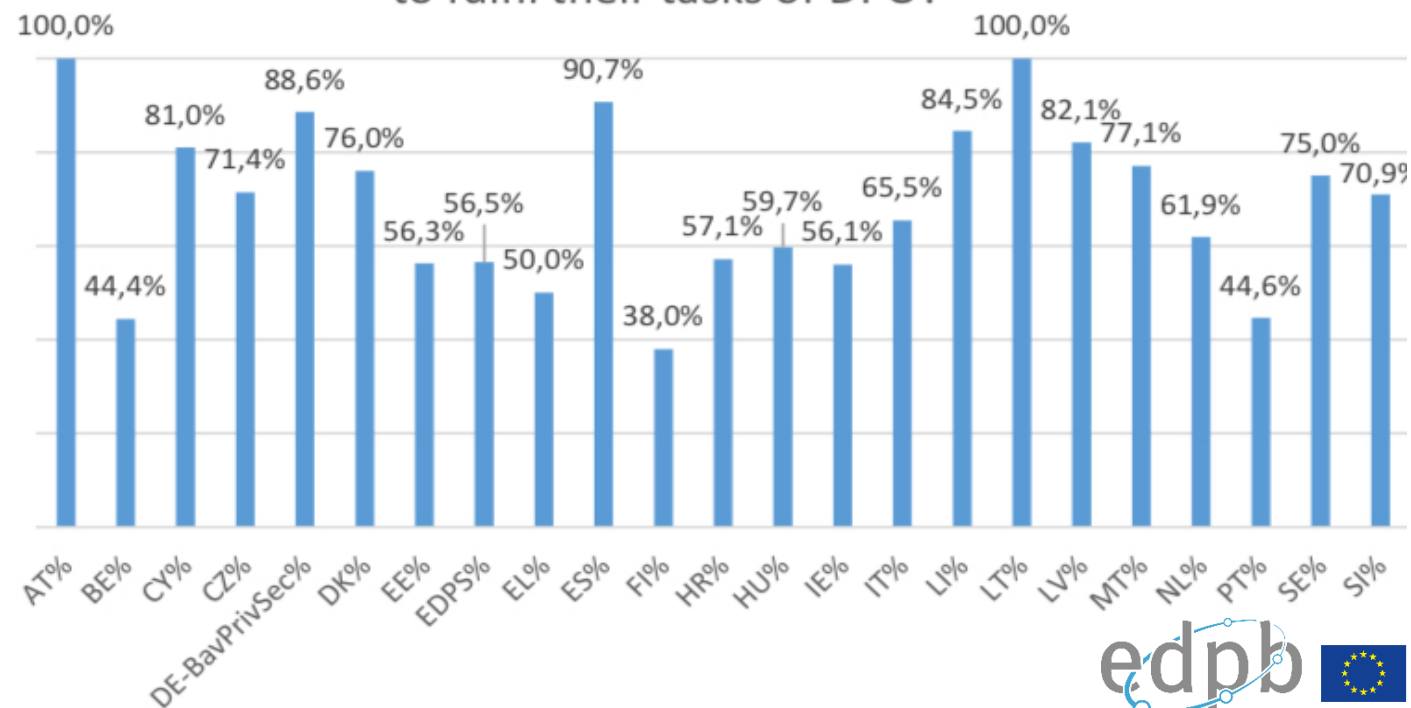
# Resources of DPOs



- Lack of **time**
- Lack of **budget**

## EDPB CEF 2023

Q22. How many DPOs consider their resources as sufficient to fulfil their tasks of DPO?



# Understanding independence of DPOs

- **Awareness of the DPO's independence among managers and clients** is generally high (**83%** certainly or probably)
- **Notable difference to this is in France**, awareness of DPO's independence seems a little lower than the other countries (**75%**)
- **55% of DPOs considers that only some of the directors** of the various departments they are interacting with **are aware of their independence of the DPO**
- **DPOs' understanding of the extent of their independence is very high in all countries** except France, where 31% reported that they do not have a clear understanding of their independence as a DPO

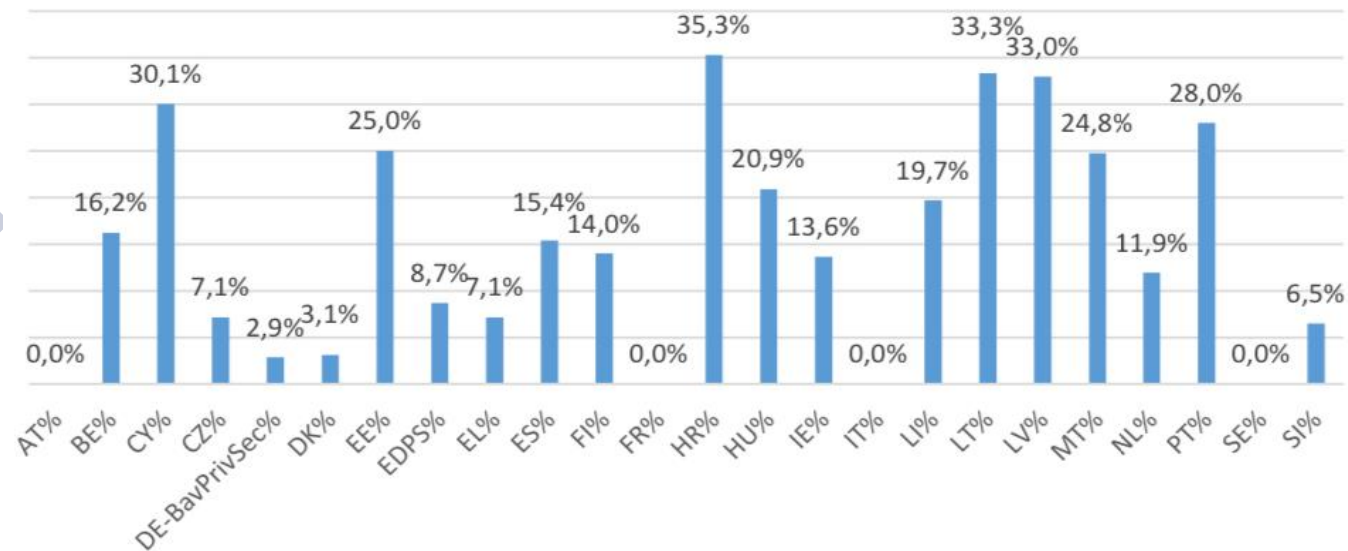
# Understanding independence of DPOs

- **Half of DPOs** reported difficult working experiences such as:
  - **50% conflict with management and information manipulation**
  - **47% operational & financial constraint**
  - **41% management not leading by examples on GDPR compliance**
  - **Range of other issues – role denigrated, inability to work on projects and access colleagues**
- **Only 33% of the respondents never experienced a situation where their independence were compromised**
- **DPOs were split on reporting a compromise of their independence to their regulator**, 48% said they would and 50% said they would not
- **41% of the DPOs experienced situations** where they had been concerned about their job (**20%**) or feared reactions or sanctions from their management (**18%**), received instructions from their management on how to handle a case, experienced threats and pressure targeted against them, etc.

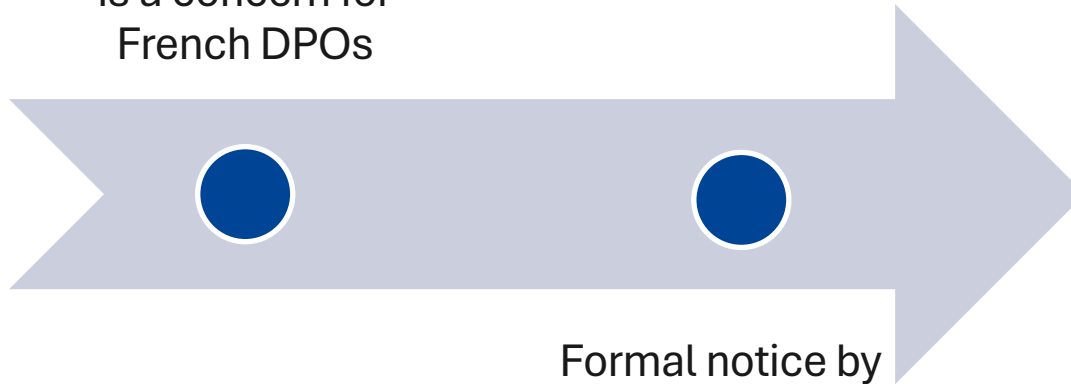
# Independence of DPOs

## EDPB CEF 2023

Q32. How many DPOs receive instructions regarding the exercise of their tasks and duties?



DPOs independence is a concern for French DPOs

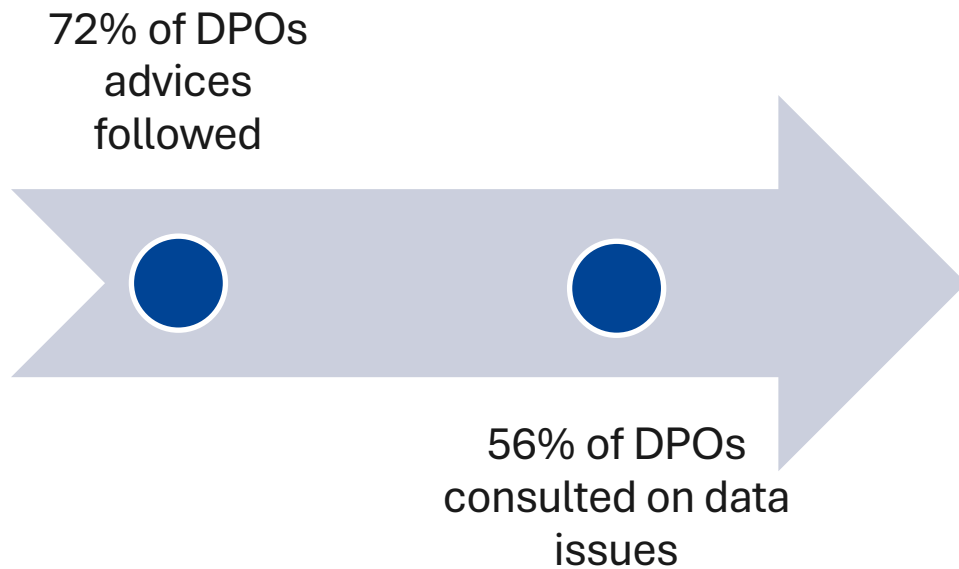


Formal notice by CNIL

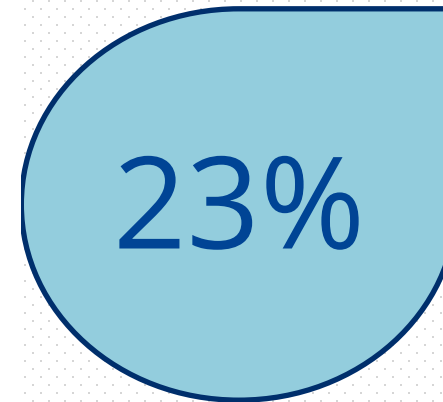
# DPO involvement in data processing

- **Only 15% of DPOs** reported to be **involved/consulted** in the data protection issues of their organisation **all the time (100% of the time)**
- **Nearly a third** of them **are involved/consulted only 50-74% of the time**
- Consultation of the DPO is required by **internal policies and processes** (Yes = **89%**)
- DPOs **declare to have access to sufficient information to fulfil their tasks**(Yes & sometimes = **98%**)
- DPOs **advice is mostly followed but not always** (Yes, sometimes = **59%**)
- Where the DPO's advice was not followed then **the reason are rarely or not documented** in **39%** of cases

# DPO involvement in data processing



## EDPB CEF 2023



Median of respondents who stated that the DPO was consulted 'all of the time'

Only one third documents 'all the time' reasons for diverging from DPOs' advice

# Governance

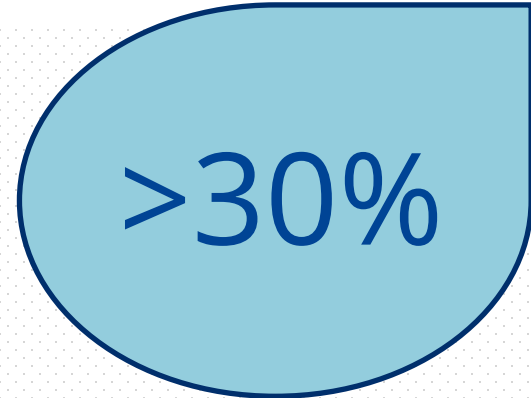
- DPOs are generally able to make reports to the **highest level of management but this is only 1 or 2 times a year (52%)** with 16% saying that no reporting is necessary
- **DPOs reported being able to freely contact the board or senior management (82%)** but this was lower in France (73%) and Spain (63%)
- If the DPO had a **dissenting opinion**, then **68% could make this known to highest management directly** but **26% had to clear it through a direct manager first**. Again, both **France (40%) and Spain (40%)** reported this additional layer between them and the highest management level in a more significant extent



# Governance

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EDPB CEF 2023



The DPO is not expected to carry out reporting to highest management level at all

Inconsistent reporting frequencies across the EEA

# Volumes of work

- DPOs reported that they **received monthly 20 or less internal queries on data processing matters (75%)** <sup>(94)</sup>
- Unsurprisingly, bigger organisations reported more internal requests
- **Data subjects could contact DPOs** and the vast majority do this by email (**94%**)
- The **number of data subject contacts per month** was reported as less than 10 times (**62%**)

# Training & professional development

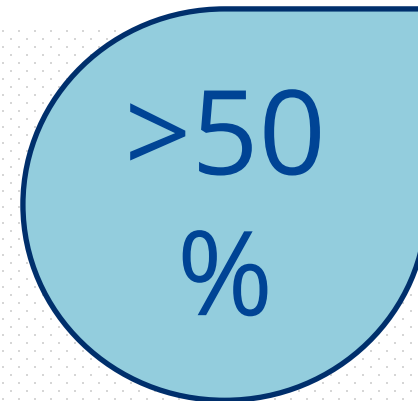
- The majority of DPO's underwent training within the previous 12 months: **42% received more than 9 hours. But 14% reported receiving none and this is highest in France (32%).**
- **40% of DPOs are focussed solely on data protection**, the majority of DPOs have other roles – legal & compliance (27%), IT or information security (17%) or audit (11%)
- 78% of DPOs rate their working conditions somehow compliant with GDPR, though **only 21% feel they are fully compliant**
- **87% of DPOs have opportunities for professional development and networking**

# Training & Professional development



**65%**  
**Training  
needs  
expressed**

**EDPB CEF 2023**



Strong majority of DPOs receiving 24 hours or less of training a year (median)

# Working life of the DPO

- A majority of DPOs consider that it is a stressful job (65%), but the majority reported that **this stress did not impact their mental health (59%) or physical health (73%)**
- **But a significant minority did report impact on their mental health (37%) and physical health (25%)**
- This was supported by **41% of respondents saying the job should not be as stressful as it is**
- DPOs reported that it **is challenging to keep up-to-date** with data protection laws, guidance and case law, with **84%** agreeing that it is sometimes or often difficult
- Small majority had **the knowledge needed (61%)** but **38% did not**
- **Most felt they reported to the correct person (77%)**
- **Most felt supported by their manager (25% sometimes and 57% often)**

# Overall job satisfaction

- Not surprisingly, **overall job satisfaction** was split among DPOs (scale of 1 to 10)
  - **66% rated themselves satisfied at 7 or higher**
  - 14% rated themselves at 5 to 6
  - 14% were not satisfied at 4 or lower
- **French DPOs seems less satisfied** than their counterparts in other countries

# Overall job satisfaction

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**54% of DPOs  
satisfied with  
their work**

**CNIL.**  
COMMISSION NATIONALE  
INFORMATIQUE & LIBERTÉS

# Support & Protection of DPOs

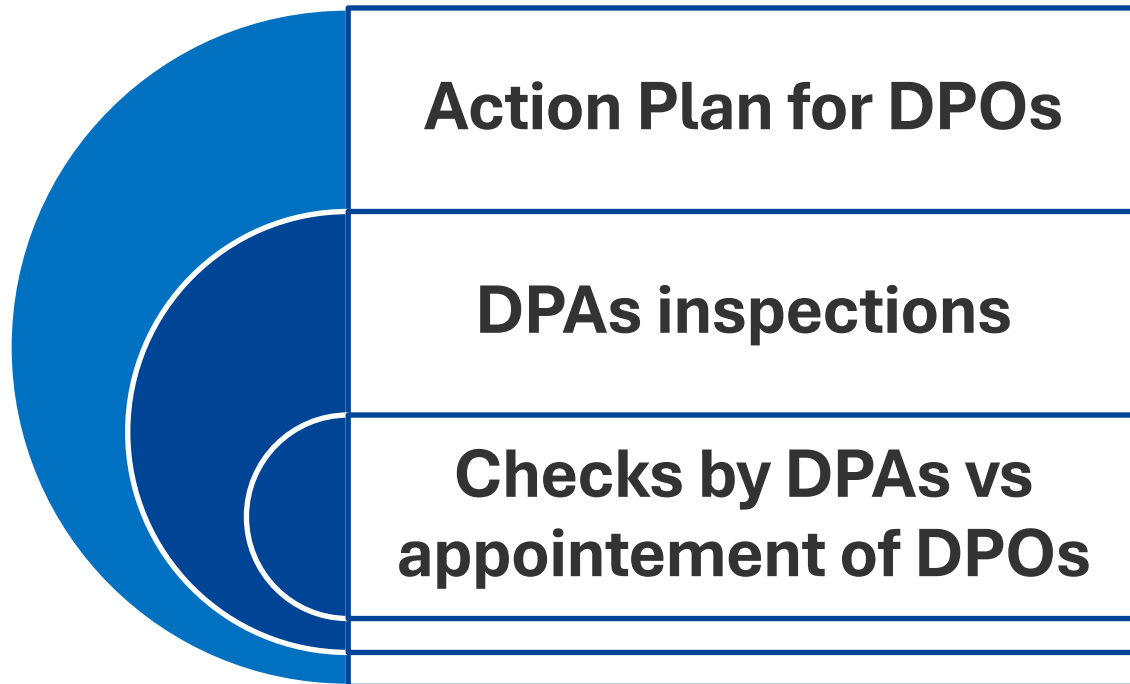
- **Only 22% of DPOs felt that the current GDPR provided sufficient protection**, but this was strongest in Germany (39%) and much weaker in other countries
- Of the alternatives presented:
  - **40% favoured data protection authorities leading by taking actions with employers**
  - **36% favoured either specific legal protection for DPOs or going as far as making the DPO a protected employee**



# Support & protection of DPOs

- **Actions that DPAs should consider from DPOs point of view:**
  - **45% wanted DPAs to send a formal letter to the organisation appointing a DPO** setting out the specific requirements of the role of the DPO
  - **32% wanted DPAs to include a systematic review of the working conditions to be included in DPA inspections**
  - **29% wanted the EDPB to update and enhance their guidelines on DPO**
  - **28% wanted DPA to impose public penalties on employers for non-compliance on DPO roles**
  - **24% wanted the DPAs to carry out a number of checks when notified of an appointment of a DPO**
- **German DPOs had less than average support for these suggestions** and if the German responses had been excluded then the % of DPOs in favour would be much higher

# Support & Protection of DPOs



## EDPB CEF 2023

### Recommendations for controllers/processors

- Promote DPOs internally, improve its involvement
- Formalise duties in an engagement letter
- Review tasks, resources and workload of DPOs

### Recommendations for DPOs

- Gather evidence in case of interference with independence
- Advocate for direct access to the highest level of management

### Recommendations for DPAs/EDPB

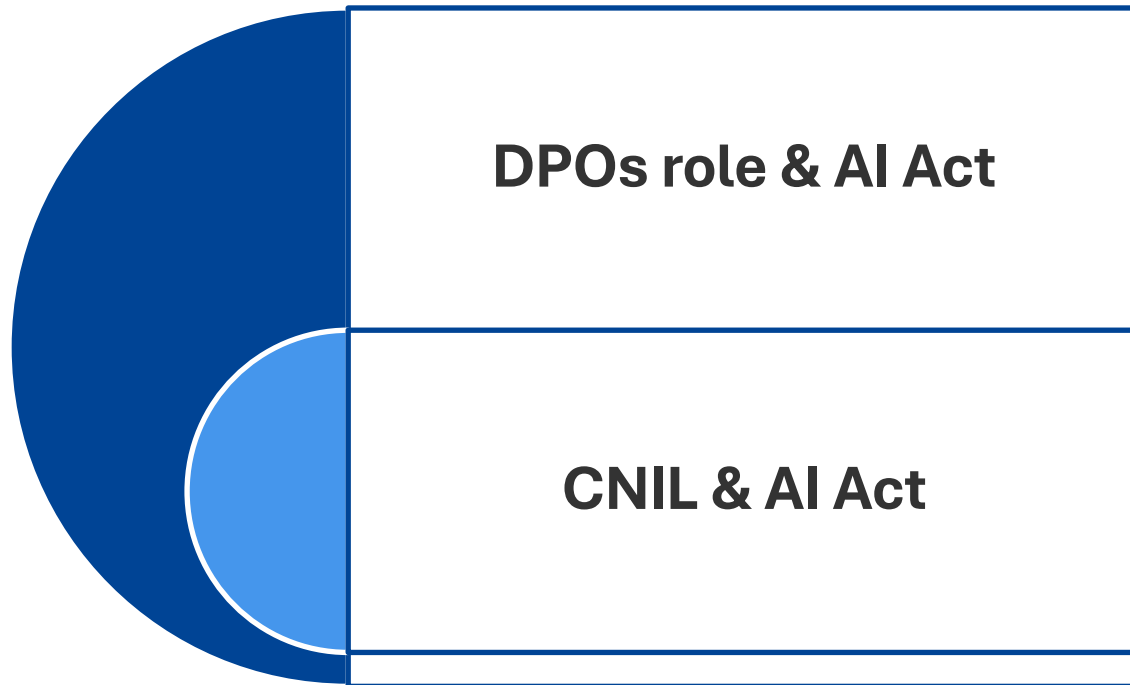
- Further guidance (e.g. reporting)
- Awareness and enforcement actions
- Involve the DPO structurally to promote its role

# Future roles of the DPO

- **Many DPOs believe that DPOs should oversee the implementation of EU legislation like the Data Act and AI Act (72%)** but a significant number (28%) are not involved in this area or only partially (47%)
- **DPOs are mainly in favour of the evolution of the DPO into a Data Governance Officer**, with 59% in favour and 39% against
- **64% of DPOs expected the new EU legislation (Data Act, DGA, AI Act, etc.) to make a reference to the role of the DPO**

# Future Role of DPOs

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## EDPB CEF 2023

- Recommendations to EDPB to update guidelines on DPOs, taking into account the new EU legislation and the identified challenges

# **CEDPO DPO Survey: Additional Insights**

# Context



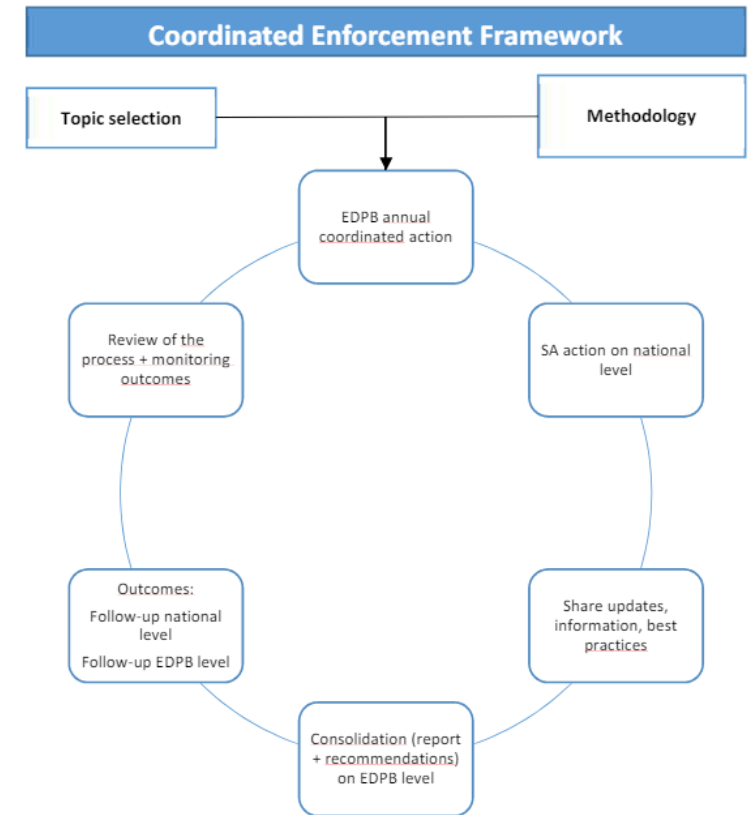
**Launch of the EDPB's coordinated enforcement on role of data protection officers in 2023.** 26 Data Protection Authorities (DPA) across the EEA (including EDPS) took part in the CEF 2023.



The EDPB established a questionnaire to assess whether DPOs are correctly appointed in accordance with Articles 37-39 of the GDPR and whether they have the necessary resources to fulfil their tasks.



Although the questionnaire was identical, the national DPAs used various methods to collect this information and targeted different groups (DPOs or controllers).



# CEDPO Objectives



**CEDPO welcomed the EDPB's initiative and decided to** establish a working group dedicated to DPOs' role. The Working group issued recommendations to help organisations respond to the EDPB questionnaire in May 2023.

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CEDPO wanted to support the EDPB in its endeavour to collect valuable insights into the profile, position and work of DPOs. That's why CEDPO launched its own questionnaire, based on the EDPB's, but with additional original questions that seemed relevant to the DPO community.

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The responses to the questionnaire will now guide CEDPO's direction, based on the challenges and interests of the DPO community. The aim is to represent them to authorities and legislators, and to be a strong advocate by bringing solutions to the challenges faced by DPOs.

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# CEDPO Questionnaire



**Time efficient:** 60 questions - 30 minutes



**Anonymity guaranteed** allowing DPOs to speak freely and encouraging honest and candid feedback



**For DPOs, By DPOs:** Crafted from our shared experiences and designed for our collective benefit.



**Multilingual:** Available in 5 languages, French, English, Spanish, Italian and German



**DPO  
SURVEY**

From April 29th to May 13th

Share Your Opinion!





# Methodology



Study carried out on a sample of **1,120 DPO or Responsible for privacy and data protection**

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The samples were interrogated online on **CAWI system** (Computer Assisted Web Interview).

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Fieldwork carried out **between April 30th and May 21st 2024**.

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OpinionWay carried out this survey by applying the procedures and rules of **ISO 20252**



# **DPO Profile and Organizational Context**

# Company size

Q. What is the size of the organization for which you are DPO?



**Total**  
1,120 persons



Germany



France



Italy



Spain



Ireland



Romania



Others

Less than 50 employees



18%

500 employees



28%

1500 employees



18%

More than 1500 employees



35%

DK



1%

Less than 500

46%

More than 500

53%

46%

36%

73%

54%

47%

69%

59%

53%

63%

27%

46%

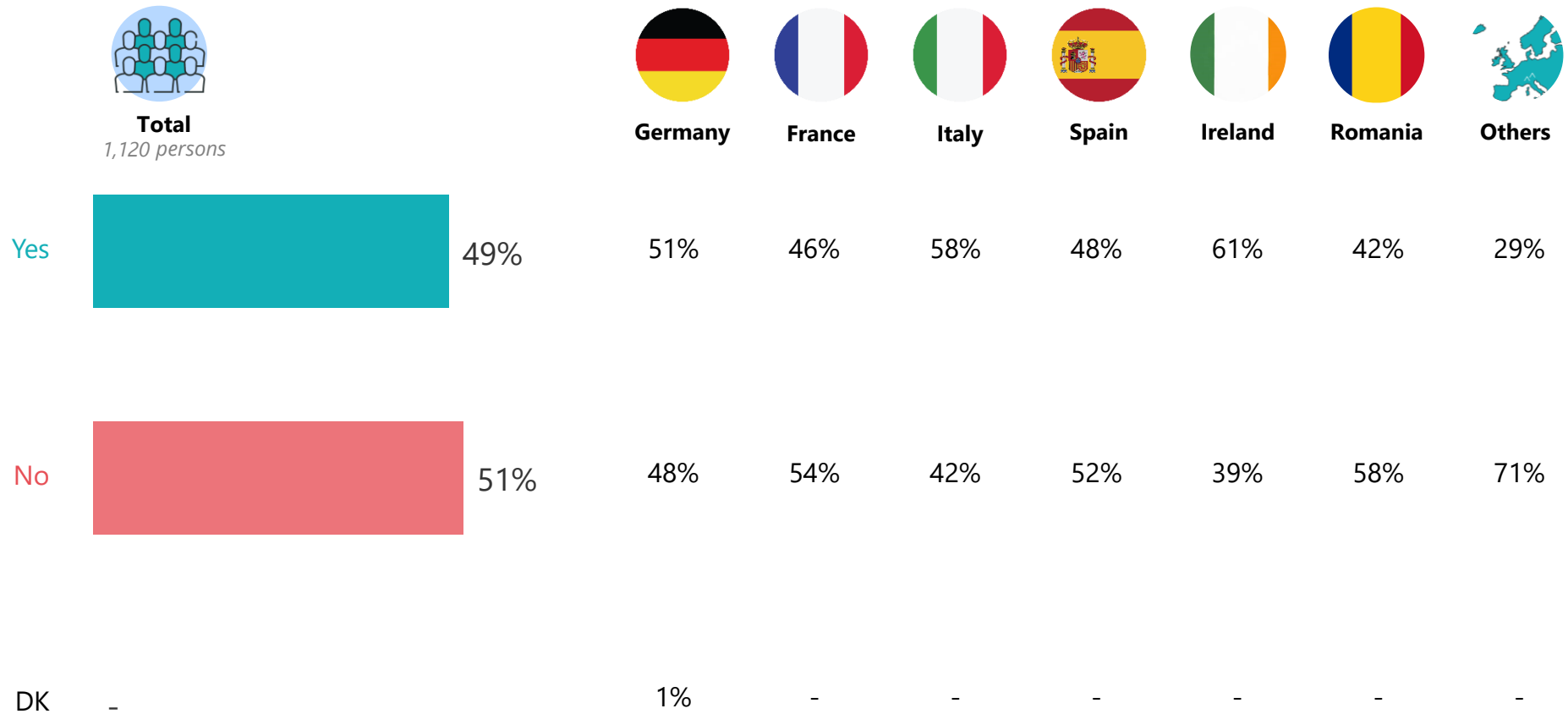
53%

31%

39%

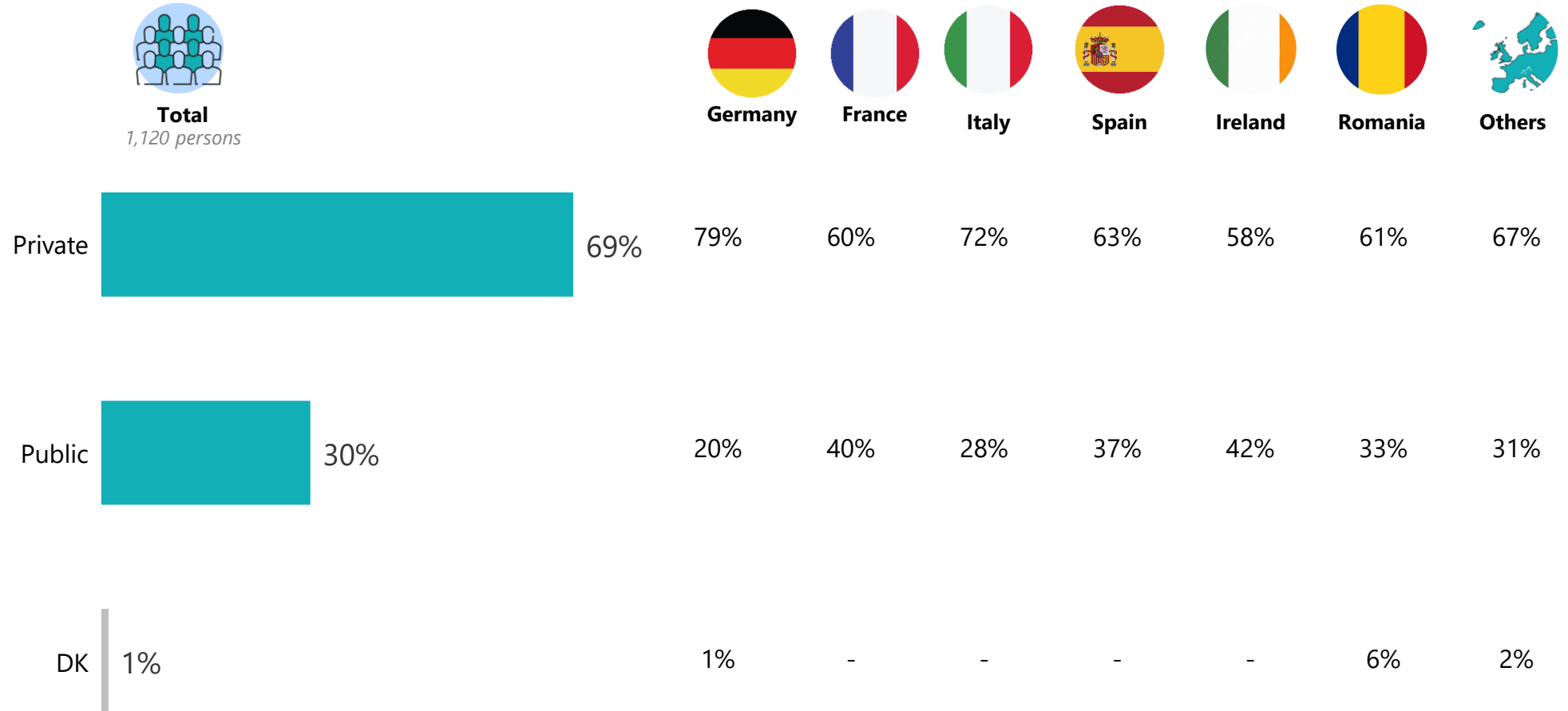
# Affiliation with CEDPO

Q. Are you, or your organization, a member of a body affiliated with CEDPO (Confederation of European Data Protection Organizations)?



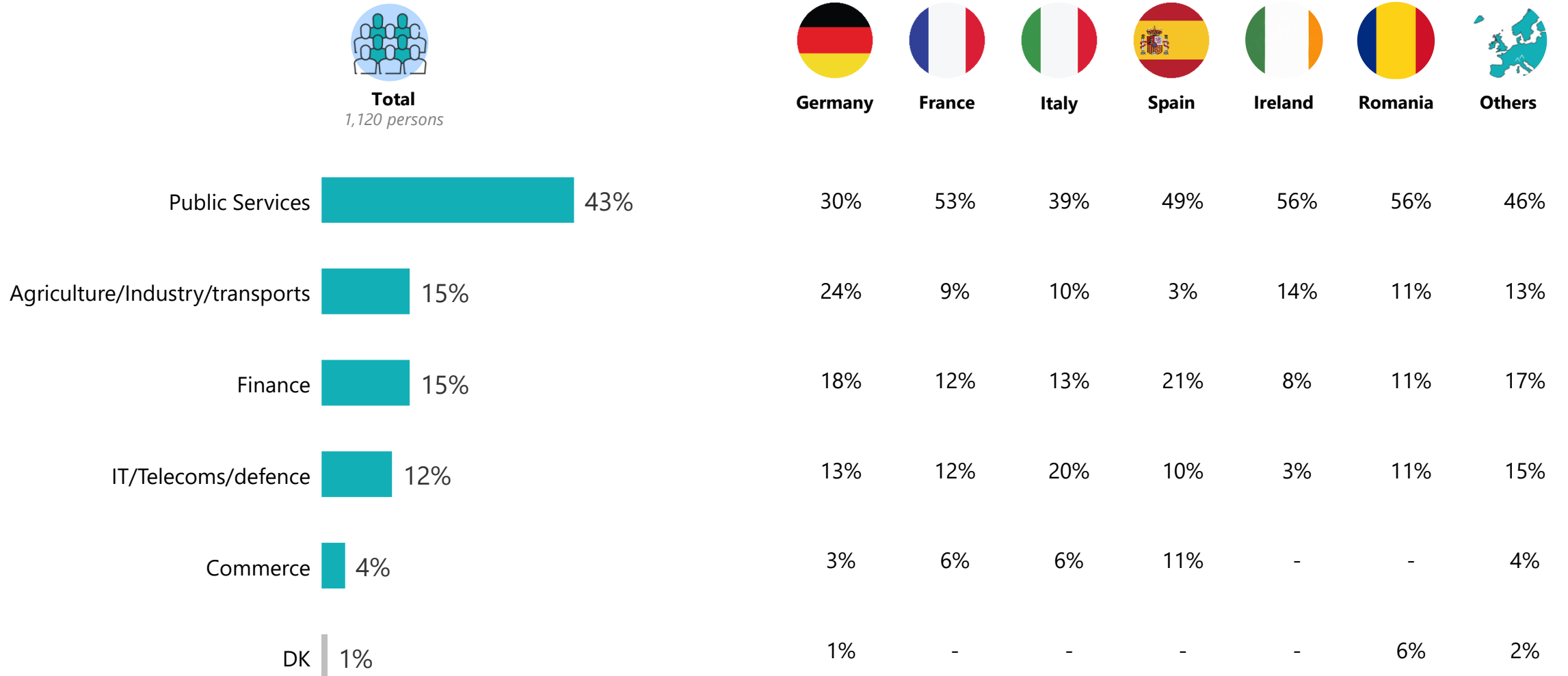
# Type of organization

Q. What type of organization are you DPO for?



# Sector

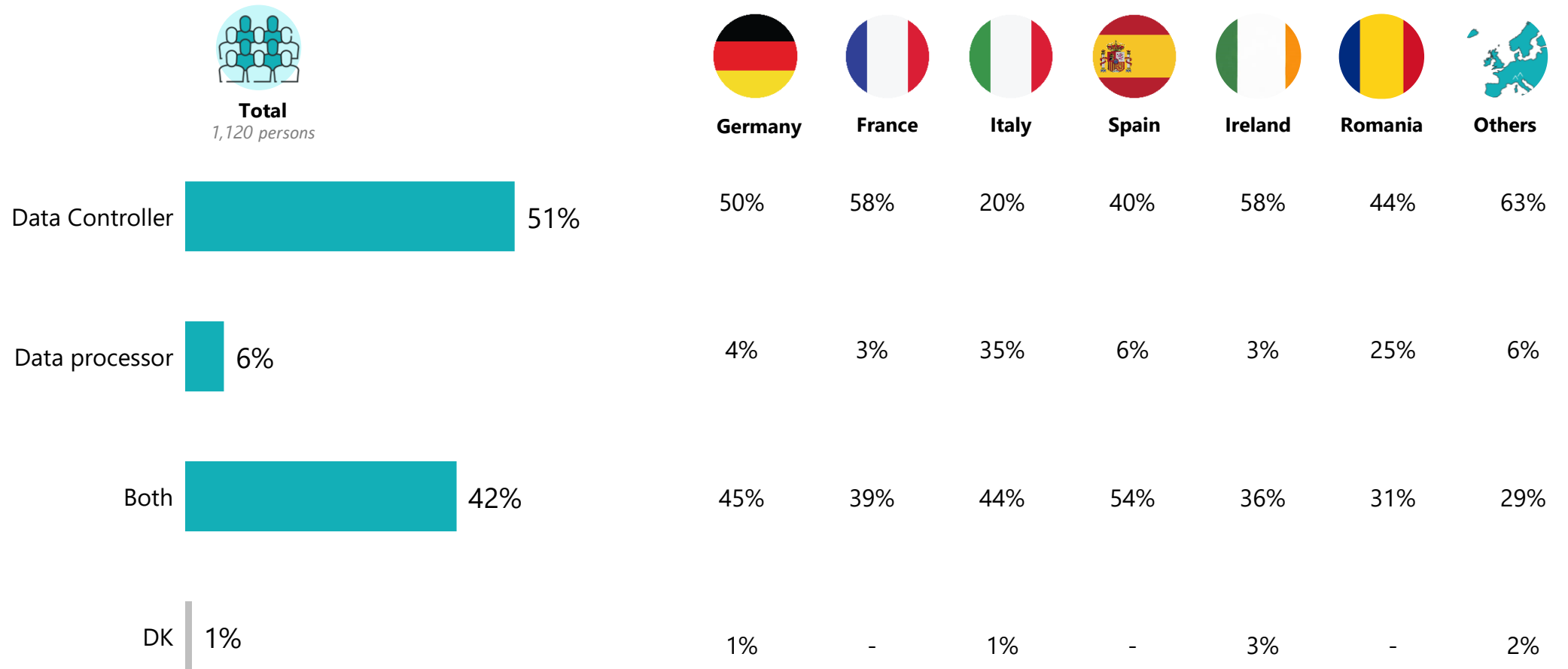
Q. Please specify the industry/ sector for which you are DPO:



# **Role, Responsibilities, and Experience**

# Role within the company

Q. What is the role of your organization (the one which justified the appointment of a DPO) in the processing of personal data?



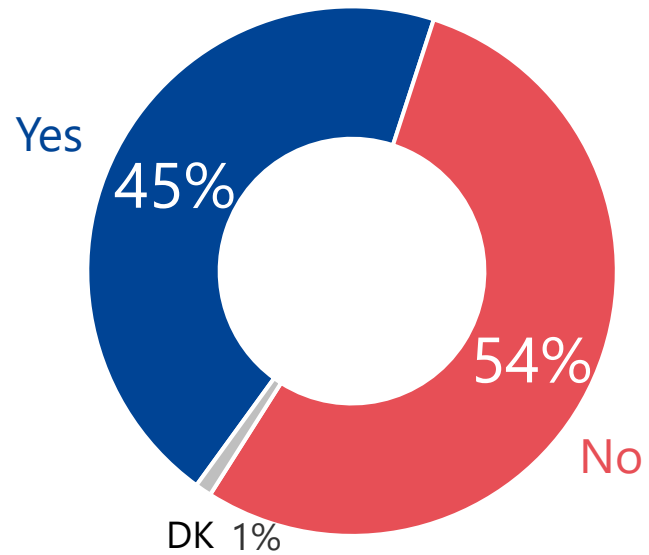


# Role as DPO

Q. As a DPO, do you act as a joint DPO on behalf of a group of undertakings or for several public authorities or bodies? (Art. 37(2) and 37(3) GDPR)



**Total**  
1,120 persons



Germany



France



Italy



Spain



Ireland



Romania



Others

	Germany	France	Italy	Spain	Ireland	Romania	Others
Yes	47%	48%	35%	51%	19%	33%	38%
No	52%	52%	62%	48%	78%	67%	62%
DK	1%	-	3%	1%	3%	-	-

# DPO externalization

Q. Are you an internal DPO (a staff member of the organization), or are you acting on the basis of a service contract (external DPO)? (Art. 37(6) GDPR)

	TOTAL	Size of organization		Industrie/Sector					Type of organisation	
		Less than 500	More than 500	Agriculture/ Industry/ Transports	IT/Telecoms/ defence	Finance	Public Services	Commerce	Public	Private
A staff member (internal DPO)	<b>72%</b>	53%	<b>88%</b>	76%	66%	60%	77%	73%	<b>83%</b>	67%
A service contract-based role (external DPO)	<b>28%</b>	<b>46%</b>	12%	24%	<b>34%</b>	<b>40%</b>	23%	25%	17%	33%

	TOTAL	Role of organization			Role		Internal or external		Affiliation with CEDPO	
		Data controller	Sub-contractor	Both	DPO	Responsible for privacy and data protection	Internal	External	Yes	No
A staff member (internal DPO)	<b>72%</b>	73%	57%	74%	71%	78%	100%	-	68%	75%
A service contract-based role (external DPO)	<b>28%</b>	27%	<b>43%</b>	26%	29%	19%	-	100%	31%	25%

# Attachment to a department

**Q. If you are an internally appointed DPO, are you attached to a specific department?**

*Question only asked to internally appointed DPOs, 72% of the overall sample*



**Total**  
804 persons

**Total Yes: 95%**



**Germany**

**91%**



**France**

**100%**



**Italy**

**100%**



**Spain**

**100%**



**Ireland**

**100%**



**Romania**

**80%**



**Others**

**100%**

Yes, highest management 21%

Yes, legal function 21%

Yes, compliance function 15%

Yes, IT or information security function 6%

Yes, administrative management 5%

Yes, information management 5%

Yes, risk management 4%

Yes, human resources 2%

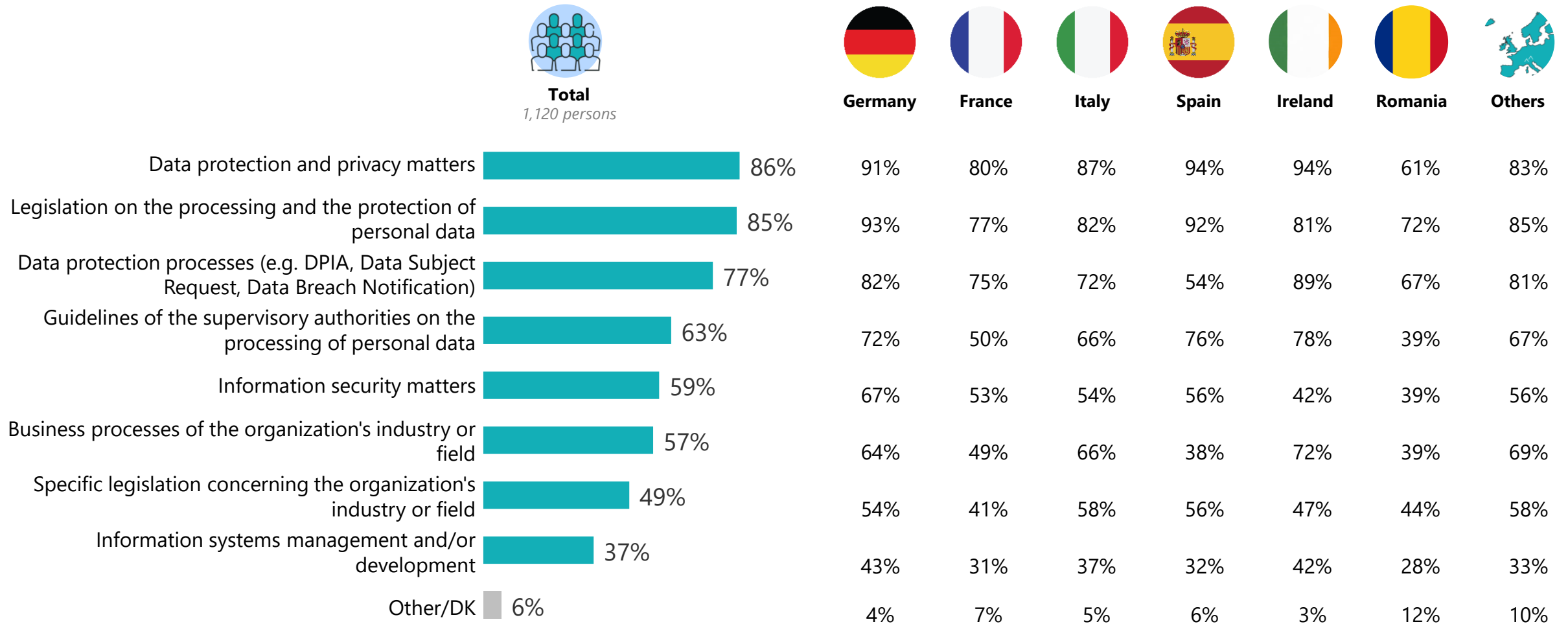
Other 16%

I do not wish to answer/DK 5%

	Germany	France	Italy	Spain	Ireland	Romania	Others
Yes, highest management	9%	30%	29%	33%	17%	15%	31%
Yes, legal function	23%	22%	8%	25%	18%	15%	17%
Yes, compliance function	18%	11%	13%	14%	31%	15%	23%
Yes, IT or information security function	9%	3%	21%	8%	4%	-	3%
Yes, administrative management	8%	1%	8%	6%	4%	10%	11%
Yes, information management	2%	9%	-	-	4%	10%	-
Yes, risk management	2%	7%	-	-	9%	5%	3%
Yes, human resources	2%	1%	8%	3%	-	5%	-
Other	18%	16%	13%	11%	13%	5%	12%
I do not wish to answer/DK	9%	-	-	-	-	20%	-

# Expertise

Q. As a DPO, in which of the following topics do you have experience or expert knowledge? (Art. 37(5) GDPR)



# Areas of education

Q. As a DPO, which of the following areas of education and / or knowledge were set as requirements for your role?



**Total**  
1,120 persons



**Germany**



**France**



**Italy**



**Spain**



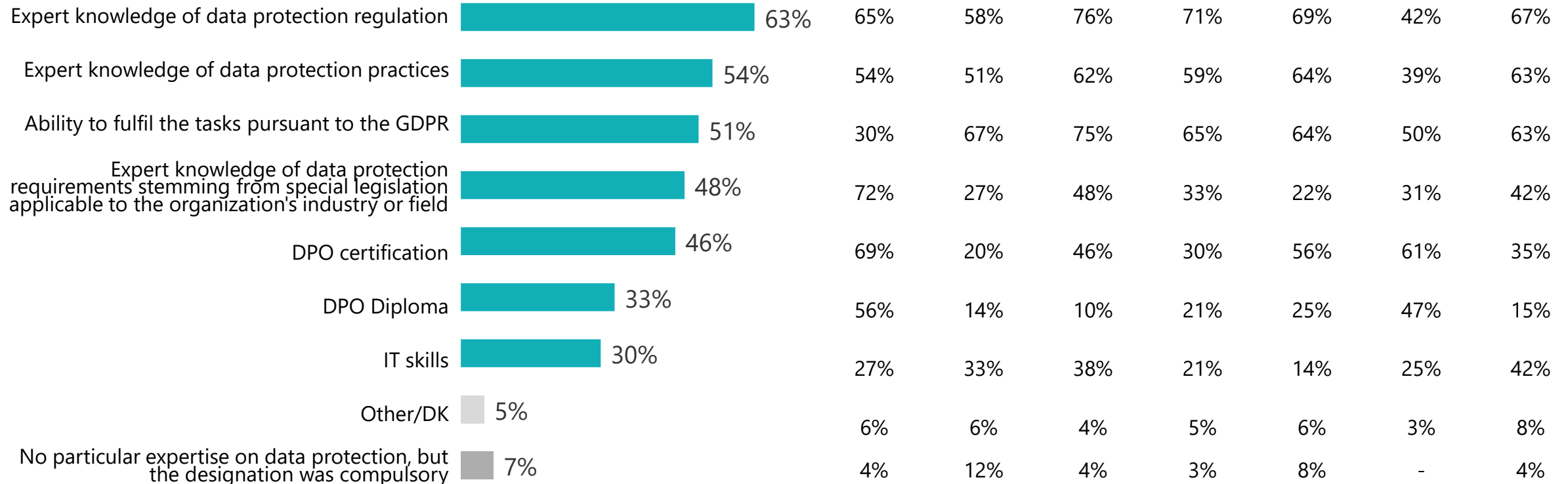
**Ireland**



**Romania**

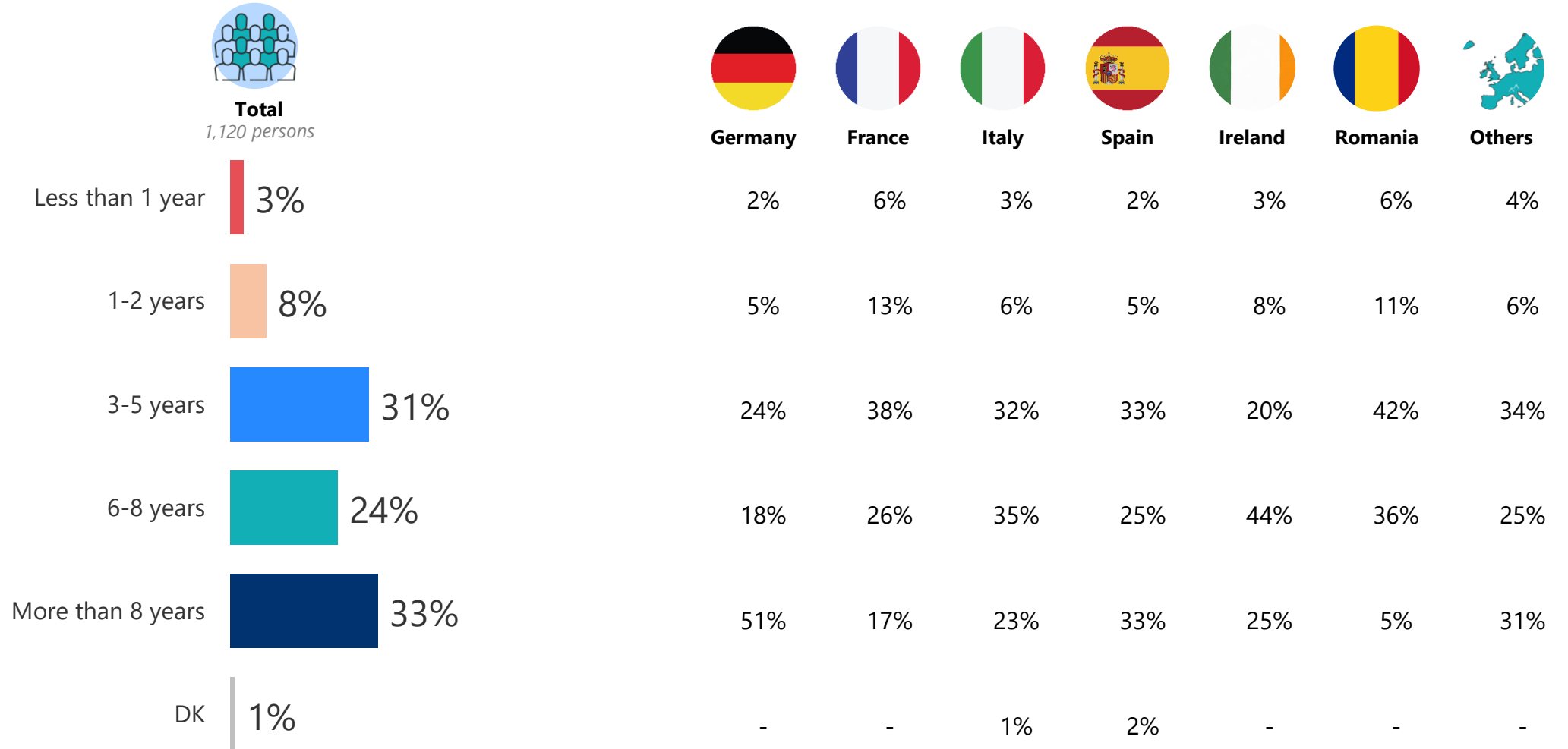


**Others**



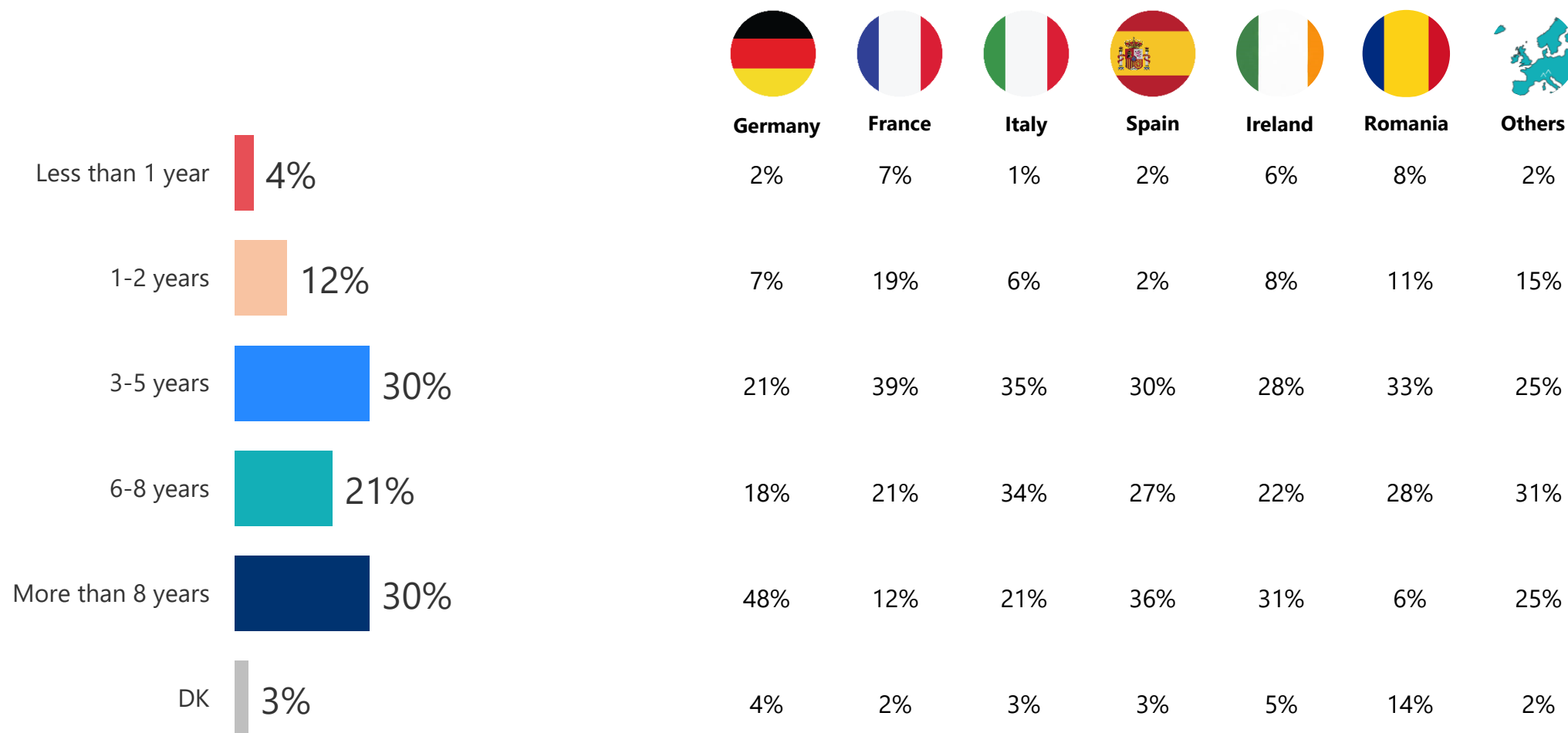
# Seniority as a DPO

Q. How many years of experience do you have as DPO on the application and the interpretation of data protection requirements?



# Seniority as a DPO in the organization's industry

Q. How many years of relevant experience do you have as DPO on working in the organization's industry or field? (Art. 37(5) GDPR)

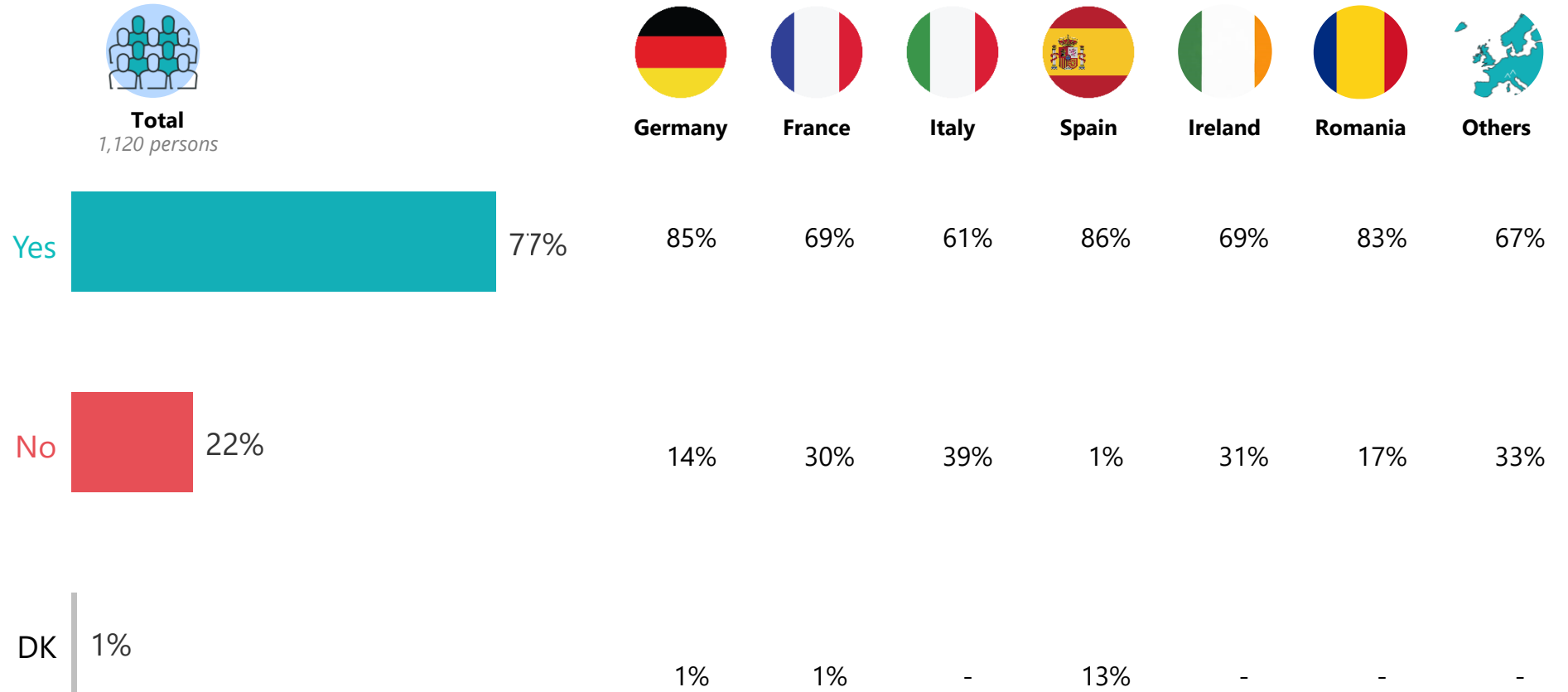


# Operational Details and Challenges



# Written description of the DPO's tasks

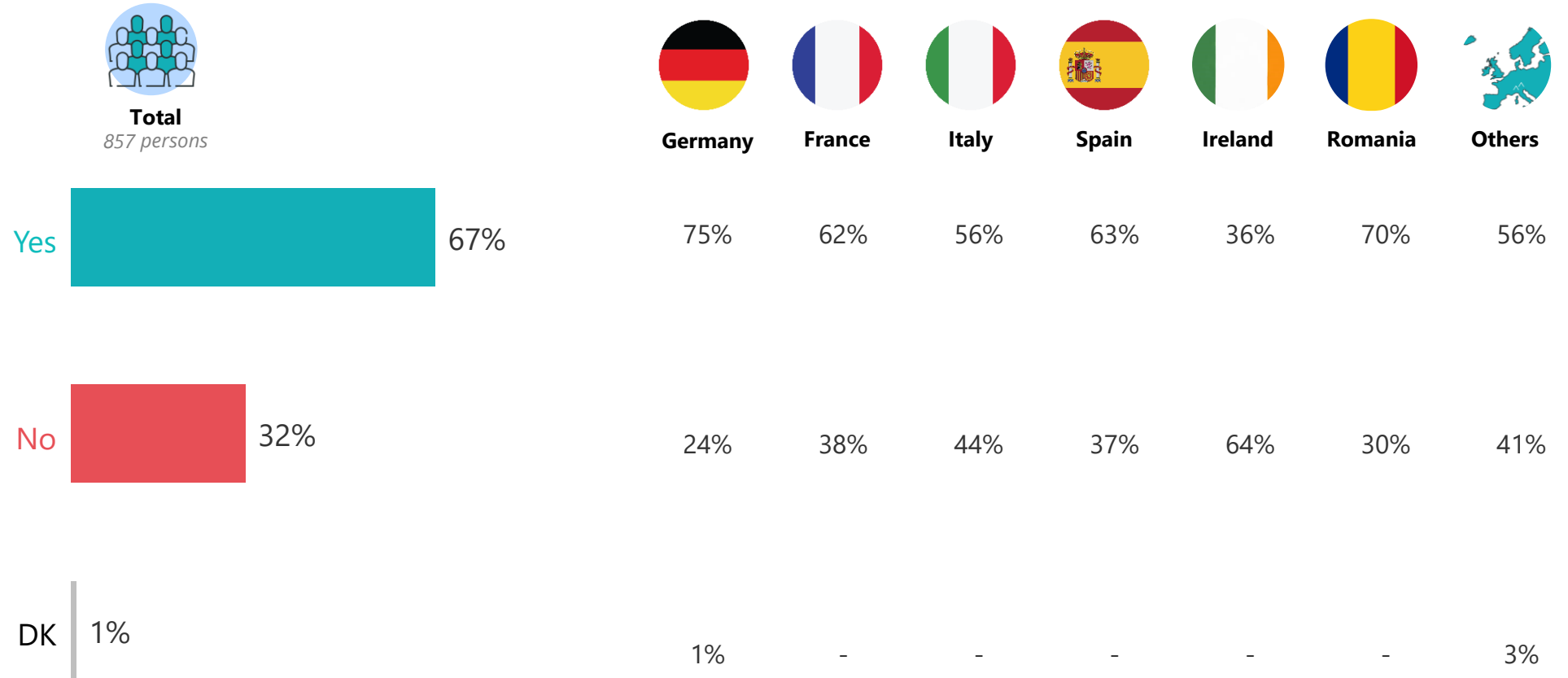
Q. Is there a clear written description of your tasks as DPO between you and your organization (e.g. engagement letter)? (Art. 39(1) and 38(6) GDPR)



# Exhaustive description of the DPO's tasks

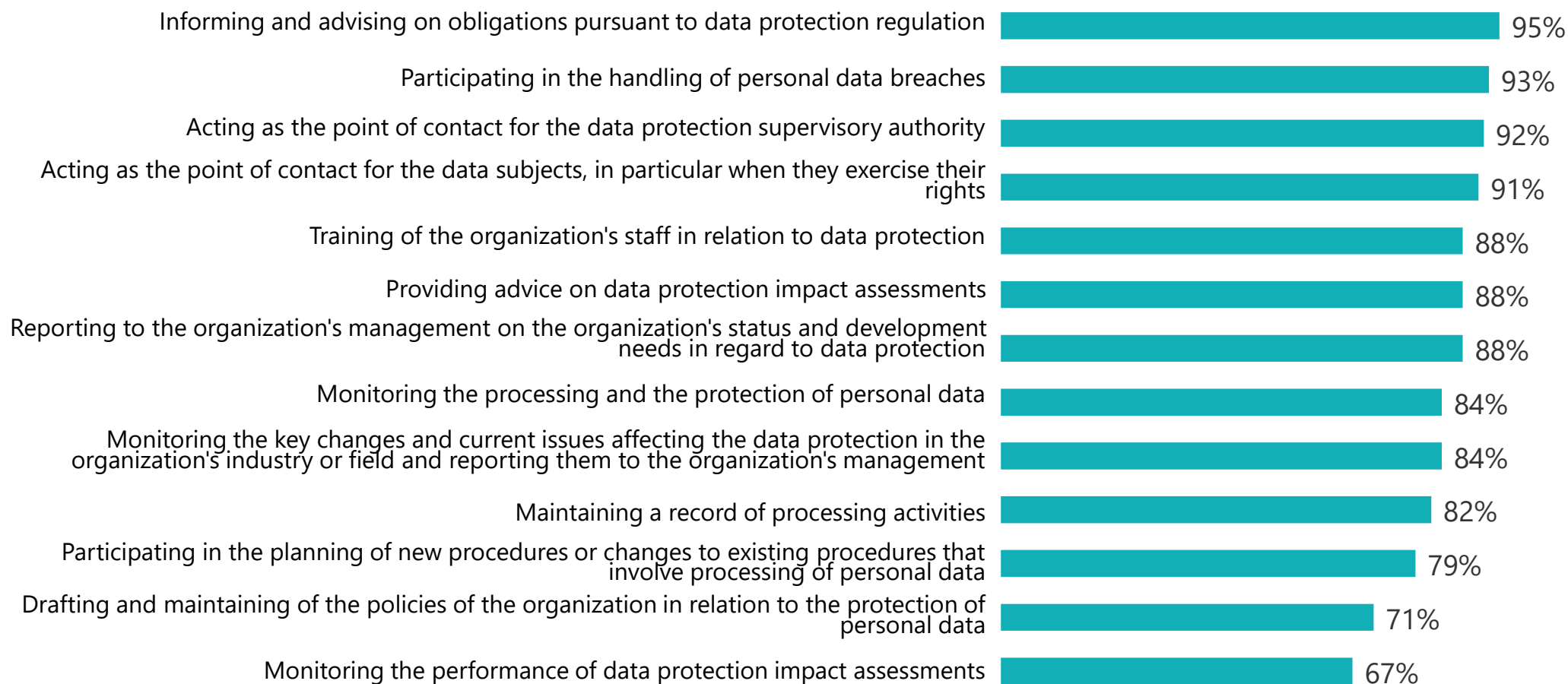
**Q. Does the written description of your tasks as DPO cover all your actual tasks in the organization?**

*Question only asked to those who have a written description of their tasks, 77% of the overall sample*



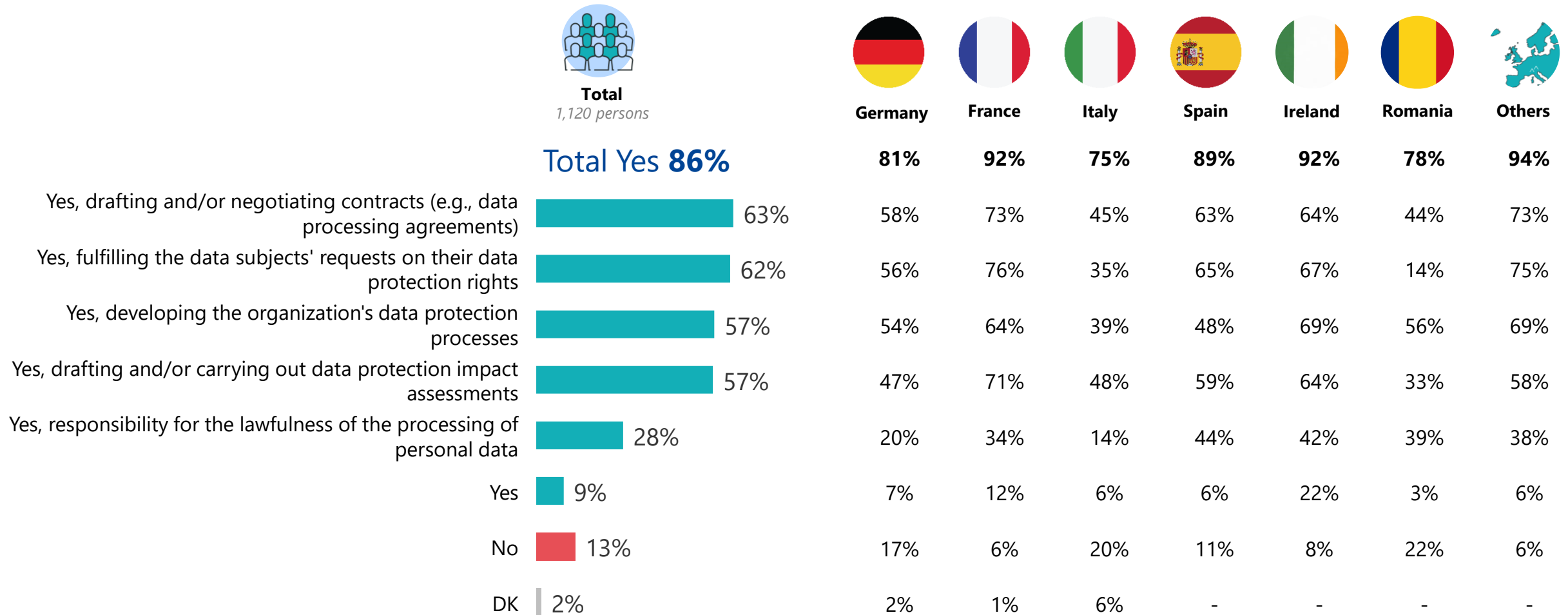
# Detailed tasks of the DPO

Q. Which of the following tasks are assigned to you, as DPO of the organization? (Art. 39(1), 38(3), 38(4) and 38(6) GDPR)



# Additional tasks

Q. Have additional tasks been assigned to you, as DPO, compared to those required under the GDPR? If so, please specify, which of the following tasks.



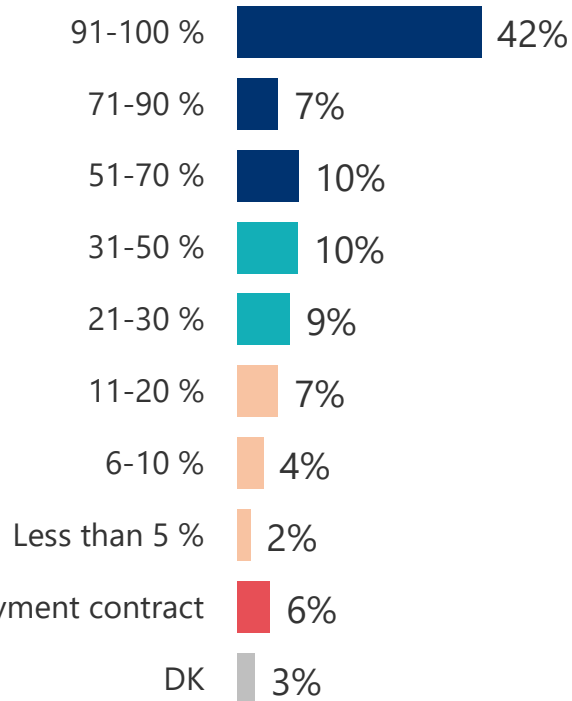
# Working time allocated to DPO's tasks and duties

**Q. If you are an internal DPO and are in full-time employment, only part of which is dedicated to your DPO tasks, how much of your working time can you allocate to performing the DPO's tasks and duties?**

*Question only asked to internal DPOs, 72% of the overall sample*



**Total**



Total 51-100

**59%**

Total 21-50

**19%**

Total 0-20

**13%**



**Germany**



**France**



**Italy**



**Spain**



**Ireland**



**Romania**

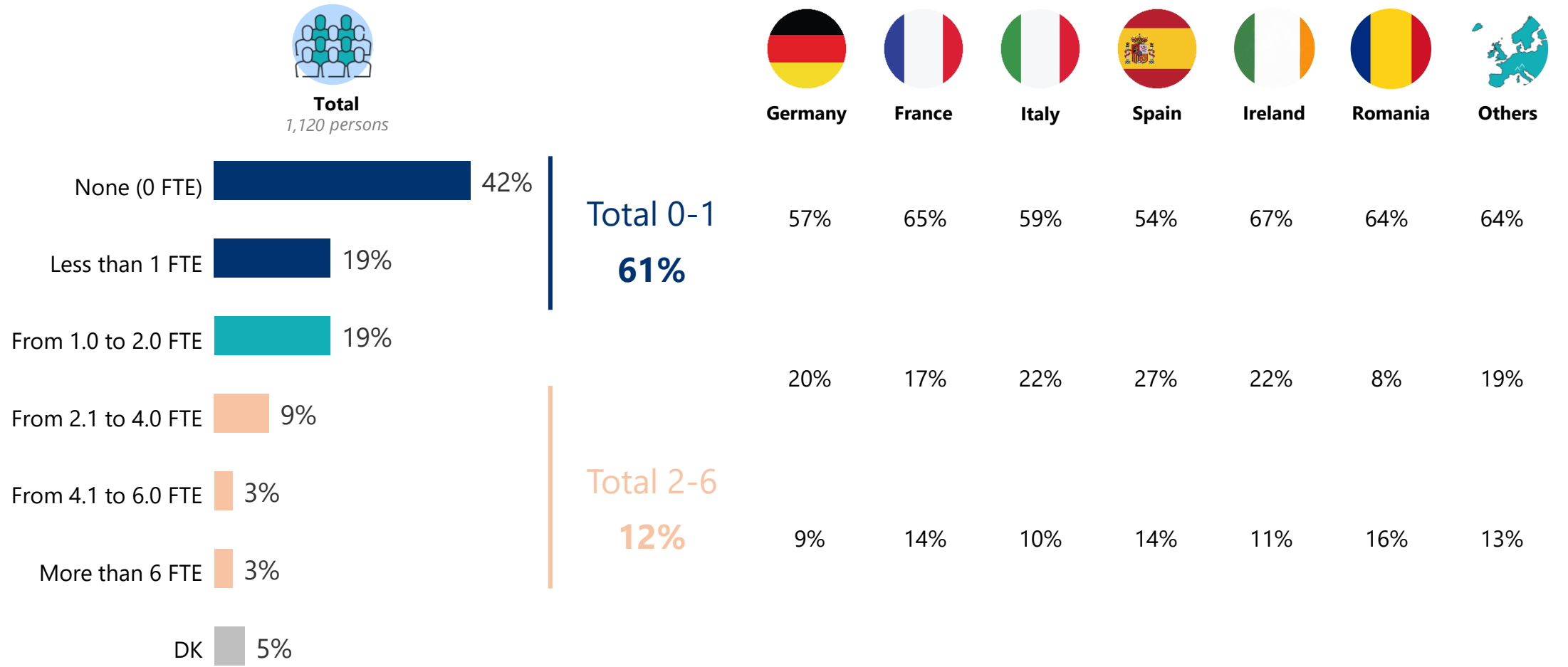


**Others**

	Germany	France	Italy	Spain	Ireland	Romania	Others
Total 51-100	61%	55%	50%	78%	70%	45%	69%
Total 21-50	20%	18%	25%	14%	4%	25%	25%
Total 0-20	11%	17%	21%	5%	4%	30%	6%

# Extra FTEs to fulfill DPO's tasks

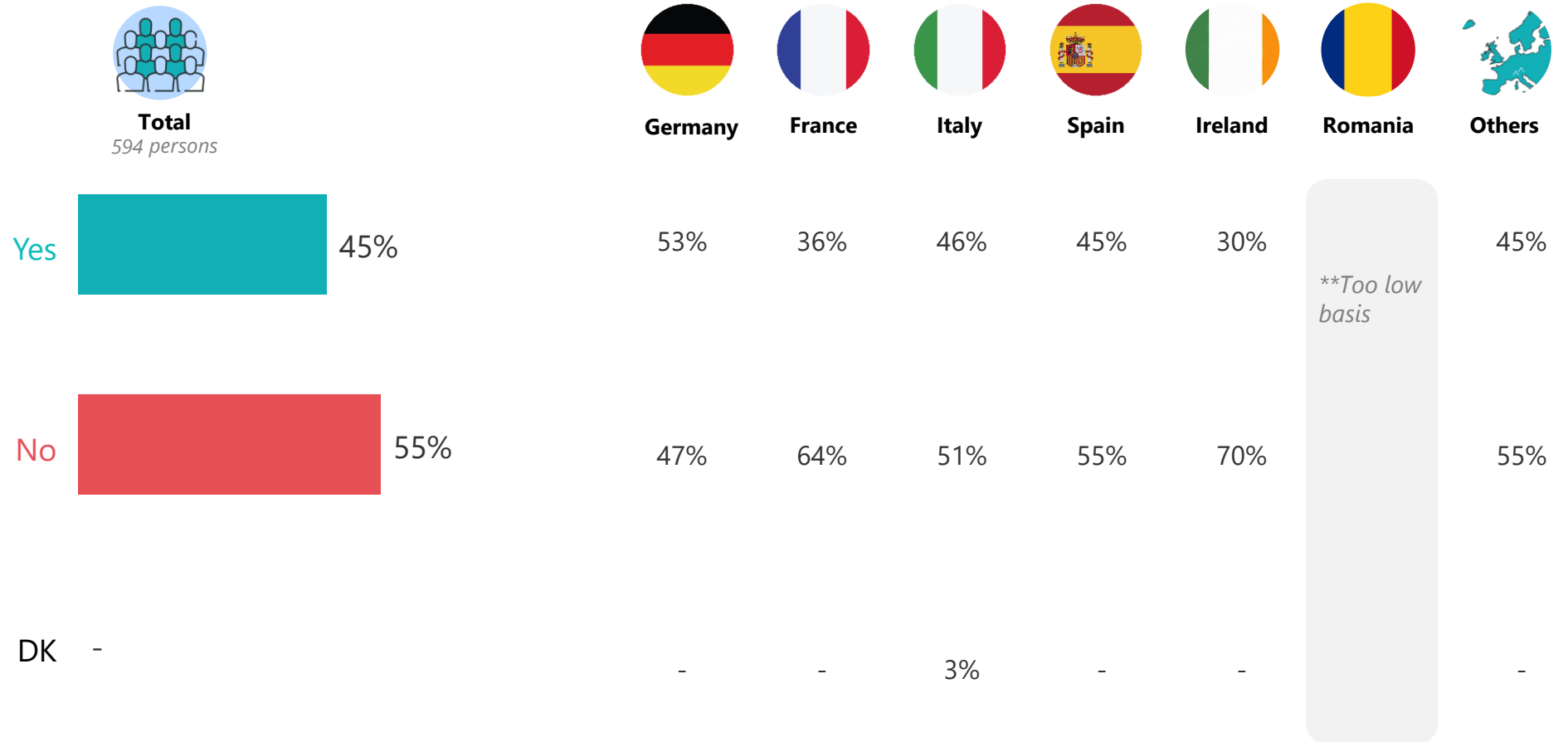
Q. How many full-time equivalents (FTE) do you have as DPO at your disposal in fulfilling your tasks as a DPO in addition to yourself? (Art. 38(2) GDPR)



# Resources adequacy to fulfill DPO's tasks

**Q. Would you estimate the aforementioned resources to be sufficient in order to fulfil your tasks as a DPO? (Art. 38(2) GDPR)**

*Question only asked to those with collaborators appointed to support them, 53% of the overall sample*

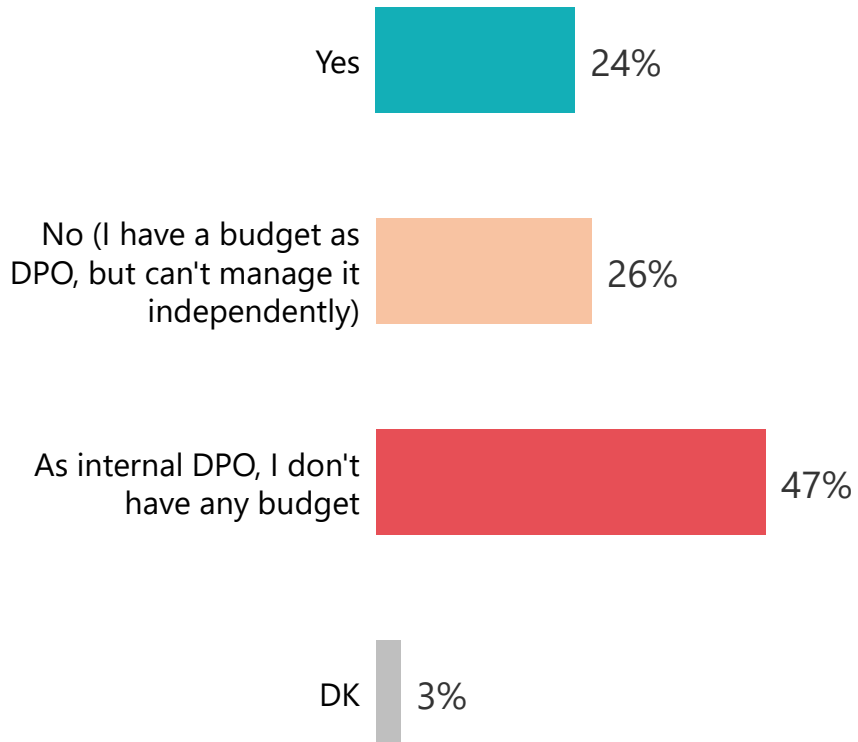


# Budget dedicated to the DPOs

Q. If your organization has allocated a budget to you, as a DPO, can you manage it independently?



**Total**  
1,120 persons



Total number having a budget  
**50%**

Total number not having or can't manage a budget  
**73%**



Germany

57%



France

47%



Italy

31%



Spain

40%



Ireland

50%



Romania

58%



Others

55%

63%

80%

87%

83%

86%

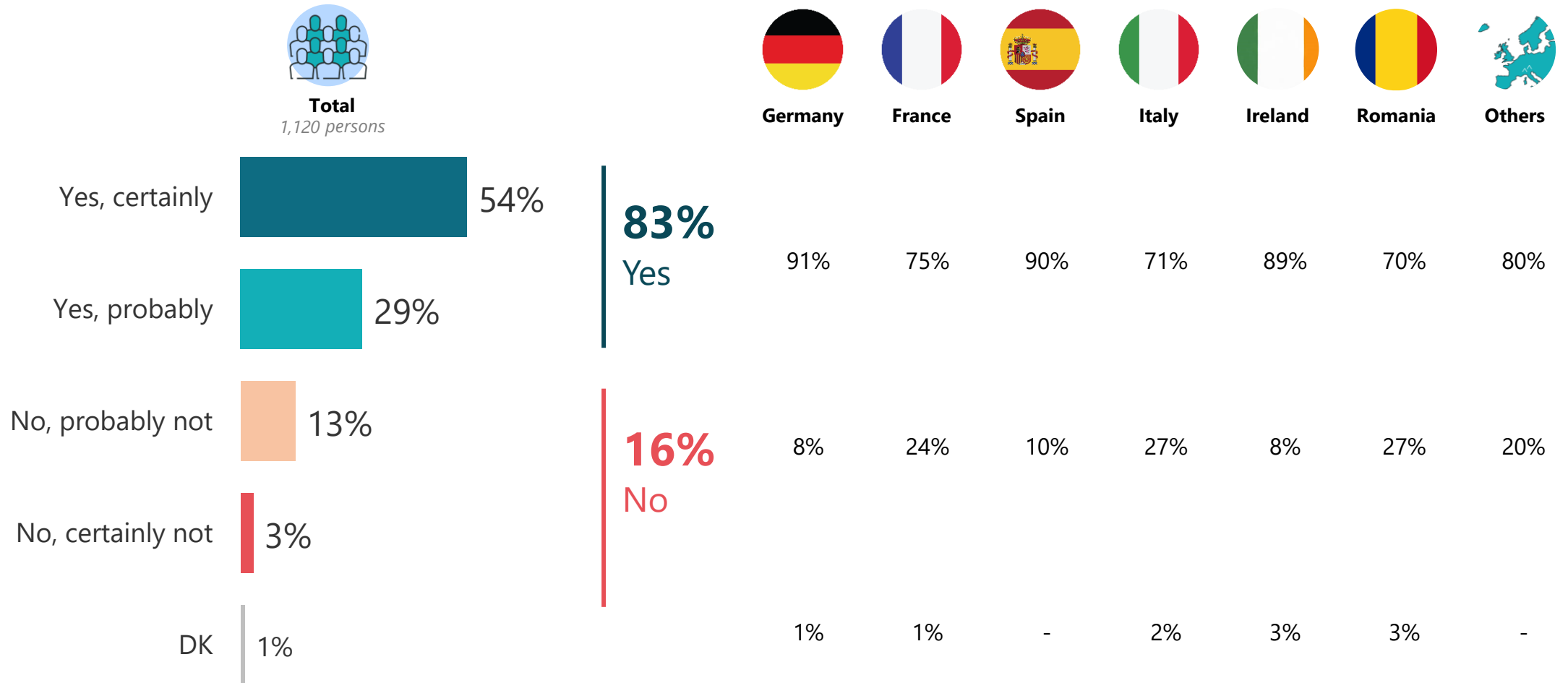
83%

77%



# Awareness of the DPO's independence

Q. Is your management or hierarchy (if you are an internal DPO) or your client (if you are an external DPO) aware of the requirement for you - as a DPO - to be independent in your tasks?

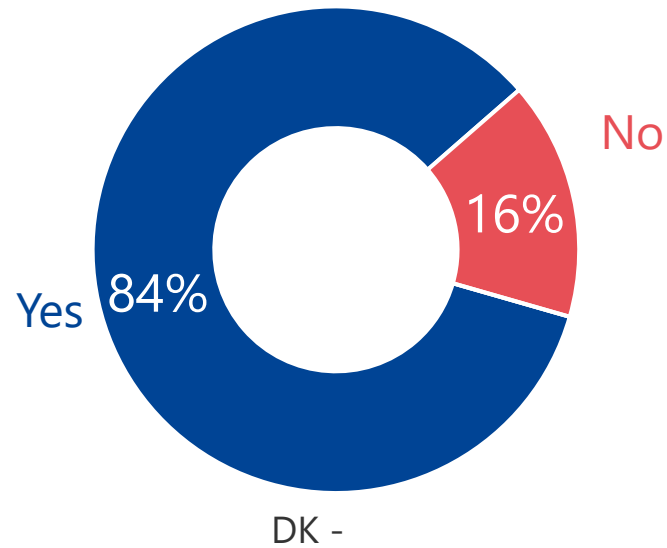


# Understanding of the independence extension

Q. Do you have a clear understanding of the extent of your independence as a DPO?



**Total**  
1,120 persons



**Germany**



**France**



**Italy**



**Spain**



**Ireland**



**Romania**



**Others**

	Germany	France	Italy	Spain	Ireland	Romania	Others
Yes	94%	69%	93%	90%	92%	81%	79%
No	5%	31%	7%	8%	8%	19%	21%
DK	1%	-	-	2%	-	-	-

# Situations experienced

Q. As a DPO, have you experienced any of these following situations?

Several answers allowed



Total

1,120 persons



Germany



France



Italy



Spain



Ireland



Romania



Others

**Conflict with management and information manipulation** 50%

**Operational and financial constraints** 47%

**Access and communication restrictions** 24%

Management does not lead by example on GDPR compliance 41%

Not granted any budget 36%

Your role, as a DPO, is often denigrated 25%

Management undermines your action and minimizes your role, as a DPO 21%

Prevented from working on a just-discovered non-compliant project 16%

Denied possibility to meet operational staff for mission-essential details 11%

Been requested to cut your budget significantly 11%

Prevented from attending training courses or events to maintain your data protection knowledge 8%

Prohibited from seeking Data Protection Authority advice or even contacting it 6%

Staff is denied to freely contact you, as a DPO 5%

Found your data breach advice note to have been altered by the management without notification 4%

Pressured by group's head DPO not to share a disagreeable analysis 4%

Moved from accessible office to a restricted area 3%

Forced to conduct an audit prior to recommended actions 3%

Forbidden from contacting a data processor's DPO for information 2%

Found your negative impact assessment changed to positive during your leave, under your name 1%

I have never experienced any of these situations 33%

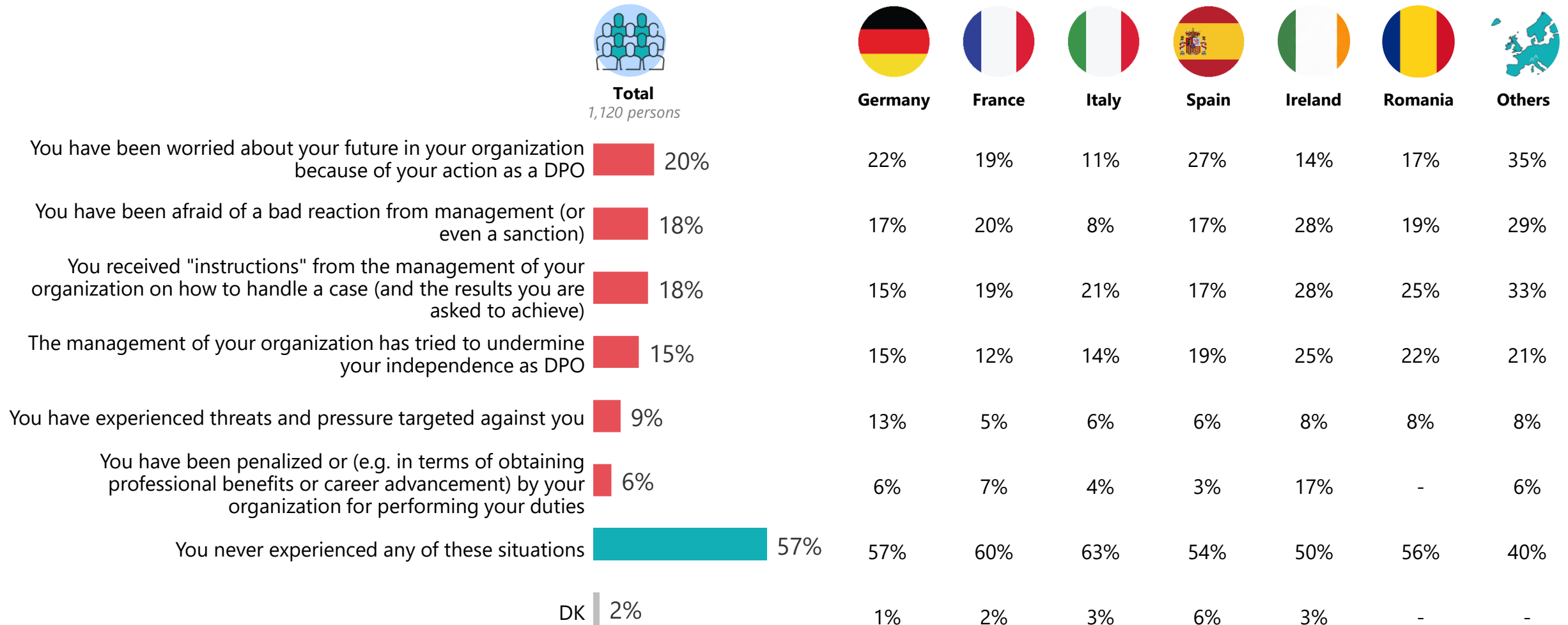
DK 2%

	Germany	France	Italy	Spain	Ireland	Romania	Others
Conflict with management and information manipulation	51%	50%	44%	41%	61%	50%	56%
Operational and financial constraints	43%	48%	58%	73%	50%	39%	46%
Access and communication restrictions	25%	22%	20%	24%	22%	31%	23%
Management does not lead by example on GDPR compliance	41%	40%	37%	37%	47%	31%	50%
Not granted any budget	34%	35%	46%	40%	36%	36%	35%
Your role, as a DPO, is often denigrated	23%	28%	18%	17%	19%	31%	35%
Management undermines your action and minimizes your role, as a DPO	21%	18%	18%	21%	28%	39%	33%
Prevented from working on a just-discovered non-compliant project	14%	15%	4%	59%	6%	11%	8%
Denied possibility to meet operational staff for mission-essential details	14%	6%	8%	13%	11%	22%	6%
Been requested to cut your budget significantly	12%	10%	11%	10%	11%	3%	10%
Prevented from attending training courses or events to maintain your data protection knowledge	5%	11%	7%	8%	11%	6%	15%
Prohibited from seeking Data Protection Authority advice or even contacting it	8%	5%	6%	5%	8%	6%	4%
Staff is denied to freely contact you, as a DPO	7%	2%	3%	6%	-	6%	4%
Found your data breach advice note to have been altered by the management without notification	6%	3%	-	5%	-	11%	8%
Pressured by group's head DPO not to share a disagreeable analysis	4%	4%	-	8%	8%	8%	8%
Moved from accessible office to a restricted area	2%	6%	-	5%	6%	-	-
Forced to conduct an audit prior to recommended actions	1%	5%	-	8%	-	3%	6%
Forbidden from contacting a data processor's DPO for information	2%	3%	-	5%	-	-	-
Found your negative impact assessment changed to positive during your leave, under your name	1%	1%	-	2%	-	6%	-
I have never experienced any of these situations	34%	34%	28%	22%	31%	36%	29%
DK	2%	2%	1%	3%	-	-	-

# Situations experienced

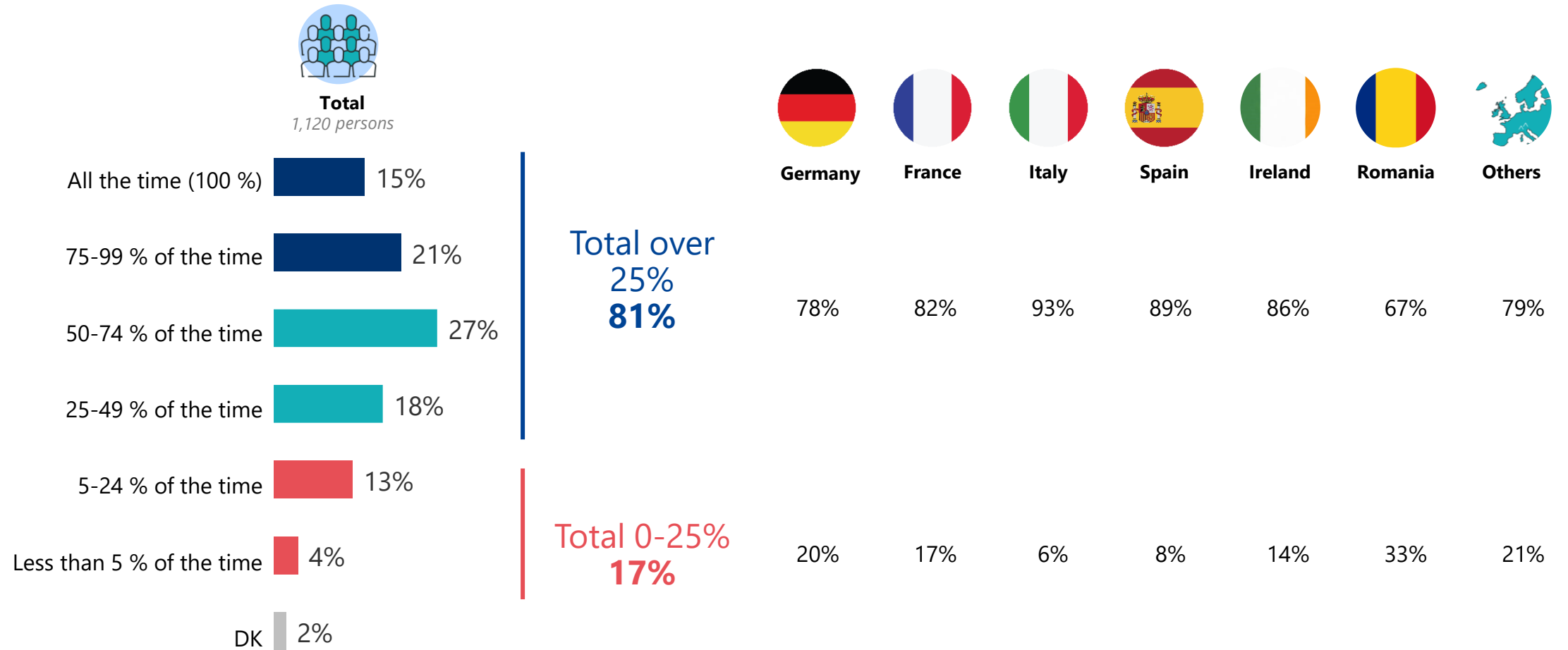
**Q. Have you experienced any of the following situations?**

*Several answers allowed*



# Involvement in the processing and protection of personal data

Q. To what extent are you involved as a DPO and/or consulted in handling and solving issues relating to the processing and protection of personal data in the organization? (Art. 38(1) GDPR)



# Processes related to the consultation of the DPO about GDPR

Q. Are you, as a DPO, required to be consulted on data protection issues (e.g. personal data breaches) as part of the organisation's internal processes?"



**Total**  
1,120 persons

Total Yes **89%**

Yes, in all processes relevant to processing of personal data **57%**

Yes, in some of the processes relevant to processing of personal data **32%**

No **10%**

DK **1%**



**Germany**

**94%**

66%

28%

5%

1%



**France**

**85%**

46%

39%

14%

1%



**Italy**

**90%**

60%

30%

7%

3%



**Spain**

**84%**

65%

19%

14%

2%



**Ireland**

**95%**

53%

42%

5%

-



**Romania**

**80%**

33%

47%

20%

-



**Others**

**85%**

60%

22%

15%

-

# Level of information related to GDPR

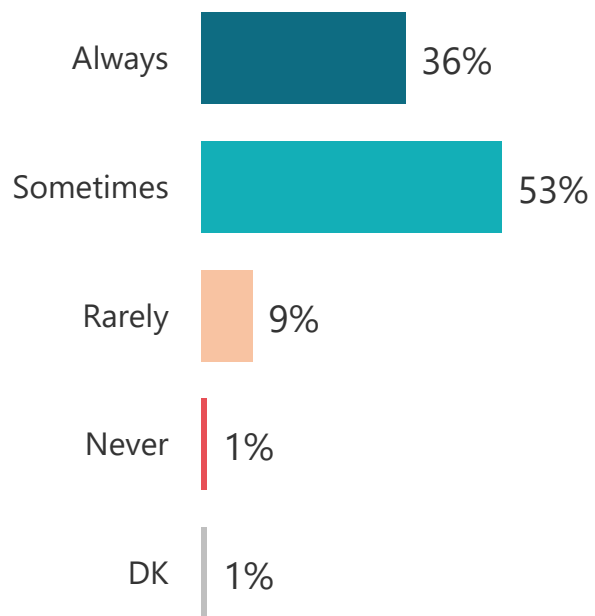
Q. As a DPO, do you have access to or receive sufficient information on data protection issues and processing of personal data in the organization to be able to fulfil your tasks? (Art. 38(1) and 38(2) GDPR)



**Total**

1,120 persons

Yes **98%**



**Germany**

**99%**

49%

45%

5%

1%

-



**France**

**99%**

23%

62%

14%

1%

-



**Italy**

**96%**

37%

53%

6%

-

4%



**Spain**

**96%**

36%

54%

6%

2%

2%



**Ireland**

**100%**

31%

64%

5%

-

-



**Romania**

**89%**

31%

50%

8%

11%

-



**Others**

**94%**

31%

52%

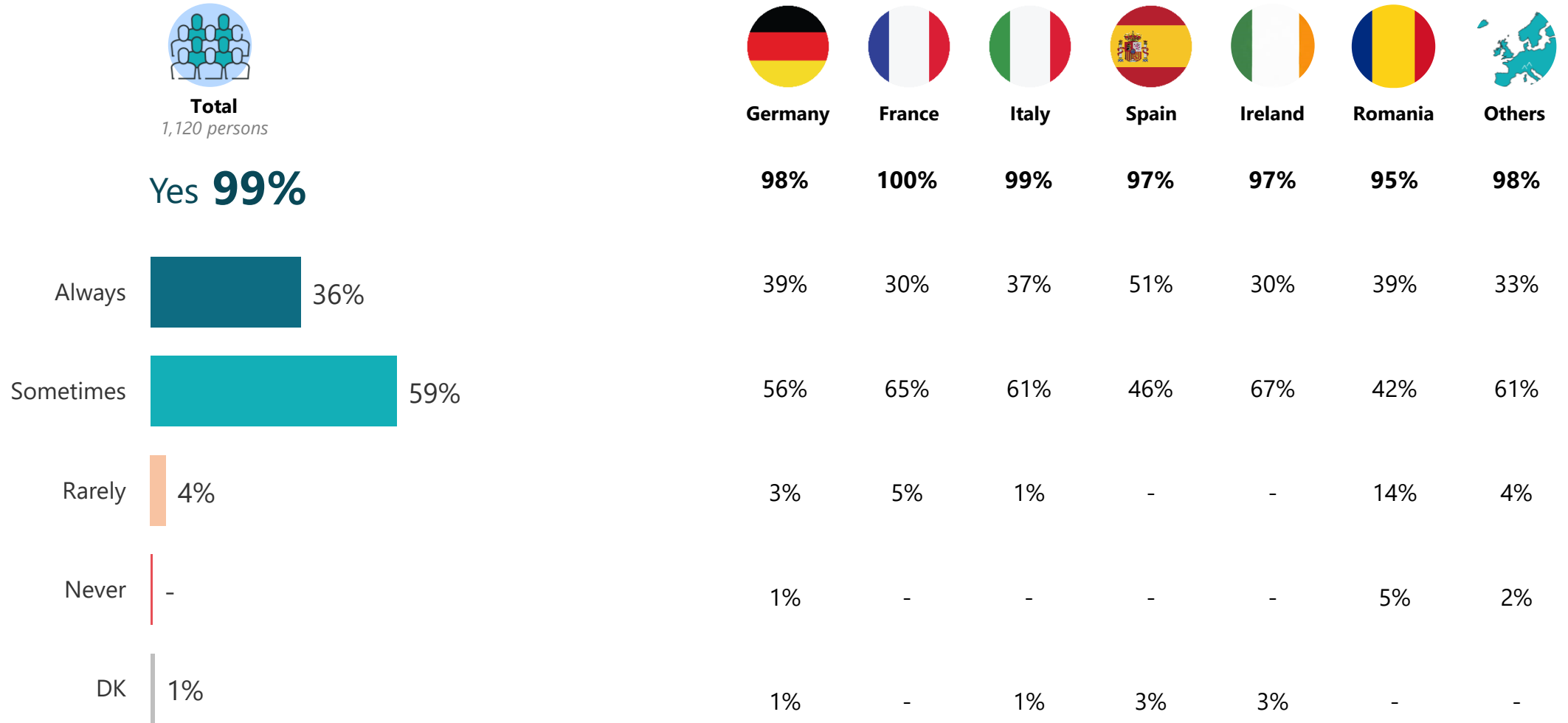
11%

6%

-

# Agreement with DPO advice

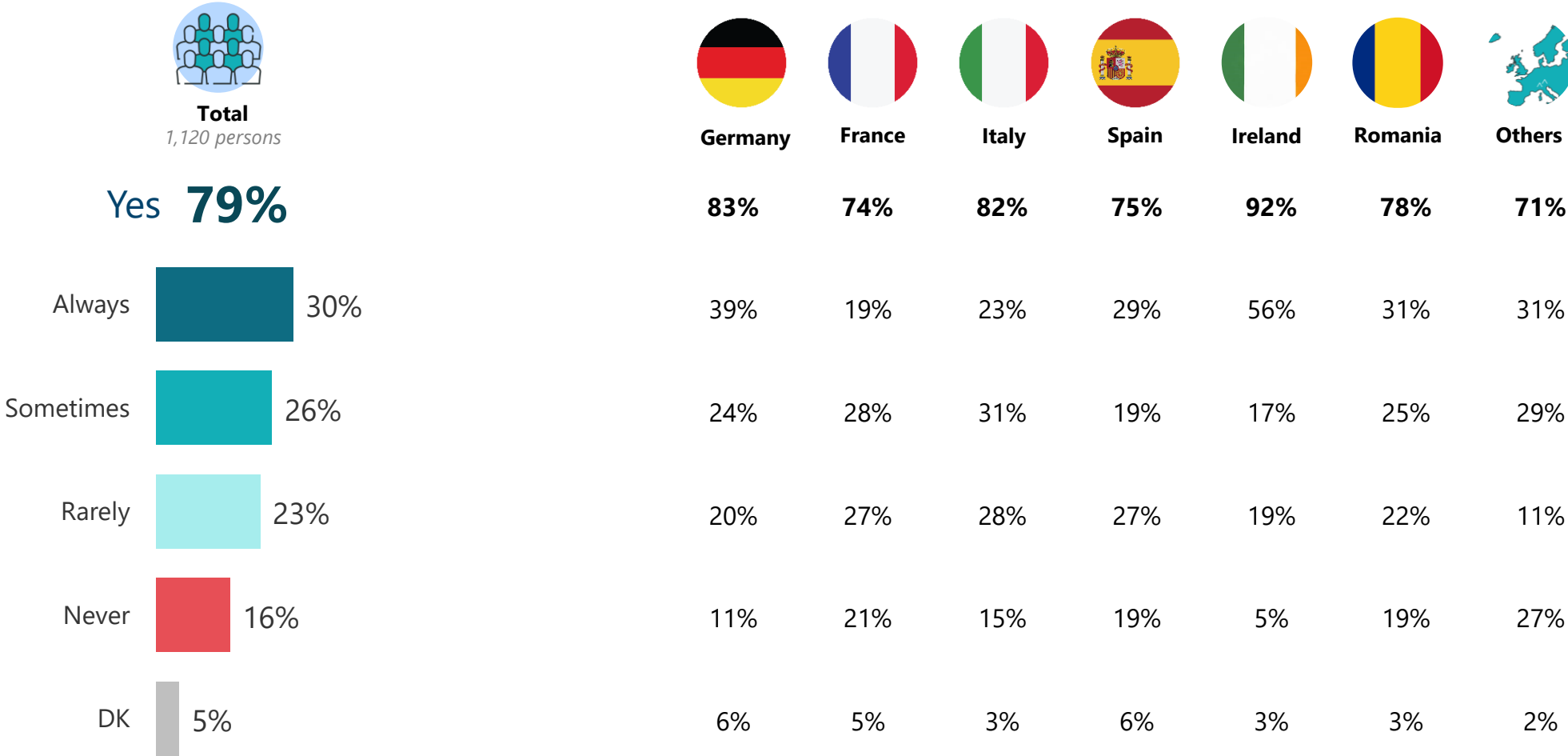
Q. As a DPO, does your organization adhere to your advice? (Art. 38(1) and 39 GDPR)





# Documentation of the decision to not follow the DPO advice

Q. In cases where your advice (as a DPO) is not followed by the organization, are the reasons documented? (Art. 38(1) GDPR)

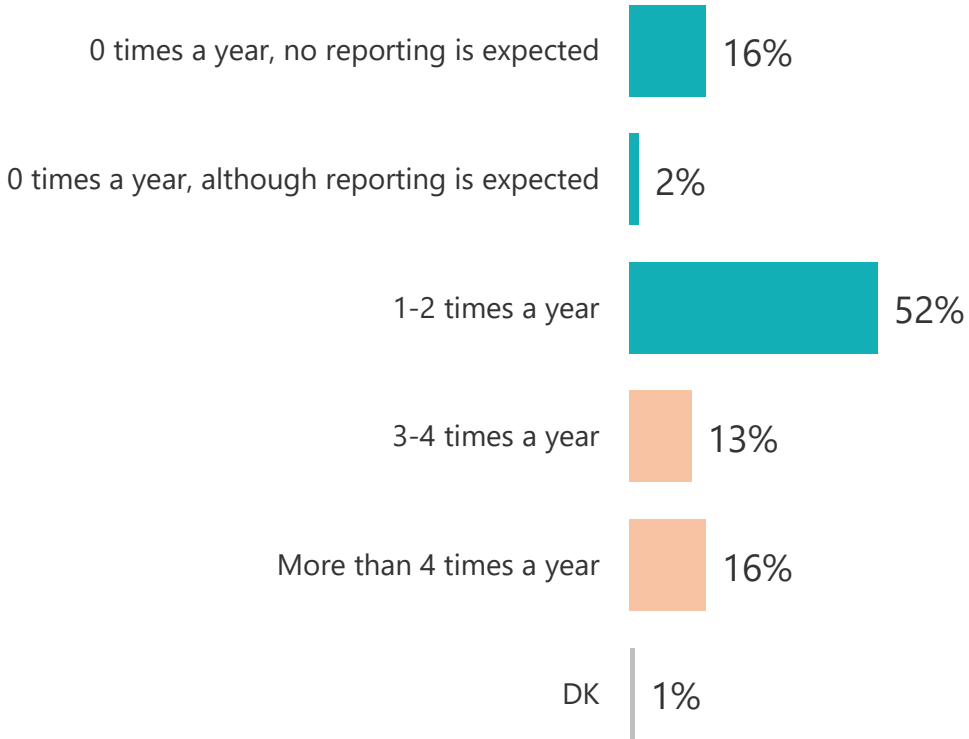


# Reporting to top management

Q. As a DPO, do you report regularly and formally to the highest management level in the organization? If so, how frequently? (Art. 38(3) GDPR)



**Total**  
1,120 persons



Total less than 2  
**70%**

Total more than 3  
**29%**



Germany

65%

34%



France

82%

17%



Italy

61%

38%



Spain

66%

32%



Ireland

31%

69%



Romania

66%

34%



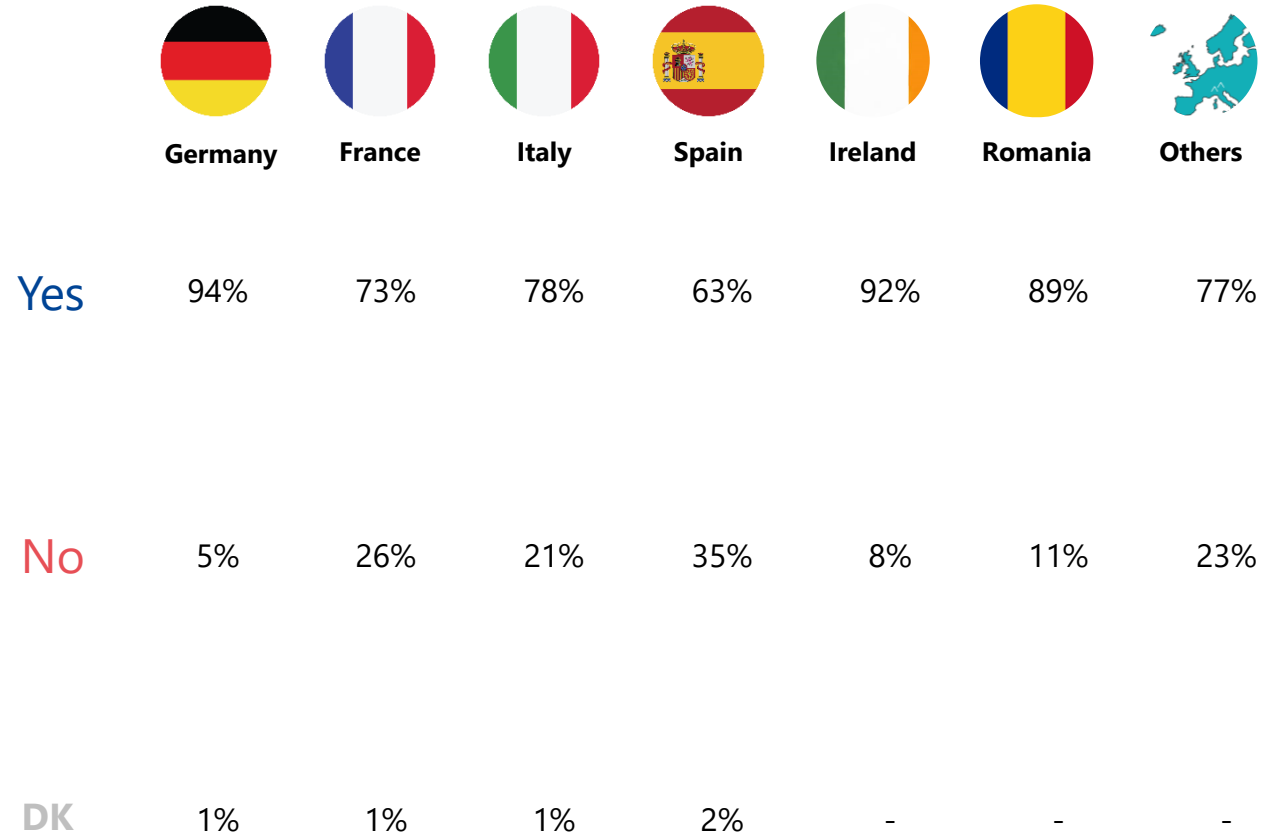
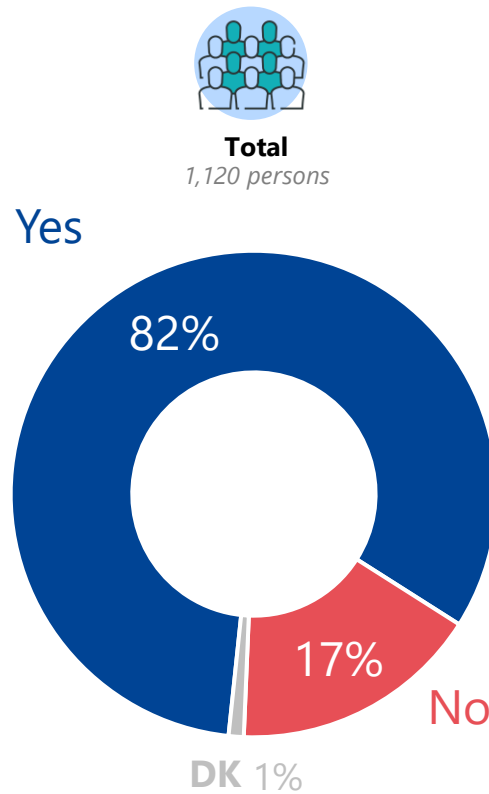
Others

71%

29%

# Ease of access to the board

Q. As DPO, can you freely contact the board or senior management?

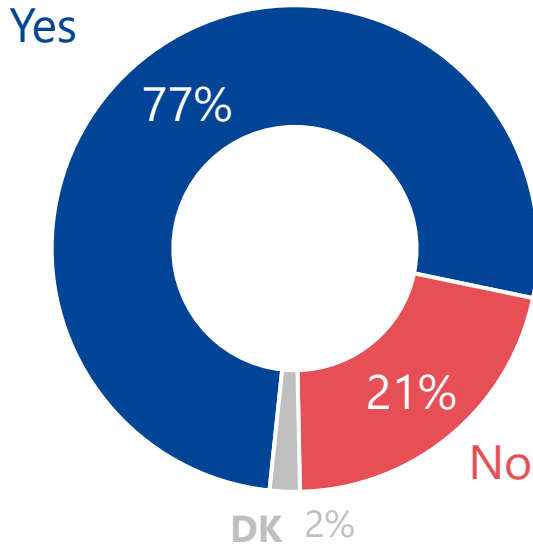


# Reporting conditions

Q. As a DPO, do you believe that you are reporting into the correct department or people to facilitate your role?



**Total**  
1,120 persons



**Germany**



**France**



**Italy**



**Spain**



**Ireland**



**Romania**

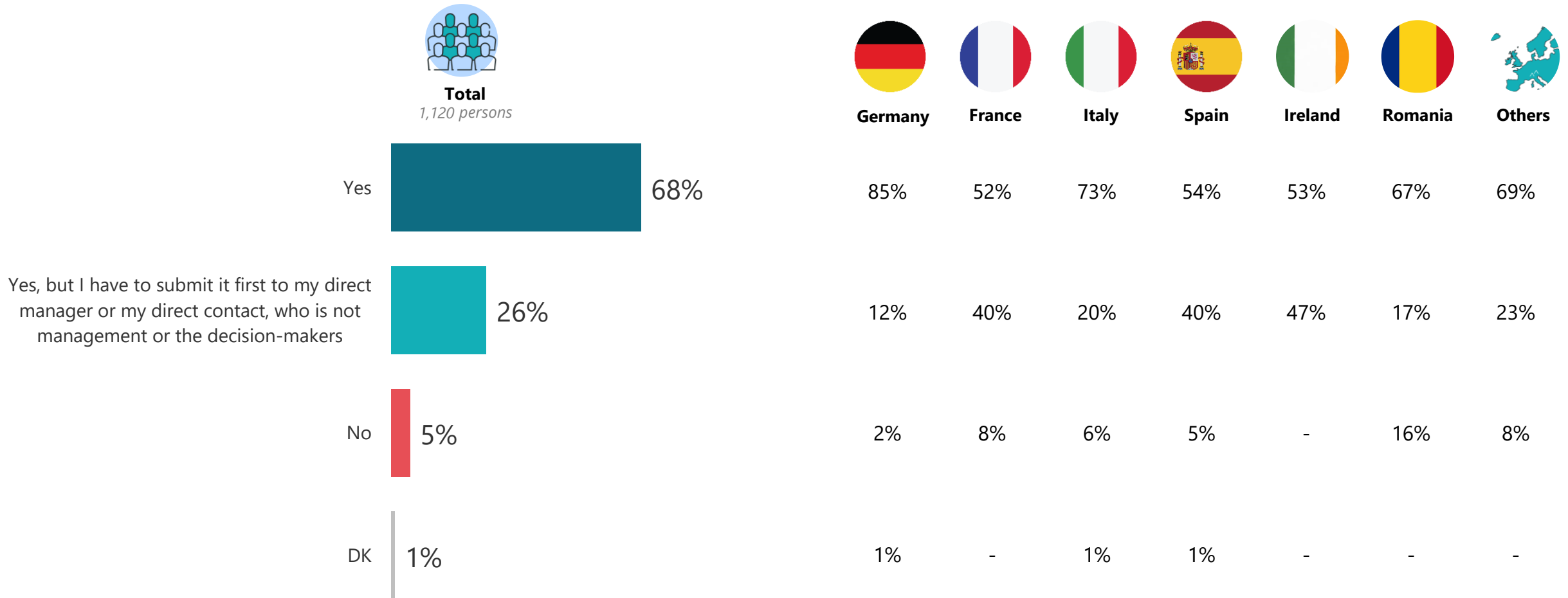


**Others**

	Germany	France	Italy	Spain	Ireland	Romania	Others
Yes	79%	74%	82%	75%	86%	61%	73%
No	18%	25%	17%	22%	14%	36%	27%
DK	3%	1%	1%	3%	-	3%	-

# Opportunities to express one's disagreement

Q. As DPO, do you have the opportunity to make your dissenting opinion clear to the highest level of management and to the decision-makers on data protection?

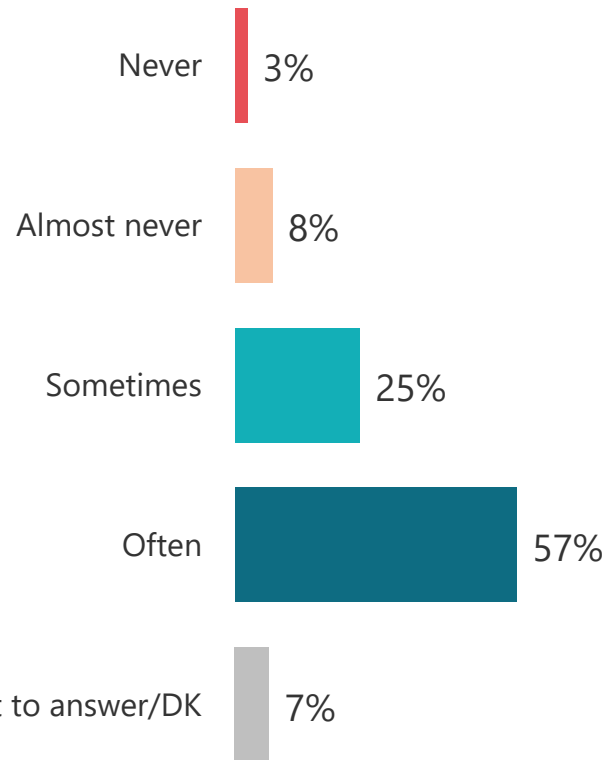


# Feeling of being supported by the line manager

Q. As a DPO, do you always feel supported by your line "manager"?



**Total**  
1,120 persons



**11%**  
Never or almost never

**82%**  
Sometimes or often



**Germany**

8%

83%



**France**

10%

88%



**Italy**

15%

69%



**Spain**

11%

82%



**Ireland**

17%

80%



**Romania**

16%

78%



**Others**

16%

74%

# Contact made by data subjects regarding their personal data

Q. Can data subjects, including employees of the organization, contact you as a DPO in matters related to the processing of their personal data or the exercise of their rights? (Art. 38(4) GDPR)



**Total**  
1,120 persons



**Germany**



**France**



**Italy**



**Spain**



**Ireland**

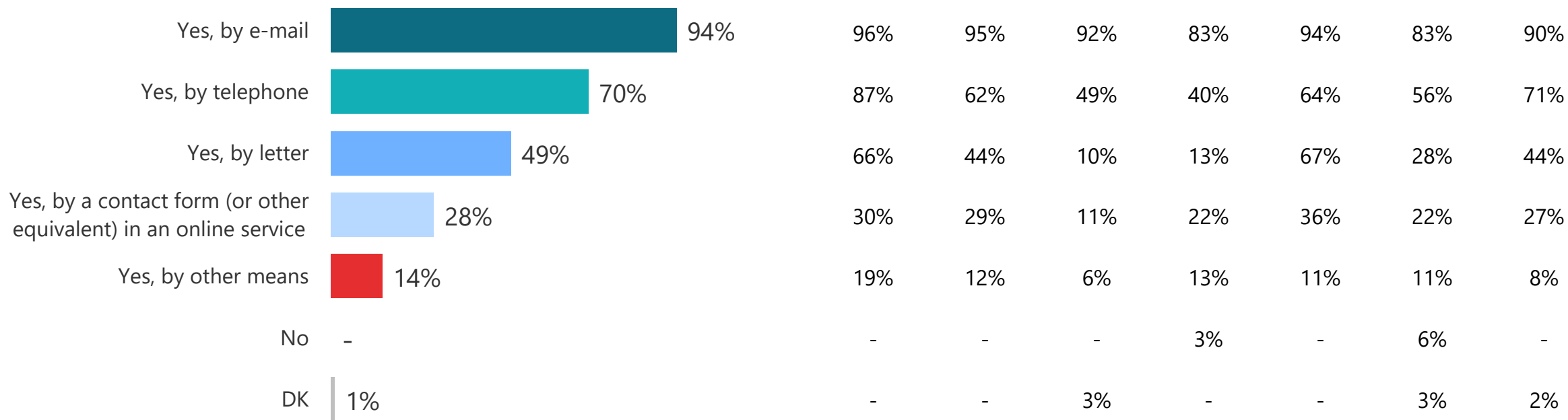


**Romania**



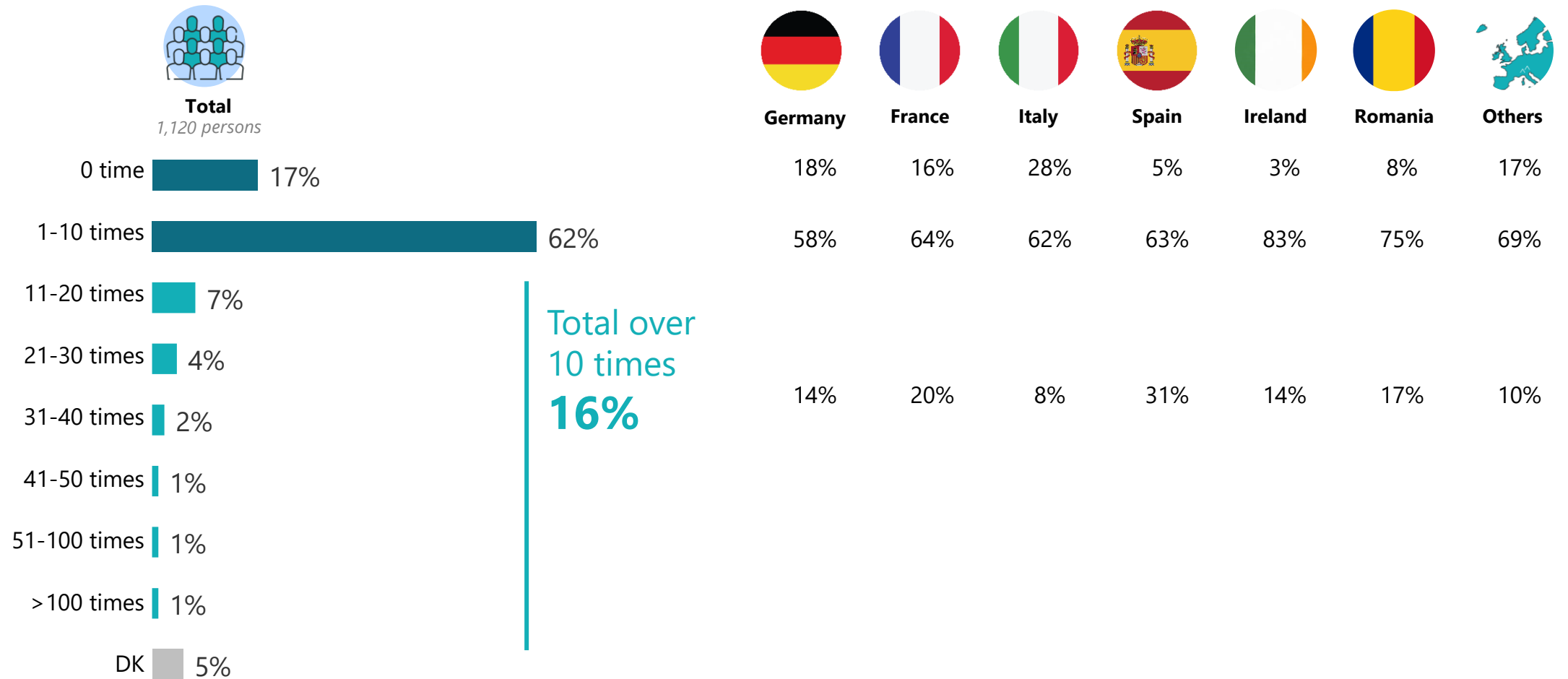
**Others**

Total Yes **99%**



# Consultation frequency

Q. On average, how often are you contacted- as a DPO - by the data subjects in a month? (Art. 38(4) GDPR)



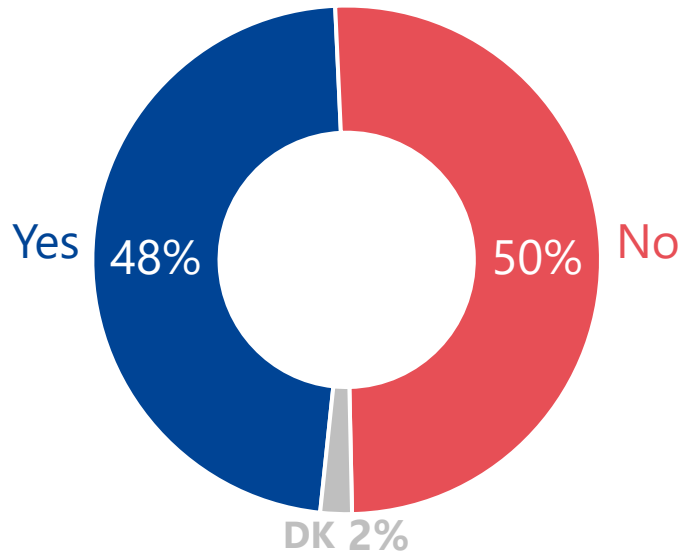


# Willingness to contact the Data Protection Authority in case the independence as DPO is not respected

Q. Would you consider contacting your Data Protection Authority if the controller does not respect your independence as DPO?



**Total**  
1,120 persons



**Germany**



**France**



**Italy**



**Spain**



**Ireland**



**Romania**



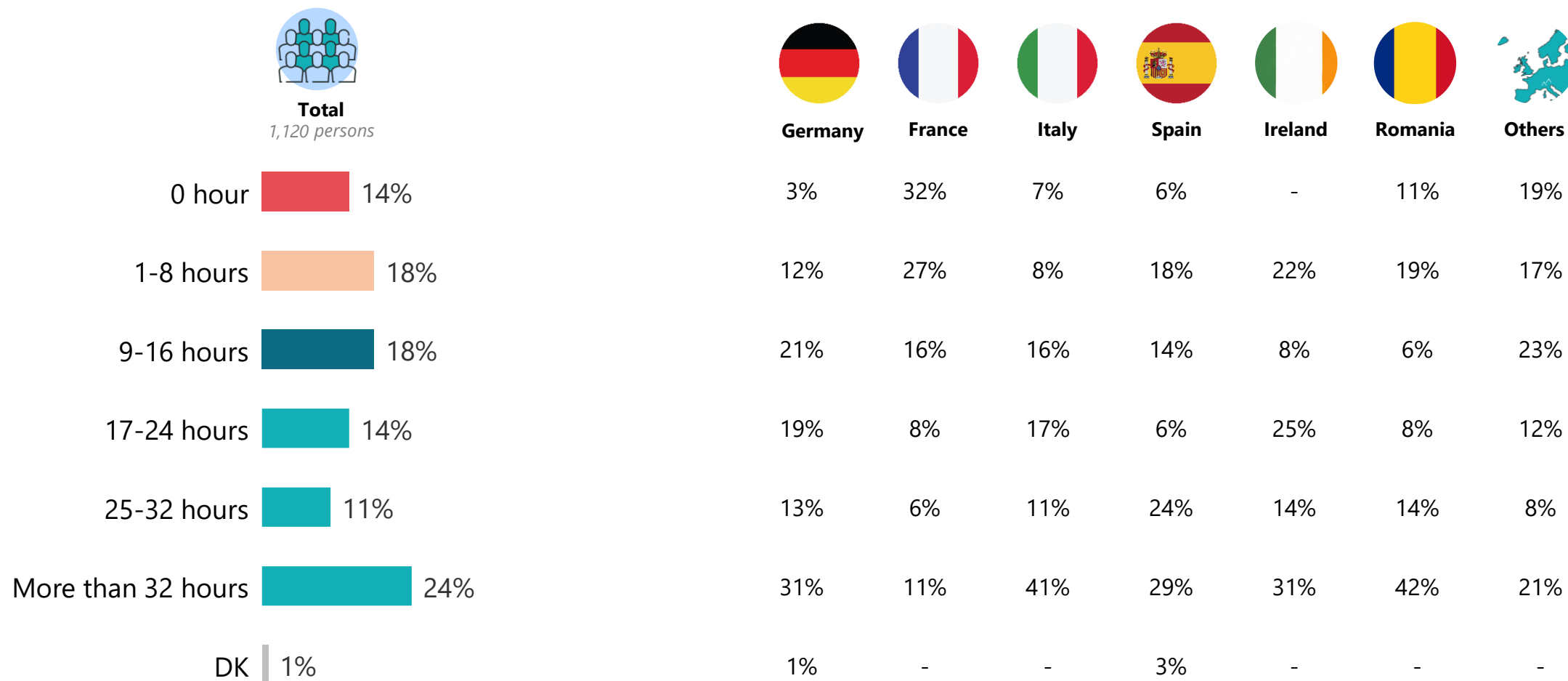
**Others**

	Germany	France	Italy	Spain	Ireland	Romania	Others
<b>Yes</b>	51%	41%	52%	54%	56%	47%	42%
<b>No</b>	46%	57%	47%	44%	44%	50%	56%
<b>DK</b>	3%	2%	1%	2%	-	3%	2%

# Professional Development and Job Satisfaction

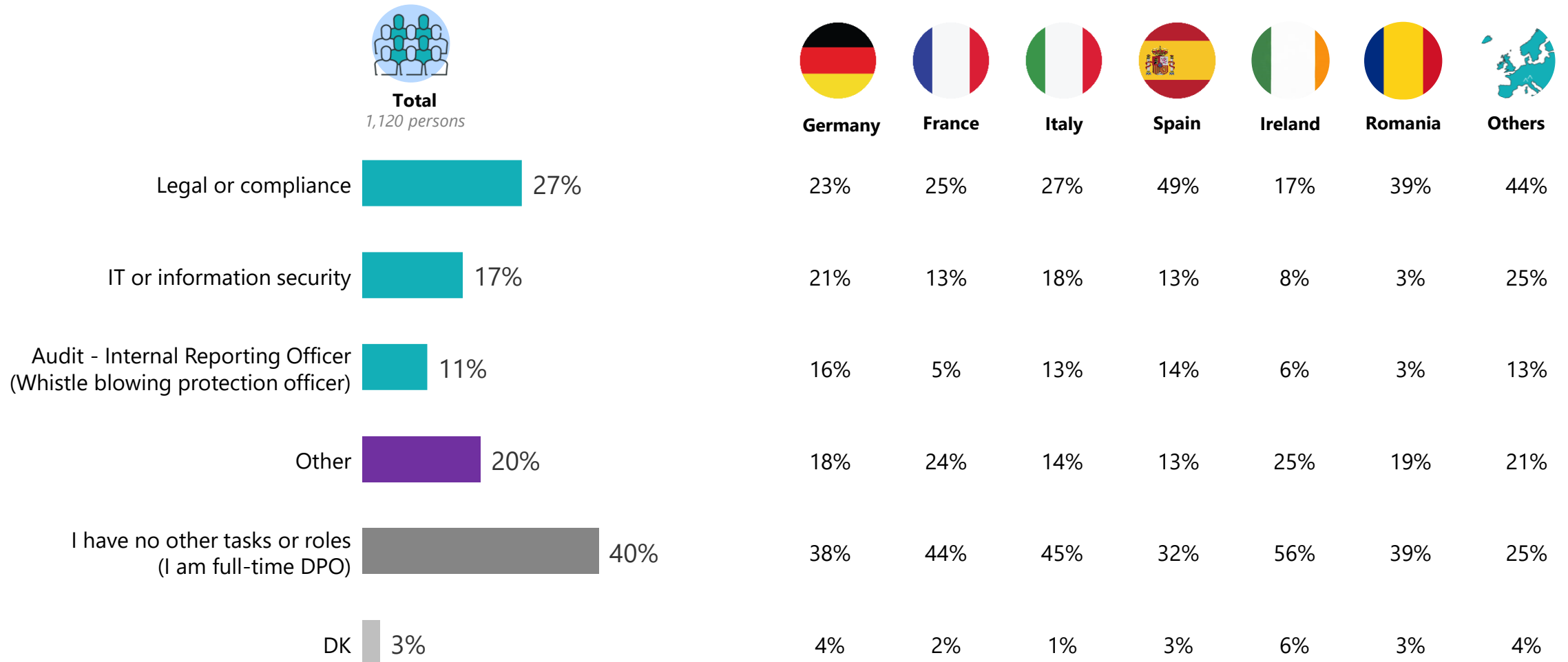
# Volume of training within the last year

Q. During the previous 12 months, how many hours of training did you, as DPO, undertake to develop and/or maintain your professional competencies and expert knowledge on data protection law and practices? (Art. 38(2) GDPR)



# Additional roles and responsibilities

Q. If you have other responsibilities or roles in addition to the tasks of the DPO, what are these tasks or roles? (Art. 38(2) and 38(6) GDPR)

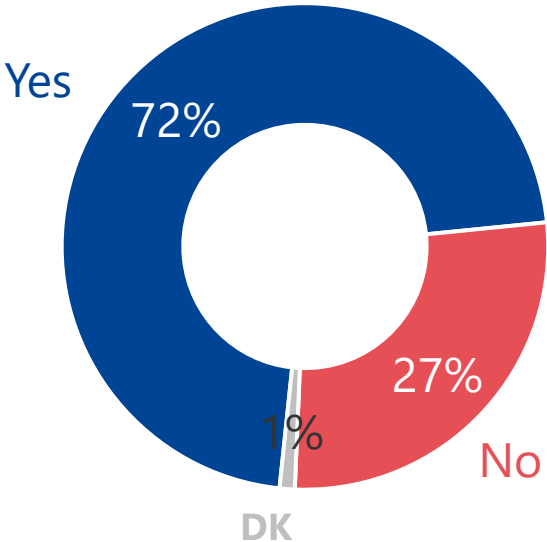


# Role of the DPO in the implementation of new legislation on data

Q. Do you think that the internal implementation of new legislation on data (Data Act, Data Governance Act, AI Act, etc.) should be overseen by the DPO?



**Total**  
1,120 persons



Germany



France



Italy



Spain



Ireland



Romania



Others

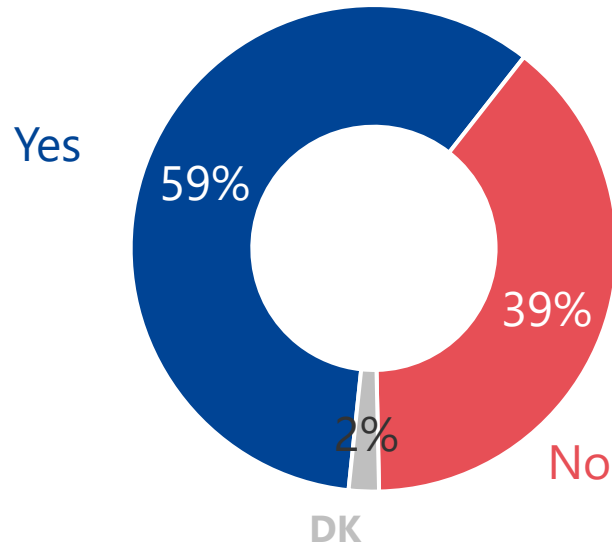
	Germany	France	Italy	Spain	Ireland	Romania	Others
Yes	68%	69%	90%	91%	61%	86%	73%
No	31%	30%	9%	6%	36%	14%	27%
DK	1%	1%	1%	3%	3%	-	-

# DPO as DGO

Q. Should the DPO evolve to a DGO (data governance officer) role? (i.e. the DPO becomes the point of reference for the application of regulations on both personal and non-personal data)



**Total**  
1,120 persons



**Germany**



**France**



**Italy**



**Spain**



**Ireland**



**Romania**

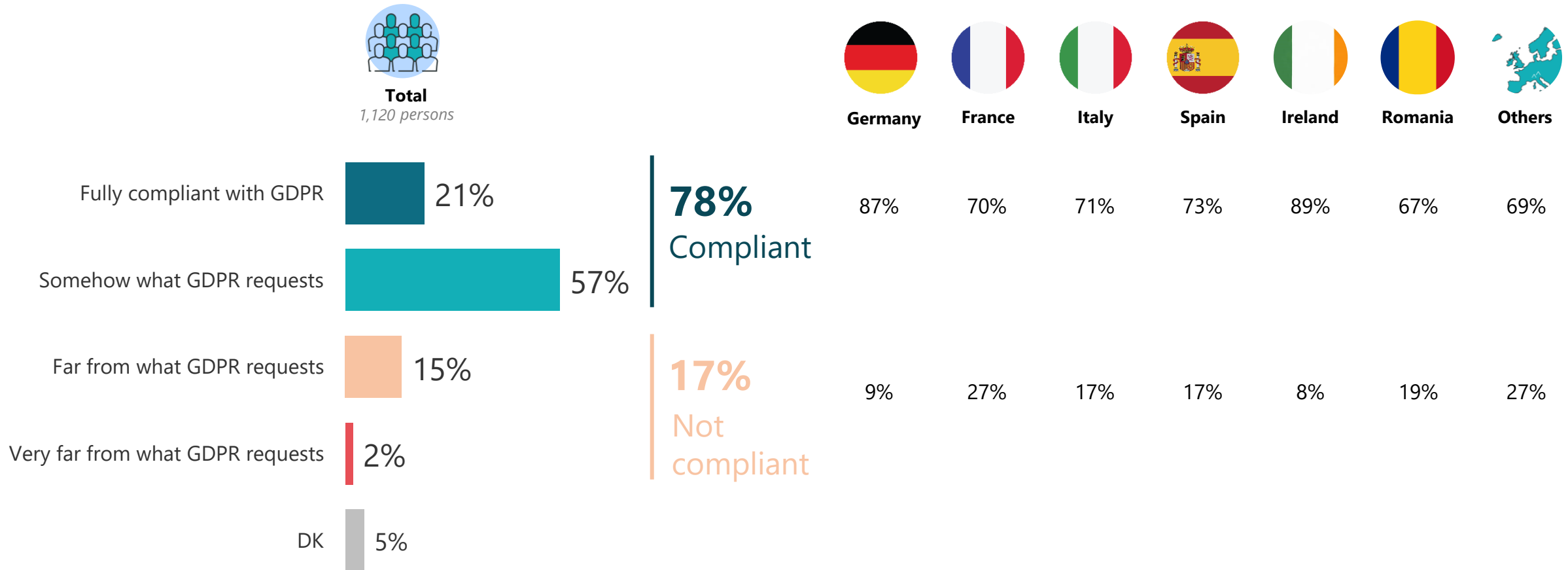


**Others**

	Germany	France	Italy	Spain	Ireland	Romania	Others
Yes	60%	57%	70%	64%	33%	72%	52%
No	37%	42%	27%	33%	67%	25%	48%
DK	3%	1%	3%	3%	-	3%	-

# Compliance of DPO Working Conditions with GDPR

Q. As an internal DPO and regarding your global working conditions (independence, position, support, resource, etc.), how do you rate your working conditions (If you are an internal DPO appointed for several data controllers, please answer for your "main" one)?



# Involvement in the implementation of new legislation on data

Q. As a DPO, are you involved in preparing your organization for the application of these new regulations?



**Total**  
1,120 persons

**Yes 71%**

Yes, all of them 24%

Yes, but only some of them 47%

No 28%

DK 1%



**Germany**

**81%**

29%

52%

18%

1%



**France**

**61%**

14%

47%

38%

1%



**Italy**

**71%**

31%

40%

28%

1%



**Spain**

**65%**

27%

38%

33%

2%



**Ireland**

**75%**

39%

36%

25%

-



**Romania**

**70%**

28%

42%

30%

-



**Others**

**71%**

33%

38%

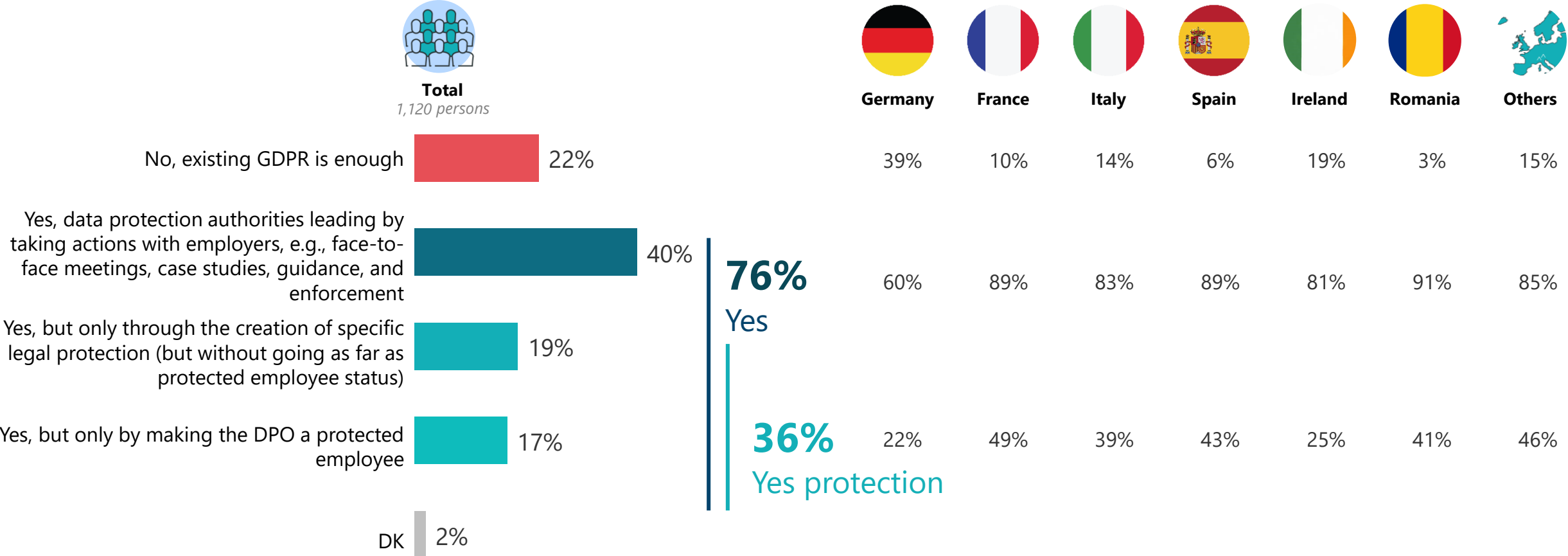
29%

-



# Need of a better "support or protection" from the Data Protection Authority

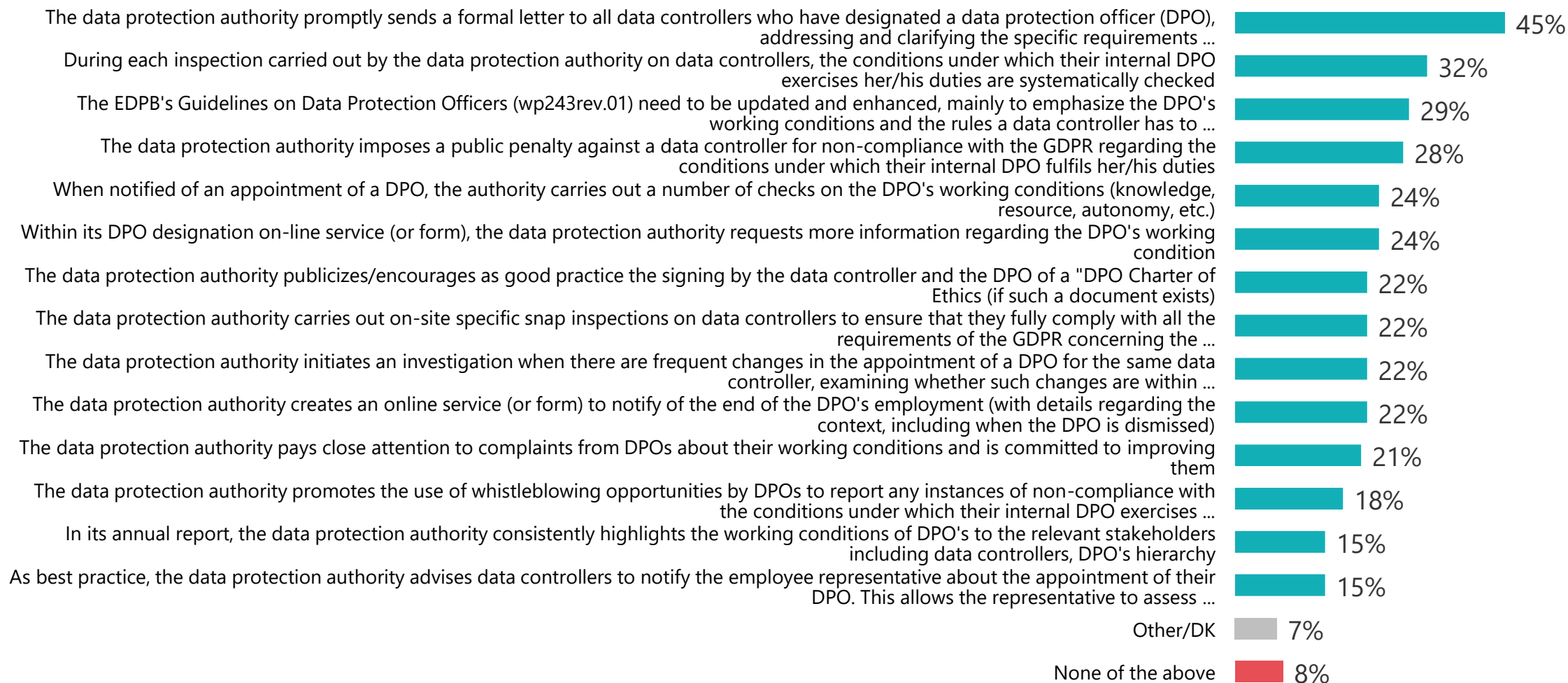
Q. On top of the existing GDPR's requirements regarding the DPO's global working conditions (independence, position, support, resource, etc.), do you think DPO's need more (or better) "support or protection" from their Data Protection Authority?



# Actions that should be considered by the DPA

**Q. Among the following actions that could be considered by your data protection authority, which are the first five that would improve your working conditions as an internal DPO ?**

*Several possible answer*



# Actions that should be considered by the Data Protection Authority

Q. Among the following actions that could be considered by your data protection authority, which are the first five that would improve your working conditions as an internal DPO ?

1/2



**Total**  
1,120  
persons



**Germany**



**France**



**Italy**



**Spain**



**Ireland**



**Romania**



**Others**

The data protection authority promptly sends a formal letter to all data controllers who have designated a data protection officer (DPO), addressing and clarifying the specific requirements ...

**45%**

34%

58%

42%

43%

61%

22%

67%

During each inspection carried out by the data protection authority on data controllers, the conditions under which their internal DPO exercises her/his duties are systematically checked

**32%**

24%

44%

30%

35%

25%

8%

42%

The EDPB's Guidelines on Data Protection Officers (wp243rev.01) need to be updated and enhanced, mainly to emphasize the DPO's working conditions and the rules a data controller has to ...

**29%**

30%

25%

38%

30%

47%

36%

29%

The data protection authority imposes a public penalty against a data controller for non-compliance with the GDPR regarding the conditions under which their internal DPO fulfils her/his duties

**28%**

21%

35%

37%

35%

25%

22%

40%

When notified of an appointment of a DPO, the authority carries out a number of checks on the DPO's working conditions (knowledge, resource, autonomy, etc.)

**24%**

18%

31%

27%

33%

19%

14%

19%

Within its DPO designation on-line service (or form), the data protection authority requests more information regarding the DPO's working condition

**24%**

12%

37%

31%

14%

17%

19%

35%

The data protection authority publicizes/encourages as good practice the signing by the data controller and the DPO of a "DPO Charter of Ethics (if such a document exists)

**22%**

16%

28%

20%

22%

31%

19%

31%

The data protection authority carries out on-site specific snap inspections on data controllers to ensure that they fully comply with all the requirements of the GDPR concerning the ...

**22%**

17%

29%

17%

22%

31%

14%

17%

# Actions that should be considered by the Data Protection Authority

Q. Among the following actions that could be considered by your data protection authority, which are the first five that would improve your working conditions as an internal DPO ?

2/2



Total



Germany



France



Italy



Spain



Ireland



Romania



Others

The data protection authority initiates an investigation when there are frequent changes in the appointment of a DPO for the same data controller, examining whether such changes are within ...

22%

15%

27%

21%

24%

44%

17%

25%

The data protection authority creates an online service (or form) to notify of the end of the DPO's employment (with details regarding the context, including when the DPO is dismissed)

22%

24%

23%

20%

11%

14%

14%

15%

The data protection authority pays close attention to complaints from DPOs about their working conditions and is committed to improving them

21%

20%

23%

17%

25%

31%

14%

13%

The data protection authority promotes the use of whistleblowing opportunities by DPOs to report any instances of non-compliance with the conditions under which their internal DPO exercises ...

18%

18%

18%

11%

14%

28%

25%

21%

In its annual report, the data protection authority consistently highlights the working conditions of DPO's to the relevant stakeholders including data controllers, DPO's hierarchy

15%

12%

17%

15%

22%

33%

11%

19%

As best practice, the data protection authority advises data controllers to notify the employee representative about the appointment of their DPO. This allows the representative to assess ...

15%

9%

20%

21%

19%

14%

28%

13%

Other/DK

7%

8%

4%

15%

13%

3%

17%

2%

None of the above

8%

13%

3%

6%

5%

-

14%

8%

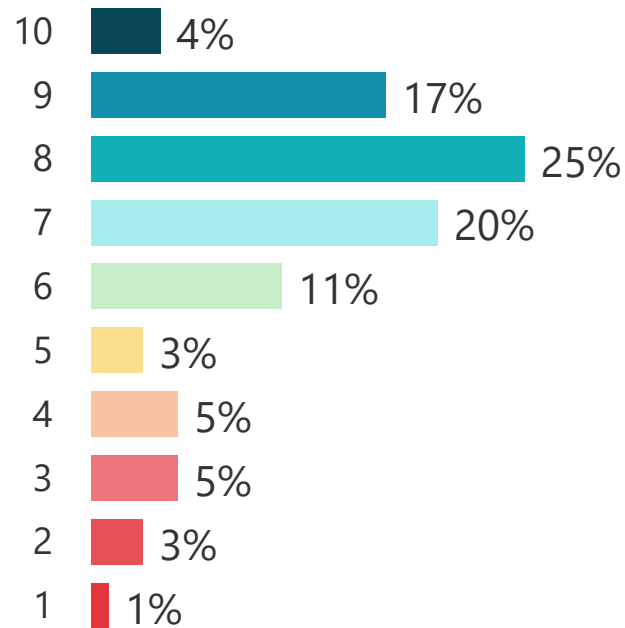
# Overall job satisfaction as a DPO

Q. On a scale of 1 to 10, how would you rate your overall job satisfaction as a DPO?



**Total**  
1,120 persons

Average **7,0**



**66%**  
7 to 10

**14%**  
5 to 6

**14%**  
1 to 4



Germany

7,2

71%

10%

14%



France

6,6

59%

18%

17%



Italy

7,0

61%

23%

8%



Spain

7,1

71%

17%

9%



Ireland

7,1

67%

19%

8%



Romania

7,0

72%

11%

12%



Others

6,8

59%

17%

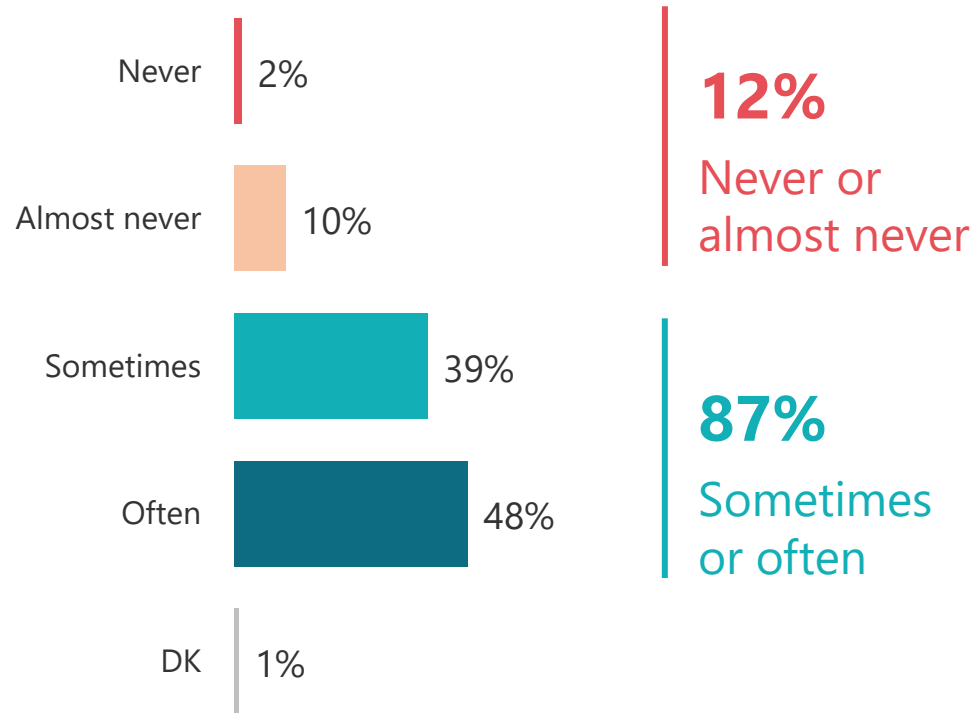
16%

# Opportunities for professional development and networking

Q. How often do you have opportunities for professional development and networking within the field of data protection?



**Total**  
1,120 persons



**Germany**

7%

92%



**France**

14%

85%



**Italy**

14%

85%



**Spain**

24%

75%



**Ireland**

11%

89%



**Romania**

25%

75%



**Others**

16%

84%

# Negative impacts of DPO's position

Q. Do you consider that the DPO's role ...?

Yes%



**Total**  
1,120 persons



**Germany**



**France**



**Italy**



**Spain**



**Ireland**



**Romania**



**Others**

is a stressful job?



65%

63%

67%

66%

59%

72%

50%

65%

impacts your mental health?



37%

37%

41%

30%

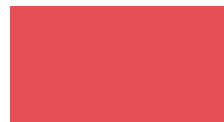
26%

44%

33%

36%

impacts your physical health?



25%

23%

28%

21%

22%

39%

22%

31%

Total Impacts health **40%**

39%

44%

32%

30%

50%

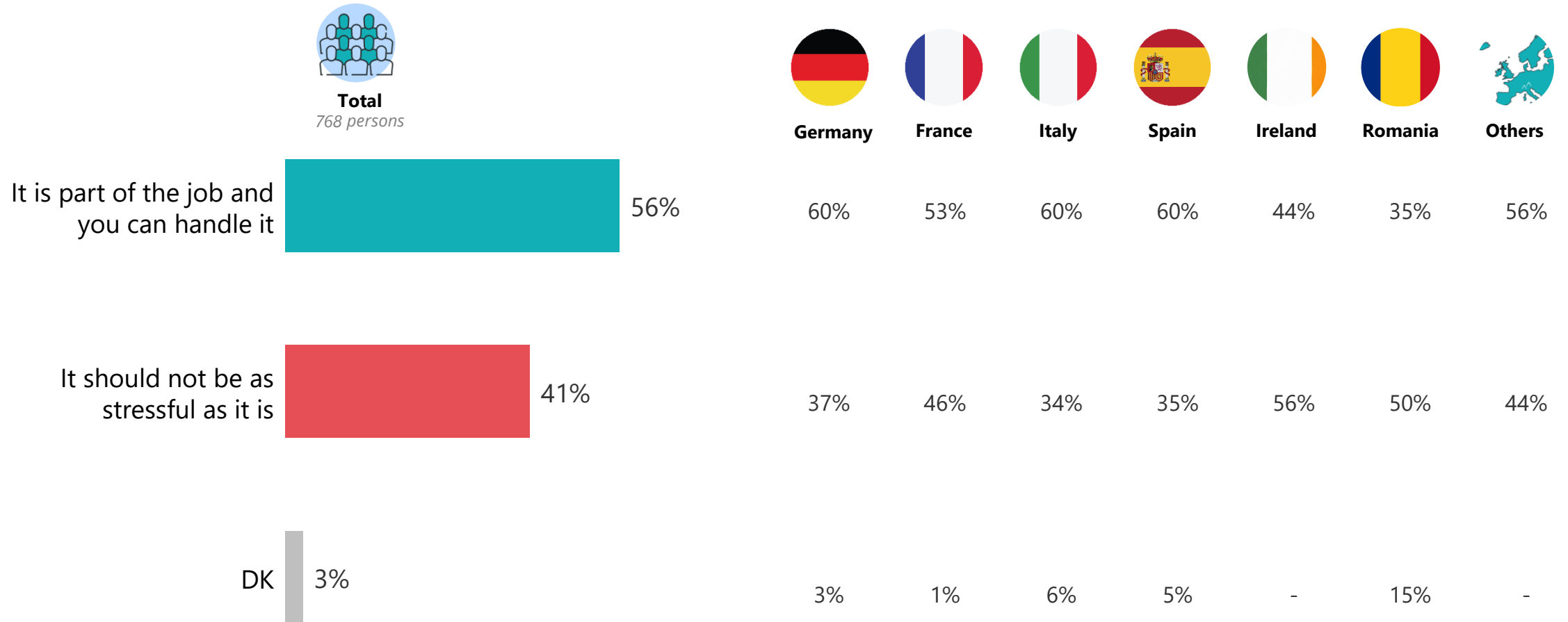
33%

42%

# Perception of the stressful nature of DPO position

**Q. If you consider that the DPO's role is a stressful job or impacts your mental or physical health, do you think that... ?**

*Question asked to those who consider that DPO's role impacts health or is stressful, 69% of the overall sample*



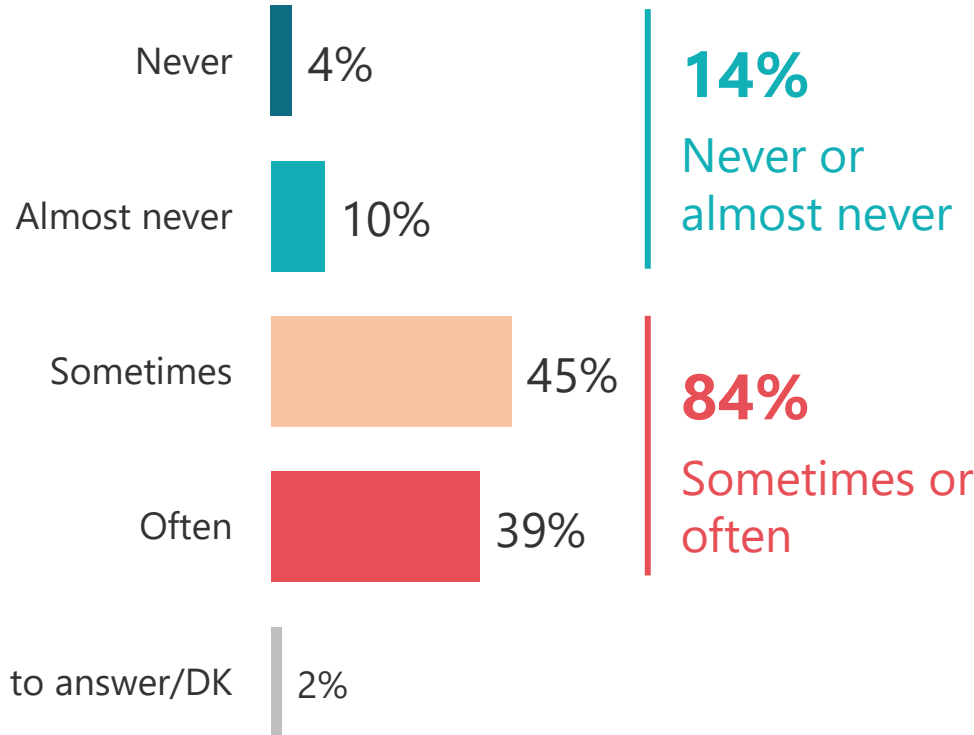


# Perception of the necessity of continually having to be up-to-date with data protection laws

Q. Is it challenging for you to continually adapt your thinking and keep up-to-date with data protection laws, guidance and case law?



**Total**  
1,120 persons



**Germany**

18%



**France**

11%



**Italy**

17%



**Spain**

11%



**Ireland**

-



**Romania**

11%



**Others**

8%

80%

88%

82%

84%

100%

78%

90%

# Feeling of missing skills to fulfill one's mission

Q. Do you feel a lack of...?



**Total**  
1,120 persons



**Germany**



**France**



**Italy**



**Spain**



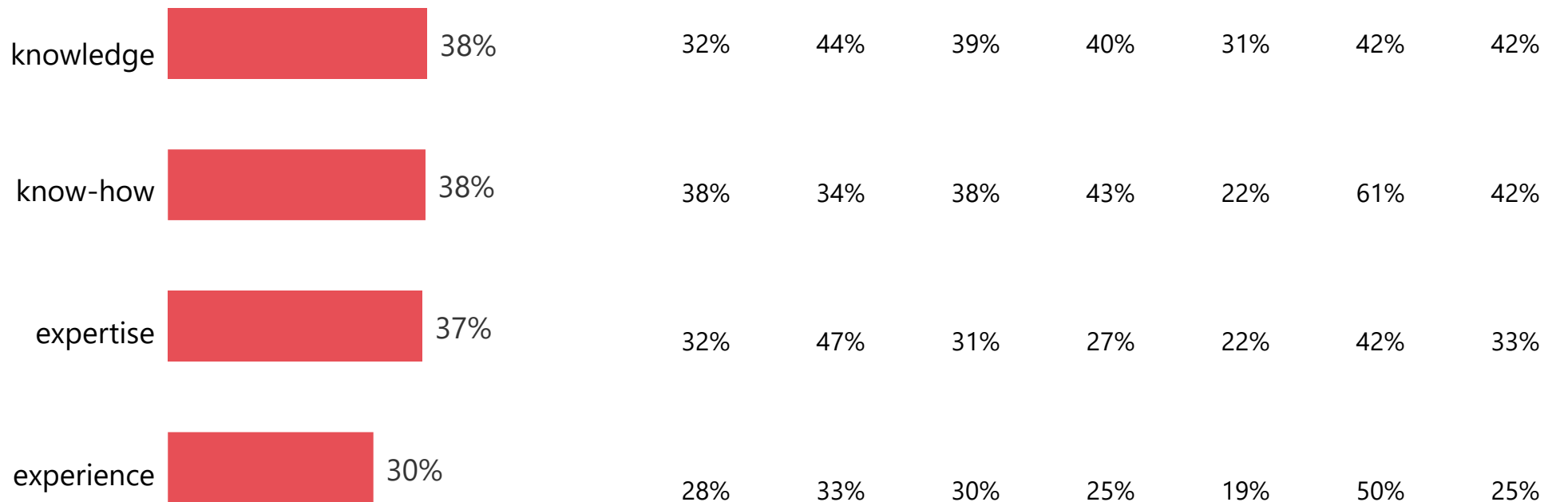
**Ireland**



**Romania**



**Others**



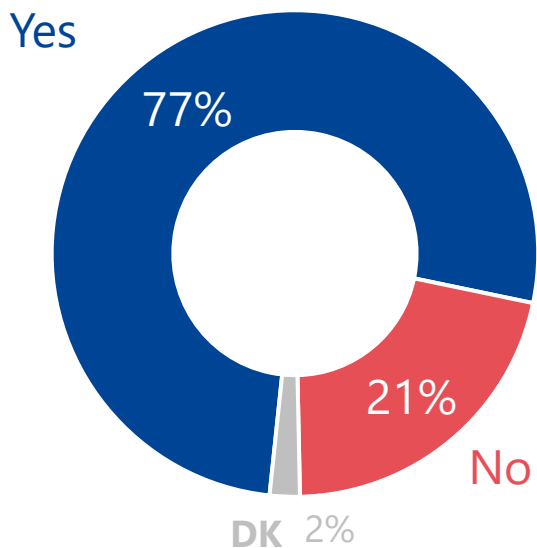
Yes%

# Reporting conditions

Q. As a DPO, do you believe that you are reporting into the correct department or people to facilitate your role?



**Total**  
1,120 persons



**Germany**



**France**



**Italy**



**Spain**



**Ireland**



**Romania**



**Others**

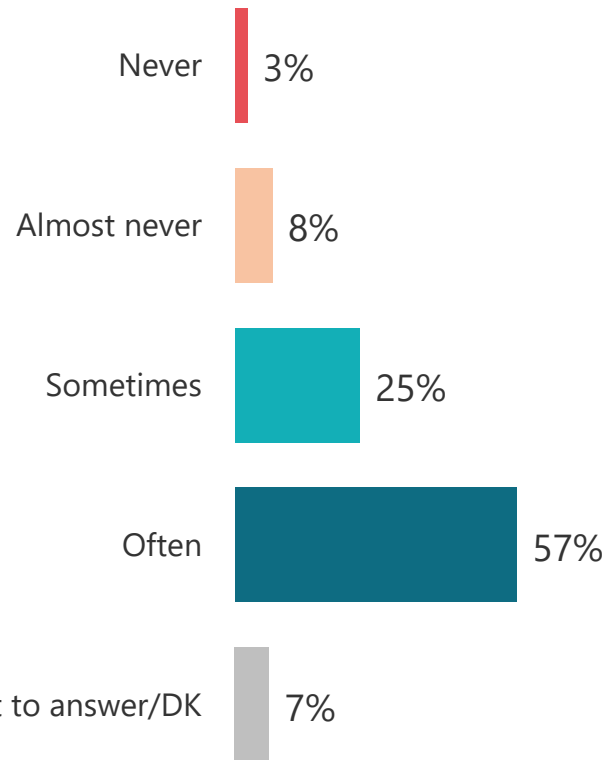
	Germany	France	Italy	Spain	Ireland	Romania	Others
Yes	79%	74%	82%	75%	86%	61%	73%
No	18%	25%	17%	22%	14%	36%	27%
DK	3%	1%	1%	3%	-	3%	-

# Feeling of being supported by the line manager

Q. As a DPO, do you always feel supported by your line "manager"?



**Total**  
1,120 persons



**11%**  
Never or almost never

**82%**  
Sometimes or often



**Germany**

8%

83%



**France**

10%

88%



**Italy**

15%

69%



**Spain**

11%

82%



**Ireland**

17%

80%



**Romania**

16%

78%



**Others**

16%

74%