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| Deputy Data Protection Officer |
| Data Protection Team |
| Risk and Compliance |
| **Grade:** 2T |

# Organisational overview

Nest is a great government delivery success story. Established in 2010, Nest has been a critical pillar of the government’s automatic enrolment pension programme, with a public service obligation to accept any employer wishing to use the scheme to discharge their automatic enrolment duties.

Now with over 12 million members, our award-winning pension fund is tailored to members’ requirements by combining extensive research and an expert understanding of their needs. First-class investment practice and governance are the backbone of our organisation. We invest responsibly and sustainably and are always transparent about the choices we make. It is both a privilege and a responsibility to help each of our members achieve the retirement they want.

It’s important that Nest has an equally diverse workforce and promotes an inclusive culture. This is in line with the organisation’s values and ensures that Nest is a corporation fit for the future.

# Departmental/Directorate overview

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| Data protection sits within the Risk & Compliance Directorate, along with Enterprise Risk, Information Security, Compliance, Master Trust Supervision and Pensions Technical, and Financial Crime. The directorate supports the business in delivering its strategic priorities by overseeing that risk and controls are identified, prioritised and managed through an enterprise risk management framework. Nest operates a ‘three lines of defence’ model, with Risk & Compliance sitting in the second line providing advice, guidance and challenge to the first line.  The Data Protection (DP) Team currently consists of two roles, the Data Protection Officer (DPO) and Deputy DPO, and is accountable for the day to day operation of the data protection procedures in line with the Data Protection Policy in order to ensure compliance with data protection and privacy legislation. |

# The role

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| The Deputy DPO reports to the DPO. The role is responsible for delivering second line support to first line teams (Nest and third party), advising and assisting on data protection risks, controls and compliance across the whole Nest enterprise. |

# Scope and deliverables

## Accountability

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| * Help deliver the day to day DP operating framework that enables the DPO to discharge their duties so Nest is compliant with DP legislation, guidance and Nest’s internal policies. * Contribute to the review and updating of DP policies, guidance and templates. * Maintain and continuously improve all processes recorded within the DP Operations Manual to enable the DP team to effectively deliver second line activities. * Support and advise the first line in the design of DP controls owned by their function. * Provide high quality and timely advice and guidance in compliance with the Nest DP Policy and associated documents. * Engage with the Enterprise Risk Management team and Risk Co-ordinators across Nest to support them in designing and implementing viable risk management options, ensuring DP risks are managed in line with Nest risk management policies and standards. * Track and drive Nest’s timely and accurate response to the exercise of individual’s rights including right of access, right to object, right to rectification etc., and also member complaints relating to data protection. * Respond to and manage data incidents and breaches, assisting the DPO in notifying the ICO as applicable and dealing with any actions/recommendations from the ICO. * Undertake DP investigations and prioritise activities to enable the immediate mitigation of DP weaknesses and non-compliance to support the prevention of recurrences, agreeing required tasks with the relevant stakeholders and putting in place processes to track to resolution. * Undertake privacy and data protection assurance reviews. Plan individual reviews, test and evaluate the systems and working practices identified, and issue reports that include, as necessary, recommendations or corrective actions required to achieve compliance with relevant legislation, codes of practice and policies. * Assist the business in the completion of Data Protection Impact Assessments (DPIAs) on business or technical change, to identify and assess risk, and mitigating actions, ensuring the statutory DPO review is completed. * Contribute to Nest’s procurement process by providing DP advice on proposed engagements. * Advise on and review contracts and data sharing agreements with third parties including those relating to projects, to ensure appropriate DP requirements are considered and relevant clauses included. * Contribute to DP reports for the Executive Committee, in addition to any other reports as required. * Engage with Heads of Nest functions, supporting their key projects and initiatives by advising on compliance with Nest's DP policies and DP legislation. * Help ensure the completion of mandatory DP training by staff. Deliver bespoke training as required and contribute items to further DP awareness. * Maintaining an awareness of developments in privacy and data protection legislation, regulatory guidance and codes of practice, case law and external standards, sharing details with Nest staff as appropriate. * Deputise for the DPO when required. |

## Deliverables

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| * Manage oversight of Nest’s Records of Processing Activities (RoPA). * Maintenance of the DP dashboard, liaising with the DACI team and the Scheme Administrator to ensure data accuracy. * Monitoring the DP mailbox, dealing with queries as appropriate and escalating to the relevant business area where required in a timely manner. * Review the mandatory DP training course content annually. |

## Relationships and autonomy

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| * Interact regularly with the DPO to ensure tasks required for the maintenance and improvement of DP compliance across Nest are identified and completed. * Interact regularly with the wider Risk and Compliance directorate. * Interact regularly with key departments and teams processing personal data, including People and Development, Procurement, Nest Insight and Customer Experience. * Interact with third party suppliers on DP compliance, principally the Scheme Administrator. * Advise business functions and project teams on DP compliance requirements and provide pragmatic advice and actionable plans for the management of compliance gaps. * Interface with external industry groups, law firms and recognised DP bodies to maintain awareness of current developments and threats in DP to maintain Nest’s DP capabilities to best practice. * Interface with the ICO and the Department for Work and Pensions (DWP) when necessary. |

# Role requirements

## Experience and technical skills

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| * Knowledge of current/proposed UK privacy and data protection legislation (including the Data Protection Act, UK General Data Protection Regulation and Human Rights Act) * Practical experience operating within a DP role, demonstrating the capacity to manage activities within both project lifecycle and departmental BAU compliance environments. * Practical experience communicating to business stakeholders the impact of DP and the approach to compliance across the organisation. * Experience of translating DP legislative requirements into pragmatic and practical advice. * Experience of responding to data subject rights requests or complaints, whether from individuals or the ICO. * Detailed understanding of DP domains including governance, risk, compliance, data subject rights requests, records of processing, regulatory enquiries and legislation. * Experience of working within financial services, whilst beneficial, is not essential. |

## Personal attributes

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| * Ability to handle/prioritise a varied workload, take decisions using own initiative and meet ambitious timelines (setting and adjusting opposing priorities in a constantly evolving environment). * Communication skills, capable of explaining complex legislative requirements using clear and unambiguous language with business focussed audiences. * Relationship Management skills, capable of effectively managing dynamic resourcing options including those external to Nest Corporation e.g. contractors, consultants etc. * Stakeholder management skills, capable of influencing senior stakeholders to implement positive changes when necessary. * Strategic awareness, capable of recognising the 'bigger picture' as well as understanding and challenging in detail. * Have or work towards appropriate DP certifications or qualifications such as CIPP/E and CIPP/M. |

## Differentiators

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| As the DP team is relatively small the successful candidate will have the desire to bring best practices, to implement change and to challenge the way things are done in order to improve the service the team provides to Nest. |

## Working pattern

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| Nest operate a flexible working policy. |

## Grade Descriptor

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| 2T: Works to achieve operational targets with significant impact on the results of the Function. Works independently with limited supervision. |

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| Nest Corporation  10 South Colonnade  Canary Wharf  London, E14 4PZ  [nestpensions.org.uk](https://www.nestpensions.org.uk/schemeweb/nest.html) |  |