Briefing Paper

OneTrust Implementations for Multi-Organisation Public Sector Structures

The DPG

Executive Summary

The public sector faces increasing scrutiny to demonstrate data protection maturity across complex, multi-agency environments — from local authorities and Multi-Academy Trusts (MATs) to federated NHS bodies and devolved government structures.

These organisations need solutions that deliver:

- Clear governance across disparate entities
- Local autonomy with central oversight
- Scalable infrastructure
- Commercial models that work across shared budgets and funding lines

At The DPG, we've developed a proven, flexible implementation model for OneTrust that solves these challenges — combining deep technical expertise with practical delivery experience and tailored cost-sharing models.

We configure OneTrust to mirror the real-world operating and reporting structure of your public sector group. Our model:

Creates a multi-level organisational structure in OneTrust

Supports both legal and logical hierarchies (e.g. departments, schools, clinical units)

Enables central visibility with localised control and access

Maintains ringfenced data and workflows for each entity

How it works:

A central "Group" entity sits at the top of the hierarchy — typically the trust, authority, or board.

Beneath this, we define logical groupings (e.g. boroughs, regions, academies) that reflect your governance or funding clusters.

Individual legal entities (schools, clinics, departments) are then mapped and onboarded into the appropriate place in the structure.

There can be as many levels in the hierarchy as needed to accurately reflect the organisation's operational and reporting structure.

A "Logical Entities" table is used to map employees, systems, or business units to their position in this structure — functioning as an org chart to ensure alignment and control.

This approach ensures:

- Each participating organisation can manage its own Records of Processing Activities (ROPAs), DPIAs, and incidents.
- The central body retains oversight across the entire landscape for assurance and regulatory reporting.
- Resources (e.g. policies, data maps, workflows) can be standardised and cascaded, while still allowing local tailoring.

Governance & Shared Services: Designing for Practical Oversight

In multi-organisation environments, governance can become a bottleneck. We solve this by defining a clear operating model up front.

Our approach includes:

- A central governance layer with defined responsibilities for platform configuration, policy consistency, reporting, and assurance.
- Delegated administrators in each local organisation who manage their own users, data inventory, and assessments.
- Shared taxonomy libraries (data types, legal bases, processing activities) across all entities — promoting consistency while allowing for local exceptions.
- Standardised DPIA workflows, with optional central approval routing.

We also provide ongoing governance support through both:

- Our Managed Services Offering, available at the central shared-service level or on a per-entity basis, and
- Fractional leadership roles, including Chief Privacy Officers (CPOs), Data Protection Officers (DPOs), and AI Governance Officers, who can operate across the programme or embed within specific organisations to ensure strategic oversight and regulatory confidence.

This blended model allows organisations to scale their internal capability as needed, without delaying programme rollout or compromising quality.

Onboarding, Enablement & Ongoing Support

We understand the operational complexity of public sector programmes, so we manage onboarding in manageable phases with real-world constraints in mind (academic calendars, fiscal year-ends, etc.).

What we provide:

01 A centralised project plan with phased onboarding per organisation

02 Role-based training (live, recorded, and self-service)

03 Local admin enablement kits and quick-start templates

04 Branded resources tailored to your sector and language

05 UK-based support with SLA-driven escalation options

Our Managed Services Offering can also provide ongoing operational support — from system admin to data mapping, DPIA reviews, and reporting — on either a centralised or per-entity basis.

This enables each participating organisation to become self-sufficient quickly, while keeping central teams focused on value-added activity.

Infrastructure & Data Security

Overview

We host OneTrust on UK-based, ISO27001-certified cloud infrastructure, and configure:

- Fine-grained access controls
- Segregation of duties between central and local teams
- Data retention and archival policies
- Full audit trail and reporting visibility across all activities

We also support integrations with existing systems (e.g. M365, HRIS, whistleblowing platforms) using OneTrust APIs and connectors — ensuring the platform becomes embedded in your day-to-day risk and compliance operations.

Commercial Model: Supporting Cost-Sharing Across Multiple Entities

Procurement in multi-entity public sector environments often requires flexibility to avoid delays and support participation across varied budgets.

Our commercial model supports:

- Tiered pricing based on size or complexity (e.g. pupil roll, headcount, risk profile)
- Transparent cost allocation using pre-agreed criteria (e.g. per capita, per site, FTE-based)
- Opt-in structures where entities can join under a master contract with a defined pricing model
- Phased rollout schedules tied to funding availability or strategic priorities

This allows each participating organisation to contribute fairly to the programme while reducing procurement overheads and accelerating time-to-value.

Public Sector Use Cases & Adaptability

While much of our experience comes from the private sector, the structures and challenges are identical — federated environments, central/local tensions, cost pressures, and siloed risk.

Example Parallels

01 A global chemicals firm with 120 legal entities mapped to 5 operational clusters — each with local privacy teams but shared governance.

02 A multinational media organisation with 30 brands operating semi-autonomously — sharing a central risk framework through OneTrust.

03 A regional education service with separate governance for primary, secondary, and SEND schools — delivered via a single shared OneTrust instance.

Why The DPG? Your Delivery Partner for Privacy at Scale

- **OneTrust Experts:** We've delivered more than 50 OneTrust implementations across sectors, from fast-track startups to FTSE100 companies.
- **Public Sector Aware:** We understand funding cycles, governance sensitivities and organisational complexity
- **End-to-End Capability:** From design and implementation to Managed Services and Fractional CPO/DPO/AI Governance Officer support, we stay with you for the long term.
- **Outcome-Focused:** Our success is measured in operational clarity, confident compliance, and long-term sustainability — not billable hours.
- **Flexible Delivery:** Advisory, implementation, training, and ongoing support — configured to your needs, not ours.
- **Trusted by Leaders:** We are privacy partners to national charities, global financial services firms, and multi-entity conglomerates. We know how to build a scalable, supportable privacy programme — and we get it done.

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