



Is your team ready for GDPR? (GUIDANCE FOR MANAGERS/TEAM LEADERS)

New data protection legislation into force on the 25th May 2018. Much work has been done centrally to prepare for GDPR and you will have already been doing a number of things to help support the University's GDPR compliance.

These are the things that you should have been doing:

1. Ensuring completion of training

2. Reviewing the information you hold

3. Documenting what you're doing with information

4. Informing individuals

1. Ensuring completion of training:

- Do ensure that your team have completed the mandatory Information Security e-learning (accessed via Blackboard) which explains the key principles around data protection and information security. To get individual departmental breakdown on completion of training please contact ias@le.uk
- If you have any specific questions that are not covered by this training or you need more information do email our team for more information at gdpr@le.ac.uk.

2. Reviewing the information you hold:

- You should only retain personal information for as long as it is required for the purpose it was collected. Therefore, if you keep out-of-date personal data you should look to dispose of this as confidential waste. Do refer to the appropriate [retention schedules](#) to support you in this work. Further guidance can be found in our Quick Guides on [Reviewing your Files](#) and [Reviewing your Emails](#).
- Do ensure that any locally held files for staff who have left your team/section are disposed of immediately. The centrally held HR file contains all the key information that needs to be retained. If you have completed this task already please ensure you have informed the GDPR team by emailing gdpr@le.ac.uk.
- If you have documents that you feel might be of long-term historical value do contact the [University Archivist](#) to discuss whether these documents can be transferred to the University Archives.

3. Documenting your data processing:

- You need to ensure that you maintain clear documentation on how personal data is managed. This documentation takes a number of forms including the University's information asset register and published privacy notices.



- If you are collecting and using personal data you need to ensure that this is captured on the University's Information Asset Register. To check whether your data is captured and for more information please email the [University Records Manager](#).
- You should also ensure that you are clearly documenting how you are managing, using and sharing data and communicate this to the affected individuals. To do this you need to ensure that you have created and published privacy notices explaining this. Further information on creating privacy notices can be found in our [Quick Guide](#).

4. Informing individuals about the data you collect and hold:

- A major aspect of GDPR is being transparent with individuals about how the University is using their personal data.
- Privacy Notices (which document how data is being used) should be shared with affected individuals.
- Particular attention should be given in cases where you are holding data which has been obtained based on the consent of an individual. This data will often have been collected to keep individuals informed about future events/opportunities but may no longer be in compliance with GDPR. In these cases you should look to confirm that individuals are happy for you to continue to retain their data. This confirmation should be in the form of an individual's clear and affirmative statement of consent. If they do not consent or you do not hear back from them then you should remove their data from your systems. Please see our [Quick Guide on Consent](#) for more information.

Some common misconceptions:

I have to get rid of all my old emails

- No, but you should make efforts to review these to ensure that any personal data that you no longer have a valid reason for holding is deleted.

We need consent for all the personal data we process

- Consent should not be relied upon as the lawful basis for holding data
- The emphasis on consent under the common law duty of confidence remains unaltered

GDPR is a complete change from the past

- No, GDPR is an evolution in existing data protection law not a revolution. If you have been complying with the principles of Data Protection GDPR should not be a major concern.

GDPR is like The Millennium Bug, it'll all be fine after May 2018

- No, unlike preparations for The Millennium Bug the steps to support GDPR compliance will be an on-going journey

Further information:

- If you need further information or have questions about GDPR issues please email gdpr@le.ac.uk
- Further guidance on data protection legislation is available at: <https://www.le.ac.uk/gdpr>

