



University of East Anglia

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[REDACTED]

04 January 2018

Dear [REDACTED]

Freedom of Information Act 2000 – Information request (ref: FOI_17-295)

We have now considered your request of 04 December 2017 for information relating to GDPR.

Our response is on pages 2-4 of this letter, together with a copy of your request, and in the four accompanying documents:

- FOI_17-295 Appendix A
- FOI_17-295 Appendix B
- FOI_17-295 Appendix C
- FOI_17-295 Appendix D

We hope this information will meet your requirements, however if you are not satisfied you have the right of appeal. If you wish to appeal, please set out in writing your reasons for appealing and send to the above address. You must appeal within 60 calendar days of the date of this letter. Any appeal received after that date will not be considered nor acknowledged. This policy has been reviewed and approved by the Information Commissioner's Office.

You also have a subsequent right of appeal to the Information Commissioner's Office. Further information is available on their website:

https://ico.org.uk/Global/contact_us, or by telephone on 0303 123 1113.

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Please quote our reference given at the head of this letter in all correspondence.

Yours sincerely

Dave Palmer
Information Policy and Compliance Manager
University of East Anglia

Response to Freedom of Information Act 2000 request (FOI_17-295)

Please send me the following information under FOI:

- whether you have a project board (or any equivalent committee/group/structure) that oversees the work of preparing for the GDPR

There is no project board as such, but the team implementing GDPR report to the University's Information Strategy and Services Committee (ISSC) which is overseeing preparations for GDPR.

<https://portal.uea.ac.uk/committee-office/uea-committees-and-boards/information-strategy-and-services-committee>

- the resource you have dedicated to preparing for GDPR, including:

** the number of central FTE you have preparing the University for the GDPR*

The University's information compliance team has specific responsibility for data protection and other areas of information compliance. Two members of this team work primarily on data protection and GDPR preparations. This figure includes additional resource of one FTE fixed term until end July 2018, which was added into the information compliance team specifically with the remit to pick up additional demand placed on the team due to GDPR preparations.

It should be noted that staff in other areas of the University will be working on GDPR preparations, but this work will be incorporated into their existing roles.

** whether you have a project manager*

No.

** the name and job title of the project lead*

The work to prepare for GDPR is being led by Ellen Paterson, Information Policy & Compliance Manager.

** the budget for preparing for the GDPR*

No budget has been directly allocated to prepare for the GDPR. Costs associated with staff development are drawn from departmental operating budgets.

** the budget for implementing for the GDPR*

No budget has been allocated for implementing the GDPR. Note that there are expected to be budget impacts due to work required to security IT systems to a standard expected under GDPR, but this work has not been scoped yet.

- your compliance/implementation plans

Plans for the work for preparing for GDPR have been submitted to ISSC. The latest plan submitted to ISSC is available from the University website:

<https://portal.uea.ac.uk/documents/6207125/20601571/isc16d042+gdpr+update+roadmap.pdf/>

The latest version of the plan is in the accompanying document, FOI_17-295 Appendix A.

- any reports from the project board (or equivalent) to senior management about GDPR

Reports on GDPR have been submitted to each meeting of ISSC since the GDPR was first put into force in May 2016. The reports are available from the ISSC web pages at the link provided above and in the accompanying document, FOI_17-295 Appendix B.

- any internal progress reports on GDPR compliance

See response to the previous question.

any guidance or policy for staff or students, either prepared or in draft, on:

- PIAs for staff*
- consent requirements under GDPR*
- pseudonymisation*
- privacy (or data protection) by design and default*

Guidance on PIAs is on the UEA web site at <https://portal.uea.ac.uk/information-services/strategy-planning-and-compliance/regulations-and-policies/information-regulations-and-policies/data-protection/pia> (note that this will be updated to reflect DPIA requirements under GDPR).

Guidance on GDPR in general is on the UEA web site at <https://portal.uea.ac.uk/information-services/strategy-planning-and-compliance/regulations-and-policies/information-regulations-and-policies/data-protection/gdpr>

The presentation available from this page includes guidance on all these areas.

At the time of your request we do not hold any other draft or final guidance or policies specifically on pseudonymisation, consent, or privacy by design and by default.

- data mapping exercises, e.g. questionnaires/spreadsheets, data flow maps/diagrams and any other products/outputs

The University is currently engaged in a data mapping exercise to ensure we comply with GDPR's requirement to maintain Records of Processing Activities (see Article 30), as well as to help us establish where action needs to be taken to bring processing activities up to the GDPR standard. A copy of the initial scoping questionnaire is available here:

<https://forms.office.com/Pages/ShareFormPage.aspx?id=IYdfxj26UUOKBwhl5djkBRhVtlMab5GIEc9Ii-SGpUMVIPNTc2SjZJMDIEN0s5OFRXTU1aRFIRRS4u&sharetoken=g4JVsx9WLYpQkBrD4H3>

The questionnaires/spreadsheets currently in use for this exercise are provided in the accompanying files Appendix C and Appendix D.

As this work is not yet complete we do not hold any GDPR-specific data flow diagrams or maps.

- GDPR-data sharing/processing agreements

At the time of your request we do not hold final, GDPR-ready versions of our template data sharing and data processing agreements. Our aim in the coming months will be to ensure all existing agreements are revised where necessary to comply with GDPR.

This web page is still under development, but once complete will reflect GDPR and UEA requirements in relation to data sharing. <https://portal.uea.ac.uk/information-services/strategy-planning-and-compliance/regulations-and-policies/information-regulations-and-policies/data-protection/datasharing>