

**UNIVERSITY OF CAMBRIDGE
GDPR DATA PROTECTION WORKING GROUP**

TOOLKIT TO HELP UNIVERSITY INSTITUTIONS PREPARE FOR NEW DATA PROTECTION LEGISLATION (GDPR)

**UPDATE NUMBER 1
9 FEBRUARY 2018**

The Toolkit was issued on 22 November 2017 and is published at <https://www.information-compliance.admin.cam.ac.uk/data-protection/general-data-protection-regulation>.

This update document is divided into two parts: the first provides an update on new and forthcoming materials since the Toolkit was issued, and the second provides additional context to assist with the interpretation of certain actions. The updates are arranged by the reference numbers used in the Guidance Notes.

UPDATE ON NEW AND/OR FORTHCOMING MATERIALS

2.4 (examination data guidance). This updated guidance is now published at <https://www.educationalpolicy.admin.cam.ac.uk/curricula-and-assessment/retention-examination-data>.

5.1 (research guidance). This updated guidance is at a late stage of development and should be published shortly.

6.1 (data protection policy). This policy is at a late stage of development and will be taken through appropriate committees for approval.

6.3(b) (data protection online training). This training course is in development but is unlikely to be available before mid-March 2018. The target completion date for this action should be adjusted to 30 April 2018 (from 31 March 2018). In addition, we acknowledge that the phrasing of this action was unfortunate: Departmental Administrators can strongly encourage their staff to take the training, but cannot 'ensure' it. Finally, we confirm that the training will be added to standard central induction processes and templates for new staff.

6.5 (records retention guidance). This updated guidance is at a late stage of development and should be published shortly.

7.2 (website privacy policy guidance). This guidance is at a late stage of development and should be published/circulated shortly.

7.3 (Information Asset Register). This system is in development and pilot testing is taking place. It is being designed to be as self-explanatory and simple to use as possible and brief guidance notes will be embedded within the system itself. It will be partially pre-populated. Institutions will be advised of its launch in a standalone communication in March 2018 and a demonstration/training session will be held.

7.5 (privacy by design guidance). This guidance is at an early stage of development.

ADDITIONAL INFORMATION ON CERTAIN ACTIONS

1.2 (supplementary privacy notices). This action was not intended to suggest that supplementary privacy notices need not be given when an Institution is using or collecting personal data from students, staff or others in a specific way that might nonetheless be referenced in the core notices. For example, if an Institution is running a staff survey that collects personal data, the invitation to complete the survey should explain its purpose and how the staff members' personal data will be used, shared and stored for the survey's administration, even though the use of personal data for surveys and research is referenced in general terms in the core staff notice at <https://www.hr.admin.cam.ac.uk/hr-staff/hr-data/how-we-handle-your-personal-data>.

2.5 and 4.3 (student/staff records retention). The retention periods mentioned in these actions were designed to be broad-brushstroke recommendations. It is fully understood that longer retention periods will/might apply for some student/staff records held within Institutions (e.g. to comply with health and safety law if students/staff have worked with radioactive materials or asbestos). The detailed records management guidance at action 6.5 gives fuller information.

7.1 (student/staff profiles on websites). This action is focused on A-Z listings of students and staff and profile webpages. For information on the data protection and other legal issues when taking publicity/promotional photographs for use on websites or in other University publications, please see the existing guidance issued by the Legal Services Office at <https://www.legal.admin.cam.ac.uk/how-we-can-help/copyright/information-sheet-5>.

CONTACT FOR QUESTIONS

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