

# GDPR COMPLIANCE



Aaron & Partners  
Solicitors

**Aaron & Partners LLP**

Solicitors

5-7 Grosvenor Court

Foregate Street

Chester CH1 1HG

Tel: 01244 405555

Fax: 01244 405566

**Employment/ HR Team - GDPR – recommendations/actions**

Recommendation/Action	Responsibility	Resources required	Timescale
<b>A. Compliance preparation – HR</b>			
<p><b>1. Review Personal Data</b></p> <p><b>(Data Mapping Audit)</b></p> <p>Create a spreadsheet (or asset register) and list the personal data (“PD”) the Company holds. Identify :</p> <ul style="list-style-type: none"> <li>• where it came from</li> <li>• the reasons the Company stores PD</li> <li>• the legal basis for the Processing;</li> <li>• Create a yes/no checklist as to whether the Company needs to store PD. What is the justification for retaining specific data?</li> <li>•</li> </ul>	The Company		
<p><b>2. Clear out Personal Data</b></p> <p>Delete PD that is no longer required for legal, regulatory or historical reasons. The less PD is held, the easier compliance will be.</p> <ul style="list-style-type: none"> <li>• record what data was removed and why.</li> </ul>	The Company		
<p><b>3. Identify who is responsible for each element of GDPR.</b></p> <p>Is the Company obliged to appoint a Data Protection Officer (“DPO”)?</p> <p>If not, will the Company nominate a responsible person with knowledge of</p>	The Company		

<p>GDPR?</p> <p>Will the Company be making a voluntary appointment of DPO?</p> <ul style="list-style-type: none"> <li>• ensure the Company staff know what they should be doing to prevent a data breach.</li> <li>• Training for managers and HR</li> <li>• Training for all staff.</li> </ul>			
<p><b>4. Inform and where appropriate consult with staff re:</b></p> <ul style="list-style-type: none"> <li>• any changes to policies and procedures</li> <li>• any changes to their contractual terms</li> </ul>			
<p><b>B. Policies, procedures and documentation</b></p>			
<p><b>5. Review the Company's existing documentation and amend to ensure that data subjects are clearly notified of their rights under GDPR:</b></p> <ul style="list-style-type: none"> <li>• Recruitment documents and policies</li> <li>• Offer letters and contracts for:</li> </ul>		<p>Copies of existing contracts and templates as detailed in the bullet points in section B5 in Word format.</p>	

<ul style="list-style-type: none"> <li>• Apprentices</li> <li>• Employees</li> <li>• Workers</li> <li>• Self employed contractors</li> <li>• Consultants</li> <li>• Interns/volunteers</li> </ul> <ul style="list-style-type: none"> <li>• Staff handbooks to include: <ul style="list-style-type: none"> <li>○ Data Protection Policy,</li> <li>○ Retention (and storage) of Records Policy (to include emails),</li> <li>○ Data Deletion Policy; and</li> <li>○ any policies and procedures applicable to staff</li> </ul> </li> <li>• Consent forms (including medical report/records disclosure consent forms)</li> <li>• Standard letters regarding PD</li> </ul>			
<p><b>6. Review existing consents.</b></p> <ul style="list-style-type: none"> <li>• Are these necessary?</li> <li>• Do the Company collect sensitive personal data? If so, for what purpose (e.g. diversity monitoring)?</li> <li>• Is consent freely given, specific, informed and unambiguous?</li> <li>• Has consent been given by way of a statement or clear affirmative action?</li> </ul>		As above.	
<p><b>7. Create/keep records of Consent (where this is relied upon as the</b></p>	The Company		

<p><b>basis for Processing PD).</b></p>			
<p><b>8. Review and update the Company's Privacy Notices.</b></p>		<p>Copies of the Company's existing privacy notices.</p>	
<p>9. Review Data Subject Access policy and procedures to ensure GDPR compliance:</p> <ul style="list-style-type: none"> <li>• Create template Data Subject Access documentation.</li> <li>• Training for HR</li> </ul>		<p>Copy of existing policy - or draft a new policy (if required)</p>	
<p><b>10. Prepare Data correction request policy and template responses.</b></p>		<p>Draft new policy and templates.</p>	
<p><b>11. Prepare Data breach reporting policy and procedures:</b></p> <ul style="list-style-type: none"> <li>• Create a register/document any breach, its effects and remedial action taken;</li> <li>• Review template internal breach notification documentation;</li> <li>• Create template breach reporting documentation.</li> </ul>		<p>Draft new policy and templates.</p>	