



ENGAGE, EDUCATE, EMPOWER

DATA PRIVACY ADVISORY SERVICE



Cytundeb Rhannu Gwybodaeth
Bersonol Cymru
Wales Accord on the
Sharing of Personal Information



NALANDA
TECHNOLOGY

Join at [menti.com](https://www.menti.com) | use code **8572 9240**

Go to

www.menti.com

Enter the code

8572 9240



Or use QR code

WELCOME FROM DPAS



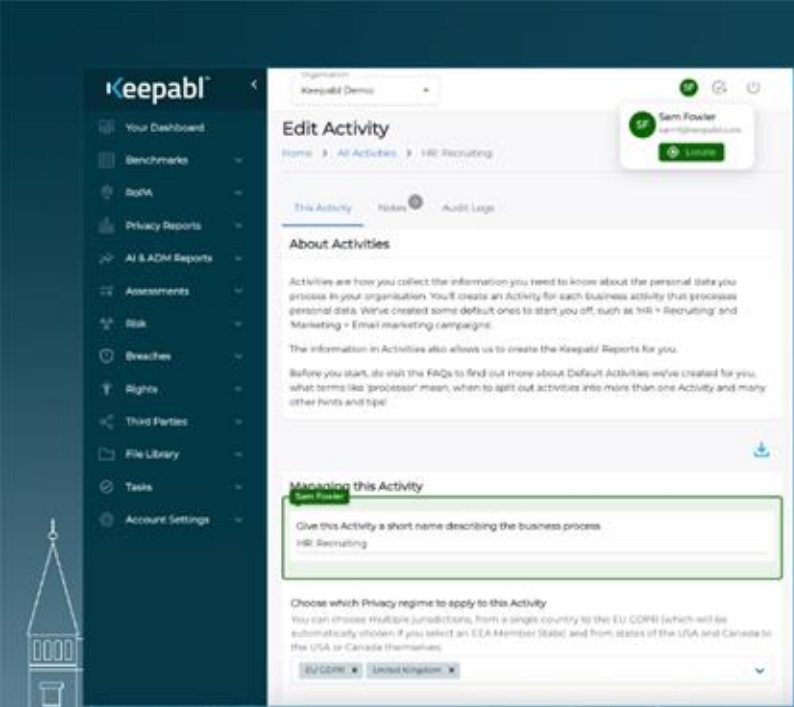
NIGEL GOODING





NATALIE BENNETT



PLATINUM SPONSOR




The screenshot shows the 'Edit Activity' page in the Keepabl application. The left sidebar contains a navigation menu with items like 'Your Dashboard', 'Benchmarks', 'GDPR', 'Privacy Reports', 'AI & ADM Reports', 'Assessments', 'Risk', 'Breaches', 'Rights', 'Third Parties', 'File Library', 'Tasks', and 'Account Settings'. The main content area is titled 'Edit Activity' and includes a breadcrumb trail 'Home > All Activities > HR > Recruiting'. Below the title, there are tabs for 'This Activity', 'Notes', and 'Audit Logs'. The 'About Activities' section explains that activities track personal data collection and processing, and provides information on how to manage them. A form field labeled 'Give this Activity a short name describing the business process' contains the text 'HR Recruiting'. At the bottom, there is a dropdown menu for 'Choose which Privacy regime to apply to this Activity', currently set to 'EU GDPR'.



Rise above Privacy Stress

hello@keepabl.com



The background of the advertisement features a stylized white line-art illustration of a city skyline with various architectural elements like towers, domes, and a pagoda, set against a dark blue background.

SPONSOR



**Complex data
disclosures,
made simple**



SPONSOR



Everything
your privacy
team needs

REGISTER OF PROCESSING ACTIVITIES			
Name	Status	Progress	
Emergency Contact	APPROVED	100% <div style="width: 100%;"></div>	
Strategic Planning Sessions	PENDING	50% <div style="width: 50%;"></div>	
Compliance Monitoring	DRAFT	10% <div style="width: 10%;"></div>	

The screenshot shows the Responsum software interface. At the top, there is a navigation bar with the Responsum logo and tabs for Awareness, Privacy, Security, and Risk. The main content area is titled "Processing activity - Strategic Planning Sessions". Below the title, there is a date "04/09/2024" and a note "Modified 3 days ago by John Doe". A sidebar on the left lists sections: General information, Context & scope, Data Protection Principles, and Processed data lifecycle. The main content area displays the "General information" section, which includes fields for Name (Strategic P...), Description (Sessions tc...), Legal basis for processing (Select Leg...), Purpose (Set strateg...), and Related assessments (LIA - State...).

SPONSOR



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PICCASO
2025
WINNER

Privacy Team of the Year:
Public Company

Vision Organisations will confidently, effectively, and lawfully share personal data, as necessary, for the benefit of people in Wales.

Mission Helping service providers to deliver better services by promoting a standardised, consistent, and lawful approach to the sharing of personal data.



WASPI's importance as the **information sharing framework in Wales**, recognised by Welsh Government and other stakeholders, following work and support in particular areas including during pandemic and as part of the nation of sanctuary programme

No equivalent framework in UK

1000 +

organisations now signed up to the Accord

SPONSOR



A complete Privacy & AI compliance platform



Powered by
AI



RoPA

Create and manage your Record of Processing Activities.

Questionnaires & DPIAs

Create, schedule and share fully customisable questionnaires, including DPIAs

DSAR & FOI

Collect and manage DSARs and FOIs with automated workflows.

Data Breach

Maintain a register of incidents and data breaches.

Data Mapping

Simplify, organise and improve the quality of your data mapping.

Cookie Consent

Collect and manage website cookie consent.

AI Systems Register

Create and manage your AI Activities Register to support AI governance.

Compliance Management

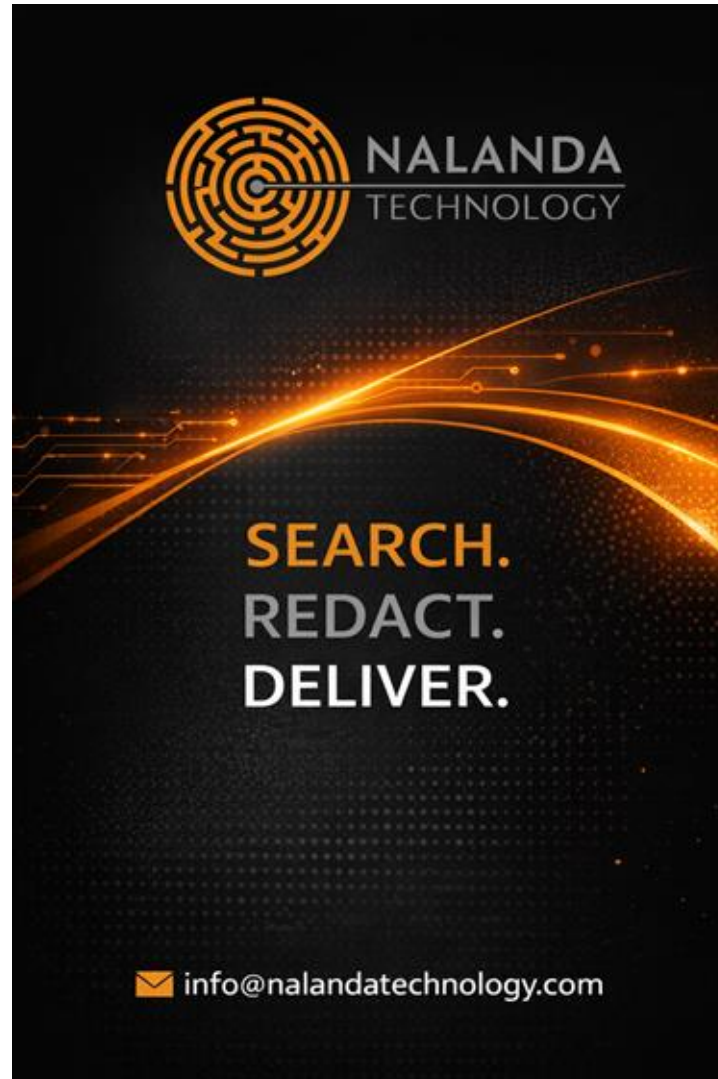
Manage your compliance projects for both standard and bespoke frameworks

Risk Management

Identify, assess and manage risks.



SPONSOR





ENJOY YOUR DAY!

DATA PRIVACY ADVISORY SERVICE



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INTRODUCING



EMMA MARTINS





“Those who have a ‘why’ to live can bear with almost any ‘how.’”
– Viktor Frankl, *Man's Search for Meaning*



B B C

INTRIGUE

RANSOM MAN



PEEPERS CREEPERS

Activists Say Ring Cameras Are Being Used by ICE

"Your Ring camera is an ICE agent."

By [Joe Wilkins](#) / Published Jan 21, 2026 2:02 PM EST



FEDERAL IMPACT HEALTH HEALTH CARE IMMIGRATION MEDICAID

ICE is using Medicaid data to find out where immigrants live

States fear immigrants will shy away from seeking health care.

BY: ANNA CLAIRE VOLLERS - JANUARY 20, 2026 5:00 AM



Attorney General Bondi Demands Access to Minnesota's Voter Rolls and Welfare Data

HEADLINE JAN 26, 2026



RFK Jr's autism study collecting Americans' private medical records

The National Institutes of Health claims it is fulfilling RFK's promise to find cause of autism by September



Experience

Knowledge

Compassion
Passion

Care

Intelligence

Authenticity

Insight
Nuance

Wisdom

Empathy

Creativity



Martins



NAVIGATING AI

TOP FIVE DATA PROTECTION RISKS



MEET YOUR SPEAKERS



CHRISTINA TUEJE



NIGEL GOODING



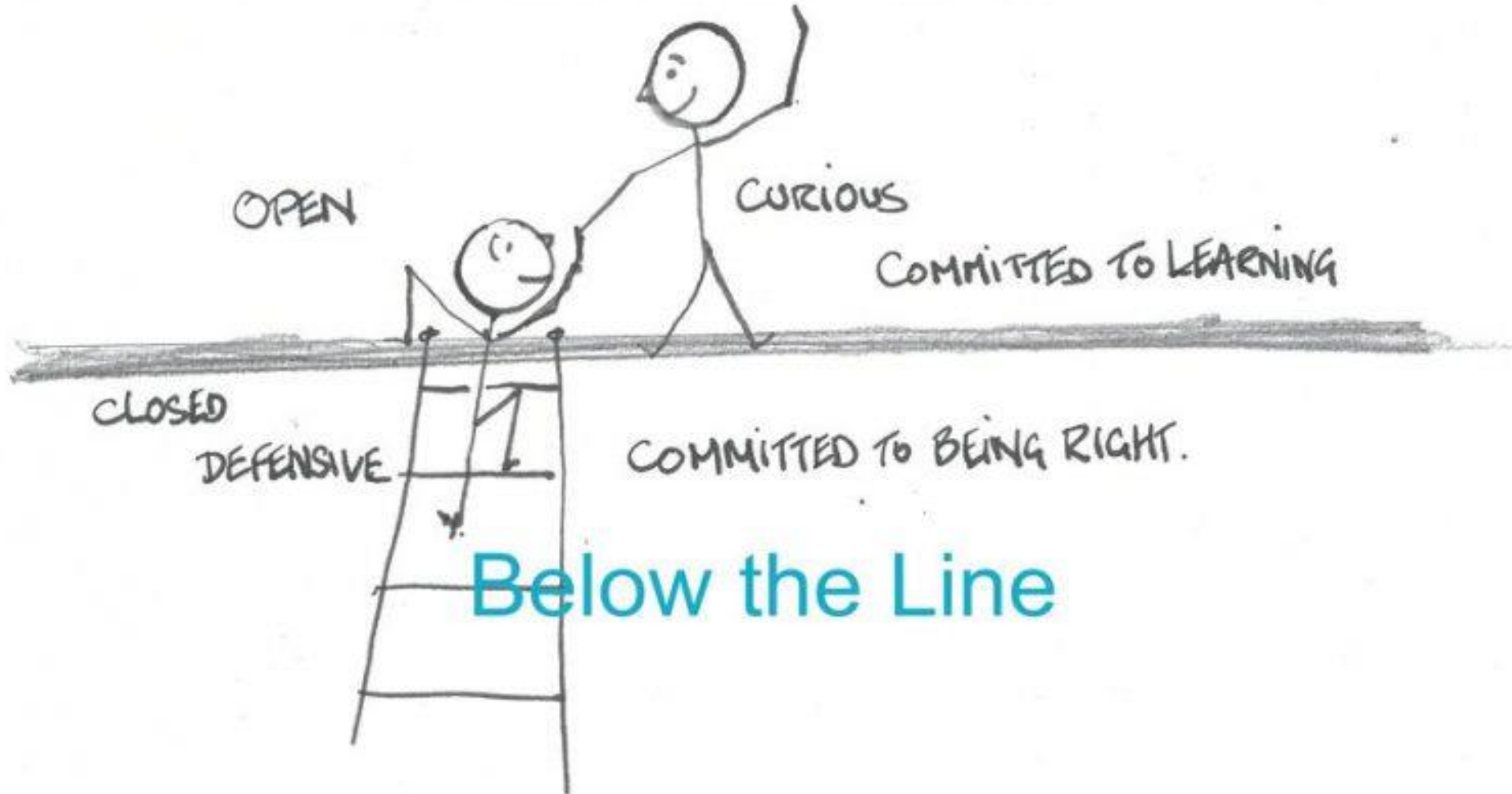
Setting The Scene: Top Five Risks

1. A global shift towards “light touch” regulation to boost innovation and competition
2. A fragmented and fast-moving legislative landscape, creating blind spots and errors
3. Divergent regulatory enforcement and inconsistent litigation trends
4. This uncertainty increases the operational burden and makes effective GRC harder to sustain
5. Automation of entry-level AI governance and data protection tasks could reduce investment in human AI governance expertise



Navigating The Risks – Where am I?

Above the Line



Above the line:

OPEN:

Curious, solutions, progress

Asking Questions
Collaboration
Feedback
Growth
Innovation
Learning
Listen deeply
Organisation's strategy
Relational connections
Trust

Below the line:

CLOSED:

Defensive, blame, innovation is blocked

Defiant
Siloed working
Criticising
Fixed mindset
Progress stalls
Blind spots
Inattentive
Privacy and AI-business objectives are misaligned
Alienation and division
Distrust

Above The Line vs Below the Line

Above The Line Objective In Navigating Risk:

Remain agile, seeking solutions, enabling progress

Below The Line Objective In Navigating Risk:

Fixed, rigid, compliance tick-box approach

Hard-wired to Stay Below the Line

Staying Above the Line is the Secret Sauce



Navigating Risks: **Above The Line**

Three Rs:

Reflection and feedback

Responsibility and accountability

Results and impact

Three R's + Guiding Principles

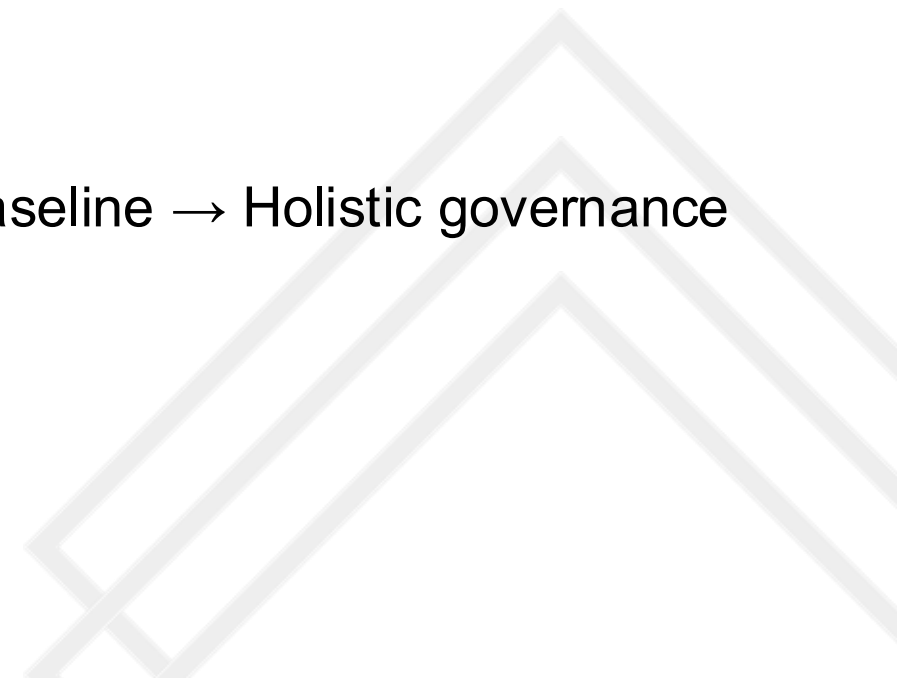


Navigating Risks: **Guiding Principles**

Responsibility and Accountability

- **Horizon scanning** – know what's coming, organisational ownership
- **Efficiency** – frictionless & agile AI governance, policies and procedures

Reflection and Feedback (continuous growth)

- **Continuous improvement** – standards and frameworks
 - **Continuous learning** – Certification, Compliance is the baseline → Holistic governance
- 

Navigating Risks: **Guiding Principles**

Results and Impact

- **Quality** – trust, ethics, what do customers / data subjects' want and need
- **Excellence** – success metrics, measuring the things that matter most

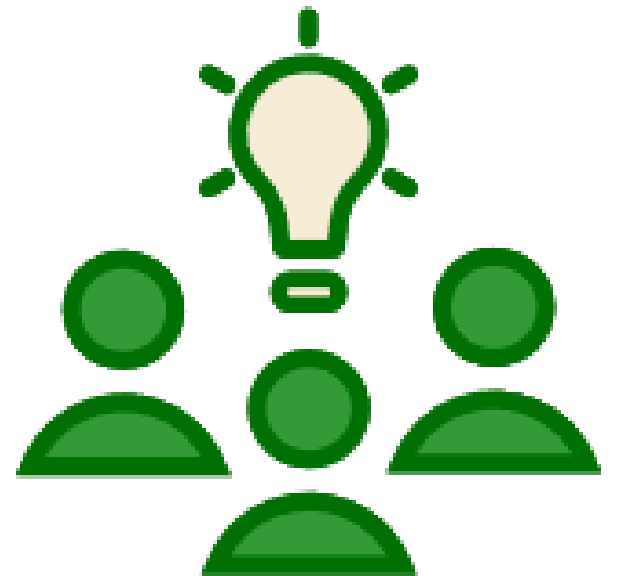


From Defensive Compliance to Holistic AI Governance

Continuous risk assessment – leverage AI for this

Cross collaboration – all eyes and ears on risk

Capability building – internal expertise, evidence, audit readiness



Why This Approach Works

- It's agile and scalable
- It's human-centred, connected to corporate priorities with an audit-readiness focus
- Psychological safety, AI implementation momentum, shared standards



References

[How can agile AI governance keep pace with technology? | World Economic Forum](#)

[UK AI Ethics and Governance Framework 2025 - Comprehensive Guide for British Businesses |](#)

[Compare the Cloud | Compare the Cloud](#)

[AI Regulation: The Politics of Fragmentation and Regulatory Capture | Oxford Law Blogs](#)

<https://blogs.law.ox.ac.uk/oblb/blog-post/2025/06/ai-regulation-politics-fragmentation-and-regulatory-capture>



BREAK AND NETWORKING

10:45 - 11:05





COMPLIANCE TO CULTURE

THE POWER OF PRIVACY CHAMPIONS



INTRODUCTION

Gloria Begu

Senior Privacy Manager

Kenvue - Consumer Health
(formerly part of Johnson & Johnson)



AGENDA

S.1

The reality: Why privacy is under pressure

S.2

From compliance to culture

S.3

The role and power of Privacy Champions

S.4

Making champions work in practice



SECTION 1: THE REALITY

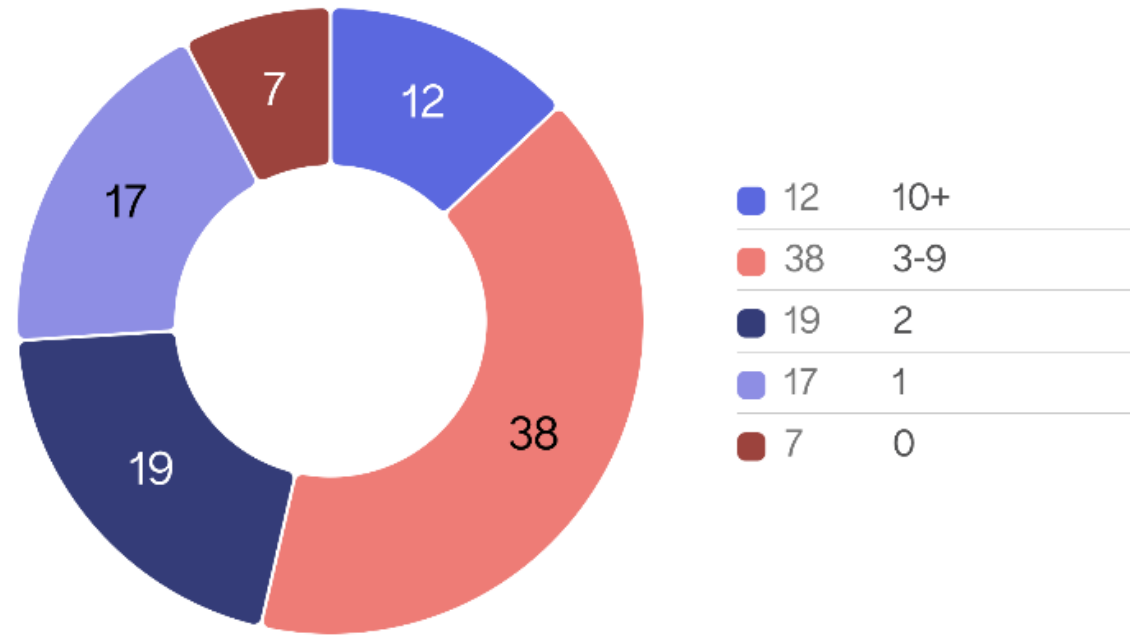
WHY PRIVACY IS UNDER PRESSURE



QUESTION #1

How many dedicated privacy professionals support your organisation?

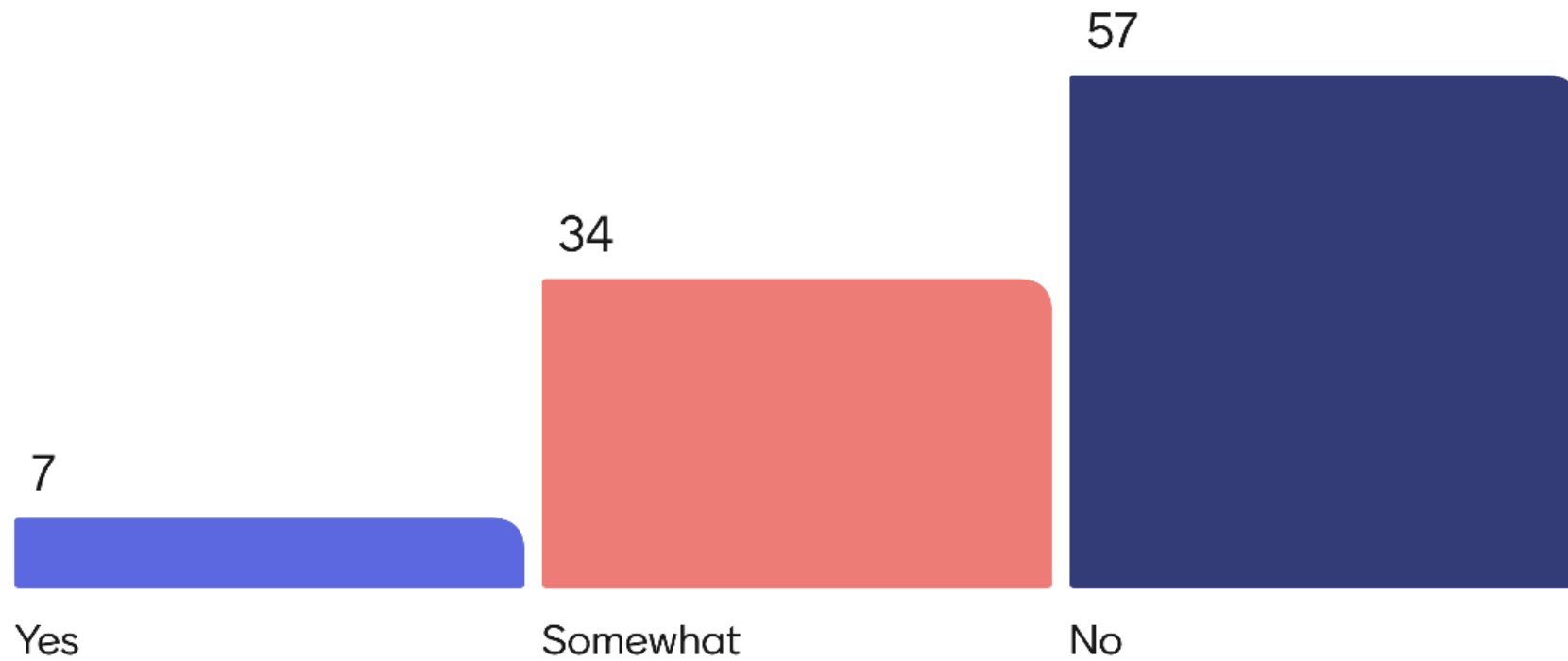
Q1: How many dedicated privacy professionals support your organisation?



QUESTION #2

Do you believe your organisation is adequately resourced to meet current and future privacy expectations?

Q2: Do you believe your organisation is adequately resourced to meet current and future privacy expectations?



DOES THIS FEEL FAMILIAR?


Decisions involving personal data happen every day...often outside formal privacy processes.

Privacy isn't always considered early or at all.

This creates a gap between privacy teams and day to day decision making.

THE STRUCTURAL CHALLENGE


Privacy teams are under increasing pressure



European
privacy teams
expect **budgets**
to shrink
further

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59% of privacy
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THE STRUCTURAL CHALLENGE

Privacy teams are under increasing pressure

European privacy teams expect **budgets to shrink further**

94% of organisations recognise a **privacy skills gap**

59% of privacy professionals cite **resource shortages** as a top challenge

In the UK, **44%** of organisations have **one or no dedicated privacy resource**

THE IMPACT OF A COMPLIANCE-ONLY MODEL



Late involvement in projects



Inconsistent decisions

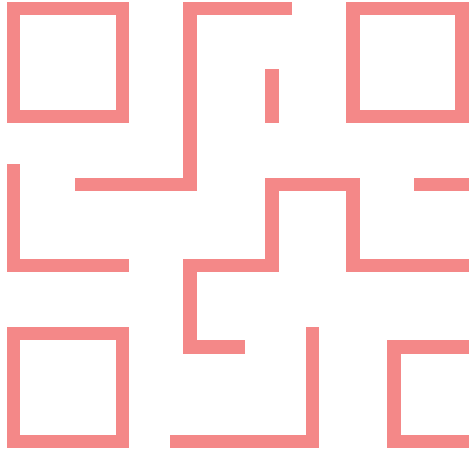


Bottlenecks and delays



Increased risk of errors and burnout risk for privacy teams

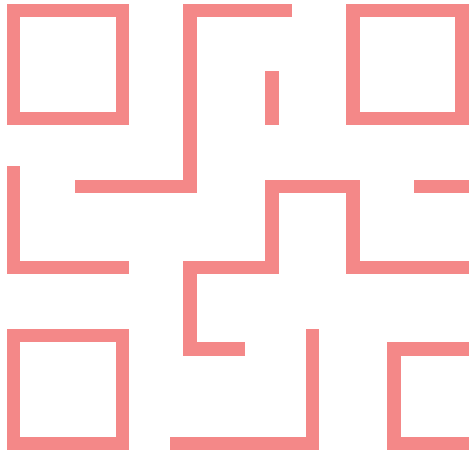
ACKNOWLEDGING TECHNOLOGY & AI



Yes - technology can and does help create privacy culture

- Technology supports privacy processes
- Automation improves consistency and efficiency
- AI can help flag risks and patterns

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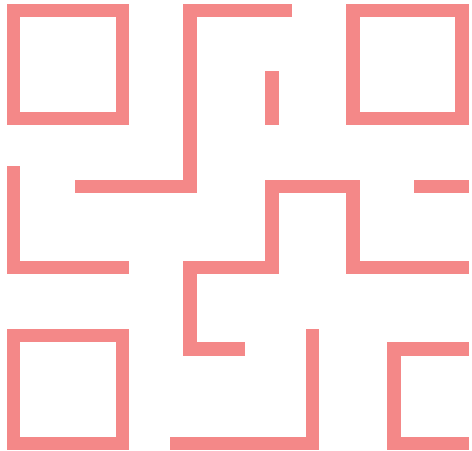
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BUT...

- Technology follows defined rules and triggers
 - It does not exercise judgement
 - It does not hold accountability
 - It does not set organisational norms
 - Technology supports compliance.
- Accountability remains human

ACKNOWLEDGING TECHNOLOGY & AI



Yes - technology can and does help create privacy culture

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Privacy Champions are one of several key levers that shape culture. If designed and built well, they are one of the most effective ways to make it visible and scalable

- It does not set organisational norms
- Technology supports compliance.
Accountability remains human



SECTION 2

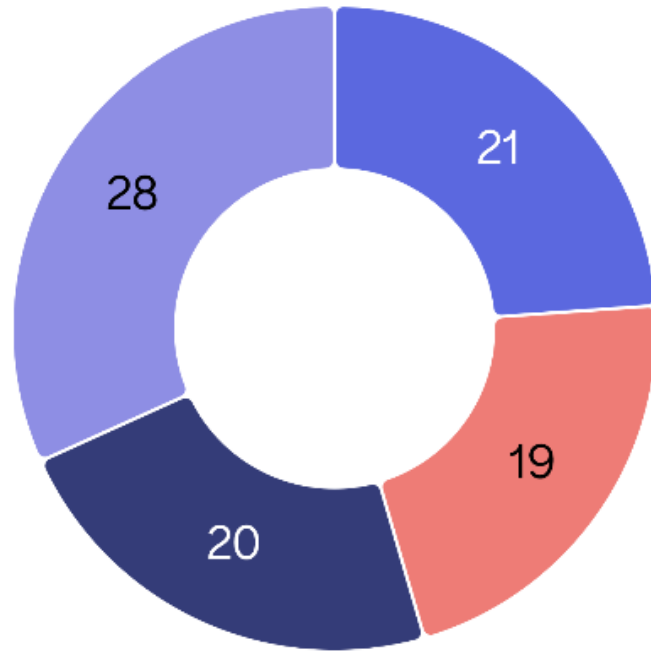
FROM COMPLIANCE TO CULTURE



QUESTION

Do you currently have anything like Privacy Champions in your organisation?

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- 21 Yes - a formal Privacy Champion programme
- 19 Yes - something informal or ad hoc
- 20 No - but we're considering it
- 28 No - not at all

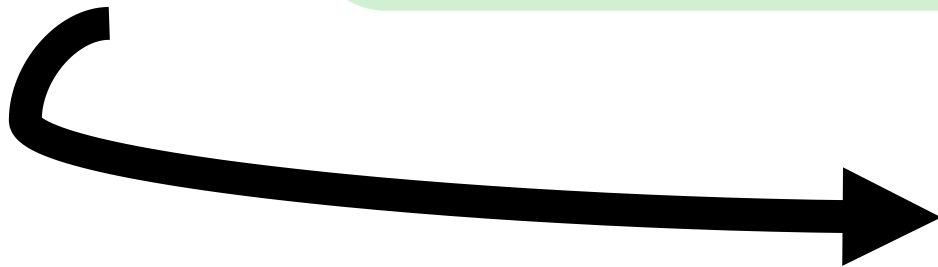
FROM COMPLIANCE TO CULTURE



Compliance

- Reactive
- Centralised
- Box-Ticking

Privacy is treated as centrally owned



Culture

- Proactive
- Shared ownership
- Embedded in day-to-day work

Privacy becomes a shared responsibility

FROM COMPLIANCE TO CULTURE



If you take one thing away so far. It's this,
Privacy does not scale through centralised
privacy review. It scales through clarity and
early thinking and decisions

work
*Privacy becomes a shared
responsibility*



SECTION 3: PRIVACY CHAMPIONS

THE ROLE AND POWER OF PRIVACY CHAMPIONS



PRIVACY CHAMPIONS

Privacy Champions are embedded individuals who help ensure privacy is considered early and consistently, acting as bridge between operational teams and the privacy function.



WHAT PRIVACY CHAMPIONS ARE NOT



- **Not privacy or legal experts** - They don't interpret the law or give legal advice.
- **Not accountable for compliance or risk** - They are not responsible if something goes wrong
- **Not risk sign off, they don't approve privacy decisions** - They guide and escalate
- **Not a replacement for the privacy team** - Privacy enquiries should not bypass the privacy team.
- **Not responsible for doing privacy work on behalf of others** - They don't complete the privacy task on behalf of the team.

WHY PRIVACY CHAMPIONS MATTER

Privacy teams cannot be everywhere

Privacy professionals are heavily outnumbered

Decisions happen daily outside the privacy function

Risk is often invisible until something goes wrong

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Risks are surfaced before they escalate

ROLES & LEVELS OF PRIVACY CHAMPIONS



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**Executive
Advocates**



Set tone and visibly support privacy

ROLES & LEVELS OF PRIVACY CHAMPIONS

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Set tone and visibly support privacy

**Operational
Champions**

**Recognise when privacy applies and raises issues
early**

ROLES & LEVELS OF PRIVACY CHAMPIONS

**Executive
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Set tone and visibly support privacy

**Operational
Champions**

**Recognise when privacy applies and raises
issues early**

**Project
Champions**

Embed privacy into initiatives and change

WHAT DO PRIVACY CHAMPIONS DO IN PRACTICE?



**Recognise when
privacy
considerations
apply**

WHAT DO PRIVACY CHAMPIONS DO IN PRACTICE?



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**Ask the right
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**Act as a local point
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**Signpost teams to
the right
processes**

WHAT DO PRIVACY CHAMPIONS DO IN PRACTICE?



**Recognise when
privacy
considerations
apply**



**Ask the right
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**Act as a local point
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**Signpost teams to
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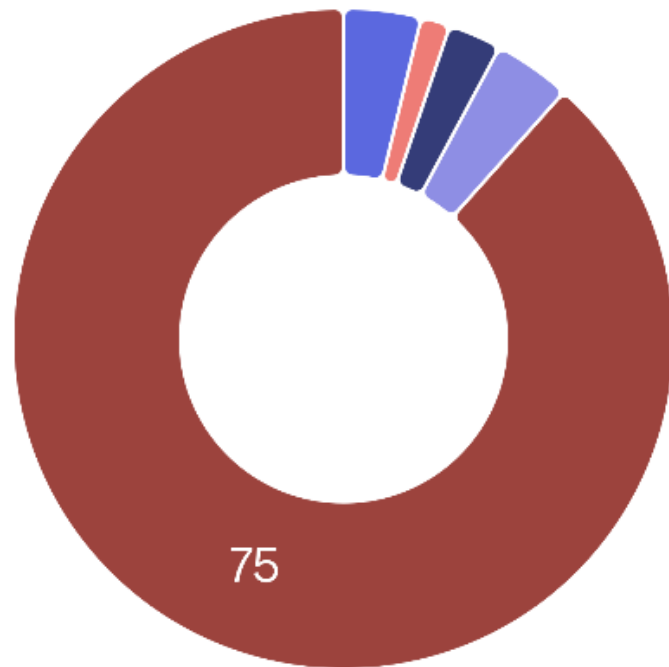


**Escalate issues to
the privacy
function when
needed**

QUESTION

A new product is launching in 2 weeks. Privacy is asked to review it at the last minute. What could a Privacy Champion have helped with earlier?

Q: A new product is launching in 2 weeks. Privacy is asked to review it at the last minute. What could a Privacy Champion have helped with earlier?



- 3 Identifying privacy risks earlier in the project
- 1 Ensuring the right processes were followed from the start
- 2 Connecting the project team to the privacy function sooner
- 3 Raising awareness of privacy considerations within the team
- 75 All of the above

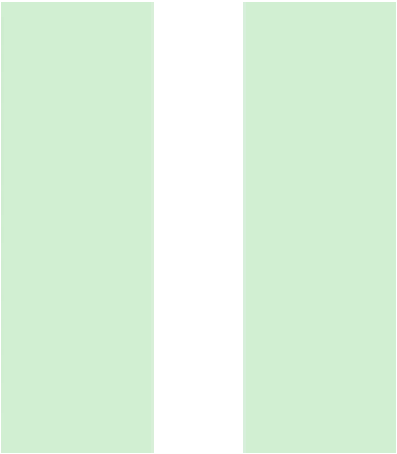


SECTION 4: MAKING IT WORK

MAKING CHAMPIONS WORK IN PRACTICE



WHAT NEEDS TO BE IN PLACE FIRST



PAUSE

WHAT NEEDS TO BE IN PLACE FIRST

A clear privacy framework and policies

Defined processes and escalation routes

A central privacy function to support champions

Leadership support and visible sponsorship



PAUSE

Time and permission for champions to play role

WHY CHAMPIONS NEED CLEAR PRIVACY FRAMEWORKS

**So Champions don't become
informal gatekeepers**

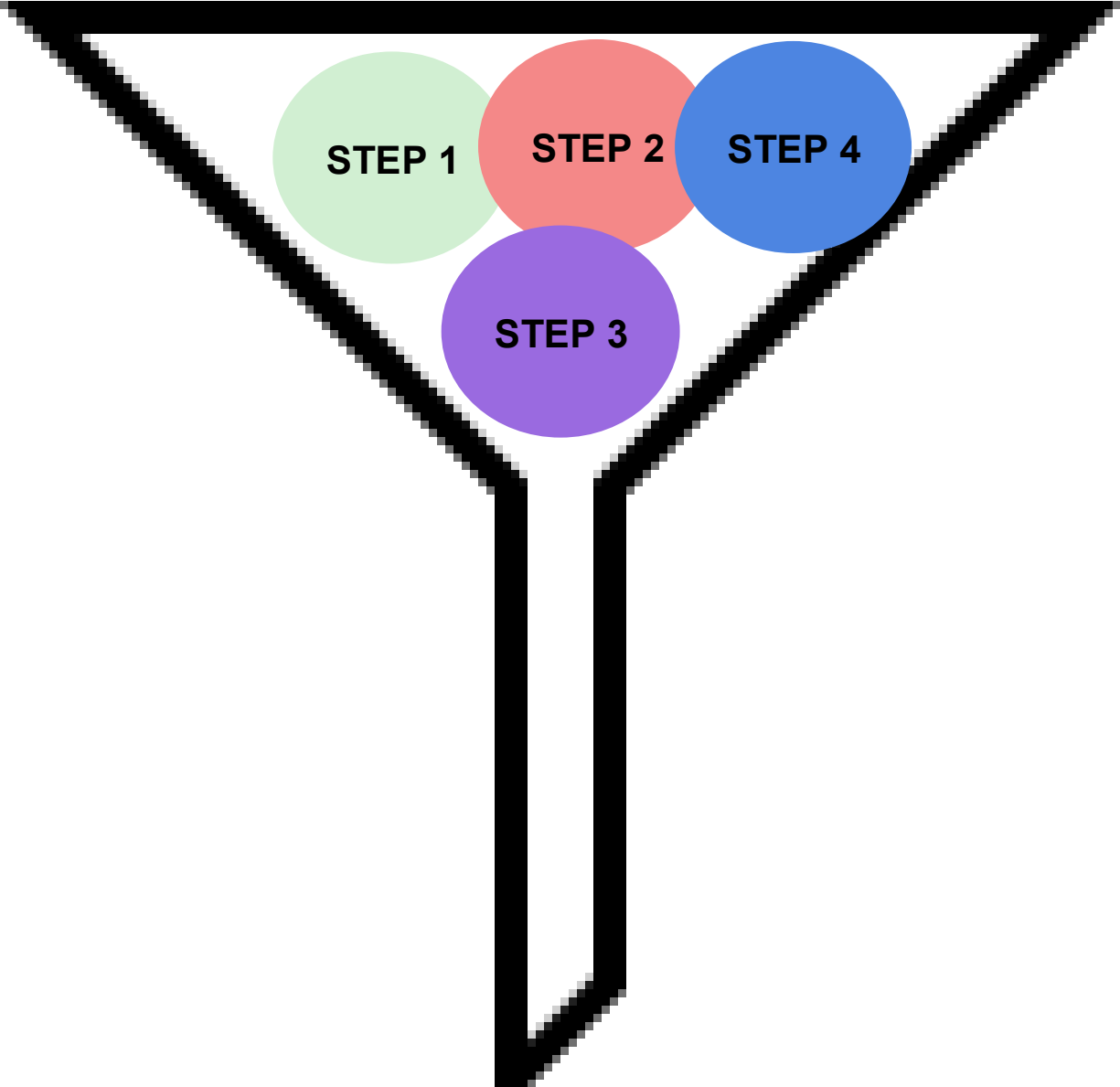
**So escalation is consistent and
safe**

So accountability stays clear

**So Champions feel confident
acting early, not hesitant or
overcautious**



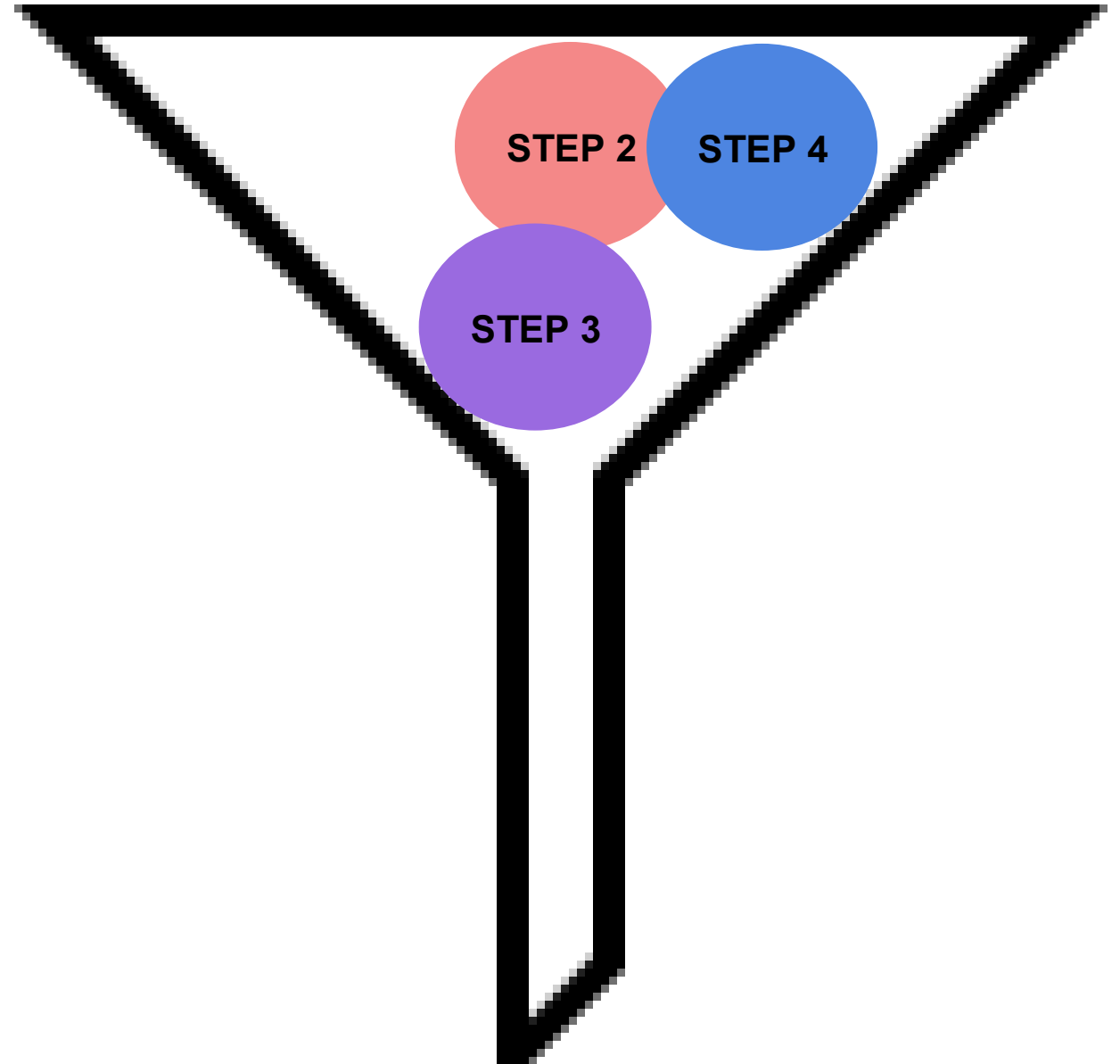
STARTING A PRIVACY CHAMPIONS NETWORK



STARTING A PRIVACY CHAMPIONS NETWORK

STEP 1

Start small
Don't aim for perfection



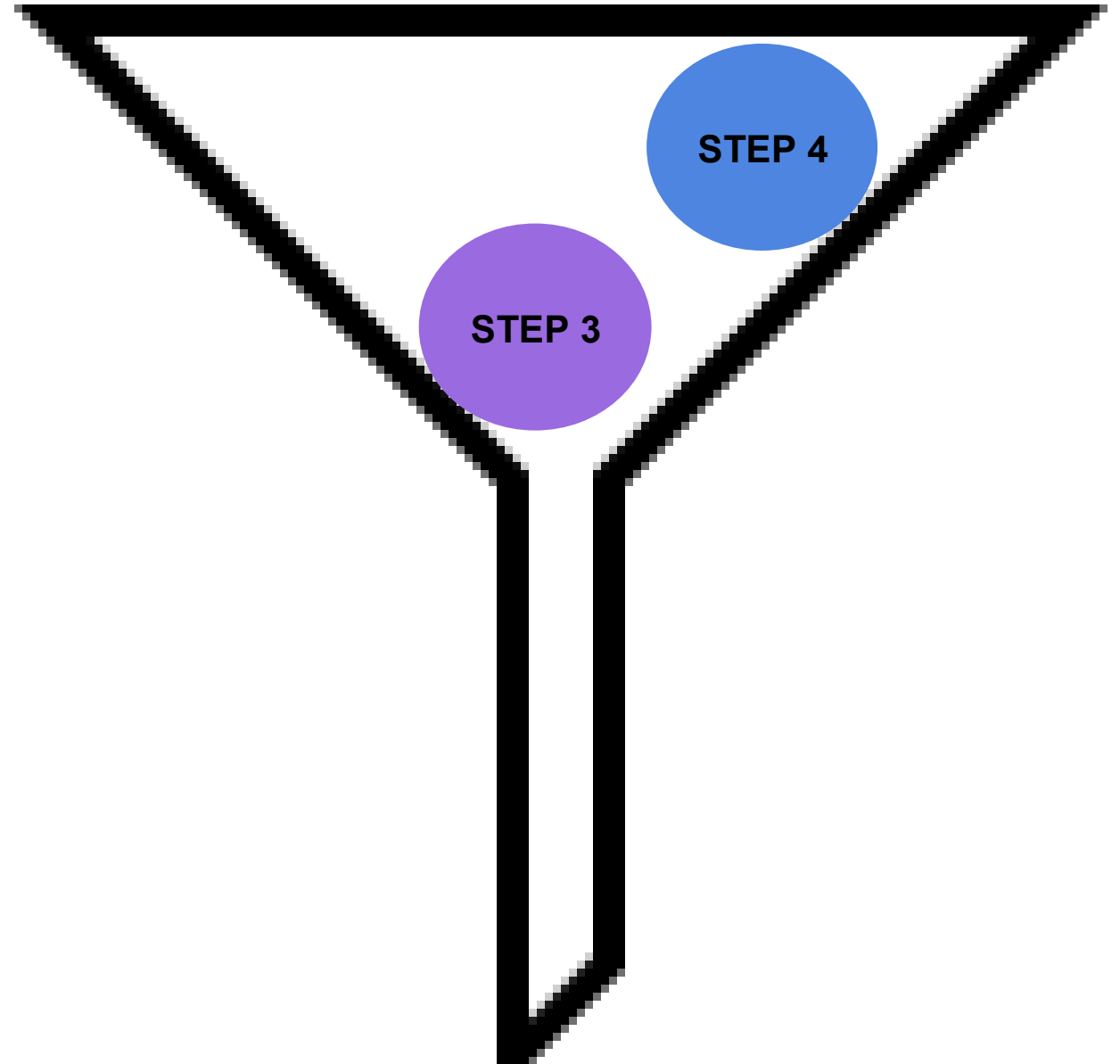
STARTING A PRIVACY CHAMPIONS NETWORK

STEP 1

Start small
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STEP 2

Find Interested People
Often already acting as
informal champions



STARTING A PRIVACY CHAMPIONS NETWORK

STEP 1

Start small
Don't aim for perfection

STEP 2

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STEP 3

Be Clear on Scope
What champions do and
don't do

STEP 4



STARTING A PRIVACY CHAMPIONS NETWORK



WHAT MAKES PEOPLE SAY “YES” TO BEING A CHAMPION



Executive Advocates

What makes it worth their time and name?

- Frame as trust, risk or ethics leadership
- Clear link to organisational reputation and resilience
- Ask for endorsement, not delivery

Avoid

- Asking executives to “volunteer”
- Expecting hands-on involvement
- Having multiple symbolic sponsors



Operational Champions

What makes this feel safe, supported and worthwhile?

- Approach people already asking questions
- Invite, don't appoint
- Recognition for existing good practice
- Emphasise support and boundaries

Avoid

- Volunteering people without consent
- Assuming interest equals capacity
- Selecting only legal or compliance roles



Project / Change Champions

What makes this part of my job, not extra work?

- Embed into existing delivery roles
- Align with existing project responsibilities
- Make it situational, not permanent
- Clear value to delivery outcomes

Avoid

- Creating a standing extra role
- Treating champions as sign-off points

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SUSTAINING ENGAGEMENT – WHAT WORKS (AND WHY)

✓ HOW TO

- Keep champions visible and valued.
Engage champions proactively not just reactively.
Close the loop by sharing relevant outcomes.
Respect champions, time and boundaries.

X WHAT TO AVOID

- Letting the role become invisible.
- Only engage in champions when something goes wrong.
- Providing no feedback.
- Allowing scope to quietly expand.
Ignoring time pressures and priorities

WHY CHAMPION PROGRAMMES LOSE MOMENTUM



- **Privacy teams stop actively using champions, too busy to engage.**
- **Champions are expected to do the work.**
- **Privacy Frameworks and processes aren't clear.**
- **Engagement becomes reactive**
- **People forget the framework exist.**

KEY TAKEAWAYS

- ✓ Privacy expectations are growing faster than resourcing
- ✓ Compliance alone cannot scale, culture is essential
- ✓ Technology scales process, but not judgement, norms or accountability
- ✓ Privacy Champions are a practical key lever to embed privacy earlier, they provide privacy presence
- ✓ Champions succeed only with clarity, sponsorship, support and time permission.



THANK YOU

ANY QUESTIONS?





CONFIDENTIALITY VS PUBLIC INTEREST?

LESSONS FROM THE HEALTHCARE SECTOR



ABOUT ME



Andrew Harvey

Joint Head of Information Governance /
Data Protection Officer



Guy's and St Thomas'
NHS Foundation Trust



King's College Hospital
NHS Foundation Trust

INTRODUCTION

**Balancing
confidentiality
and public
interest**

**Key definitions
and risk
examples**



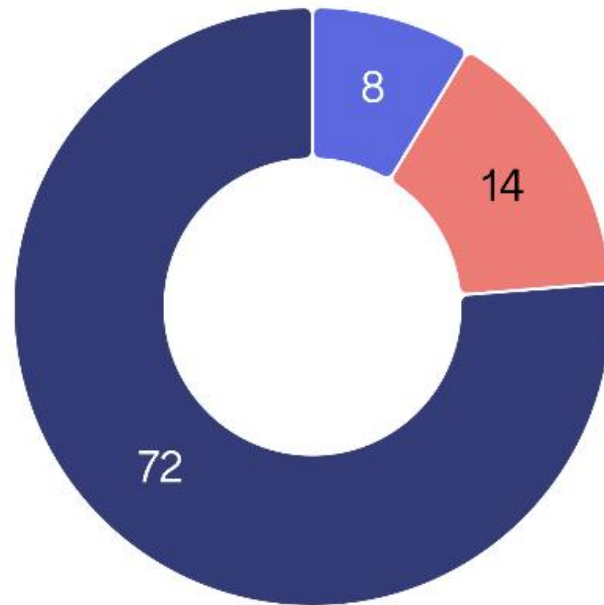
INTRODUCTION

- Junior doctor told by patient during a mental health review that they sometimes feel urge to “teach people a lesson” when they feel humiliated, but they give no names, plans, or timescales.
- Patient asks the doctor not to tell anyone, insisting it was said “just to get it off their chest.”
- Doctor is left unsure whether doing nothing could place others at risk.

Should the doctor:

- Disclose the information in the public interest?
- Maintain confidentiality?
- It depends / not enough information

Should the doctor:



- 8 Disclose the information in the public interest?
- 14 Maintain confidentiality?
- 72 It depends / not enough information

INTRODUCTION

**Balancing
confidentiality
and public
interest**

**Key definitions
and risk
examples**

**Extensive law
and guidance;
usefulness
questioned**



WHAT'S THE ISSUE?

**Case law
shapes
confidentiality**

**Spycatcher
confirms duty
of confidence**

**Public interest
can outweigh
secrecy**



CONFIDENTIALITY TAKES LEGAL SHAPE

**Cases test
confidentiality
limits**

**R v Crozier
justified
disclosure**

**Public
protection
outweighs
confidences**



WHEN THE COURTS LET CONFIDENTIALITY BEND

**W v Edgell
permits
disclosure**

**Public interests
outweighs
privacy**

**Clear test for
disclosure**



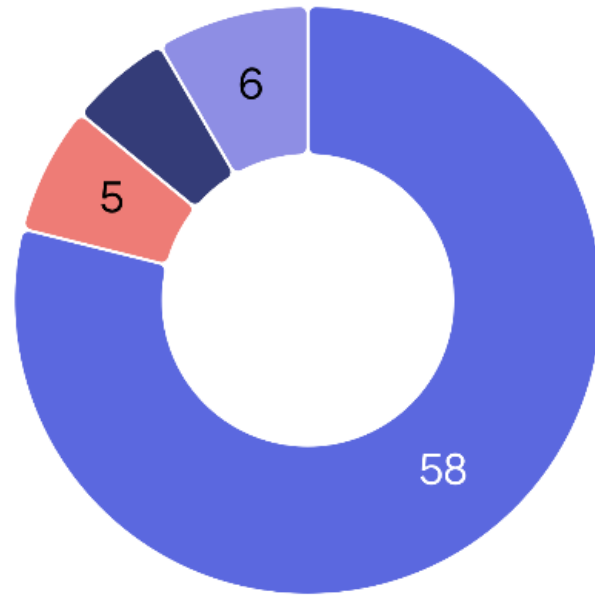
WHEN THE COURTS LET CONFIDENTIALITY BEND

- A patient tells their psychiatrist they have violent fantasies but no specific person or plan.

Which part of the four-part Edgell test is weakest?

- Real, serious, imminent?
- Would disclosure reduce risk?
- Minimum necessary?
- Does benefit outweigh harm?

Which part of the four-part Edgell test is weakest?



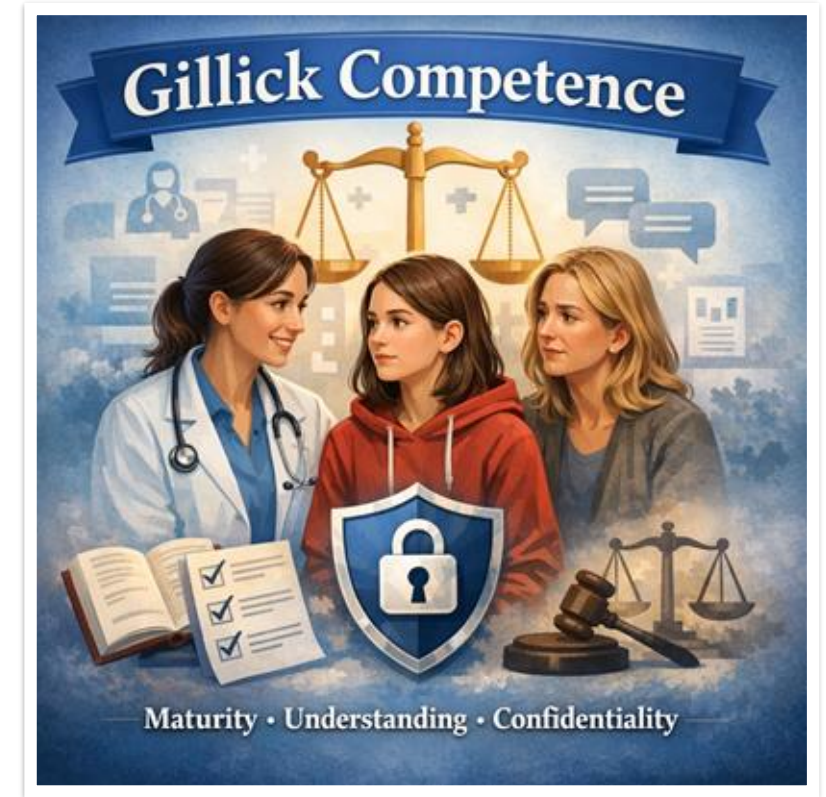
- 58 Real, serious, imminent?
- 5 Would disclosure reduce risk?
- 4 Minimum necessary?
- 6 Does benefit outweigh harm?

A TEST THE DOCTORS CAN ACTUALLY USE

**Gillick case
informs
confidentiality**

**Minors may
consent
independently**

**Gillick carries
confidentiality
duty**



AUTONOMY COMPLICATES THE BALANCE

**Risk of liability
for non-
disclosure**

**ABC case tests
autonomy**

**Confidentiality
upheld despite
alleged third-
party risk**



AUTONOMY COMPLICATES THE BALANCE

If you were the clinician, would you have told ABC?

THE RISK OF STAYING SILENT

**Post-mortem
confidentiality
recognised**

**Disclosure
required strong
justification**

**Cases provide
clear guidance**



WHAT THE LAW ACTUALLY ALLOWS

**GDPR and DPA
permit sharing**

**Health data as
special
category**

**Legal
obligations
mandate
disclosure**

**Public interest
supports core
functions**

**Vital interests
justify urgent
breaches**



PUBLIC INTEREST IN PRACTICE

**Special
category public
interest bases**

**Data Protection
aligns with case
law**

**Statutory
powers override
confidentiality**

**Freedom of
Information and
Human Rights
Limits**

**Legislation
provides
structured
balance**



LAW IS NOT THE WHOLE STORY

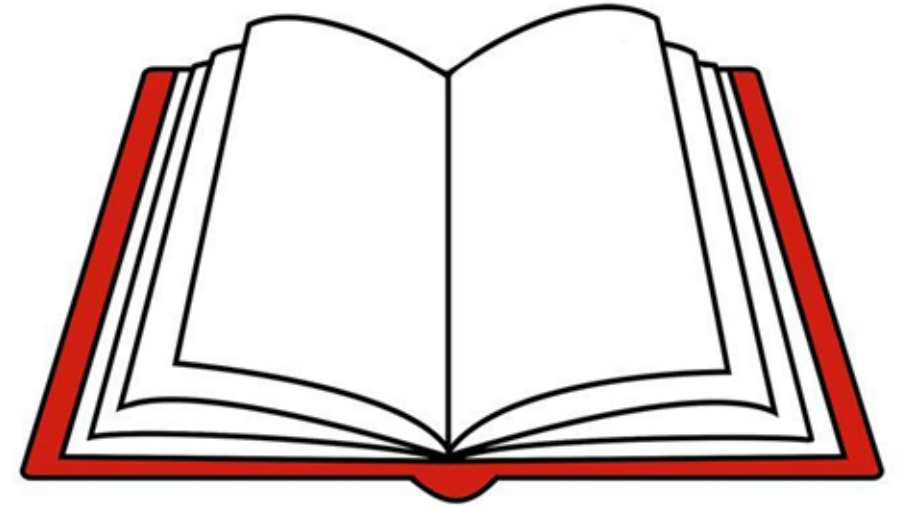
**Professional
guidance
supplement the
law**

**Caldicott
reframes duty
to share**

**Central
guidance
restates legal
principles**

**Doctor-specific
guidance offers
little clarity**

**Trust is key
added value**



WHAT THIS ALL ADDS UP TO

1. PUBLIC
INTEREST

2. PREVENTING
HARM

3. DATA
MINIMISATION

4. COMPETENT
MINORS

8. LAWFUL
SHARING

7. PUBLIC
HEALTH

6. POST-
MORTEM

5. NO BENEFIT

9. RESEARCH
EXEMPTION

10. FOI LIMITS

11. JUSTIFIED
INTERFERENCES

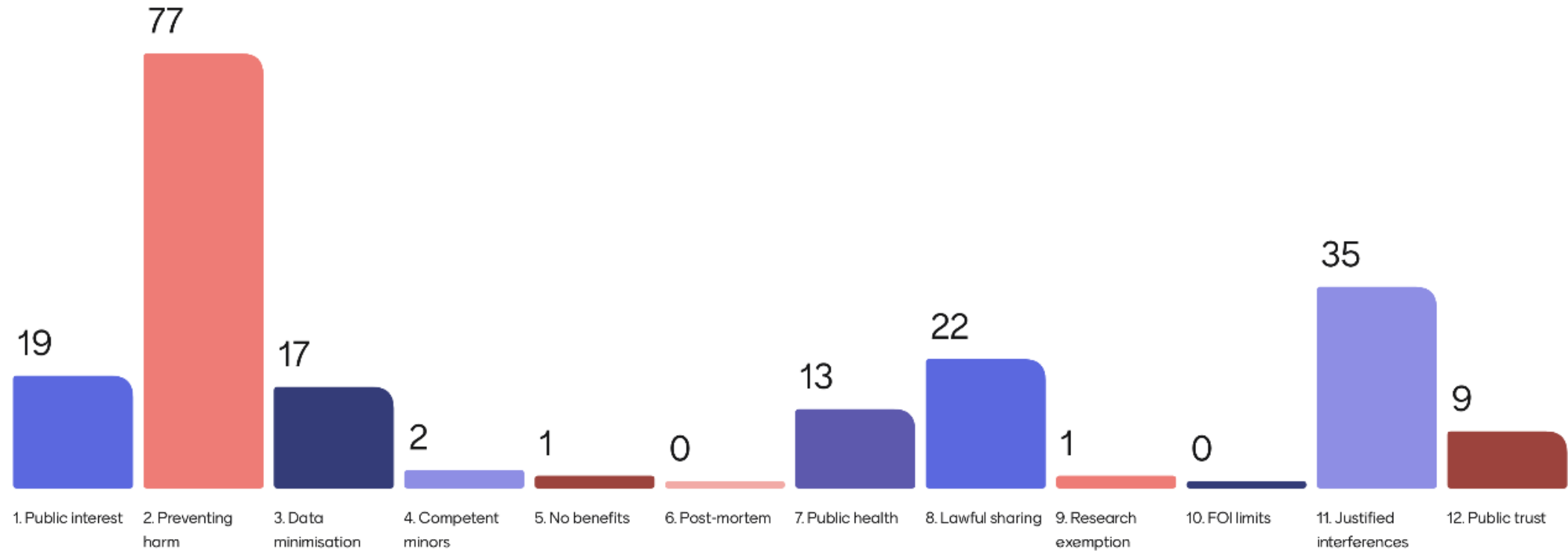
12. PUBLIC
TRUST

WHAT THIS ALL ADDS UP TO

- Patient diagnosed with a serious hereditary condition.
- Patient refuses consent to inform relatives.
- Relatives may face preventable health risks.
- No immediate emergency or legal duty to disclose.
- Clinician must decide whether disclosure is justified.

Which 3 of the framework best support resolving this?

Which 3 of the framework best support resolving this?



WHAT THIS ALL ADDS UP TO

1. PUBLIC
INTEREST

2. PREVENTING
HARM

3. DATA
MINIMISATION

4. COMPETENT
MINORS

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SHARING

7. PUBLIC
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10. FOI LIMITS

11. JUSTIFIED
INTERFERENCES

12. PUBLIC
TRUST

QUESTIONS AND DISCUSSION





LUNCH AND NETWORKING
CONTINUED AT 1.30PM





THE DUAA

THE GOOD, THE BAD, AND THE BAU



INTRODUCING



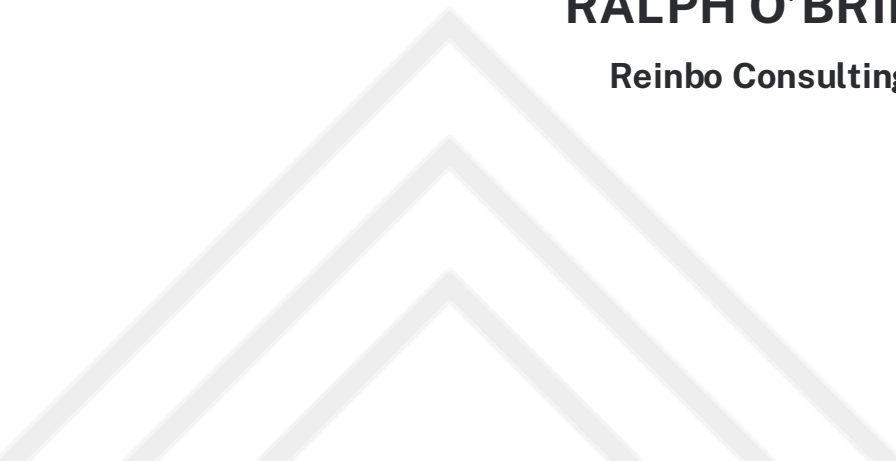
RALPH O'BRIEN

Reinbo Consulting



ROWENNA FIELDING

Miss IG Geek



THE DATA USE (AND ACCESS) ACT - LATEST

STATUTORY INSTRUMENTS

2026 No. 82 (C. 10)

DATA

DATA PROTECTION

ELECTRONIC COMMUNICATIONS

The Data (Use and Access) Act 2025 (Commencement No. 6 and Transitional and Saving Provisions) Regulations 2026

Made - - - - 29th January 2026

The Secretary of State makes these Regulations in exercise of the powers conferred by sections 142(1) and 143(1) of the Data (Use and Access) Act 2025(a) and section 104(1)(a) of the Deregulation Act 2015(b).

Citation and interpretation

1.—(1) These Regulations may be cited as the Data (Use and Access) Act 2025 (Commencement No. 6 and Transitional and Saving Provisions) Regulations 2026.

(2) In these Regulations—

“the 2018 Act” means the Data Protection Act 2018(e);

“the 2025 Act” means the Data (Use and Access) Act 2025;

“the Commissioner” has the same meaning as in section 3(8) of the 2018 Act;

“controller” has the same meaning as in section 3(6) of the 2018 Act(d);

“data subject” has the same meaning as in section 3(5) of the 2018 Act.

Provisions of the 2025 Act coming into force on 5th February 2026

2. The following provisions of the 2025 Act, so far as not already in force(e), come into force on 5th February 2026—

(a) section 67 (meaning of research and statistical purposes);

(b) section 68 (consent to processing for the purposes of scientific research);

(a) 2025 c. 18.

(b) 2015 c. 28.

(c) 2018 c. 12.

(d) Section 3(6) was amended by S.I. 2019/419.

(e) See section 142(2)(b) of the Data (Use and Access) Act 2025. In addition, sections 72 and 110 of, and Schedule 11 to, that Act were partially commenced on 20th August 2025 by S.I. 2025/904.

- (c) section 70 (lawfulness of processing);
- (d) section 71 (the purpose limitation);
- (e) section 72 (processing in reliance on relevant international law);
- (f) section 73 (elected representatives responding to requests);
- (g) section 75 (fees and reasons for responses to data subjects' requests about law enforcement processing);
- (h) section 76 (time limits for responding to data subjects' requests);
- (i) section 77 (information to be provided to data subjects);
- (j) section 80 (automated decision-making);
- (k) section 81 (data protection by design: children's higher protection matters);
- (l) section 83 (general processing and codes of conduct);
- (m) section 85 (transfers of personal data to third countries and international organisations);
- (n) section 86 (safeguards for processing for research etc purposes);
- (o) section 87 (section 86: consequential provision);
- (p) section 94 (manifestly unfounded or excessive requests to the Commissioner);
- (q) section 98 (power of the Commissioner to require a report);
- (r) section 99 (assessment notices: removal of OFSTED restriction);
- (s) section 100 (interview notices);
- (t) section 101 (penalty notices);
- (u) section 105 (consequential amendments to the EITSET Regulations);
- (v) section 110 (interpretation of the PEC Regulations);
- (w) section 112 (storing information in the terminal equipment of a subscriber or user);
- (x) section 114 (use of electronic mail for direct marketing by charities);
- (y) section 115 (Commissioner's enforcement powers);
- (z) section 116 (codes of conduct);
- (z1) section 120 (transfer of property etc to the Information Commission);
- (z2) section 121 (information standards for health and adult social care in England);
- (z3) section 130 (recognition of EU conformity assessment bodies);
- (z4) section 132 (recognition of overseas trust products);
- (z5) subsection (4) of section 133 (co-operation between supervisory authority and overseas authorities);
- (z6) Schedule 4 (lawfulness of processing: recognised legitimate interests);
- (z7) Schedule 5 (purpose limitation: processing to be treated as compatible with original purpose);
- (z8) Schedule 6 (automated decision-making: minor and consequential amendments);
- (z9) Schedule 7 (transfers of personal data to third countries etc: general processing);
- (z10) Schedule 8 (transfers of personal data to third countries etc: law enforcement processing);
- (z11) Schedule 9 (transfers of personal data to third countries etc: minor and consequential amendments and transitional provision);
- (z12) Schedule 11 (further minor provision about data protection), except paragraph 32;

- (z13) Schedule 12 (storing information in the terminal equipment of a subscriber or user);
- (z14) Schedule 13 (privacy and electronic communications: Commissioner's enforcement powers);
- (z15) Schedule 15 (information standards for health and adult social care in England).

WHAT DO YOU HAVE TO DO?

NOTHING!

(unless you really want to)

*until July 2026, when the complaints stuff is activated

THIS SESSION

- Widest-reaching changes explained
- Is it good? Is it bad? Is it just business as usual?
- For whom?
- Mentimeter: have your say!

Q1: RECOGNISED LEGITIMATE INTERESTS

s70: New lawful basis for specific purposes -

- Public task disclosure
- National security, public security, defence
- Emergencies
- Crime
- Safeguarding

Legitimate Interests Assessment **no longer required**

processing must still be fair, transparent, necessary, proportionate, secure etc etc

Q1: VOTE!

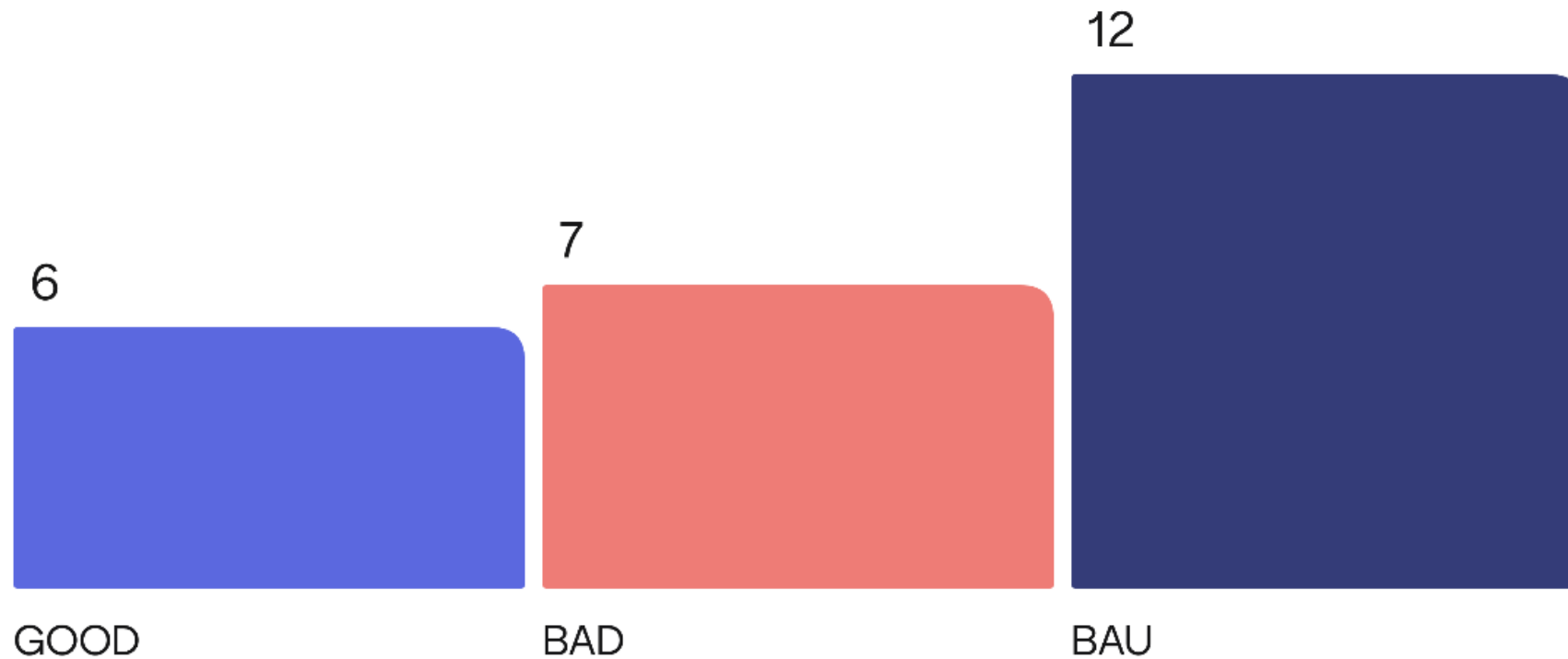
What do you think the **impact** of this change will be for-

- Data subjects
- Controller organisations
- You, as a DP professional

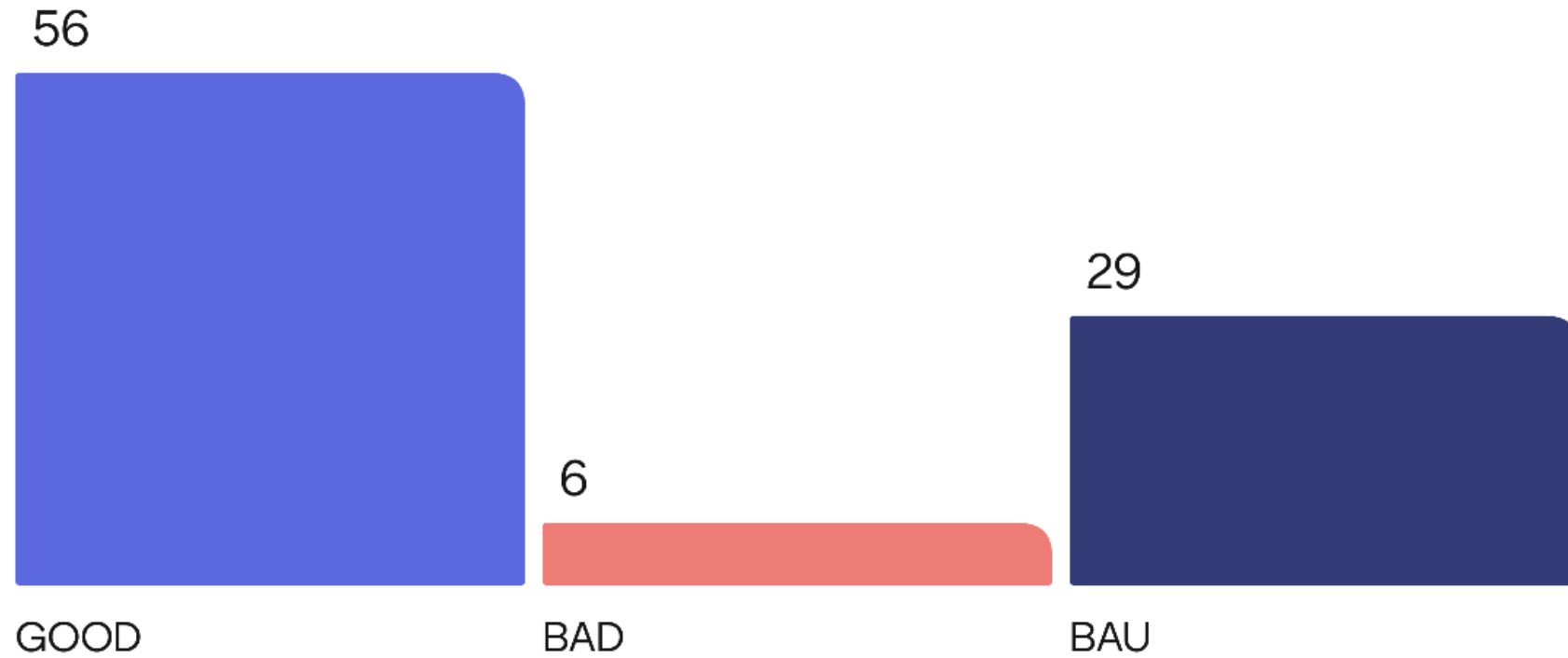
What **challenges** do you foresee?



Q1: Recognised Legitimate Interests - Impact for data subjects?



Q1: Recognised Legitimate Interests - Impact for controller organisations?



Q2: COMPATIBLE SECONDARY PURPOSES

s71: Compatibility presumed for:

- Scientific* research
- Historical research
- Archiving in the public interest
- Statistical analysis

Purpose Compatibility Assessment/consent to repurpose **no longer required**

(processing must still be fair, transparent, necessary, proportionate, secure etc, etc)

**anything described as 'science'*

Q2: VOTE!

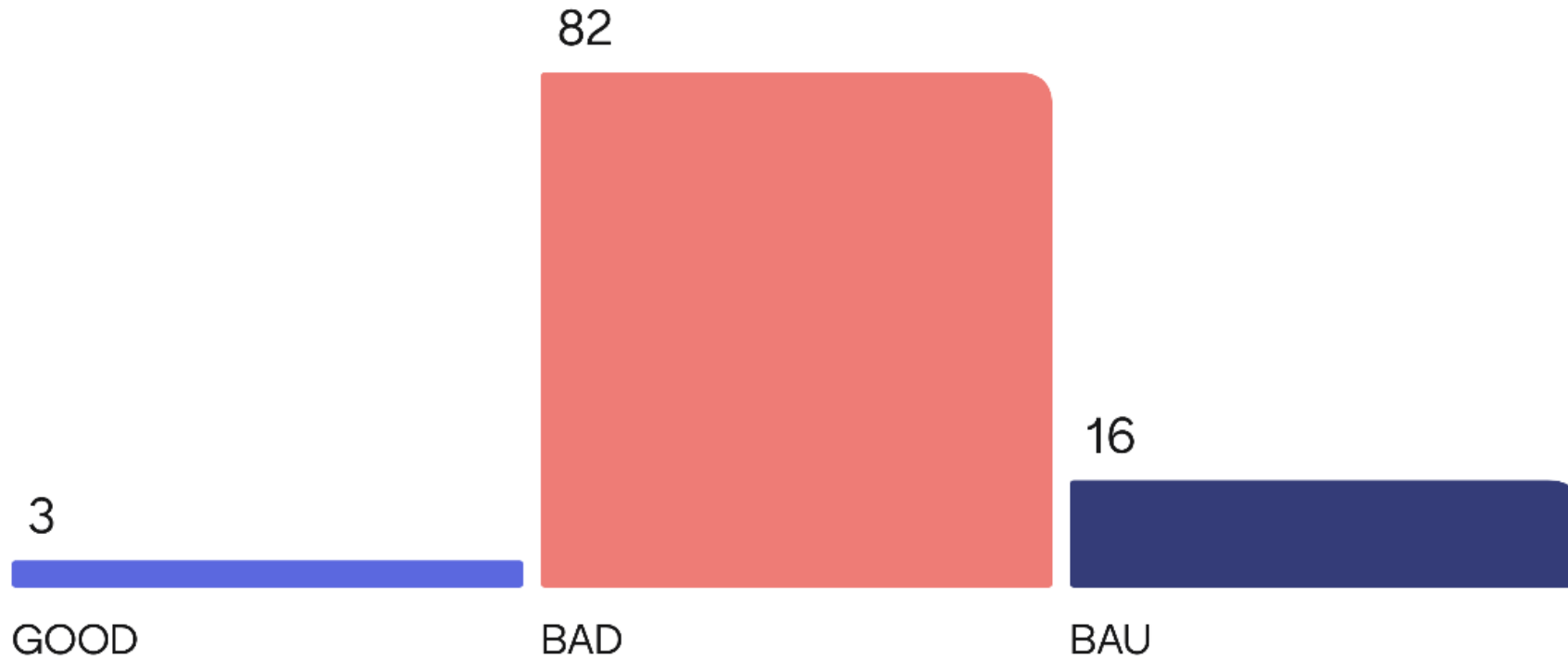
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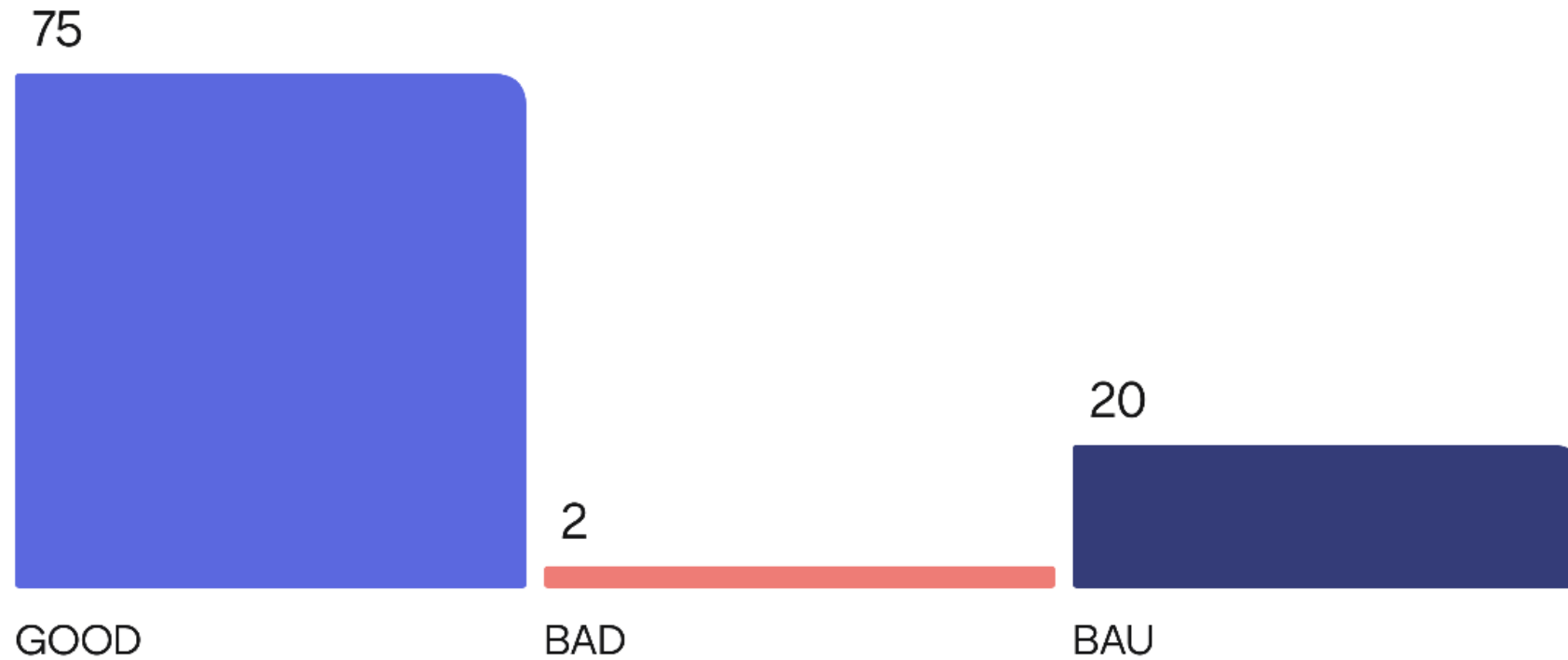
What **challenges** do you foresee?



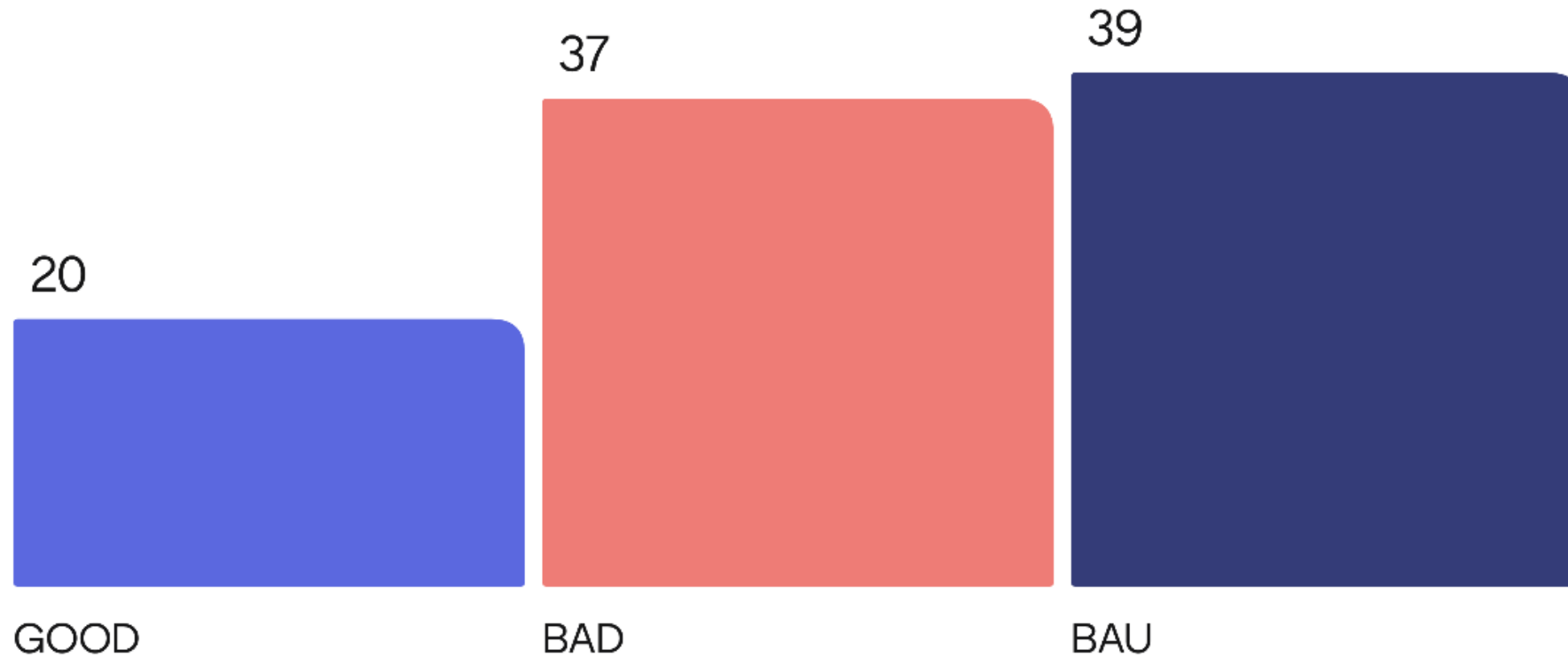
Q2: Compatible secondary purposes - Impact for data subjects?



Q2: Compatible secondary purposes - Impact for controller organisations?



Q2: Compatible secondary purposes - Impact for you, as a DP professional?



Q3: REGULATORY REGIME

ICO changes

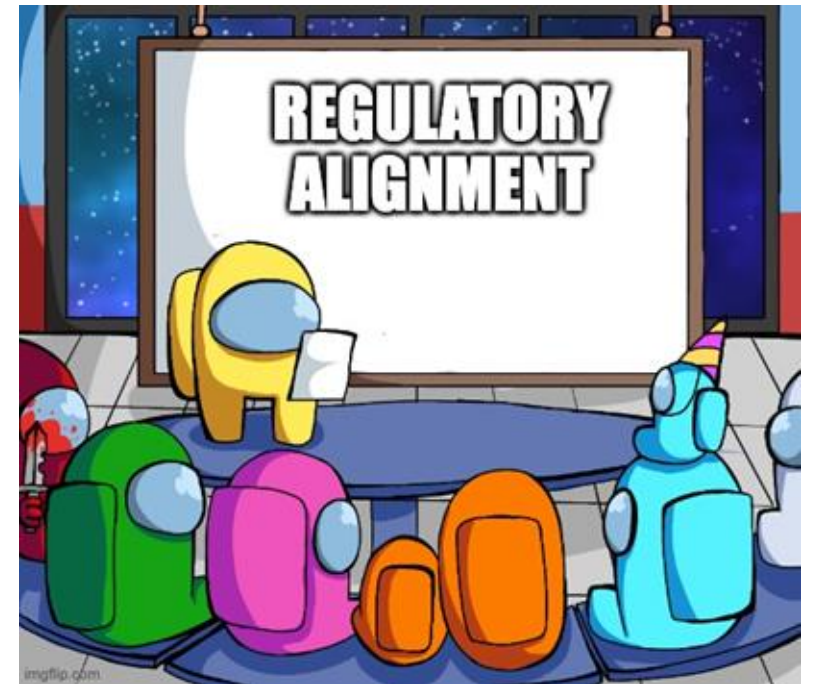
- Duty to promote competition and innovation, protect children
- New powers: compel reports, interviews
- IC role replaced by committee
- Complaints via Controller first

Q3: VOTE!

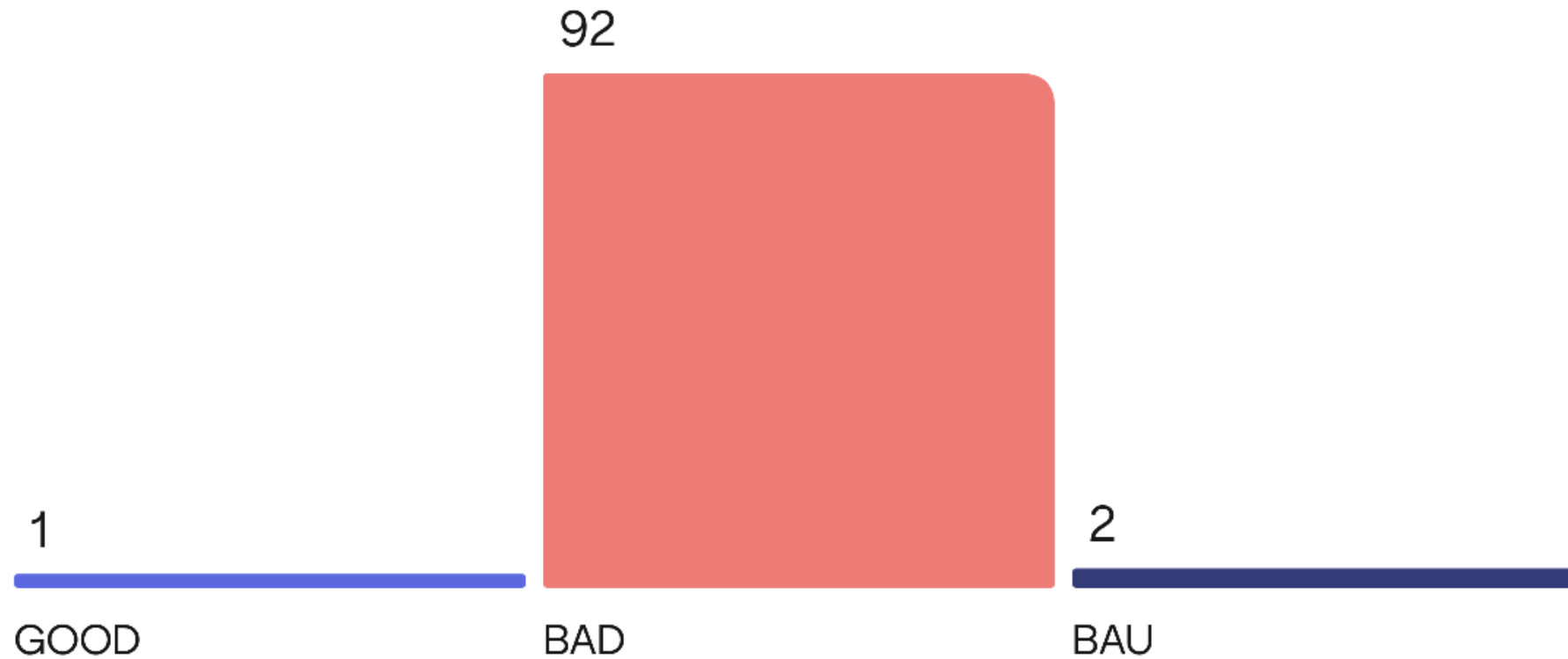
What do you think the **impact** of this change will be for-

- Data subjects
- Controller organisations
- You, as a DP professional

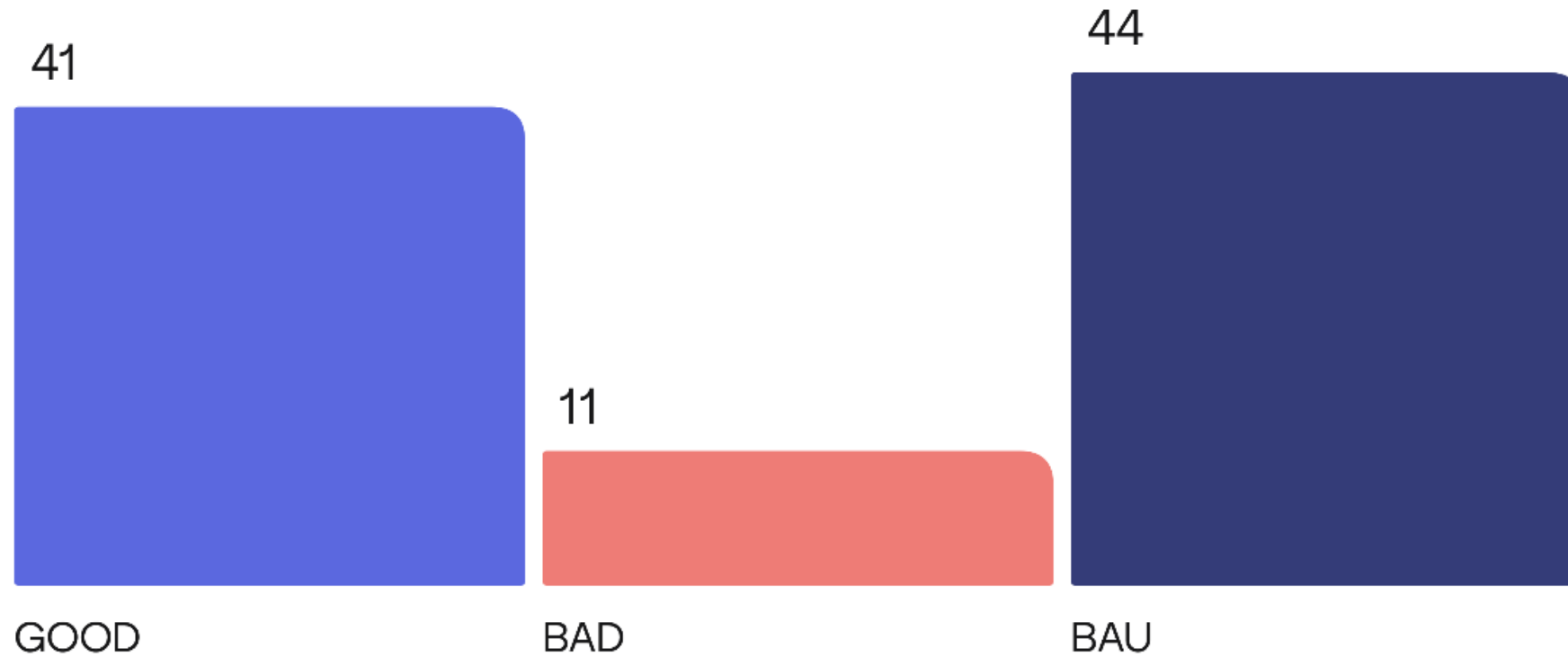
What **challenges** do you foresee?



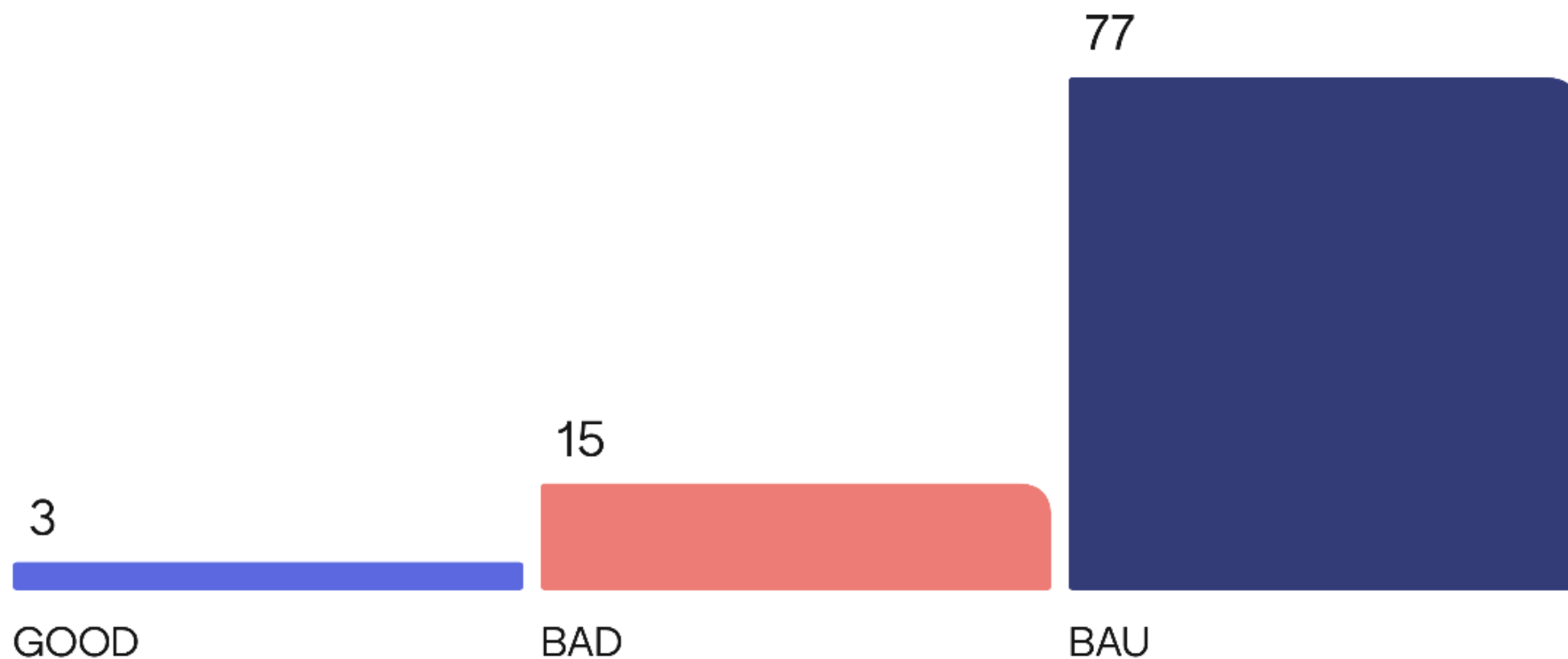
Q3: Regulatory regime - Impact for data subjects?



Q3: Regulatory regime - Impact for controller organisations?



Q3: Regulatory regime - Impact for you, as a DP professional?



Q4: AUTOMATED DECISION-MAKING

GDPR A22 rewritten

- Prohibition reversed - now allowed (unless not)
- Lawful under LI (if not high-risk or SCD)
- Safeguards* required

**impact assessment, transparency, human review, intervention*

Q4: VOTE!

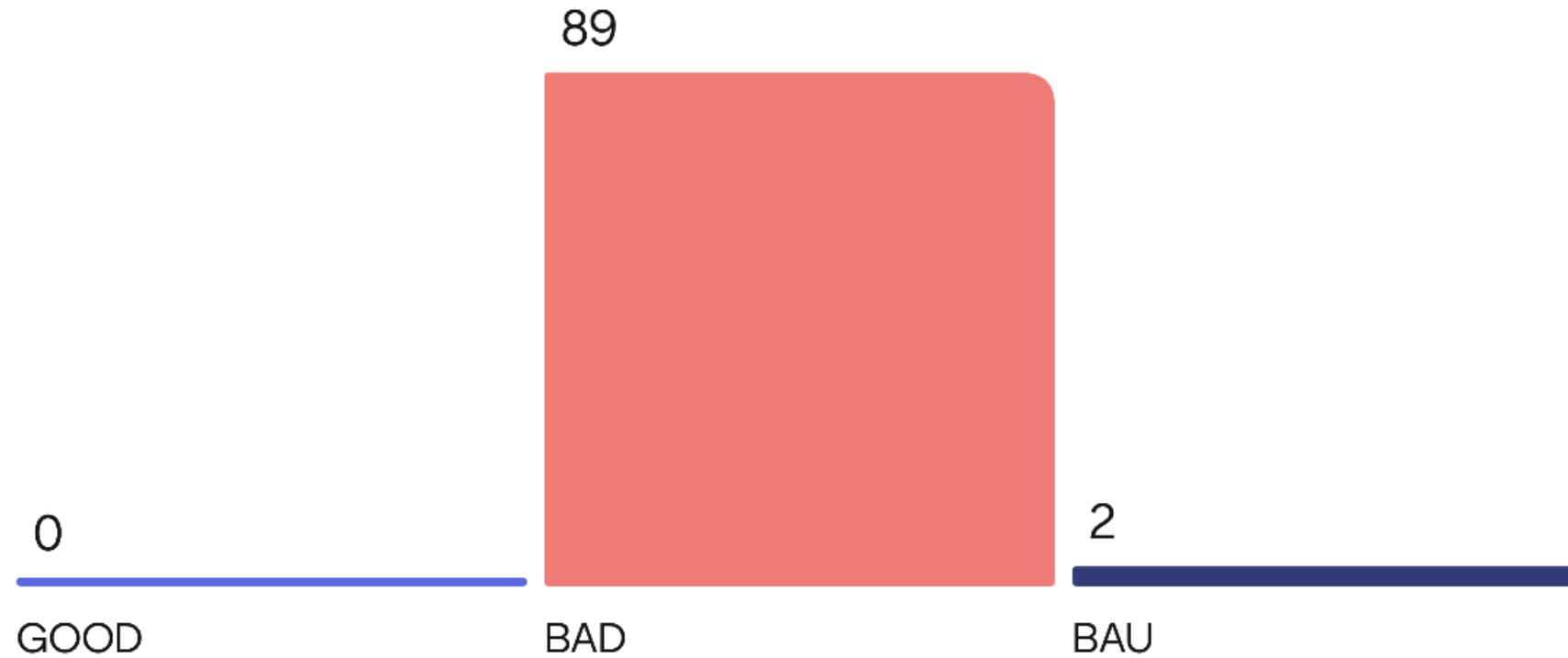
What do you think the **impact** of this change will be for-

- Data subjects
- Controller organisations
- You, as a DP professional

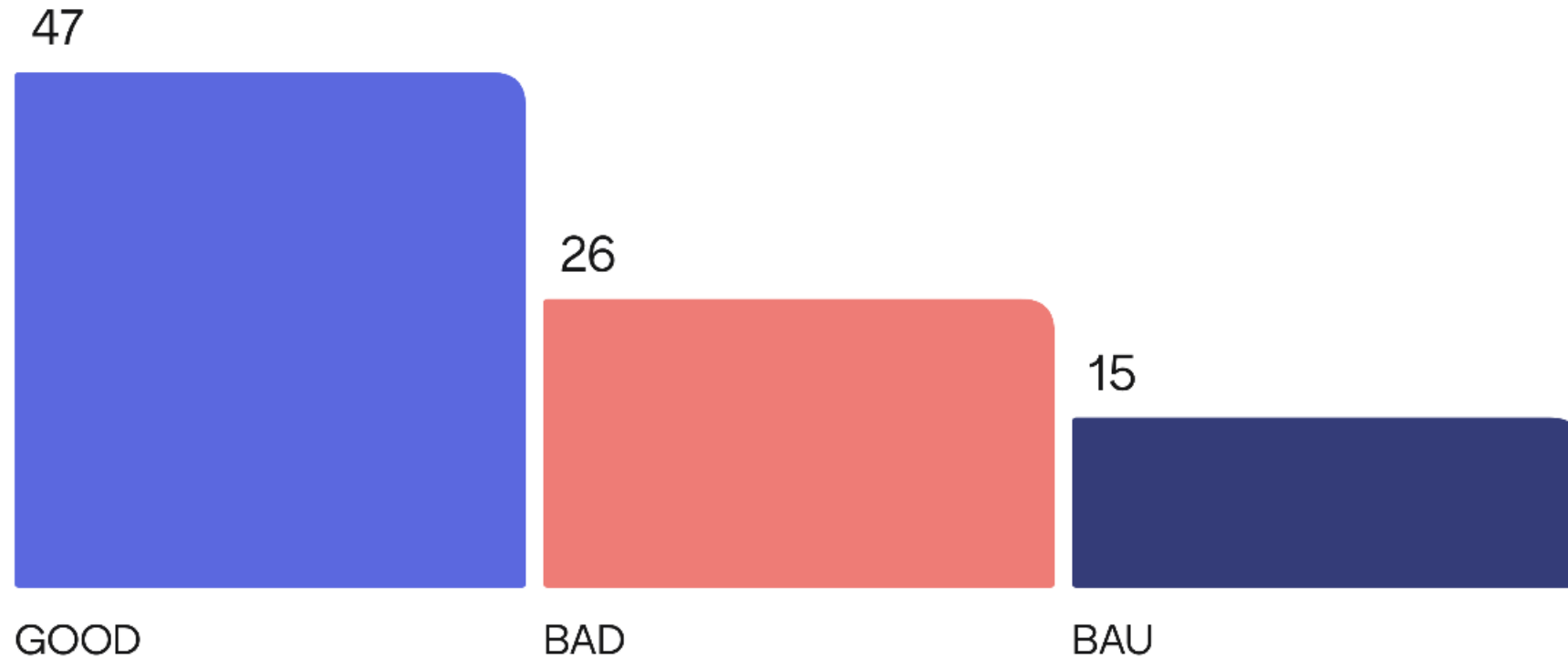
What **challenges** do you foresee?



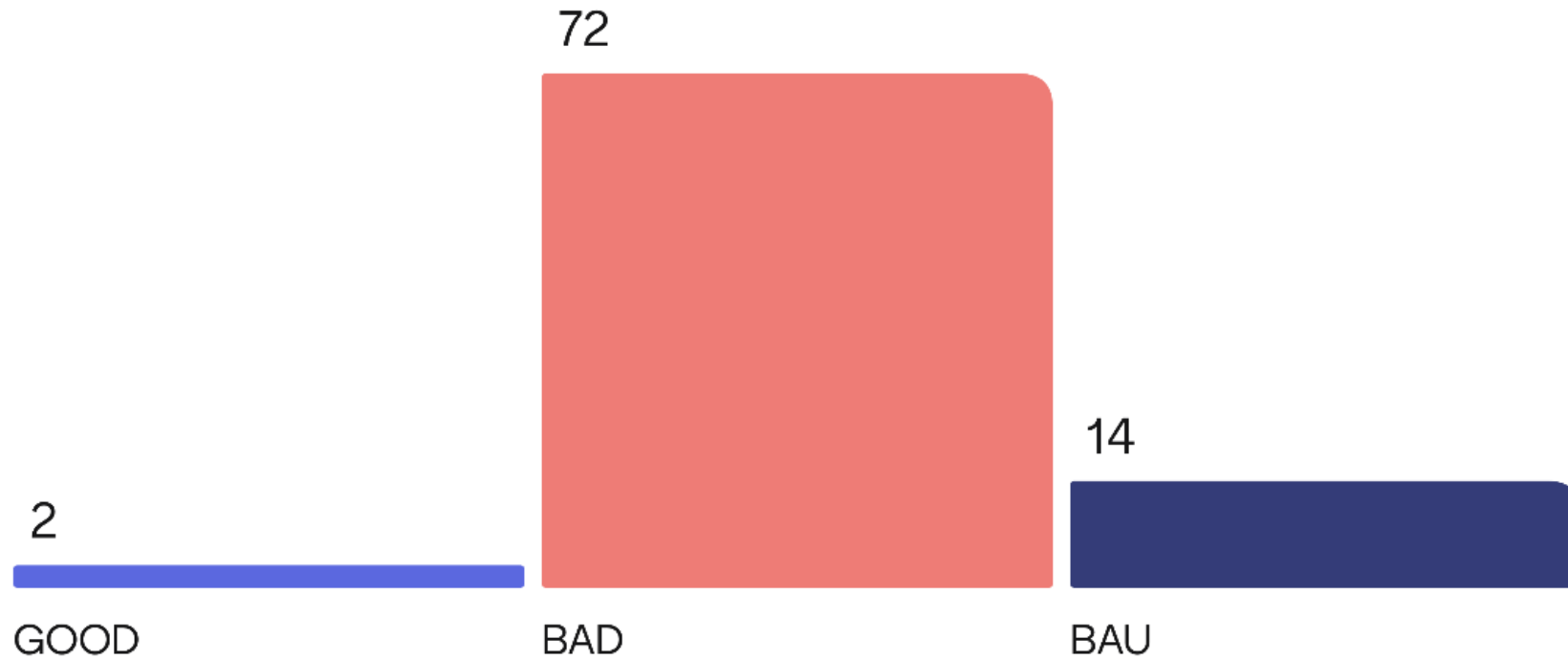
Q4: Automated decision-making - Impact for data subjects?



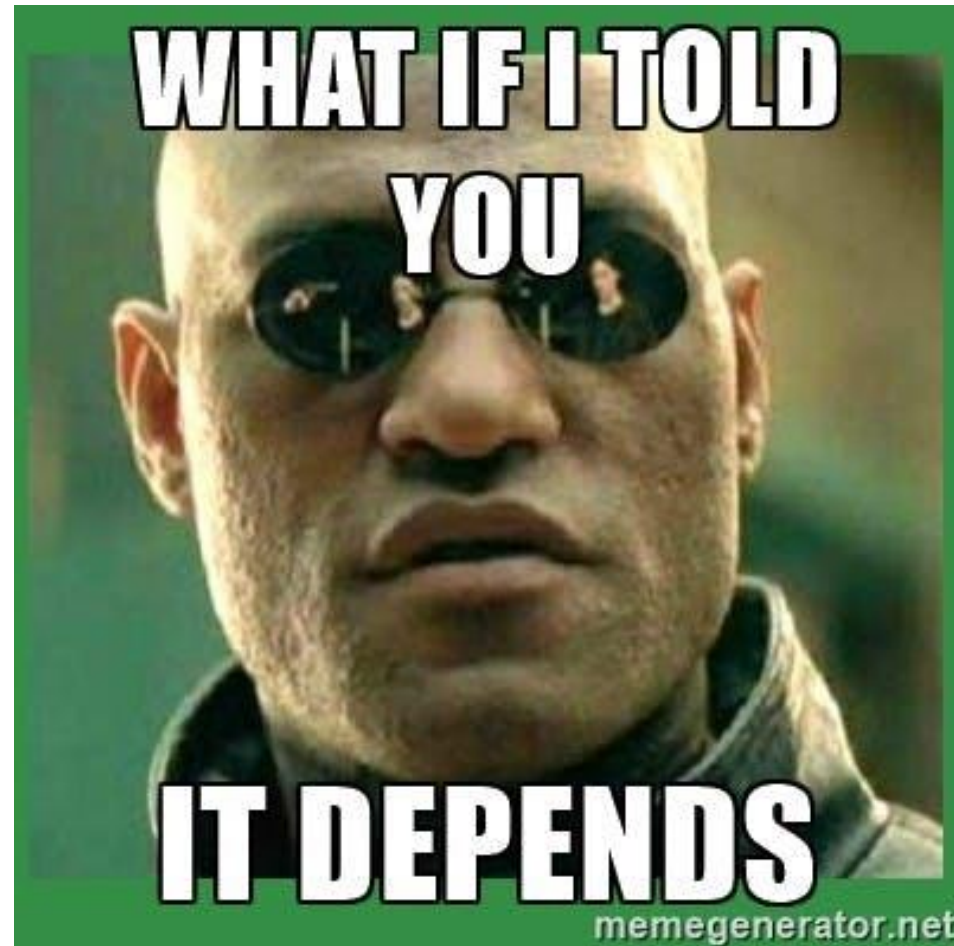
Q4: Automated decision-making - Impact for controller organisations?



Q4: Automated decision-making - Impact for you, as a DP professional?



OUR OPINION....



SO, WHAT NEXT?

- If it ain't broke, don't 'fix' it
- Keep hammering those Principles
- Keep an eye out for updated guidance
- Illegitimi non carborundum

QUESTIONS AND DISCUSSION





FROM BOARDROOM TO BREAKROOM

SOFT SKILLS EVERY DPO NEEDS



MEET YOUR SPEAKER



GILLIAN COSSEY

Director of Data Privacy Advisory, RSM UK

INTRODUCTION



20+ years experience in data protection and privacy



LET'S START AT THE BEGINNING



**DPOs / DP Teams
are often seen as
blockers!**

Why???



THE WHY





OK... SO WHAT NOW!

Law and compliance is what we do...

If the business don't like my answer (which is the legal version) then that is not my problem!

Fine – but where does that leave the business and what is the risk?

GUESS THE THEME



**What do the following
images have in
common?**





VISÃO

OBJETIVOS

MISSÃO













317

3

152

073



THE DPO CHALLENGE!



**DPOs are
expected to be...**

All of the above!



WHERE DOES THIS LEAVE US?

Find your strategy!

What kind of
DPO do you want
to be?

What do you
want to be known
for?

Culture

Relationships

Expertise,
knowledge and
skills

Theory/
commercial
advice

Revenue/shiny
toys vs
Compliance



MY DPO STRATEGY



- **Make friends – with everyone!**
- **Understand the “people” culture you are working in.**
- **Be approachable and friendly.**
- **Work together as a team.**
- **Be a team player!**
- **Gain business trust.**

LEADERSHIP SOFT SKILLS/QUALITIES



- **Listen! (And digest what people are saying)**
- **Must be able to influence.**
- **Calm in time of crisis.**
- **Solid / quick and rational decision making.**
- **Great communication.**
- **Keep learning.**

TO WRAP UP!







BREAK AND NETWORKING

14:40 – 15:15





DSARS IN PRACTICE

CHALLENGES AND SOLUTIONS

Chatham House Rule applies

You are free to use the information received, but neither the identity nor the affiliation of the speaker(s), nor that of any other participant, may be revealed



MEET YOUR PANEL



NAOMI MATTHEWS



ANDREW HARVEY



GLORIA BEGU



JOSH SCHWARTZ



OVERVIEW

- **Increase in DSARs**

Why? How to scale up? Use of extensions?

- **Tools & Tech**

What's used? What's market? Getting budget!

- **Roles & Responsibilities**

Who's involved? Who should be? Difference with scale?

- **Redactions and Case Studies**

Stats from a UK case? Tips and traps. Exemptions? Accuracy and AI.

- **Practices & Processes**

What's changed for the good or the bad?

- **Q&A**



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INTERESTING DSR STATS IN DEER V OXFORD (29,30)

- **Oxford was ordered to carry out an additional, prescribed, search:**
'...to carry out searches of its servers for data contained in emails or electronic documents sent to or received from 22 named individuals between specified dates. It also required the University to search the servers used by five departments and faculties.'
- **At a cost of £116,116, Oxford reviewed 508,161 emails and other documents**

Simmons & Simmons searched for the isolated words "cécile" and "deer" (disjunctively, and on a case insensitive basis), resulting in **8,281 documents [1.6%]**, of which:

- 3,415 documents [41%] were identified as irrelevant;
- 3,582 documents [43%] were identified as legally privileged and placed in bundles for review by the court pursuant to section 15(2) of the DPA ("the Target Bundles");
- 733 [8.9%] were identified as having some reference to Dr Deer, but as not representing her personal data: these were also included in the Target Bundles;
- 242 were identified as being sent to or received from Dr Deer (the "to/from documents") [reduced to 211 after deduplication = 2.9%]
- 74 [0.9%] were identified as outside the scope of the SARs by reason of their date; and
- 235 [2.8%] were identified as containing Dr Deer's personal data and as being disclosable
- Following elimination of duplicates, that 235 reduced to 63 and, of that 63, 30 had previously been disclosed and **33 had not** [0.4% of 8,281 and 0.006% of 508,161]

INTERESTING POINTS FROM DEER

- **Documents of which Dr Deer was the author**

Lewison LJ did 'not consider that these factors mean that the documents contain no "personal data". If the documents do contain personal data the data subject is entitled to know (as a minimum) for what purpose the personal data have been processed, and the persons to whom they have been disclosed. It is important to stress, however that the fact that the document contains personal data does not mean that the whole of the document is personal data. Moreover, the considerations mentioned by the judge may well be good reasons for declining to order disclosure of the document itself.'

- **Documents relating to the University's internal processes and how Dr Deer's complaints were to be handled**

Lewison LJ: 'I agree with the judge that these documents do not contain any of Dr Deer's personal data.'

- **Drafts of correspondence or reports**

Lewison LJ: 'The question is not whether Dr Deer was entitled to documents: that is never the question under the DPA. What Dr Deer was entitled to was information about personal data contained in the drafts. If she had already had the final version and the personal data did not differ from the personal data contained in the draft, then I agree that she would not have been entitled to any further information. Otherwise, she would prima facie have been entitled to the personal data contained in the draft.'

- **An e-mail asking whether Dr Deer might make further complaints**

Lewison LJ: 'I agree with the judge at [21] that [this e-mail] contains none of her personal data'

- **Documents relating to the University's budget**

Lewison LJ: 'the judge said, correctly in my view, that [these documents] do not contain Dr Deer's personal data with the exception of an e-mail of 16 June 2008 which does contain personal data consisting of Dr Deer's date of birth and the length of her service.'

- **Documents eg containing a list of staff members in the Department of Economics and their evaluation in terms of merit awards**

Lewison LJ: 'The same is true of the description of Dr Deer's research interests (apparently written by her) which is contained in a description of research interests of all the members of the faculty of Economics in a job description of the Professor of Political Economy. ... Clearly the whole of the document is not Dr Deer's personal data; but the description of her research interests is. The fact that she appears to have written it herself does not change that, not least because she may wish to check that her research interests have been accurately recorded. In my judgment Dr Deer was entitled in principle to the personal data about her recorded in those two documents, but not to the documents themselves. The same applies, in my judgment, to a list of Dr Deer's publications with which the judge dealt at [26].'

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THANK YOU

ENGAGE, EDUCATE, EMPOWER

