Accenture Software for
Human Capital Management

Solutions to help with GDPR Readiness

How our software helps

New complexity

HR executives understand more than most the importance of protecting personal data. Often responsible for tens of thousands of employee records and communicating across multiple geographic boundaries, privacy and data security is the foundation of successful human capital management.

While navigating individual countries' data regulations and legislation has been challenging enough, the landscape is about to become even more complex and demanding. The European Union (EU) data protection regulation which is valid since May 2018 aims to harmonize EU laws across all EU member states, but its impact will be felt far and wide—all non-EU businesses processing the data of people located in the EU will also need to comply with the these regulations.

The penalties for non-compliance are severe—up to 4 percent of annual global turnover or US$23 million (20 million Euro) whichever is greater. But help is at hand. HR leaders can address many of the stringent demands imposed by the General Data Protection Regulation (GDPR) by using software solutions that already have the appropriate functionality included.

GDPR highlights

As one of the most far-reaching legislations in recent years, GDPR has the interests of the individual at heart. In a digital world where data is the new currency, the regulations offer a means to protect personal data, placing the burden of responsibility on those who control and process data to better manage how it is collected and used.

For HR teams, it is important to carefully review the regulations as they apply to their own organization, but the aspects of their business which are likely to be affected are[1]:

Data breach
Breach notification to become mandatory and must be reported by the controller within 72 hours.

Data access
Data subjects will have the right to obtain information about the processing of personal data concerning them, where and for what purpose.

Data erasure
"The right to be forgotten" entitles the data subject to ask for personal data to be erased or halt its processing under certain circumstances.

Data portability
Rights for a data subject to transmit data to another controller.

Data protection/privacy-by-design
a requirement for the inclusion of data protection from the onset of the design of systems.

Data protection Officer (DPO)
Rules around the role of DPOs and the tasks required of them.[2]

"All personal data must be processed lawfully and transparently, and only for the purpose specified to the individual. ... which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed."

Article 5, "Processing and storing personal data"

"EU data subjects can expect companies to stop processing and to delete their personal data upon request under certain circumstances."

Article 17, "Right to be forgotten and to data erasure"

"The controller shall implement appropriate technical and organizational measures for ensuring that, by default, only personal data which are necessary for each specific purpose of the processing are processed."

Article 25, "Data protection by design and by default"

How Accenture solutions help

Alongside issues of regulatory compliance, human capital management departments are looking to boost productivity and high performance in their HR, talent and payroll functions. To this end, their systems and services need to ease and support their daily operations. In addition to maintaining secure, high-quality data, determining who has access to that data is fundamental to the HR role.

Using add-on software for **SAP ERP HCM**, the Accenture solutions can ease the management of production, test and development environments.

In addition, complementing **SAP SuccessFactors**, Accenture has developed extensions on the **SAP Business Technology Platform**. The solutions offer extensive customization and integration and help organizations to comply with the regulations. SAP HCM on-premise and SAP SuccessFactors already address many aspects of GDPR, such as role-based permission and access logging. Since Accenture products are tightly integrated with SAP's HR solutions, our solutions are well placed to leverage these features.
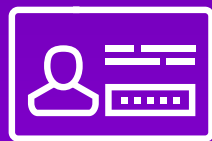
WHAT IS "PERSONAL DATA"?

Personal information is any data relating to an identified or identifiable individual, including names, e-mail addresses, identification numbers, bank details, medical information, and even a photo or an IP address. The GDPR also broadens personal information to biometric and genetic data.[3]

Concerned about the implications of GDPR?

Read the answers to typical queries below and refer to the symbols to see how GDPR readiness can be eased by Accenture solutions, on-premise or in the cloud.

	Testing, migration and consolidation		Data quality and auditing		Document lifecycle		On-premise/ cloud

How can I address pseudonymization?

The option of pseudonymization is referenced throughout the GDPR requirements. It is a term which refers to the scrambling of data so that it cannot be easily identified. The options around masking data, as offered by SAP, is helpful for productive environments. But for testing purposes, data masking hinders effective test execution, as changes in the data need to be transparent.

Accenture clone and test solutions offer powerful anonymization, modifying data in such a way that it protects sensitive personnel data from unauthorized access while enabling a realistic test environment.

How can I protect my data, whatever the environment, and better manage data deletion?

A typical SAP landscape includes, at a minimum, a development, testing and production environment, often enhanced by a training and pre-production system. Any personal data that remains in non-productive environments is subject to stringent regulations with respect to its deletion. Fines may be levied if information is easily identified or is used beyond its original purpose, meaning sensitive data must be managed wherever it is in the lifecycle. Test data is not a one-time use—it is needed time and again. In most instances, because data from the productive environment is the best data, an exact copy is often used for test purposes, making it essential that it is protected effectively.

Using intelligent anonymization rules, users can scramble the data before it is written to quality assurance to better protect personal data, on-premise or in the cloud, while maintaining business logic. The Accenture clone and test solutions also support data deletion where it is explicitly allowed by SAP's HR solutions.

How can I minimize the risk of data breaches?

For testing or training purposes, HR teams do not generally need a complete copy of all HR data in the SAP SuccessFactors system. Using the flexible options of the Accenture on-premise or cloud clone and test solutions, users can easily select data for relevant use cases and re-use these selections, making iterative testing of product updates more straightforward and secure.

Our solutions help to enable adherence to the GDPR "data minimization" principle that requires that the processing of personal data is "adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed." Limiting the exposure and access to personal data, in turn, minimizes the risk of a breach occurrence. What is more, the law expects organizations to report scenarios where data may be stolen or breached within 72 hours. Our solutions reduce the data footprint and the risk of data being exposed. In this way, those regulatory demands can be more effectively managed.

How can I check my data manages time-dependency and compliance?

Regular and consistent system checks are essential to control the quality of master data and associated processes. Any exception checking process can affect large data sets and the necessary management and analysis will add substantially to the HR and IT departments' workload. Accenture audit and compliance solutions can create the rules that help find data that is not compliant with GDPR.

For example, one important requirement of GDPR, the right to be forgotten, affects time-dependent data. According to the regulations, data can only be stored for a specific purpose and must then be deleted. But HR data in SAP or SAP SuccessFactors has time constraints which must be considered prior to its deletion. As a result, it is important that audit rules can either confirm that the data has been deleted or be able to easily identify data that must be deleted within the context of any established time-dependence.

With Accenture audit and compliance solutions, users can conduct complete checks across the whole population of HR records (active and terminated employees). In doing so, the software reminds the end user to start the deletion process for certain sensitive data (such as sickness or long-term absences), or for identified outdated master data, to better support overall decision making and compliance.

How can I better communicate with employees?

Finding a simple and easy way to create and distribute employee-related communications is the backbone of good HR communications. The Accenture document generation solutions for SAP ERP HCM and SAP SuccessFactors enable users to build and manage templates, offering a straightforward method to merge data from the respective back-end systems.

As the document generation solutions are designed to dovetail with these systems, they inherit the compliance capabilities offered by the SAP solutions and take advantage of key features, such as authorization, and role-based permissions that regulate who can access specific data being used in day-to-day communications.

The SAP SuccessFactors' backbone maintains track of access, modification and record deletion, which can be queried should an employee request it. This helps with additional demands, such as setting up document retention policies and how to apply them. Once documents are generated, they can be associated with a specific validity or expiry period, which aids compliance with the tracking and retention requirements of GDPR.

How can I avoid unnecessary storage of employee documentation?

HR executives require flexibility and control to handle high volumes of documentation, meaning the publishing and archiving process can be repetitive, time-consuming and manual. But the regulations leave little room for errors around the misuse of personal data, the storage of data or documents containing employee data. Our document management software solutions help to introduce paperless processes and render the storage of certain types of documents unnecessary.

The solutions can fully automate mass generation of documentation, to better control what is published and to whom. What is more, the solutions facilitate employee self-service, where documents can be generated on request by the employees themselves or e-mailed to them using password protection, also noted in the regulations.[4]

All documents specific to an individual employee are stored in designated folders once they are generated, a feature that avoids the issue of sensitive documents being stored on different servers and mitigates the risk of potential exposure due to duplication.

BEING READY

HR teams across the world need to demonstrate that they have the processes in place to comply with the regulations. When it comes to safeguarding personal data privacy, having robust software that can automate and manage the human capital management environment will help HR teams take ownership and meet the demands.

References

[1] http://www.eugdpr.org/key-changes.html

[2] https://ec.europa.eu/info/departments/
data-protection-officer_en

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[4] https://www.linkedin.com/pulse/managing-edocuments-under-new-
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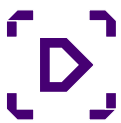
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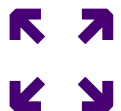
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