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THE PRIVACY POLICY CAME INTO FORCE, WHAT HAPPENS IN PRACTICE

Research paper

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Abstract

The article highlights issues related to leading an expert organization. The regulation is changing practices across Europe. Training organizations should set an example of complying with the requirements of the law. Each student must have a sense of security in the learning environment, including the production of official information and the secure processing of personal data in educational institutions. This article analyzes a questionnaire that explored the changes brought about by the EU Data Protection Regulation on the University of Applied Sciences. The survey was conducted in the spring of 2019 at four Finnish universities of Applied Sciences. People from different personnel groups responded to the survey. The responses were analyzed from the perspective of change management. The replies revealed how staff received information about the regulation, how the organization informed the changes, and whether the changes affected their work.

Keywords: Privacy Regulation, Change Management, Managing an Expert Organization.

1 Introduction

This research explores a new privacy policy that is related to organizations' knowledge. The EU's General Data Protection Regulation was adopted by the European Parliament and the Council in the spring of 2016. The objectives of the EU's general data protection regulation are to strengthen individual rights and freedoms, strengthen the internal market dimension, take full account of the global dimension of data protection, and strengthen the enforcement of data protection rules. (EU Data, 2021)

The EU General Data Protection Regulation allowed controllers and companies to review the lawfulness of their data protection practices, to make a two-year transition period by 25 May 2018, the current state of data protection / personal data security, and to analyze whether data protection and data controller data protection practices comply with new requirements. The new regulation aims to guide communities and businesses to take full account of data protection issues in their planning. (EU Data, 2021)

The research question is: What will change the new privacy policy in everyday life?

The study will investigate the phenomenon of what is happening and how the change will be translated into practice when the Privacy Regulation enters into force. With the entry into force of the Regulation, various provisions in the operating environment led to changes that need to be considered and which change how data are processed. However, according to Lewin (1947), change is not easy, and the same approach does not work in all situations. Managing change is challenging when there comes a setting from the outside that dictates policies. The organization needs to prepare things well and be informed on exactly how to proceed with the new model.

Burnes (2012, p. 25) states that the key to this stage of the change process is to make the behavior of groups and individuals more positive for change, because, without the support of groups and individuals, change can be quite short. A well-managed change helps employees accept new ways of working. In addition, monitoring is important to ensure that change continues.

There has been only a limited amount of research on this subject since the Regulation's entry into force is so short. Previous studies on the subject have been conducted mainly from a legal point of view. They focus on the rights of the registrar and deal with the Finnish legislation and new data protection legislation. In addition, with the help of the thesis, Oulu University of Applied Sciences[3], has studied how the processing of personal data changes with the decree. The responsibilities of the controller and the processor of personal data as well as the rights of the data subject were clarified. A slightly different perspective has been the book in the thesis of Seinäjoki University of Applied Sciences[4], in which the topic has been studied with the help of a questionnaire and the introduction and internalization of data protection in Finnish accounting firms have been studied. This study, which uses different perspectives, slightly ignores the topic of this article, but similar results have been obtained from the study, although the operating environment is slightly different.

To get an answer to this question, people were surveyed who work in an environment where the new setting changes processes. The subject is very timely, as the transition period has ended, and the regulation has entered into force on 25 May 2018. During the transition period, organizations were already working on processes, but work is still going on. Later, the effects of the change will also be seen when new practices are introduced, and the functioning of the changes is seen. It can be assumed that development needs will come when things go ahead and see how they work properly in different contexts. This topic also touches everyone because everyone must consider the requirements of the regulation in their work, in their working life, and in other activities.

Practical changes can be great in different organizations and environments where data is processed. One aspect of the research is also managing change and identifying change. The goal is to find out the problems and solutions for managing change and introducing new knowledge. Literature research found in change management will be key theories that will affect the background. Basic information on the Privacy Act has been gathered from OpiTietosuojaa.fi (OpiTietosuojaa, 2018). This site has a clear and comprehensive overview of all the privacy practices. In addition, the EDPS official website serves as a good background for all citizens. There are several articles in the study, so this article only covers part of the study.

2 Theory

2.1 Models of change

The study focused on how the regulation changes the practical operation of the organization. The external regulation will define a new way of working, so what will become important is how to inform the new instructions to the employees and how to get the employees to follow the new instructions.

Senge et al. (1999, p. 15) talk about a profound change in the context of organizational change, in which, in addition to staff values, aspirations, and behavior, organizational processes, strategies, operating practices, and various operating systems are renewed.

Change management has been studied from several different perspectives, some examples being the congruence model based on systems theory (Nadler, 1993), power and interaction networks as part of change management (Pfeffer, 1981), and the planned change model (Bullock & Batten, 1985). Here we first look at planned and linear change models, followed by models of more continuous change. It also looks at the key elements involved in managing complex change, including the roles of change actors, managing people, and things, changes in communication, and change resistance. In addition, a

[3] https://www.oamk.fi/en/about-oamk

[4] https://www.seamk.fi/en/

theoretical synthesis of the main points is presented. The four-field model of change presented by Buchanan and Badham (2008, p. 250) is used to aid the synthesis (see Figure 1).

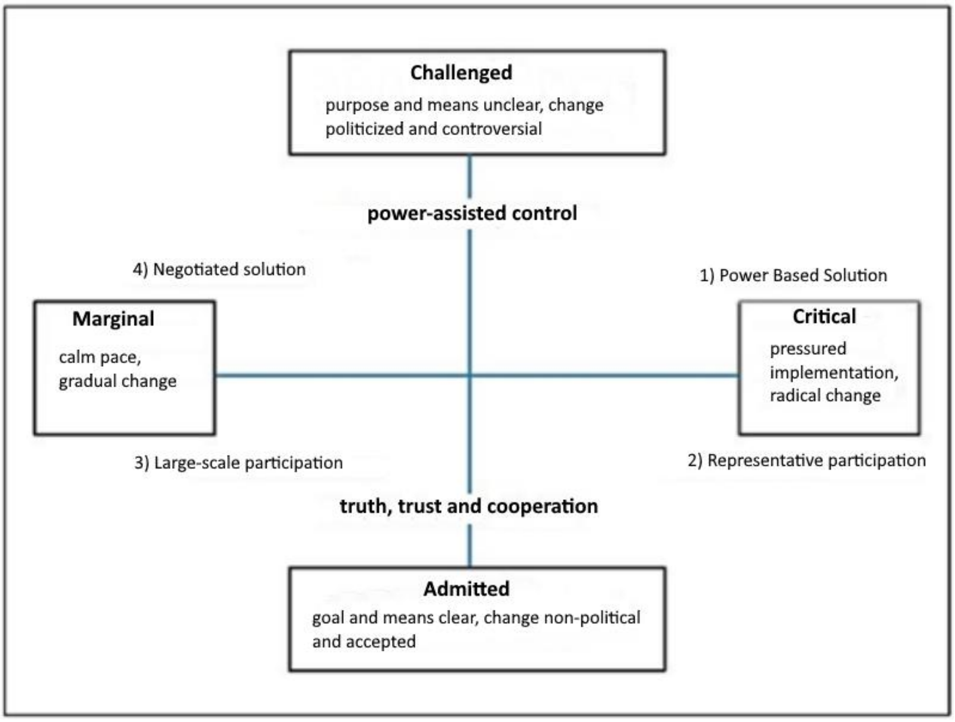

Figure 1. Four-field model of change, adapted from Buchanan and Badham (2008, p. 250).

2.2 The change process

Theoretical starting points for the implementation of the change process Models of planned change Kurt Lewin can be considered a real classic of change management, a theoretical scholar, and an illustrator of planned change. Lewin's (1947) most important theoretical model for change management has been the three-stage model of change, according to which the process of change has been seen to include the following three stages: unfreezing, moving, and refreezing. The Lewin cycle of change is outlined in the figure below (Figure 2).

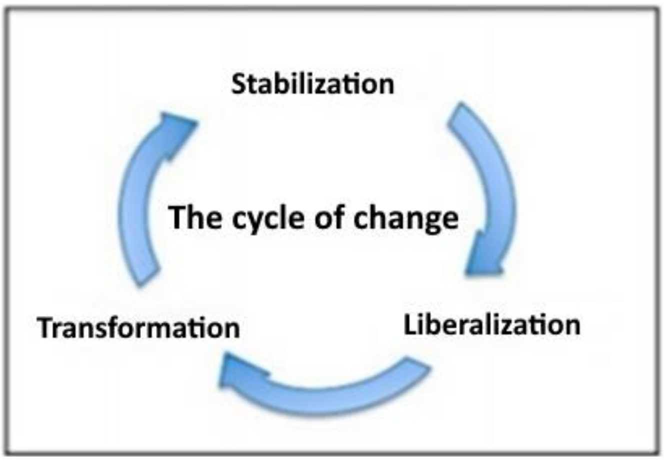

Figure 2. Cycle of change, adapted from Lewin (1947).

In the first phase of the change process, liberalization, the aim is to destabilize the balance in the organization so that the organization is ready for change. Thus, when the equilibrium of an organization is shaken, the old behavior can be discarded and at the same time, the new behavior can start successfully. However, change is not easy, and the same approach does not work in all situations. There may be different problems in the release and stabilization phases of change in different cases (Lewin, 1947).

The second stage of the change process, change, is an interactive stage with different activities and research. Burnes (2012, p. 25) states that the key to this stage of the change process is to make the behavior of groups and individuals more positive for a change, as, without the support of groups and individuals, change can be quite short.

In the stabilization phase, the final stage of the change process, the aim is to stabilize the change as part of the organization's culture and usage. It is therefore a matter of achieving a new state of equilibrium and consolidating it into the activities of the organization. At the same time, efforts are being made to ensure that the new patterns of behavior adopted are safe from a possible recession (Burnes, 2012, p. 25).

The most important thing in the stabilization phase is that the new behavior must be somewhat consistent with the rest of the behavior, personality, and learner environment, otherwise, it will lead to a new round of change (Schein, 1996).

Despite his solid position in change theory, Lewin's model has also been criticized. Kanter, Stein, and Jick (1992, p.10) see the Lewin model as too static and linear a description of the steps in the change process. They note that the model provides change leaders with a very simplified and straightforward way to plan operations as part of a complex and complex change process. For example, organizations can never be seen as in a completely liberated or stabilized phase. The various stages of change have also been found to overlap with each other, and the stages of change are thus not completely observable. Cameron and Green (2012, p. 124), on the other hand, state that the Lewin model has sometimes been used as a design tool rather than organizational development. In this case, the first stage of the process is called the planning period, the second is the implementation phase, and the third is seen as the implementation review phase. Linter's change models are also represented by Kotter's (1996) eight-step change model, which is particularly familiar with corporate change projects.

Kotter's eight-step change process is divided into the following stages: 1) Emphasizing the urgency and necessity of change, 2) Establishing a steering team, 3) Developing a vision and strategy, 4) Communicating change, 5) Empowering staff to act on the vision, 6) Ensuring short-term success, 7) consolidating improvements and implementing new changes; and 8) embedding new ways of working in the corporate culture. Based on the model, larger change projects should go through all eight steps involved in the change process. The logic of the change model is reflected in the fact that the steps should be carried out in a certain order and no steps should be omitted in the change process. According to Kotter, the failure of change is usually due to the Reverses of these eight stages, such as the neglect or failure of a particular stage of change. For this reason, each of the steps presented has its important place as part of the change process. (Kotter, 1996, pp. 3–21)

2.3 Criticality of models

Reverses of change can be fatal to organizational change projects, as they can slow down new change projects, provoke undue opposition, frustrate staff, and sometimes stifle the necessary change projects altogether (Kotter, 1996, p. 14). The eight-stage model presented by Kotter and other similar models of change has been criticized for its linear nature. Linearity means that things are seen to go as straightforwardly and logically as possible. According to Cameron and Green (2012), Kotter's model is a tool that appeals to multiple leaders. However, they criticize the model for not emphasizing as much a need for leadership in the last two phases as the first phases of the model required. Indeed, Cameron and Green state, citing their own experiences, that all stages of the transformation process are typically challenging to complete. (Cameron & Green, 2012, p. 127.) Buchanan and Badham (2008) see the application of these rational linear models in practice as difficult for a variety of reasons. First, the models identify an ideal set of rules to which management may not have sufficient time and resources.

Second, the models are seen as generalizations, in which case they provide little guidance on how to apply them in specific contexts. The third criticism has been that the models in question do not look at the relationships between the various components, nor at how these should be emphasized. As a final critique, Buchanan and Badham argue that these models typically accept as an aspect of organizational development that the failure of communication causes conflict within the organization. However, many organizational developments support activities, such as information-sharing forums, that have been created specifically to resolve conflicts. In addition, the political dimension of change has been overlooked in these models. (Buchanan & Badham, 2008, p. 249). These steps presented in the change models of Lewin and Kotter are typical of several changes.

However, change is not always a completely straightforward and logical process. For this reason, alongside linear change models, continuous and nonlinear change models have also been presented. For example, Cameron and Green (2012) have described the change as a continuous circular process (Figure 3).

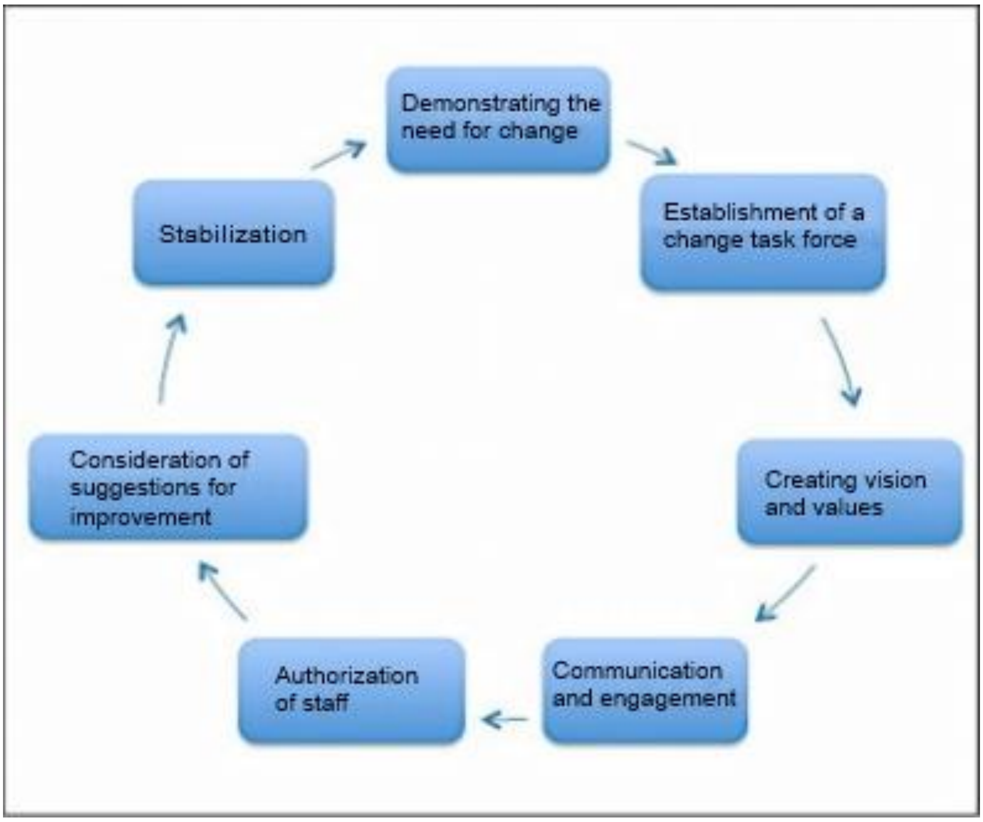

Figure 3. Cycle model of change, adapted from *Cameron & Green (2012, p. 127)*

The model bears similarities to the eight-step model of change presented by Kotter (1996) but is based on continuity of change rather than linearity. The model places particular emphasis on the role and importance of management at each stage of change (Cameron & Green, 2012, p. 127).

3 Background

3.1 Requirements of the Regulation

The new guidelines are important because the regulation brings with it requirements that have not existed before. It will be easier for the employee to adopt the new operating methods if the instructions are clear, and the new operating models are well managed for the use of the employees. A person has the right to know what information has been collected about him or her and how the information is stored. This places new demands on data controllers, as the data must be easily accessible.

The purpose of the Data Protection Regulation was to update data protection rules, create a single European digital internal market and increase transparency and openness in the processing of personal data. In addition, the purpose was to strengthen the rights of data subjects regarding the processing of their data. Overall, the Regulation also strengthened the level of European data protection outside the EU and the EEA. (Juncker & Timmermans, 2015) The European Data Protection Regulation was published in the Official Journal of the European Union on 4 May 2016, stating that the Regulation is directly applicable from 25 May 2018. The directive differs from the regulation precisely because it binds a Member State to adopt a law harmonizing the directive and the law, but as such the regulation is binding on both citizens and public authorities (Juncker & Timmermans, 2015).

3.2 Basic principles of the Data Protection Regulation

The relationship between the basic principles of the Data Protection Regulation can be illustrated as follows: According to the data protection criteria, personal data must have the right to be processed and the processing must be proportionate to the intended use. Finally, personal information must be deleted. The image I drew illustrates this (see Figure 4).

Figure 4. Relations of the basic principles of the Data Protection Regulation to each other.

3.3 Entry into force

The provision came into force in 2018. In practice, the normal operation of organizations and associations continued as before. Now that a few years have passed, there are no noticeable changes in human activity. Some things have been better considered, but there are still a lot of people who have not mentioned the issues in the regulation or are unable to influence it. The study raises the same questions as to when the regulation entered into force. On this basis, at least there is no awareness of the subject, and since it is no longer on the surface, it seems to have been forgotten and will not necessarily lead to changes that should have taken place.

A nationwide survey was conducted for this study, the results of which are discussed in this article. In a nationwide survey in the spring of 2019, the change was reflected in the activities of educational organizations. The study was conducted at four polytechnics located geographically in different parts of Finland. Respondents' job descriptions varied, as the questionnaire was sent to people representing different groups of staff.

An external rule or regulation can be a reactive change, in some way a compelling change to which an organization must respond. Reveals a deeper change in organizational change, in addition to staff values, aspirations, and practices, organizational processes, strategies, practices, and various operating systems are being reformed. In addition to fundamental change, the concept of change is also applicable (Senge et al., 1999).

The research questions sought to find out how the change caused by external regulation was directed at polytechnics. We wanted to find out how it was communicated and whether the necessary change had been made. In an expert organization, such as a teaching-driven polytechnic, leadership is different than in a traditional company. For example, running a commercial business is based on the success of the business and, in general, the profit at which employees are expected to be efficient. Leadership then involves managing events, that is, often sending assignments or requests for action to subordinates, and subordinates can be rewarded with bonuses or other means of good performance. Leading an expert organization is more of an effort to get people to work the right way as directed. A leader strives to be an example and leadership is transformative leadership.

4 Method

4.1 Target

The survey looked for answers to what the respondents know about the data protection regulation, and how the requirements of the regulation have changed the employee's work. The purpose of the questions was to find out whether the regulation changed thinking and practice, in the employee's basic job description. At the same time, it was investigated whether the change was visible in the organization and how it was made visible. The topics of the survey were the requirements of the regulation and practical implementation as well as the instructions on how it works in practice. We wanted to find out how and who gave instructions, where the employee knew how to act.

4.2 Implementation of the research

The survey was carried out in four polytechnics, which are geographically located in different parts of Finland. The questionnaire was answered by the Oulu University of Applied Sciences, the South-Eastern Finland University of Applied Sciences, the Seinäjoki University of Applied Sciences, and the Tampere University of Applied Sciences. The job descriptions of the respondents varied, as the survey was sent to people representing different staff groups. Respondents included teaching staff, management and administrative staff, and support staff, including research, development, and innovation personnel.

Finland is a very conscientious follower of EU didactics and regulations, which is why it is interesting to see how the new regulation will be taken over and how organizations will make the changes to their operating environment that will be needed immediately after the regulation enters into force. The EU's common data protection regulation will help everyone do the same, and university students will be treated equally in the data processing. The surveyed Universities of Applied Sciences are geographically located in different parts of Finland.

The survey focused on finding out how the change has been implemented in the organization. Research has been done on change management, and Kotter, for example, points out the stages of change, in theory, where putting change into practice requires several different stages and, if one of the stages fails, makes it difficult or impossible to implement the desired change (Kotter, 2012). In the Kotter model, change management is described in step of eight steps. Eight different steps according to which change are progressing and at the same time eight different steps where change management can fail. The implementation of change is affected by many different things and different steps that need to be considered (Kotter, 2012).

Change can fail if the need for change is not understood in the first step. Not to see threats and opportunities. Resources cannot be assessed correctly and motivation for change is difficult because the benefits of change cannot be sufficiently justified (Kotter, 2012).

The study highlighted the same problems very much that Kotter raises about change management. Although the transition period was long due to the introduction of the regulation, many places were not prepared in time. The measures that had to be taken as required by the regulation were left in many places until the end of the transitional period, and changes were urgently sought. The results of the survey highlighted the lack of adequate guidance and thus the compliance with the partially modified practices seemed to be at an early stage in the implementation of the Regulation. Over time, the change has not become completely permanent, or the way of working has not changed enough. Monitoring of the requirements of the Regulation has been very limited.

The information has come at an early stage, but the lack of management guidance and monitoring are problem areas that have led to minor changes and may not be enough to meet the requirements of the regulation. It does not seem to be fully committed to change in all respects. The example of management may not have been sufficiently visible to employees and the change in practice has not been demanded clearly enough. Employees have not been made to see the benefits of change sufficiently and, as a result, commitment has been lacking. As a result, the work steps for the various processes have not been updated, and the change has not been implemented on a practical level in every location. Over time, uncertainty about how one should act grows and it is easy to return to old practices that are perceived as familiar and safe. According to Kotter, the steps of change must go one step at a time and when all the steps have been completed, the change will succeed. About the introduction of the Data Protection Regulation, it seems that we are at some mid-stage and to succeed, organizations need to go back a bit and take new steps more strongly to achieve the best outcome.

The survey aimed to find out with simple questions how well the regulation is known how employees have been instructed to act and how the instructions are implemented in practice. In addition, it was investigated whether the guidelines had changed processes and how the change has been instructed.

Questions used in the survey:

Basic information

1. Sex
2. Unit/science field
3. The industry I mainly work for

Questions

When did you find out about the new privacy policy?

1. Where did you get the main information on the decision regarding the EU Data Protection Regulation?

General information about the job

1. How much of your work includes customer service (students, staff, and stakeholders)?
2. How often do you process personal data about students or staff?

Theme 1: Regulation requirements

1. How well do you know the EU Data Protection Regulation (GDPR)?
2. How have you been redirected to a change that has occurred due to the privacy policy?

Theme 2: Practical Doing

1. How do you consider the requirements of the Regulation in your work?
2. Have your working practices changed since the Regulation came into force?
3. What working practices have changed in practice?
4. Is there a change in working methods in your work environment, for other actors?

4.3 Analysis

The criteria for filtering the material were selected at the beginning of the analysis. The second criterion was information on the requirements of the Regulation to determine how the Regulation was communicated to the organization. Another criterion was a behavior change to find out what the regulation has changed and how. The issues of orientation and information on how the employee has worked after the regulation came into force were discovered. The defendant also had a free word in use, which in his own words can be further refined with his own experiences.

The analysis was continued by picking up inspirations in the mind map, the images that emerged from the answers. With the help of the mind map, things that combined answers were clarified. The map identified key issues such as external and internal actors, as well as changes in the practices and requirements of the regulation. Through these, a more accurate picture of impressive things began to emerge.

The mind map works well when you want to do a situation analysis. It can be used to clarify and bring out ideas. For example, it may be a matter of identifying and refining problems. Figure 5 below illustrates a mind map.

Figure 5. Thought Map.

5 Results

In general, the answers show that the information is well managed. However, based on the responses, support services appear to have been better informed than the training side. Figure 6 shows how the data has been processed in different industries. Individual anomalous responses may be due to the marginal normal flow problems that always occur in large organizations.

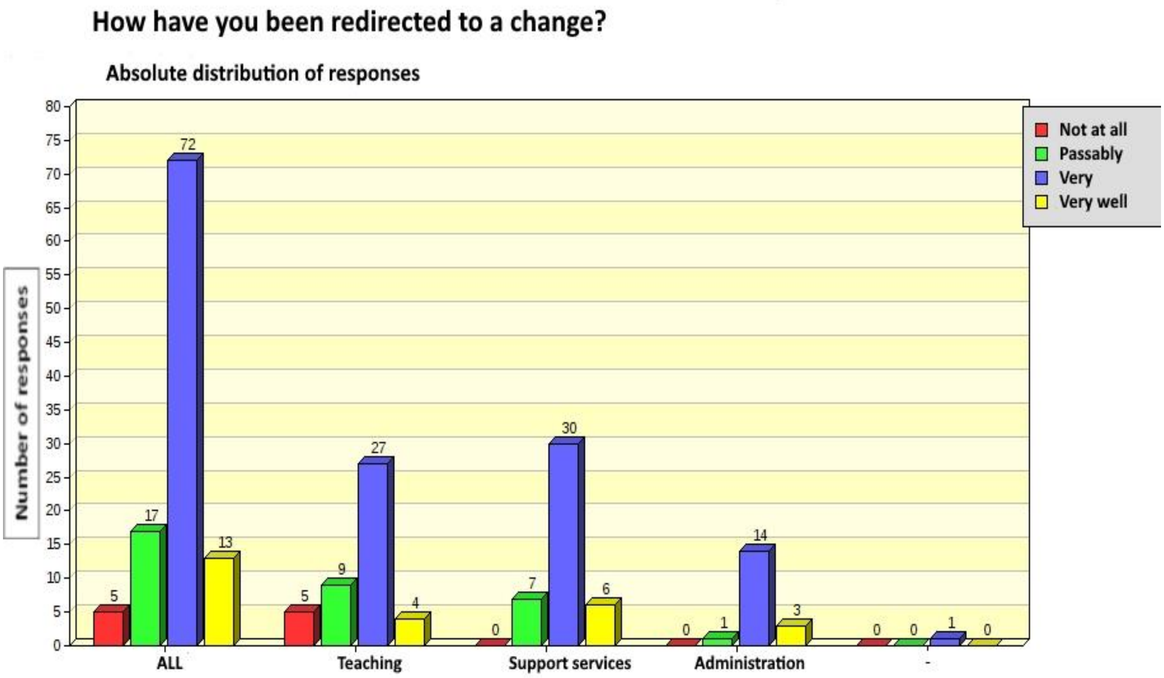

Figure 6. The answers to the question: How have you been redirected to a change?

In an expert organization, some subordinates also lead themselves. In teaching, teachers typically develop their skills independently, so reform knowledge can also be absorbed independently, without the guidance of a tutor. This is also reflected in the responses from different disciplines.

The question: How have you been redirected to a change that has occurred due to the privacy policy?

According to the responses, the majority believe that the information is well managed. Some respondents have received very good instruction in the Data Protection Regulation. However, some feel that information has been lacking and some have not received any guidance at all. Most respondents say they have received good information about the data protection regulation. Free word in the field It was said that there had been training in the matter and employees were required to take a data protection test.

“The orientation has been done both through information and training.”

“The organization’s staff had to conduct an online privacy exam.”

The picture of absolute distribution shows well how most feel they have received good change guidance. Only a few responses revealed that there was no guidance at all. This may also be due to communication. The result is shown in Figure 7.

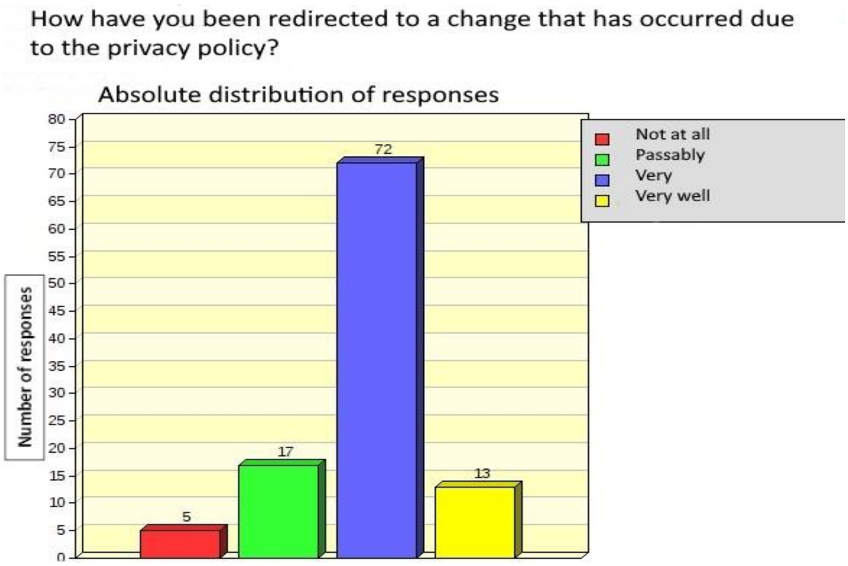

Figure 7. Redirected to a change.

Here are examples of answers to different themes.

The question: How well do you know the EU Data Protection Regulation (GDPR)?

Most report knowing the requirements well. This result supports the idea that change management has been relatively successful. However, some report that they do not know very well so one could conclude that the communication has partially failed. Some respondents stated in their free responses that they had not received any information about their organization but had heard about the news or something else. They were therefore aware of the regulation and its requirements, even though they had not received information from their organization. Respondents also found those who were unfamiliar with the regulation. Their share was very small and says even more that communication has not reached everyone. However, most respondents were familiar with the regulation in some way, Figure 8 shows the distribution of responses.

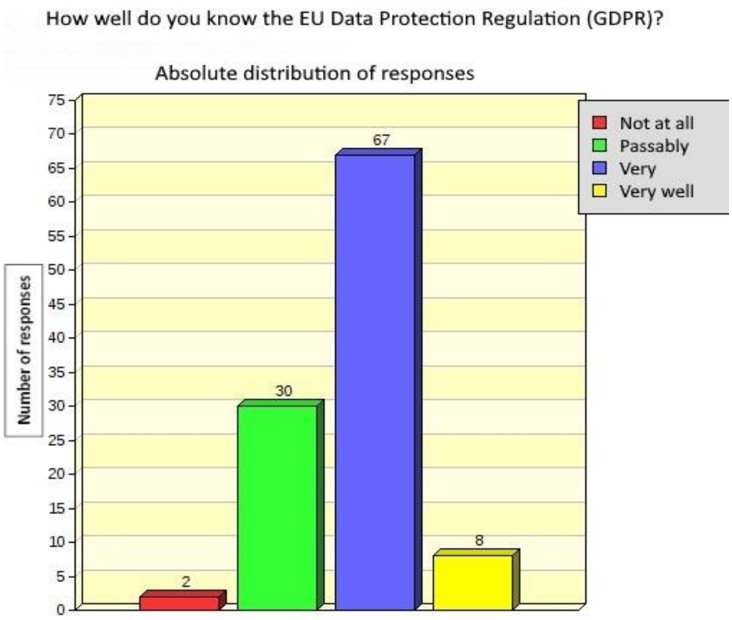

Figure 8. Knowing regulation Requirements.

The question: Have your working practices changed since the Regulation came into force?

Most of the respondents had changed their working methods only slightly. The second most had changed their way of working a lot. Very little has changed for a small number of respondents and not for some respondents at all. Figure 9 shows the distribution of responses to changes in working methods.

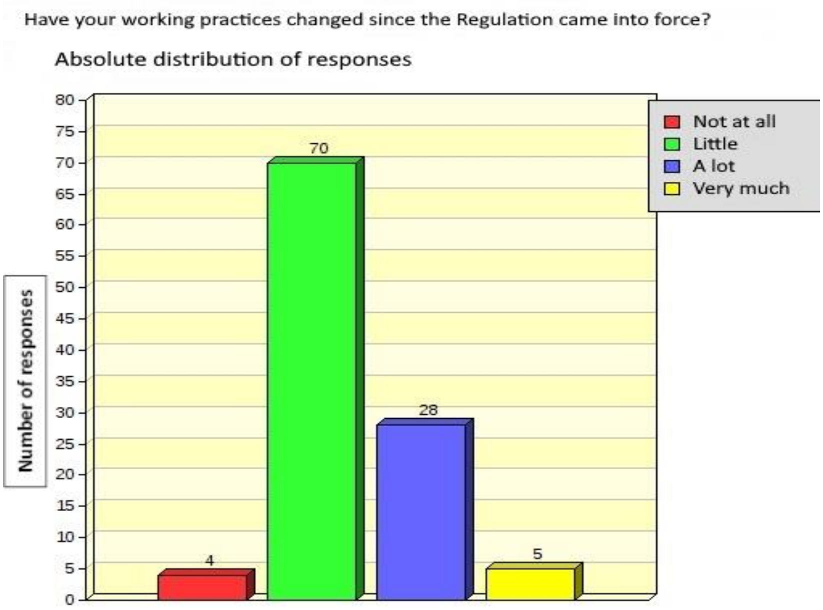

Figure 9. Working practices changed.

Changes in working methods may be the result of changes in processes, but they may also be the result of their actions. For example, if you have left doors open in the office when you leave the room, you may have changed the activity so that the room door is now locked when you leave. This ensures that no outsider can see any paper that could contain personal information. Respondents also think that it would be good to further increase their knowledge.

A large majority of respondents stated that their working practices had changed little since the entry into force of the Regulation. This may be because there is no information on what should be changed. The regulation and its entry into force have been announced, but there is still no guidance on its implementation. The results show that simply notifying a change is not enough, and new guidelines should also be made available to employees. Changing work habits is unlikely if the employee is unable to do a familiar task in a new way. Managing change is key at this stage so that new ways of working can be introduced in addition to information.

The changes in the processes that took place due to the data protection regulation are discussed in another article that is part of this study. This article discusses the management of change and its implementation.

6 Discussion

The article describes the situation in which the regulation came into force. In addition, the first half of the year was studied by studying the environment and asking the employees. The survey was answered by 107 employees from different occupational groups. It takes time to learn new ways of working and stabilizing in everyday activities. The monitoring and management of change in policies must be systematic so that employees understand the need for change. In the longer term, it will be seen whether the processes have been reformed and whether the practice has changed sufficiently.

Senge et al. (1999, p. 15) speak of a profound change in the context of organizational change, in which, in addition to staff values, aspirations, and behaviors, organizational processes, strategies, operating practices, and different operating systems are renewed. This supports the idea that change is holistic, with good guidance and follow-up as processes change.

The debate on whether the necessary changes have been made and whether the changes required by the Data Protection Regulation have been considered needs to be continued. The results of the study show that we are aware of the problems, but in practice, the changes are still little visible. Forced change from the outside emphasizes the need for leadership.

Burnes (2012, p. 25) states that the key to this stage of the change process is to make the behavior of groups and individuals more positive for change, because, without the support of groups and individuals, change can be quite short. A well-managed change helps employees accept new ways of working. In addition, monitoring is important to ensure that change continues.

Based on the results of the survey, there is still worked to be done in operational management so that virtually everything starts to work as it should. Care must be taken to guide and engage members of organizations, as the requirements of the Regulation have not yet been fully understood.

7 Conclusions

The survey provided a good picture of the attitude of the University of Applied Sciences field to the new regulation. The regulation determines the protection of the individual in everyday work, and because of the need to handle personal data somewhat, it is important to create an environment where requirements are considered in everyday life as part of everyday work. Teaching and guiding new ways of working and managing activities play an important role in user learning to change. In practice, continuous monitoring should also be a part of everyday life, so that shortcomings can be tackled as soon as they occur. Customers, who are all actors in higher education institutions from staff to students, should feel safe and aware that their personal information is safe.

The results of the survey show that the information has been provided quite well in the organizations. In part, it seems that the information has not been received so well. Some points also show that, even though the information has been obtained, it has not been understood or can be combined with one's work, and for this reason, it is not felt necessary to change one's way of working, even if necessary. Now that time has passed and the requirements of the regulation are beginning to appear in everyday life, it is good to go over the key changes that the regulation will bring. It is a good idea to refine the guidelines and continue to follow them so that the renewed practices can also be recorded in the renewed processes and thus in everyday life. It appears that monitoring has failed and that, as a result, practices have not changed sufficiently in all respects.

In the future, it would be interesting to find out how a similar change has been put into practice in other countries such as Germany or Sweden.

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