

Steps to take now...

STEP		ACTION WE HAVE TAKEN AS A SCHOOL
	<p>Awareness</p> <p>Ensure decision makers and key people in our school are aware that the law is changing to the GDPR. They need to appreciate the impact this is likely to have.</p>	<p>TRAINING</p> <ul style="list-style-type: none"> Headteacher, Business Manager and Chair of Governors attended Diocese GDPR briefing sessions for schools. (March 2018) Governors watched GDPR briefing video. (March 2018) Whole-school staff meeting run by Nick Langley (123ICT Director), to ensure all staff are aware of the implications of the GDPR. (May 18)
	<p>Information We Hold</p> <p>Document what personal data we hold, where it came from and who we share it with. We will organise an information audit.</p>	<p>DPIA ASSESSMENTS</p> <ul style="list-style-type: none"> For areas where personal data is processed or records stored, and particularly higher risk areas, a Data Protection Impact Assessment (DPIA) form is completed. Information Asset Register - Complete the Information Asset Register (IAR). Records Management Policy produced detailing information we hold. (May 2018)
	<p>Communication Privacy Information</p> <p>Review our current privacy notices and put a plan in place for making any necessary changes in time for GDPR implementation.</p>	<ul style="list-style-type: none"> GDPR Compliance action plan agreed to address the steps needed to be taken pre and post 25 May 2018. Approved by H&S Governors. (May 2018) GDPR Privacy Notice for pupils and another for staff written and approved by governors, to explain why and how pupil/staff information is shared. (May 2018) Data Protection Policy updated for GDPR. Approved by H&S Governors. Published on website and parents informed via newsletter. (May 2018)
	<p>Individuals Rights</p> <p>Check our procedures to ensure they cover all the rights individuals have, including how we should delete personal data or provide data electronically and in a commonly used format.</p>	<p>DATA PROTECTION POLICY</p> <p>These procedures are included within Data Protection Policy. (May 2018)</p>
	<p>Subject Access Requests</p> <p>Update our procedures and plan how we will handle requests within the new timescales and provide any additional information.</p>	<p>DATA PROTECTION POLICY</p> <p>The process for making subject access requests is included within Data Protection Policy. (May 2018)</p>
	<p>Lawful Basis for Processing Personal Data</p> <p>Identify the lawful basis for our processing activity in the GDPR, document it and update our privacy notice to explain it.</p>	<p>INFORMATION ASSET REGISTER & RECORDS MANAGEMENT POLICY</p> <p>Our Information Asset Register and Records Management Policy detail the lawful basis for the information we hold.</p>
	<p>Consent</p> <p>Review how we seek, record and manage consent and whether we need to make any changes. Refresh existing consents now if they don't meet GDPR standard.</p>	<p>ACCEPTABLE USE POLICY</p> <p>Acceptable Use Policy has been reviewed and revised to ensure compliance with GDPR. Parental consent is being re-sought to reflect changes in the new standards.</p>
	<p>Children</p> <p>Start thinking now about whether we need to put systems in place to verify people's ages and to obtain parental consent for any data processing activity.</p>	<p>ACCEPTABLE USE POLICY</p> <p>Children's dates of birth are verified when places are offered in the school's Nursery.</p>
	<p>Data Breaches</p> <p>Ensure we have the right procedures in place to detect, report and investigate a personal data breach.</p>	<p>DATA PROTECTION POLICY</p> <p>Personal data breach procedure included within Data Protection Policy as Appendix One. (May 2018)</p>
	<p>Data Protection by Design and Data Protection Assessments</p> <p>Familiarise ourselves with the ICO's code of practice on Privacy Impact Assessments as well as the latest guidance from the Article 29 Working Party, and work out how and when to implement them in our school.</p>	<p>SUPPLIER COMPLIANCE</p> <p>Process of contacting suppliers/data processors/software companies to check they are GDPR compliant is being undertaken by Darrell Marchand, Business Manager. Completion date set for end of academic year.</p>
	<p>Data Protection Officers</p> <p>Designate someone to take responsibility for DP compliance and assess where this will sit within our school's structure and governance arrangements. Consider whether we need to formally designate a DP Officer.</p>	<p>DATA PROTECTION OFFICER (DPO)</p> <p>The DPO for our school is Louise Askew, Governance & Compliance, River Learning Trust. Louise is contactable via: laskew@riverlearningtrust.org</p> <p>Chair of Governors, Nicola Lacey is our Data Protection Link Governor</p>

Further Actions post 25 May 2018

- Review and update other related policies relating to data protection – ICT Policy, Freedom of Information Policy and Acceptable Use Policy. Table for approval at Summer Term 2018 Governor’s Meeting.
- Annual IAR review - Put into place an annual cycle for reviewing that the IAR file is up-to-date and updating any DPIA forms as appropriate and have a checklist for running through which files/information to delete/securely destroy each year.
- New staff and regular volunteers - Ensure new staff and regular volunteers have data protection briefing as part of their induction.
- Keep Supplier Compliance Register up-to-date.
- Engage with PTA to define responsibilities in relation to personal data.