

Tarleton Mere Brow CE
GDPR Action Plan (2018)

Action Plan for: GDPR (General Data Protection Regulation)		Overall Target: To ensure that the school is compliant in all areas of GDPR by 25/5/18	
What does the subject provision look like now?		How do you know?	What is your vision?
<ul style="list-style-type: none"> The school is currently compliant in data protection regulations The school recognises the need to further review and develop data protection procedures in light of the new GDPR regulations which come into effect on 25/5/18 Headteacher & Bursar have attended a training session on GDPR for schools (Jan 2018) 		<ul style="list-style-type: none"> Review of current practice GDPR Training Discussions with other schools 	<ul style="list-style-type: none"> The school is compliant in GDPR and the 7 data protection principles are in place All staff and Governors understand their responsibility in terms of data protection and there are no instances of data protection breaches A knowledgeable and effective DPO is in place Systems are in place to ensure on-going new initiatives are compliant with GDPR
Actions	Method of Delivery (Including Time Scale)	Lead	Success criteria
1. Review and revise a new privacy notice.	<ul style="list-style-type: none"> Download DFE privacy notice and substitute for existing notices. Privacy notice on new Data protection page of website 	HT BU	100% stakeholders can access school privacy statement ensuring transparency
2. Gather information about the data you hold.	Complete matrix to gather information about the data that you hold that includes the following: <ul style="list-style-type: none"> Why is personal data processed? Whose personal data is processed? What personal data is processed? When is personal data processed? Where is personal data processed? 	HT	100% of matrix completed and used to identify further actions
3. Adopt a retention schedule.	By 23/3/18 <ul style="list-style-type: none"> Review retention schedule and consider use of LCC or Information Records Management Adopt a retention schedule By 25/5/18 <ul style="list-style-type: none"> Ensure retention schedule is applied 	HT BU	By 23/3/18 Retention Schedule is in place By 25/5/18 100% Retention Schedule as a working document by relevant staff
4. Raise awareness with staff & governors about the dangers of inappropriate data sharing.	<ul style="list-style-type: none"> SLT have reviewed data leaks to the organisation and have identified potential risks (i.e. proof of identity; caution over the phone; if in doubt asking someone who knows) SLT have identified any changes in practice required and have considered different options, recording changes, reasons why and next steps, including communicating with staff Discussions with Governors at meetings to raise awareness Discussions with teaching and non-teaching staff to raise awareness 	HT	100% of data protection risks identified and actions in terms of changes in practice considered and actioned By 23/3/18 100% staff and governors aware of GDPR and dangers of inappropriate data sharing 100% staff and governors aware of changes in school practices in terms of data protection
5. Check contracts for third party processors.	By 30/4/18 <ul style="list-style-type: none"> A list of third party data processors has been created For each data processor on the list, it has been checked whether an SLA or contract is in place Where a contract is not in place, either a contract is set up or 	Ht BU	By 30/4/18 100% of third party processors identified 100% third party process have contract/SLA in place with the school

	<p>working with that service is terminated</p> <p><i>Examples of third party data processors include: IT Supplier; Confidential Waste; Software Supplier; Hardware Supplier</i></p>		
6. Create a data protection policy or handbook.	<p>By 30/4/18</p> <ul style="list-style-type: none"> - Research appropriate information to be included in a school data protection policy - Write policy and share <p>By 25/5/18</p> <ul style="list-style-type: none"> - Start to work from policy <p>By June 18</p> <ul style="list-style-type: none"> - Policy approved by Governors at Resources Committee Meeting 	HT	<p>By 30/4/18</p> <p>Policy completed and is fully GDPR compliant</p> <p>100% Staff/Governors have received the Data Protection Policy</p> <p>By 25/5/18</p> <p>100% Staff/Governors adhere to Data Protection Policy</p> <p>By June 18</p> <p>Governors have approved Data Protection Policy</p>
7. Appoint Data Protection Officer (DPO)	<ul style="list-style-type: none"> - Consider who would be best placed to be the DPO through having conversations with cluster schools/SLT/Governors - Using the information available make a decision on who the DPO is <p>By 30/4/18</p> <ul style="list-style-type: none"> - DPO in place - DPO has had relevant training to be successful in the role as they will need to understand the rules of data protection 	HT	<p>By 28/2/18</p> <p>100% options considered on who is best placed to be DPO</p> <p>Decision on DPO made and communicated</p> <p>By 30/4/18</p> <p>100% understanding of their role (DPO)</p> <p>DPO is fully involved in GDPR compliance</p>
8. Ensure new projects and initiatives are compliant with GDPR	<p>By 25/5/18</p> <ul style="list-style-type: none"> - Download 'Conducting a Privacy Impact Assessment Code of Practice' - Ensure it is understood and adapt the model templates for use in school - Ensure paper work for a Privacy Impact Assessment (PIA) is in place <p>On-going</p> <ul style="list-style-type: none"> - PIA is used to identify potential data protection risks when considering new projects and initiatives for the school 	HT	<p>By 25/5/18</p> <p>100% templates for a PIA for the school is in place</p> <p>Systems for consideration of further data protection in place</p>
9. Data Protection page on school website informs all stakeholders of how the school holds and processors data.	<p>By 25/5/18</p> <ul style="list-style-type: none"> - School website has full information on the 7 Data Protection Principles - Information is easy to find and easy to understand - A link to the Data Protection Policy is contained on the page <p>On-going</p> <ul style="list-style-type: none"> - Data Protection page is updated to reflect the most up-to-date information 	HT	<p>By 25/5/18</p> <p>Data Protection page on school website conveys 7 Principles of Data protection</p> <p>100% of stakeholders can access up-to-date information on GDPR/data protection</p>

Next Steps:

