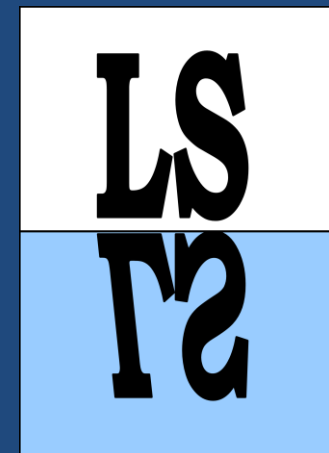


GENERAL DATA PROTECTION REGULATION



Lakeside School
Action Plan
Updated 3rd May 2018

| Current Position | | | | | | |
|---|--|-----------|--------------------|--|--|---|
| The legislation regarding Data Protection is changing and new laws will come into effect on 25 th May 2018. The school holds large amounts of sensitive data relating to pupils and staff. Data Protection is a focus of Ofsted in addition to being regulated by the Information Commissioner's Office therefore the school needs to ensure it is compliant with the new regulations. | | | | | | |
| Action Plan | | | | | | |
| Item | Action | Timescale | Person Responsible | Evidence | Success Criteria | Progress/RAG |
| 1. | Determine who will be the Data Protection Officer | 20.11.17 | FGB | Decision minuted at FGB 20.11.17. DBR appointed as DPO | DPO Appointed | Completed 20.11.17 |
| 2. | Provide information on GDPR from Hants Legal Services to Governors | 15.01.17 | DBR | Action minuted as completed at FGB 15.01.17 | Guide circulated | Completed 08.01.18 |
| 3. | Data Map all data, electronic and paper, held within school | 31.03.18 | DBR | Database of data held within the school | Database created to determine: <ol style="list-style-type: none"> 1. Description of data 2. Category of data 3. How data is collected 4. What data is used for 5. Legal basis for using data 6. Location of data 7. If the data leaves School 8. Who the data shared with 9. Who can access the data 10. How long the data is kept 11. Who owns/uses the data | Draft created. DBR meeting with data holders to confirm draft. Draft data security questionnaire completed and to be sent to staff. HCC DPO full DBR wait-listed for next available. Once training completed data mapping will be signed off. |

| Item | Action | Timescale | Person Responsible | Evidence | Success Criteria | Progress/RAG |
|------|--|-----------|--------------------|--|--|---|
| 4. | Categorise data | 31.03.18 | DBR | Data categorised as Personal data or Special category data | Data categorised within database | Draft completed as action 3. |
| 5. | Review data held to determine if data is secure and appropriate. | 31.03.18 | DBR | Database updated to reflect changes needed | All necessary and legal data is mapped and where necessary data no longer required is destroyed. | In progress – DBR meeting with data holders. |
| 5.a | Review quality assurance checks on Therapeutic and Alternative Provision providers to ensure GDPR compliant. | 30.04.18 | STE/DBR | Quality Assurance records | Evidence that providers are compliant | |
| 5.a | Publish retention schedules, privacy notices and name DPO on school website | 31.05.18 | DBR/MCN | Information on website | Parents and staff can access information | |
| 5.b | Review if Education Psychologist & Speech Therapist should have access to Pupils' files | 31.05.18 | DBR | Outcome of review communicated to staff and therapists | Clear guidance on therapists access to files | DBR consulted with STE. Therapist will have access to EHCP without appendices only. If access to further information is required DPO will be consulted. |
| 5.c | Ensure all filing cabinets holding pupil files are locked. | 31.05.18 | LMK | Filing cabinets are locked | Controlled access to pupils files | New keys are on order. Filing cabinets are in a secure location however additional security considered appropriate to ensure GDPR compliance. |
| 5.d | Review options regarding signing-in book in reception to secure visitors information | 30.04.18 | DBR | New signing-in arrangements | Visitors information is secure | |
| 5.e | Review records for parental permission for trips and activities to ensure records are taken and kept for required period | 30.04.18 | DBR/LMK | Central file kept of parental permission received. | School compliant with HCC and DfE guidance | |
| 5.f | Confirm data mapping entries for Governors are accurate and complete | 30.04.18 | DBR/JST | Governors' entries are reviewed and updated | Accurate record of Governors records | |

| Item | Action | Timescale | Person Responsible | Evidence | Success Criteria | Progress/RAG |
|------|--|-----------------------------------|--------------------|---|--|--|
| 6. | Review and where necessary redraft all school privacy notices to ensure they are compliant with GDPR and the data used within the school | 30.04.18 | DBR/FGB | Redrafted privacy notices submitted to FGB 14.05.18 | FGB minute their approval of new privacy notices | Draft Parent and Pupil Privacy notice to be approved by FGB 14.05.18 Draft Workforce Privacy notice pending EPS guidance. |
| 7. | Review and where necessary redraft the school's Data Protection Policy | 30.04.18 | DBR/FGB | Redrafted Data Protection Policy submitted to FGB 14.05.18 | FGB minute their approval of new policy | Draft Data Protection Policy to be approved by FGB 14.05.18 |
| 7.a | Publish Data Protection | 31.05.18 | DBR/MCN | Information on website | Parents and staff can access information | |
| 8. | Conduct Data Privacy Impact Assessments (DPIA) for all projects or changes to existing services or systems to determine if the project will change the way data is collected, processed or stored and/or if new data is to be collected. | On-going | DBR | DPIA | DPIA Updated GDPR Database | |
| 9. | Provide whole school training | 25.05.18 | DBR | Training records | All staff are aware of their responsibilities regarding GDPR | Pending DPO training |
| 10. | Review Privacy Notices | Annually or after a positive DPIA | DBR | Redrafted or reviewed Privacy Notices submitted to FGB | FGB minute their approval of new Privacy Notices | |
| 11. | Review Data Protection Policy | Annually or after a positive DPIA | DBR | Redrafted or reviewed Data Protection Policy submitted to FGB | FGB minute their approval of new Data Protection Policy | |
| 12. | Provide Induction and Refresher training | On-going | DBR | Training and Induction records | All staff are aware of their responsibilities regarding GDPR | |