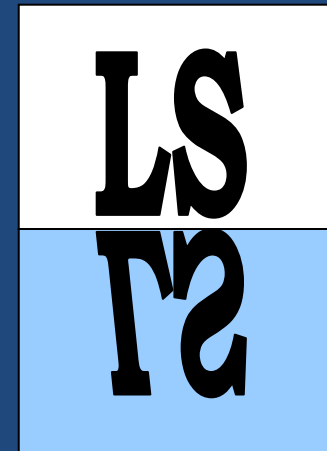


# GENERAL DATA PROTECTION REGULATION



Lakeside School

Action Plan

Updated 12<sup>th</sup>

September 2018

Current Position						
The legislation regarding Data Protection is changing and new laws will come into effect on 25 <sup>th</sup> 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"> <li>1. Description of data</li> <li>2. Category of data</li> <li>3. How data is collected</li> <li>4. What data is used for</li> <li>5. Legal basis for using data</li> <li>6. Location of data</li> <li>7. If the data leaves School</li> <li>8. Who the data shared with</li> <li>9. Who can access the data</li> <li>10. How long the data is kept</li> <li>11. Who owns/uses the data</li> </ol>	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. DPO training completed 28.06.2018 Data Mapping complete however, this is a dynamic document and so will be updated regularly.

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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 31.12.18	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. School investigating securing data. Relocating filing cabinets, arranging for lost keys to be replaced or locks fixed. Training to embed best practice in the management of data. Dial in facilities to exclude the need for flash drives
5.a	Review quality assurance checks on Therapeutic and Alternative Provision providers to ensure GDPR compliant.	30.04.18 01.09.18	STE/DBR	Quality Assurance records	Evidence that providers are compliant	All contractors to be written to with HCC proforma.
5.a	Publish retention schedules, privacy notices and name DPO on school website	31.05.18 31.12.18	DBR/MCN	Information on website	Parents and staff can access information	Retention schedules are available to be uploaded to the Website Revised deadline due to staff absence
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.

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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. Files are secure
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	New signing-in books are in place.
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	New system in place
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	All documents to FGB are redacted. JST completed review of FGB files and archived/shredded where necessary. FGB have a locked filing cabinet for FGB files. Keys held by JST and DBR.
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. Approved with one amendment 6.a
6.a	Update Workforce Privacy Notice to include Volunteers and then distribute both notices	30.04.18	DBR	Privacy Notice updated	Privacy Notices are distributed	Notices distributed 15.05.2018
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 - Approved

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7.a	Publish Data Protection	31.05.18	DBR/MCN	Information on website	Parents and staff can access information	New policy agreed and on website
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 30.09.2018	DBR	Training records	All staff are aware of their responsibilities regarding GDPR	Pending DPO training New web based training provide contracted to provide e-learning module. Training to be launched September as part of the annual training cycle. EduCare appointed as e-learning provided. GDPR training module to be completed by all staff on 17.09.18 Inset.
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	FGB decided no requirement for separate notice for Governors. Notices to be amended to include all staff and volunteers – Governors will come under the category of volunteers. Copies submitted to FGB 24.09.18

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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	Reviewed September copy submitted to FGB 24.09.18
12.	Provide Induction and Refresher training	On-going	DBR	Training and Induction records	All staff are aware of their responsibilities regarding GDPR	All staff to complete E-learning module on GDPR 17.09.18 inset – staff joining after this date to complete as part of their induction