



beebug

ICT Specialists for Schools

GDPR Guidance for Primary Schools

How to prepare for the GDPR

Awareness: Make your school staff aware that the Data Protection Act is changing and how it will affect schools.

Information: Audit the information you currently hold and what Data Processing policies are currently in place. Data Mapping is important here to build a picture of where your data is, who has access to it and if it is shared with any 3rd parties.

Privacy: Review your current privacy agreement and put a plan in place for any changes that are necessary.

Rights: Check your current privacy policies to ensure your procedures cover all the rights individuals have (including how you delete personal data).

Consent: Review how you are seeking, obtaining and recording consent for data processing. (ONLY if consent is your ONLY justification for processing the Data in the first place.)

Breaches: Make sure you have the correct procedures in place to investigate and report a personal data breach. A breach must be reported to the ICO within 72 hours of discovery

Students: Think about what systems you're going to put in place to verify the age of individuals and to gather consent from parents or guardians in regards to data processing.

Officers: Designate a Data Protection Officer (DPO) to take responsibility for data protection compliance. With the rules for reporting a breach being time sensitive a backup DPO should be in place to give you year round coverage.

e-safety: Having an e-safety policy in place is vital to ensure all key stakeholders know what needs to be done to remain compliant. e-safety monitoring software should be in place to help ensure the policy is being upheld.

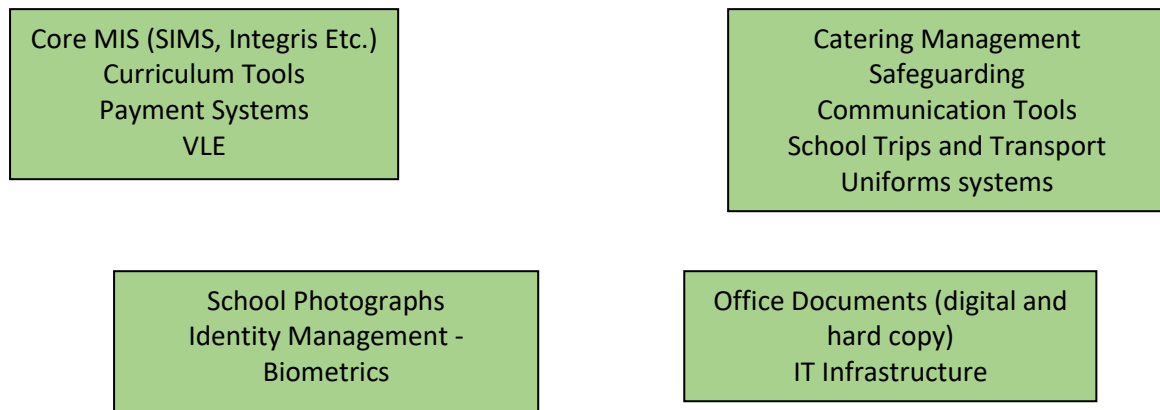
Processor: Choose Data Processor(s) who is/are also compliant with GDPR obligations and IT asset disposal. Data Processors are defined as any natural or legal person, public authority, agency or any other body which processes personal data. This includes Beebug if we support your servers, data, online backup or other data related services.

For more information, please contact Beebug Ltd on 01727 840 303 or email us at sales@beebug.co.uk.

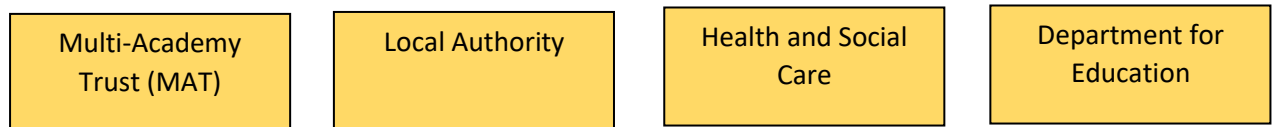


Think About Your Data

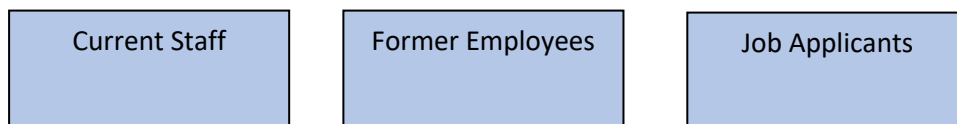
Your data is stored in a variety of places. You will need to map out these locations and understand what data is where, if its shared, who its shared with and does the 3rd party then share that data.



Where do you send that Data?



Whose Data do you keep?



Scope

Which personal and special category data items are contained with that system?

Sharing

Does any personal data flow from that system to anywhere else?

Retention

What is the systems data retention policy? Does it align with the data retention policies needed to fulfil your duties as a school and is this clear within your contract with the supplier

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Access

How would you get the information for a subject access request out of that system?

Security

How does the system ensure the security of the personal data held? What recognised standards are in place?

Own readiness

Is this system supplier confident that they will be GDPR compliant by May 2018?

How will they demonstrate that to you?

Risks and Top tips....

- Check for software that is not on the SLTs radar.
- Involve all staff in the development and checking of your ecosystem diagram

Sharing of your data (onward flow)

Do you have any software that shares data from your MIS?

If so where does this data go?

Do these systems store data and if so where is it stored?

Data Protection Officer (DPO)

Needs:

- to be highly knowledgeable about data protection and GDPR
- to understand the school's operations and policies
- to promote a strong culture of data protection
- to be aware of compliance, obligations, promoter training and conduct audits
- to undertake data impact assessments as required

Can't be:

- Head of IT
- Head teacher

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How to manage your DPO role

Realign your responsibilities within your own team.

Maintain separation from those making technology or processing decisions. i.e. exclude Head teacher and Head of IT as above.

You can technically contract in a DPO but the expertise and in-depth knowledge requirements of the schools data and policies must be adhered to. An outside contractor would need to take on all these responsibilities and be able to demonstrate they meet the criteria and are performing all DPO functions, including impact assessments. This is very difficult to achieve as a 3rd party and for this reason we would suggest extreme caution if you go down this route.

The same as above would also apply to a Shared DPO between multiple schools, Volunteers and Governors who can also technically be a DPO but the same knowledge requirement as above would apply.

The role of a DPO once up and running is relatively straight forward and we would always recommend that this be carried out by someone at the school, preferably a member of the office staff so they have maximum exposure to changes in the schools data procedures.