

# Schools Working Together on GDPR

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## Who are we?

- **Maxine Bates** – School Business Manager, Breckon Hill Primary School, Middlesbrough and Chair of the Middlesbrough local SBM forum group
- **Jackie Lowe**, School Business Manager, Viewley Hill Academy, Middlesbrough.
- **Sue Cochrane**, Trust Business Manager, Aspire Learning Partnership, Redcar and Cleveland, and Chair of the Redcar and Cleveland Administrative forum group.

# What was the problem?

It was December and GDPR was looming!  
Local Authorities were not prepared to support.  
There was a lot of information, but it was confusing and much of it was not relevant to schools.  
Everyone was at a different point in preparation.  
Some schools were not aware of GDPR or had no idea where to start.  
Some schools were saying they didn't have the time to look at it.



**That's the great thing  
about GDPR**



**It's so vague and  
nobody really knows  
what it's all about**

## What was our solution?

- We set up a working party, to sift the information and put together a “best practice” approach.
- We recruited volunteers from Redcar and Cleveland and Middlesbrough schools.
- By working together we could share the load, and gather essential information which could be shared widely across all schools through our local networks.
- A lot of the training and information was high level – we wanted to develop a practical approach.

## How did we share the load?

- We initially had 8 members in the team.
- We decided on the key areas, and each took responsibility for researching a different area
- We met regularly to share our findings, and agreed ways to share with the wider group of schools.



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## What did we produce and how did we share the information?

- We collated the information into a Pathway to Compliance document.
- This was a toolkit of resources and links to relevant information and templates that we had found to be the clearest and most useful guidance.
- We shared the information through briefings to our local network groups.
- We also placed the information on our sharepoint drives for easy access by colleagues.





## GDPR Pathway to compliance

### STEP 1: Pre Audit

Clear out as much unwanted data as possible, referring to retention guidelines.

Links to resources:



Information Management Toolkit

### STEP 2: Audit

Undertake an audit of all data stored and processed by the school, defining the legal ground for processing data.

Links to resources:



Legal Grounds for Processing Personal C



LGFL-GDPR-Data-Audit-Log-10-2017 (2).xl

### STEP 3: Policies

Policies will need to be reviewed to ensure that they meet the new regulations.

Suggested policies include:

- Safeguarding
- Data Protection
- E-safety
- Acceptable use
- Whistleblowing

• Links to suggested documents:



LGFL-GDPR-E-Security-NBHC05-Data-Protection-Policy-10-2017 (2).c



ction-Policy.pdf



GDPR\_Data Protection Policy\_201



Model\_policy\_-\_data

### STEP 4: Privacy Notice

Privacy notices need to be updated to ensure they will meet the new requirements

Links to suggested notices from the DFE:

<https://www.gov.uk/government/publications/data-protection-and-privacy-privacy-notices#history&source=Online%20Safety%20Section>

### General guidance

Link to ICO information: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>



GDPR Guide.pdf

### STEP 5: Training

Training needs to be provided to all staff.

Links to possible training:

Data protection training video by ICO (subtitled) - Data Day Hygiene  
<https://www.youtube.com/watch?v=ksEMs8s8En0>



GDPR Data Docs Darts OCT 2017.pdf

### STEP 9: Data Sharing / 3<sup>rd</sup> party

Schools should seek information from 3<sup>rd</sup> party organisations how they are meeting the GDPR regulations and put in place formal data sharing protocols.

### STEP 8: Data Breach

Schools must understand that action to take in event of data breach



Data Breach notes Jan 18.docx



Personal Data Breach check.pdf

### STEP 7: Insurance

Insurance arrangements need to be discussed with your own providers, to determine cover in the case of a data breach

### STEP 6: Data Protection Officer

Current guidelines state that all public bodies, including schools must appoint a data protection officer.

Links to suggested documents:



KeyDoc\_-\_model\_role\_description\_for\_the



Who-can-be-your-DPO.pdf



Data Protection Officer.pdf



Who can be your DPO.pdf

## What worked well?

- Schools felt that the guidance demystified GDPR and made it more manageable, accessible and understandable from a school perspective.
- The template data audit logs, policies, privacy notices, training presentations and checklists made it easier for schools to carry out key tasks.
- We came up with a list of FAQ's that enabled us to share answers to questions and areas that were worrying people
- There was someone to ask – although we weren't experts, we gathered a lot of knowledge through the research and discussions, and gathered contacts that we could approach to answer questions.

## Next Steps - What still needs to be done post 25<sup>th</sup> May?

- Many schools are still not fully compliant – although the implementation date has passed, there is still work to do and schools still need support to work towards compliance.
- Data Protection Leads and DPOs need enhanced training.
- Some areas will become clearer as the new legislation is embedded and tested through legal action, and this information needs to be shared with schools.

