

GDPR in schools



Intro and aims

- The ICT Service: support@theictservice.org.uk, 0300 300 00 00
- Cambridgeshire County Council: Information and Records Team.
Data.protection@cambridgeshire.gov.uk 01223 699137.

Here to:

- Explain what GDPR means for schools
- The key things you need to do (GDPR Toolkit)
- Answer queries

What have you heard about GDPR?!

- Lots of complex issues
- Huge amounts of work
- Huge fines if you get it wrong

GDPR Background

- New EU legislation
- Replaces Data Protection Act 1998
- Data Protection Bill going through UK Houses of Parliament and Lords



Replaces Data Protection Act, but ...



Data Protection now and post-May 2018

Legislation that sets out principles on how every organisation collects and uses personal data.

Personal data is anything that relates to an identifiable, living individual.

From details in info systems, to emails, paper files, CCTV, audio recordings etc.

GDPR Principles (similar to DPA) Part 1

1. Processing (anything you do with data) must be lawful, fair and transparent.
2. Data must be collected for specific purposes and only used in line with those purposes.
3. Collect and use the minimum data needed

GDPR Principles (similar to DPA) Part 2

- Take reasonable steps to ensure data is accurate and up to date.
- Only keep personal data for as long as you need it.
- Take all reasonable measures – technical and organisational (procedures, training etc) - to keep the data secure
- Accountability: “The controller shall be responsible for, and be able to demonstrate, compliance with the principles.”

Exercise – what do you do currently?

- SIMS
- FMS
- Parental communications
- Online payments
- Library systems
- Governor documents
- Website
- Teaching resources

1. Registration

- Should already be registered with Information Commissioner's Office (usually £35 per year for schools).
- Need to keep your own documents, but still pay an annual fee to ICO (£55?)

2. Creating an Information Asset Register

- A list of the key information you collect and use
- Take a look at the template. Anything else to add?

Asset number or ID	Description of asset	What does it do	Location	Data Processor	Owner	Volume	Personal data
1	SIMS	Records data about pupils and staff at the school	Centrally Hosted	The ICT Service	Data Manager [name]	300 pupils, 40 staff	Yes; includes sensitive personal data
	FMS	School finance system	Centrally Hosted	The ICT Service	Business Manager [name]	40 staff, 1000 orders/invo	Payroll data

3 and 4. Privacy Notices and Consent

- Model notices for pupils and staff data, working from DFE templates
- Any areas where you currently ask for consent?
- Consent must be freely given, unambiguous, and be a clear affirmative action (i.e. opt in, not opt out). Note that consent can be withdrawn at any time.

5. Data Protection Officer

- You need to have a nominated DPO
- Must have knowledge of data protection law and practices and should be involved in key decisions around personal data.
- The ICT Service offering this as a service

6. Rights

They include:

- The right of access (requesting copies of information)
- The right to request data is rectified or erased
- The right to object to how you are using their data

- Need to have processes in place to deal with them. How would you deal with them now?

7 and 8. Data breaches and Privacy by design

- Must report serious breaches to the ICO within 72 hours
- Need to be able to recognise a breach (or potential breach) and what to do in response.
- Privacy by design means doing an impact assessment when you are making a significant change affecting use of personal data (e.g. a new IT system).

9. Review of contracts

- What contracts do you have with third parties where they store or use personal data on your behalf?
- Need to review to ensure appropriate clauses are in place. ICO guidance is forthcoming.
- Suppliers are often taking the lead on this.

Other points

- Make good use of technology – follow good practice around security
- Use this as an opportunity to review general practices and raise awareness.

Any questions?