

GDPR – Status Update

Management Committee – 13 March 2019

Background

The School is required to comply with the General Data Protection Regulation (GDPR) and associated Data Protection Bill introduced in 2018, which replaces the Data Protection Act 1998

The summary findings of an Information Governance Audit undertaken in August 2018 found that the school had 'Adequate Assurance' with a trend towards 'Higher Compliance' A number of areas for attention were identified.

Action Taken

During February, the following actions have been taken to continue the evolution of our data protection:

- Information Asset Register draft
- Data Flow Mapping draft
- Updated Privacy Policy
- Staff Awareness
- Information Governance Reporting
- Data Protection Impact Assessment for MyConcern

Information Asset Register

The first iteration of the Information Asset Register (IAR) has been collated following analysis sessions with key staff. 45 Information Assets have been identified to date and are undergoing review for full documentation. An example of the IAR is shown below:

Information Asset Register

IAR ID	Org 1	Org 2	Title	Date Reviewed	Review Status	Format	Owner	Owner Role	Manager	Manager Role	Additional Information	Related Security Incidents	Classification
IAR001	Office	Office	Pupil Records (SIMs, RM etc.)	28/02/2019	In Date	Database	Headteacher	SIRO/Headteacher	Headteacher	SIRO/Headteacher	Asset under multiple owners during attendance at school		Official-Sensitive
IAR002	Office	Office	Pupil Records	28/02/2019	In Date	Paper	Headteacher	SIRO/Headteacher	Headteacher	SIRO/Headteacher	Asset under multiple owners during attendance at school		Official-Sensitive
IAR003	HR	HR	Employee Records	28/02/2019	In Date	Database	Headteacher	SIRO/Headteacher	HR manager	HR manager	P7, SIMS		Official-Sensitive
IAR004	HR	HR	Employee Records	28/02/2019	In Date	Paper	Headteacher	SIRO/Headteacher	HR manager	HR manager			Official-Sensitive
IAR005	SEN	SEN	Special Educational Needs (SEN) Records	28/02/2019	In Date	Paper	Headteacher	SIRO/Headteacher	SENCO	SENCO			Official-Sensitive
IAR006	Office	Office	Attendance Records	28/02/2019	In Date	Database	Headteacher	SIRO/Headteacher	Headteacher	SIRO/Headteacher			Official
IAR007	Headteacher	Headteacher	Behavioural Incident Records	28/02/2019	In Date	Database	Headteacher	SIRO/Headteacher	Headteacher	SIRO/Headteacher	(Instances of breaches of school rules, e.g. Bullying, Racism, Violence etc)		Official-Sensitive
IAR008	Office	Office	Medical Treatment Records	28/02/2019	In Date	Paper	Headteacher	SIRO/Headteacher	Office Manager	Office Manager			Official-Sensitive

Data Flow Mapping

Work has commenced on the Data Flow Mapping, which lists data flows in and out of school, purpose, classification and security. This data is cross referenced to the Information Asset Register. A sample of this mapping is below – 38 data flows have been identified to date and are undergoing full review and documentation (for context, each flow requires 44 fields to be populated before the review is considered to be complete)

Data Flow Mapping														
Summary Details														
Flow ID	Org 1	Org 2	Date Reviewed	Review Status	Flow Title	Asset ID	Classification	Send/Receive	Internal/External	Condition (Personal Data)	Condition (Special Category)	Volume	Frequency	Notes
DLM001	Admissions	Admissions	23/02/2019	In Date	Admissions Data - inbound	IAR015, IAR040, IAR041, IAR042	Official-Sensitive	Inbound	External	6(1)(c) Legal obligation	9(2)(g) Substantial Public Interest	Bulk	Annually	Contains FSM, LAC, etc.
DLM002	Admissions	Admissions	26/02/2019	In Date	Admissions Data - outbound	IAR015, IAR040, IAR041, IAR043	Official-Sensitive	Outbound	External	6(1)(c) Legal obligation	9(2)(g) Substantial Public Interest	Bulk	Annually	External communication to CEM for entrance test logistics via PKN.
DLM003	Admissions	Admissions	26/02/2019	In Date	Admissions Data - CAF	IAR015, IAR040, IAR041, IAR044	Official	Inbound	External	6(1)(c) Legal obligation	9(2)(g) Substantial Public Interest	Bulk	Annually	Inbound applications list from County
DLM004	Admissions	Admissions	26/02/2019	In Date	Admissions Data - Successful applicants	IAR015, IAR040	Official	Inbound	External	6(1)(c) Legal obligation	9(2)(g) Substantial Public Interest	Bulk	Annually	Inbound successful order of merit from County
DLM005	Admissions	Admissions	26/02/2019	In Date	CEM Test papers	TBC	Official	Outbound	External	6(1)(c) Legal obligation	9(2)(g) Substantial Public Interest	Bulk	Annually	Outbound answer papers to CEM via PKN for marking
DLM006	Admissions	Admissions	26/02/2019	In Date	Appeals documentation	TBC	Official	Outbound	External	6(1)(c) Legal obligation	9(2)(g) Substantial Public Interest	Adhoc	As & When	Appeals documentation sent to appeals panel at County Council
DLM007	SIMS Officer	Sim Officer	26/02/2019	In Date	Intended Leavers destination	IAR001	Official-Sensitive	Outbound	External	6(1)(c) Legal obligation	9(2)(g) Substantial Public Interest	Bulk	Annually	
DLM008	Finance	Finance	26/02/2019	In Date	Schools payroll	IAR026	Official-Sensitive	Inbound	External	6(1)(b) Contracts	9(2)(b) Employment, Social Security/Protection law	Bulk	Monthly	

Updated privacy policy

An updated privacy policy has been added to the school's website. This has been adapted from the Essex County Council Information Governance Service (IGS) proforma and is the overarching privacy policy. It has been linked to our internal databases, including the admissions and lettings databases.

Staff awareness

In addition to the analysis undertaken as part of the asset and data flow identification, for which an internal-only issues log has been compiled and will form evidence of our actions, staff were also made aware at the staff meeting in February of additional GDPR actions being taken.

We have identified as an immediate issue that removable media (USB, CD, home printing, etc.) is still in common usage. Staff were advised that these capabilities will be removed during March unless exceptional approval is given in order to prevent accidental unauthorised portability of data.

Information Governance Reporting

The first of our monthly reporting templates has been completed and submitted to the IGS for review – a report will be issued for the Full Governing Body meeting. The report comprises of the following data:

- Security incidents
- Freedom of Information / Environmental Impact Reporting requests
- Subject Access Requests
- Training
- Information Technology data (Storage, storage growth, accounts opened / closed, etc.)
- Records of Process Activity (the Assets and Flows referenced above)
- Records Management
- Surveillance usage
- Privacy Impact Assessments
- Audit Outcomes.

Data Protection Impact Assessment (DPIA)

A DPIA is now required for each technology implementation or material upgrade. Essex IGS reviewed and approved our assessment for MyConcern on 5th March 2019.

Targets for March

- Completion of the Information Asset Register
- Completion of the Data Flow Mapping
- Issuance of an updated Record Retention policy in line with the ECC IGS policy
- Implementation of Non-Disclosure Agreements for visitors and volunteers.