



Kenmore Park Infant & Nursery School.



DRAFT GDPR for schools – Action Plan (24th November 2017).

No.	Action	Person responsible for action	Monitoring action	Timescale	Evidence /evaluation
1	School should erase incorrect data /contact numbers as soon as they are informed of the error rather than waiting until able to contact the parent concerned.	P. Nathwani & M. Mulchay.	School leadership	By 24.05.18	
2	In school there needs to be a clear Data Retention Policy , which it adheres to.	P. Nathwani	School leadership	By 24.05.18	
3	Firewalls and encryption of the data in any software the school uses or strong passwords in place that are forced to be frequently changed.	Bee-Bug All staff.	School leadership	By 24.05.18	
4	Screen Policy in place.	P. Nathwani	School leadership	By 24.05.18	
5	Consent must be specific (i.e. the exact purpose for the processing must be clearly explained), informed (the data subject must be told about it and understand what he data is to be used for) and it must be an unambiguous indication of the data subject's wishes. Consent under GDPR has to be in the form of a clear, affirmative action. There can be no pre-ticked boxes and consent cannot be inferred from silence or inactivity (no phrases such as '...if we do	All staff communication.	School leadership	By 24.05.18	

	not hear from you we will assume you consent).				
6	Individuals have an increased right to access to their data and its use. (If you receive a Subject Access Request (SAR) you must supply all the data to the individual within one month – and you are no longer able to charge for doing so.	P. Nathwani School Leadership	School leadership	By 24.05.18	
7	Schools need to have a process in place to ensure that if an individual requests their data to be erased this can be achieved. (unless you can prove that there is a valid reason to continue processing it.	P. Nathwani School Leadership	School leadership	By 24.05.18	
8	Schools need to ensure they have a good governance process in place to record the measures taken to protect the personal data under the GDPR requirements.	Chair of Governors Clerk to the GB.	School leadership	By 24.05.18	
9	Regular staff training around the subject, keeping accurate records of processing, regular and documented monitoring and audits.	P. Nathwani & School Leadership	School leadership	By 24.05.18	
10	Staff training to evidence that they have been taught about this conducting Privacy Impact Assessments (often know as Data Protection Impact Assessments – DPIA).	School Leadership & P. Nathwani	School leadership	By 24.05.18	
11	Data Protection officers need to be appointed. Their 3 main responsibilities: 1. Advise and inform the school and its staff about their obligations to comply with GDPR and any other data protection legislation.	P. Nathwani	School leadership	By 24.05.18	

	<p>2. To monitor the school's compliance with GDPR, train staff, conduct audits etc.</p> <p>3. To be the first point of contact with the ICO and data subjects.</p>				
12	<p>Ensure compliance and that SMT, Governors etc appreciate impact GDPR is going to have on school.</p>	P. Nathwani & School Leadership	School leadership	By 24.05.18	
13	<p>Start to document what personal data you hold and process, where it comes from and who you share it with. Flow diagrams to be produced.</p>	P. Nathwani	School leadership	By 24.05.18	
14	<p>Privacy notice – Parent, pupil school contracts to include GDPR information. Parents to sign to give their consent.</p>	P. Nathwani	School leadership	By 24.05.18	
15	<p>Develop structures for SAR so you are ready to handle them within the time constraints outlined. Have someone responsible for dealing with these and a second person to cover in the event of absence..</p>	P. Nathwani	School leadership	By 24.05.18	
16	<p>Document the legal basis and update privacy notices to explain lawful basis of processing. In majority of cases, the legal basis will be public interest so be sure to state this in your privacy notices.</p>	P. Nathwani	School leadership	By 24.05.18	
17	<p>Consent – need consent for processing, record it and refresh existing consents. (Children – parental consent up to 13 years of age).</p>	P. Nathwani School leadership	School leadership	By 24.05.18	
18	<p>Data breach – have procedures in place to deal with these if they occur.</p>	P. Nathwani School leadership	School leadership	By 24.05.18	

19	Privacy Impact Assessment (PIA) – have these in place for all processing and update if your processes or technology changes or new processing/supplier are being considered.	P. Nathwani	School leadership		
20	International – know where the personal data is going (strict rules about moving data out of the EEA. Implications if use Cloud software , where is it hosted.	P. Nathwani School leadership	School leadership		

Produced by R.K. Mahil-Pooni 24.11.17