

Edition 2

GDPR Countdown



COUNTDOWN TO
COMPLIANCE



COMPLIANCE &
ACCOUNTABILITY



A STEP CHANGE IN
CULTURE &
AWARENESS

NEWSLETTER



Steps to Compliance

Staff Awareness / Training

You should all now have received the link to the GDPR system, together with user name and password where you will find the training video and short quiz, as mentioned in the first GDPR newsletter issued in February. This will give you an introduction to GDPR and will take you through all the areas you need to be aware of. If you have not received this email, please contact Dawn via email (dp@evolvetrust.org). Please would you cascade to any individuals within your teams who may have missed this communication.

THIS IS A MANDATORY REQUIREMENT - PLEASE WATCH THIS VIDEO AND COMPLETE THE QUIZ BY THE 20TH APRIL 2018 AT THE LATEST. HEADTEACHERS WILL BE ALLOCATING MEETING TIME FOR YOU TO DO THIS.

Once you have watched the introduction video you will see that there are additional GDPR videos which will give you further information. Please spare the time to watch these.



Data Mapping Audit

To comply with GDPR as a Trust we must understand what personal data we process and control, how and

why. A working group has been set up to undertake this huge task and this will be a starting point to raise any compliance issues with processes or systems.

It is of paramount importance that we understand the legal grounds for managing the data we control and process and are able to demonstrate compliance.

Appoint a Data Protection Officer (DPO)



Under GDPR Public Authorities must appoint a Data Protection Officer and the Trust have appointed Dawn Pare to this role. Dawn can be contacted via email dpare@evolvetrust.org for any GDPR help and guidance.

Here's some further guidance:

What do we need to do to change?

- **Communication** - communicate with pupils and parents to help them understand what data you process and why.
- **Review and refine** – carry out regular reviews of your data protection practices to ensure you remain up to date.
- **Evidence** – We must be able to demonstrate that we have complied with the new requirements. You not only need to make sure you are doing the correct things to comply with GDPR, but must also have evidence to demonstrate that you have done so. It is essential that you maintain proper records and a clear paper trail to prove this.
- **Consent** – one of the “lawful purposes” for processing personal data is if an individual has given you consent. Under GDPR any consent must be freely given and informed. Individuals will be able to easily withdraw their consent and you will also need to periodically refresh any consents given. Consent must be recorded to evidence this.



Best Practice

A strong password is key to protecting data
- replace with numbers and symbols
(mix uppercase and lowercase)

Double check email addresses and be careful when sending to multiple recipients

Do not email personal information to your personal email address

Use encryption for special category or confidential personal data

The following is a link to a short video which you may find interesting around data privacy

https://www.youtube.com/watch?v=_YRs28yBYuI



More about consent ...

- Necessary for a contract
- Necessary for compliance with a legal obligation
- Vital interests of the data subject or another person (this is in a life or death situation)
- Necessary for a task in the public interest (this is around safeguarding and pupil welfare)
- Legitimate interests (marketing / publicity)



If consent is used as the legal basis for managing data, then a record of consent must be kept with details of:

- who consented
- what they consented to
- when they consented
- how data can be used

A full review of how you seek, record and manage the consent of individuals whose data you process must be undertaken and further guidance will follow shortly to advise of next steps.

- Consent must be actively given. You cannot rely on silence, inactivity or pre-ticked boxes.
- Consent must be freely given, specific, informed and unambiguous.
- Consent must be separate from other documentation such as terms and conditions or declarations.
- There must be simple methods for withdrawing consent including the same methods that were used to obtain it.
- Separate consent must be obtained for distinct processing activities.

What is a personal data breach?

A security incident that has affected the confidentiality, integrity or availability of personal data, for example ...

USB sticks being lost or stolen
 Sending a confidential attachment containing personal data to the wrong email recipient
 A computer virus which wipes a hard drive which has not been backed up

Staff to report concerns to their Headteacher, Senior Leadership Team or Dawn Pare as Data Protection Officer IMMEDIATELY!

Look out for Edition 3

for more useful information around The General Data Protection Regulation (GDPR)