

Preparing for the General Data Protection Regulation (GDPR)

ICO's 12 Steps		Action
Awareness	<ul style="list-style-type: none"> ▪ To organise awareness training in order to inform all school personnel and governors. ▪ To hold refresher training for all school personnel and governors when necessary. 	
Information we hold	<ul style="list-style-type: none"> ▪ To organise an information audit of data held on pupils, school personnel , parents, governors/trustees and suppliers. 	
Communicating Privacy Information	<ul style="list-style-type: none"> ▪ To review current privacy notices and to undertake any necessary changes before the implementation of GDPR. 	
Individuals Rights	<ul style="list-style-type: none"> ▪ To check current procedures to ensure they cover all the rights of individuals. 	
Subject Access Requests	<ul style="list-style-type: none"> ▪ To update present procedures, to plan how to handle requests within the new one month timescale and to provide any additional information. 	

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Lawful basis for processing personal data	<ul style="list-style-type: none"> ▪ To review the various types of data processing that the school carries out and then identify and document the legal basis for carrying it out. 	
Consent	<ul style="list-style-type: none"> ▪ To review how the school seeks, obtains, records consent and consider any changes that are required. 	
Children	<ul style="list-style-type: none"> ▪ To 'start thinking now about whether we need to put systems in place to verify individuals ages and to obtain parental or guardian consent for any data processing activity.' 	
Data Breaches	<ul style="list-style-type: none"> ▪ To ensure the right procedures are in place to detect, report and investigate a personal data breach. 	
Data Protection by Design and Data Protection Impact Assessments	<ul style="list-style-type: none"> ▪ To consider when to begin implementation of the Privacy Impact Assessments. 	
Data Protection Officers	<ul style="list-style-type: none"> ▪ To have in place a designated Data Protection Officer to take responsibility for data protection compliance. ▪ To assess where this role sits within the school's structure and governance arrangements. 	

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International	<ul style="list-style-type: none"> ▪ To determine (if the school operates internationally) under which data protection supervisory authority applies to the school. 	
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Data Protection Audit of Personal and Sensitive Data

	What type of data?	How is the data collected?	How is it processed?	Where did it come from?	Where is it located?	How is it secured?	Who is it shared with?
Pupils							
School Personnel							
Parents							
Governors							
Suppliers							

GDPR School Readiness Statement

ICO's 12 Steps	Statement	Date(s)
Awareness	We have held:	
	<ul style="list-style-type: none"> ▪ awareness training for all school personnel on: 	
	<ul style="list-style-type: none"> ▪ awareness training for all governors on: 	
	<ul style="list-style-type: none"> ▪ awareness training for parents on: ▪ awareness training for suppliers on: 	
Information we hold	We have undertaken an information audit of all data held on pupils, school personnel, parents, governors/trustees and suppliers on:	
	From that audit we have made the following improvements: <ul style="list-style-type: none"> ▪ 	
Communicating Privacy Information	We have reviewed current privacy notices and we have made the following improvements: <ul style="list-style-type: none"> ▪ 	
Individuals Rights	We have checked current procedures to ensure they cover all the rights of individuals have and we have made the following improvements: <ul style="list-style-type: none"> ▪ 	
Subject Access Requests	We have reviewed current procedures and we plan to handle new requests within the one month timescale by: <ul style="list-style-type: none"> ▪ 	
Lawful basis for processing personal data	We have reviewed the various types of data processing that we carry out and we have identified and documented the legal basis for carrying it out by: <ul style="list-style-type: none"> ▪ 	
Consent	We have reviewed how we seek, obtain and record consent and we have made the following improvements: <ul style="list-style-type: none"> ▪ 	

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Children	<p>We have in place the following system to verify the ages of individuals:</p> <ul style="list-style-type: none"> ▪ 	
Data Breaches	<p>We have in place the following procedures to detect, report and investigate a personal data breach:</p> <ul style="list-style-type: none"> ▪ 	
Data Protection by Design and Data Protection Impact Assessments	<p>We have started to implement the Privacy Impact Assessments on:</p>	
Data Protection Officers	<p>We have appointed _____ as Data Protection Officer. This role fits into school's structure and governance arrangements as follows:</p>	
International	<p>We are / are not an international school and our data protection supervisory authority is:</p> <ul style="list-style-type: none"> ▪ 	