GDPR Action Plan

Created: April 2018   *Reviewed Oct 2018*   *Next Review: April 2019*

Personnel Involved: NC – Natalie Cox – Data Protection Officer   MW – Michelle Ward – Headteacher   DC – Darren Cranshaw - GDPR Link Governor

Action	Personnel	Timescale	Success criteria	Steps taken to achieve outcome	Monitored by	Evaluation	Future Actions
Appoint a GDPR officer	NC / MW	Spring Term 2018	NC appointed to role	Post training discussion between NC & MW; agreed NC to take on role and responsibility to be appraisal target	MW DC	NC was appointed as GDRP officer Spring Term	
Appoint a link governor to oversee GDPR	Full Governing Body	Summer Term 2018	Named governor agreed at meeting of Full Governors	Link visit ensuring compliance	KA (Chair of governors)	October 2018 link governor visit with NC / MW	
Complete appropriate training on GDPR legislation and requirements	NC / MW	Spring Term 2018	Course attended and named people confident in responsibilities	Action plan produced outlining steps needed to develop all stakeholders responsibilities.	MW	Plan produced and shared with stakeholders in Autumn 2018.	

Creating Privacy Notice & GDPR Policy & upload to school website	NC	To meet deadline of May 25th 2018	Statutory documentation on the school website	Annual review of documents & compliance check of website	NC & MW in Summer Term 2018 Summer Term check by Primary Site	Documentation in place.	Policy review May 2019
Audit data held – pupils	NC	Re-evaluated annually in Summer Term prior to Data Collection Sheets being sent home in Autumn Term	Critical analysis of what data is kept and why ensuring all documentation is stored securely	Internal data sheets adapted accordingly to ensure information gathered complies only with statutory / Archdiocesan obligations	MW	Adapted data sheet	Remove country of birth, proficiency in English & pupil nationality as DfE no longer requires this data.
Audit data held and share with staff	NC	Autumn Term 2018	Privacy notice for staff shared to all team members	Compose data collection sheet for all staff	MW	Complete data collection sheets for staff; stored securely	Share appropriate Privacy Notice with staff. Compose data collection sheet for all staff
Adopt retention and audit schedule for data held in: SIMS CTF files First Aid files Pupil data sheets	NC / MW	Autumn term 2018	Retention schedule adopted and Information Asset Register created.	Make decision about which historical pupil & staff data needs to be retained and for what purpose and timescale.	NC / MW	Types of data identified and some clarification given in key areas, and noted that some data cannot be	Create an Information Asset Register (IAR) on a spreadsheet. Formulate a rolling programme of

Activity/Photo consent Staff personnel files SEND files Safeguarding files CPOMS Assessment tracker				Using a spreadsheet, formulate a rolling programme of document retention. Paper copies securely stored in locked rooms.		deleted as held securely by Capita or other external sites	document retention. Create spreadsheet to identify where different types of data is stored.
Staff training on data controls within the classroom.	NC / MW	Summer Term 2018	Staff to have encrypted memory sticks. Staff aware of not sharing pupil data with other parents or outside companies and agencies Staff aware of responsibilities when taking data off site to ensure it is stored securely.	Purchased encrypted memory sticks for all teaching staff. Refer to staff meeting minutes	NC / MW	Staff training completed	Update training annually in the Autumn Term
Agreed procedures for sharing data and ensuring confidentiality with third party processors: IT Bought-in services Purple Mash	NC	At the point of contract renewal	Ensuring third party processors are compliant with GDPR legislation and understand responsibility of not sharing data with other organisations	Check contracts to ensure compliance with GDPR legislation	NC / MW	Contracts set up for 2018/19 comply with the expectations	Check contracts to ensure compliance with GDPR legislation

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Annually register with ICO – Information Commissioners Office	MW	Each Summer Term	Registration certificate in Safeguarding File.	Safeguarding File audited in June.	NC/MW	Certificate in Safeguarding File.	Annually registration with ICO – Information Commissioners Office
Review GDPR compliance	DC / NC / MW	Review twice a year – October and April	Ensure identified actions have been completed following six-month review	RAG-rated action plan with future actions identified	NC / MW	Action plan in place.	Six-monthly review to be completed
Reporting data breaches	DC / NC / MW	Autumn term 2018	Procedures and documentation in place for data breaches. Information shared on website for parents if they want to report a data breach.	Data breach log created. Named contact on website for parents to report a concern regarding a data breach.	MW/DC	Need to create a data breach log to ensure all relevant information is reported and recorded.	Create a data breach log including: date reported to ICO and LCC legal advisors nature of the incident; number of records involved; consequences of the breach; measures taken and shared on the website.