

Northgate Primary School Audit and Visit Report 10.09.18

What schools are already doing – best practice

Each school is unique, for example, a school where the rooms are used for lettings has different risks to schools that are not. The audit walks through how data is processed, accessed and displayed with recommendations for your next steps.

Schools prior to audits have already adopted the following practice regarding displaying photos and lists:

- Photos without name;
- Photo with forename (in contained areas);
- Photo and name with explicit consent for general display;
- Photo with name (welfare and vital interests), for example: severe allergies/medical/care plans. In this situation procedures to minimise the risk by adding to folders and/or storing in cabinets at night i.e. medical rooms and kitchens are being introduced;
- Forename on class/ lists and displays.

Within administration/offices:

- Changing visitor signing in sheets to carbon copy (less PII data on display) or electronic signing in systems;
- Lockable cabinets for files such as Workforce Census;
- Automatic door locking/key fobs;
- Clear desks;
- Secure waste disposal/shredders;
- Printers with codes.

Whole school:

- Banning unencrypted memory sticks;
- Training staff and communicating best practice;
- Clear desk practice around school i.e. classrooms;
- Using GDPR as an opportunity to complete whole school data cleansing and destroying outdated data;
- Updating staff code of conduct to incorporate GDPR;
- Developing data retention schedules;
- Minimising data on display, for example: lists with date of birth.

Further details for each area to inform of best practice can be obtained from the DPE Knowledge Bank and online training material.

Visit report

The headteacher (Lindsay) has already started the process of and is working towards GDPR compliance. The headteacher, staff and administration are aware of their responsibilities, for example, the school is moving away from memory sticks to using the Google platform, printers have codes and Lindsay has also completed a school information asset data audit. The school wanted an action plan and this is included in the report.

Report type:	Mini school audit		
School:	Northgate Primary School	Date:	10.09.18
Staff member:	Lindsay Hanger (HT)	Time:	13.30
Policy	Type	Viewed/discussed	
	GDPR data protection policy	Yes	
	GDPR privacy statement	Yes	
	SAR procedure	Yes	
	Breach procedure	Yes	
	Consent forms	Yes	
	Retention schedule	Yes	
	Documents required	Yes	
Data mapping	Type		
	GDPRiS	Yes	
	DPE toolkit	Yes	
	Other (please specify):	Notes:	
Personal data	Explanation/concern	Action Point	Consent obtained
For example: Pupil photographs			Yes
Pupil photographs			Yes
Staff names			Yes
Staff photographs			Yes

Key points

School Walk:

Action recommendations made within the walk and within the best practice information above, including:

- **Reception/visitor signing in sheet:** Review of signing in procedure. Minimise PII data on display/purchase carbon copy signing in book;
- Add information to inform visitors where they can access the school's privacy statement from i.e. school website.
- **Front and HT office:** Lists on display with sensitive data. Review and minimise data on display or make use of folders and file/cabinets to store securely at night.

Around school:

- **Corridors/coat pegs/lists:** Ensure consistency and use of forename only. Where there is teaching and learning justification this is acceptable, however, schools are adopting forename only and this has become standard practice.
- **Review of medical/allergy/care plans:** on display, for example: Medical room. Can these be added to folders or covered? School to determine if being on display is in the vital interests and welfare of the child.
- **Laptop security: Staffroom** - reminder to staff to lock laptops when not being used.

Action plan check list:

1. Complete actions within the audit walk above.
2. Use the DPE compliance tools (Toolkit) as the school's action plan (rag rate). This can also be used to show progress for governors. To include completion of:
 - GDPR Data Protection Policy

- Privacy Statement, staff and parents
- SAR Procedure
- Data breach Procedure (use the DPE toolkit version and update staff)
- Photo and video consent (use to compare with the school's own consent forms)

Add the DPE toolkit and policies to the school central electronic filing system.

3. **Training:** Build in to the school calendar 'all staff' GDPR training. Key GDPR staff to complete the DPE e-learning modules and then consider all staff to complete. Continue to use staff meetings/briefings to raise staff awareness.
4. **Third party providers:** Obtain list of all third party providers and relevant contracts. Ascertain whether the school has purchased GDPRiS (<https://www.gdpr.school/gdpr-schools/>) or whether it would be beneficial to do so. If not, to work with SL at the next visit to complete data mapping.

DPE to provide:

- Guidance for the retention of historical data i.e. school photos etc, and more information pertaining to the retention schedule (ongoing Knowledge Base updates + Autumn development);
- Guidance/exemplar for the record of processing activity (Autumn development – tool, with workshops/guidance available in September).
- Information Classification Policy (ongoing Knowledge Base updates – July/August);
- Risk Management (RM) Policy (ongoing Knowledge Base updates – July);
- Training Policy (ongoing Knowledge Base updates – July);
- Exemplar breach list to show levels of risk and what items would constitute a minor or severe breach. (Sept – in RM + knowledge bank article/blog).