

GDPR ACTION PLAN – JUBILEE PRIMARY SCHOOL 2018 -9

Target	Risk	Action	By Whom	Timeframe
Ensure school has effectively communicated demands of GDPR to all stakeholders including parents, governors and staff.	Reduces risk of data breach	<ul style="list-style-type: none"> • GDPR newsletter to be sent to all parents and staff informing them of changes 	CL	By 8.6.18
		<ul style="list-style-type: none"> • Newsletter to be published on website as news item in first instance 	CL	By 8.6.18
		<ul style="list-style-type: none"> • Privacy notice to be sent home to all families 	CL	By 15.6.18
		<ul style="list-style-type: none"> • GDPR tab to be added to website and all GDPR documents published 	AC	By 15.6.18
		<ul style="list-style-type: none"> • Parents to check and confirm details and amend as necessary 	CL	By 25.6.18
		<ul style="list-style-type: none"> • Governors to receive GDPR training and sign receipt of privacy notice 	JE / TP	By 11.7.18
		<ul style="list-style-type: none"> • Staff to receive GDPR training and sign receipt of privacy notice 	JE / TP	By 19.6.18
Ensure school systems are in place to deal with a Subject Access Request (SAR) in and out of term	If no response is received within one month an individual can claim ‘distress’	<ul style="list-style-type: none"> • Ensure arrangements are in place 52 weeks a year 	JE / TP	By 22.6.18
		<ul style="list-style-type: none"> • Written SAR requests to be date stamped 	CL	Ongoing

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time		<ul style="list-style-type: none"> • All SARs to be sent to DPO 	CL	Ongoing
Ensure school rigorously enforces set timeframe for retention and destruction of documents and records of records destroyed kept	Failure to destroy may lead to breaches If information is destroyed too soon it may impede the SAR process	<ul style="list-style-type: none"> • Timetable in place & alerts set up • Records kept when records destroyed 	CL CL	By 15.6.18 By 15.6.18
Ensure school has procedures in place for the recording and storage of recruitment materials	Unsuccessful job applicants have 6 months to make SAR requests	<ul style="list-style-type: none"> • Keep register of unsuccessful job applicants and why candidates didn't meet criteria 	CL	By 15.6.18
Ensure school suppliers and 3rd parties have signed up to privacy notices	Schools have a responsibility to ensure that all suppliers and 3rd parties are bound by GDPR	<ul style="list-style-type: none"> • Compile a list of all suppliers' privacy notices and keep hard copies in a file 	CL	By 20.7.18
Ensure school insurance covers data breach	School may be liable for a large fine	<ul style="list-style-type: none"> • Check and amend policy as necessary 	CL	By 29.7.18
Ensure school is fully aware of data held or collected	Possible inadvertent breach or mismanagement of data	<ul style="list-style-type: none"> • Compile comprehensive list of all data held or collected by school – use LGFL spreadsheet 	CL / JE / TP Plus relevant staff	By 31.10.18
Ensure all school staff are aware of policies and procedures relating to	A data breach could occur	<ul style="list-style-type: none"> • Regular cycle of induction and training in place • Induction programme of 	JE / TP JE / TP	Ongoing

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<p>the new legislation</p>		<p>new staff including students, volunteers and in - year new staff</p>		
<p>Ensure all staff understand the policies and procedures for taking data off the premises</p>	<p>Risk of breach of data if memory sticks or documents are lost Possible unauthorised copying of pupil and staff data Potential risk of viruses being brought into the school</p>	<ul style="list-style-type: none"> • Sign in and sign out procedures for contact details / medical info etc. • Encrypted memory sticks always used for documents containing children’s names / DOB/ SEN status e.g. – annual reports, SEN reports, welfare reports, assessment information • Personal phones and tablets not to be used for school emails unless logging in through lgfl • All school business to be conducted on lgflmail accounts including by governors and students • Governors details stored on SIMs to allow for LGFL emails • No photos to be taken on phones or tablets – only 	<p>CL</p> <p>CL to order & maintain stock All staff</p> <p>All staff</p> <p>All staff, governors & students</p>	<p>By 15.6.18</p> <p>By 8.6.18</p> <p>By 20.6.18</p> <p>By 20.7.18</p>

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		<p>school equipment to be used</p> <ul style="list-style-type: none"> • List of passcodes for school I pads and laptops kept securely in safe • 		
<p>Ensure school's ICT hardware and systems minimises the risk of a breach</p>	<p>Risk of data being corrupted, stolen or held to ransom</p>	<ul style="list-style-type: none"> • Staff clear of procedures to be followed if they receive malware • Investigate upgraded Sophos anti-virus via Strictly • The school's system is regularly tested for virus penetration • Staff clear downloads as soon as they have been saved to the main drive • Changes made to SIMs are initialled and dated • Create supply teacher log ins for accessing staff drive 	<p>AC & Strictly</p> <p>Strictly</p> <p>All staff Checked by Strictly CL</p>	<p>By 19.6.18</p> <p>Ongoing</p> <p>Ongoing</p> <p>By 20.7.18</p>

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Ensure data has been backed up in case of system failure and that back up tapes are securely stored	Risk of all data being lost	<ul style="list-style-type: none"> • Store tapes in a different part of the building to main server • Tapes changed over on a regular basis and stored in fire proof safe 	Strictly	By 20.7.18
Ensure that cloud based school data is stored in counties which adhere to GDPR regulations	Risk of data breach	<ul style="list-style-type: none"> • Check and file hard copies of privacy notices 	CL	By 20.7.18
Ensure school allows for the encryption of confidential data	Minimises risk of hackers accessing information	<ul style="list-style-type: none"> • Set up system to send encrypted emails for use both within school and with outside agencies - Investigate possibilities for this e.g Egress and USOFX2 • Information of SEND, welfare, child protection and assessment on school drives is encryption protected 	AC & Strictly	By 20.7.18
			AC & Strictly	By 20.7.18
Ensure risk of the confidentiality of emails being breached is minimised	Risk of confidential information being shared	<ul style="list-style-type: none"> • Confidentiality message added to all emails sent 	CL	By 19.6.18
Ensure school is	Risk of data being	<ul style="list-style-type: none"> • Check whether school 	AC & Strictly	By 20.7.18

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protected against cookie misuse	cloned and misused	website and linked websites contain cookies <ul style="list-style-type: none">• Ensure school is clear about cookie information	AC & Strictly	By 20.7.18
Ensure inoperable website domains have been erased	Individuals can claim distress is photos or personal information remains on defunct website	<ul style="list-style-type: none">• Run check	Strictly	By 29.6.18