

# GDPR and Schools

## Are you prepared?

12 steps  
to take  
now



GDPR enforcement begins in May 2018  
ICO's 12 steps to take now\* - adapted for Schools.

**ContactGroup**

## **1 Awareness**

You should make sure that decision makers and stakeholders in your school (e.g. Headteacher, Governors, senior leadership team) are aware that Data Protection law is changing to GDPR. They need to appreciate the impact this is likely to have in school operations.

## **2 Information you Hold**

Think about all the personal data you hold (e.g. pupils, parents, staff, governors, suppliers, LAs, trustees). You need to document this, including where the data came from, and who it is shared with.

## **3 Communicating Privacy Information**

Review your privacy notices (e.g. on website and in documents) and ensure they are in-line with GDPR implementation changes.

## **4 Individuals' Rights**

Check that your procedures cover all the rights individuals have, including how you would delete personal data or provide data electronically and in a commonly used format.

## **5 Subject Access Requests (SARs)**

There will be a new one month timescale for handling requests for information stored on an individual. You should review your procedures to reflect how you will handle SARs.

## **6 Lawful Basis for Processing Personal Data**

You will also have to explain your lawful basis for processing personal data in your privacy notices, and when responding to a Subject Access Request.

## **7 Consent**

Review how all your school's data is obtained, recorded and shared. By reviewing data consent, you can make changes and refresh existing consents now if they don't meet the GDPR standard.

## **8 Children**

Review whether you need to put systems in place to verify individuals' ages and to obtain parental or guardian consent for any data processing activity (including any system where a student enters their name or other details online, e.g. homework access)

## **9 Data Breaches**

Ensure you have the right procedures in place to detect, report and investigate a personal data breach. You should also communicate this to all school staff and stakeholders.

## **10 Data Protection and PIA**

Familiarise yourself now with the ICO's code of practice on Privacy Impact Assessments (PIAs) and plan how and when to implement them in your organisation.

## **11 Data Protection Officers**

You should designate someone to take responsibility for data protection compliance and assess where this role will sit within your school's structure and governance arrangements. You should consider whether you are required to formally designate a Data Protection Officer.

## **12 International**

If you are an international school, or you operate internationally, you need to determine which data protection authority applies to you.