

GDPR: Need to Do

The GDPR emphasises transparency, security and accountability by data controllers and processors, while at the same time standardising and strengthening the right of European citizens to data privacy.

Step 1: Awareness

Make sure that the BOM, Principal and whole school staff appreciate the impact the GDPR is going to have on the school's data processing activities and the actions that are needed to take place to become GDPR compliant.

Step 2: Staff engagement

Engaging staff on data protection allows the school to set up very practical conversations about its ways of working now and in the future with respect to the data it holds and collects.

Step 3: Brainstorm our current risks and how to mitigate them

Talk through with staff what we currently do with personal data and where it is stored. This will help identify risks and mitigations. This creates awareness and responsibilities, it identifies how the school community will work to protect the personal data it collects and it will allow the school to ensure the technology that it uses is safe and secure.

Step 4: Information you hold

Start to document what personal data you hold and process, where it comes from and who you share it with. It is important that people across the school are engaged in the process; this can help ensure nothing is missed when mapping the data your school processes.

Step 5: Data Mapping Activities

Devise a questionnaire – you can distribute this to the areas within the school you have identified as processing personal data. Use straightforward questions that will prompt answers to the areas requiring documentation. Example questions: Why do you use personal data? Who do you hold information about? What is the legal basis for the collection of the data? Was/is consent required?

Meet directly with key personnel – this will help you gain a better understanding of how certain departments in your school use data.

Locate and review policies, procedures, contracts and agreements – as well as feeding directly into the documentation exercise, this can help you compare and contrast intended and actual data processing activities.

Step 6: Document Audit Trail

Once you have a basic idea of what personal data you have and where it is held, you will be in a good position to produce your data flow or data map so that you can see clearly what personal data is moving through the school system and where it ends up. This exercise would also extend to reviewing the school's current data protection policy.

Step 7: Building blocks towards compliance

Engaging in this exercise will allow your school to demonstrate and document the various types of data processing the school carries out and the legal basis for processing the personal data.

Step 8: Safe and secure storage

The benefit of the data mapping exercise is that it might show up gaps in compliance or it might highlight data sets which require greater levels of security and is at high risk if it were lost. Consideration should be given to those risks identified, such as accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed. Identify and document the security measures taken to ensure safe storage of the data.

Step 9: Updating your current Data Protection Policy

Following the data audit, you now have a documented overview of all the personal data you collect.

The information gathered is now reviewed in preparation for developing your school's data protection policy and is relevant to the personal data held by your school.

This policy should reflect the GDPR principles and be compliant with the GDPR.

The policy should demonstrate how and why the school collects, retains, updates, stores, facilitates access to and reviews the manner in which personal data is retained.

Step 10: Data protection is not just for the 25th May 2018

Data protection legislation will continue to evolve and into the future data protection awareness and continued compliance will be a little and often job! We are all still learning! With that in mind, we should be on the front foot to understand and deliver the right response under the GDPR.