



Welcome and thank you for choosing GDPRiS to accompany you on your school's journey to GDPR compliance.



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## Start your preparations for GDPR

Every member of staff in school is responsible for protecting the data you hold. If you haven't already done so you should start planning now, ensure you understand GDPR and your responsibilities.

There seems to be a lot of panic related to the introduction of GDPR however, compared to many private organisations, schools are much better placed to address the new regulations. Whilst there are many extra demands required to map and audit personal data stored and shared, schools with existing rigid data protection policies should see GDPR as an opportunity to improve the way they work.

## What should you be doing to prepare?

There's lots of information out there and we have done our best to gather it together and present it in a way that makes sense to schools. We believe the below guides and resources will help you start your preparations with the right approach.

GDPR & Schools - find out what is changing and how it may affect your school

Preparing for GDPR in Schools - the 12 steps you need to take to prepare for GDPR

<u>Readiness tracker</u> - download and record your actions step by step to track your progress

GDPRiS articles - read through our articles about how GDPR will affect schools

In addition to the above there is a wealth of information on the Information Commissioners Office (ICO) website.

Sign up to receive our '<u>user newsletter</u>' to stay up to date with what's happening at GDPRiS, updates on GDPR and DPA and much more.

## What exactly is the role of your school under GDPR?

You are the 'data controller' and therefore responsible and accountable for the data you hold. Anyone else you are connected with, such as 3rd party suppliers, who also process personal data are called the 'data processor'. Under GDPR data controllers and data processors will have equal liability should there be a data breach.



## How will GDPRiS help you achieve compliance?

GDPRiS is a simple and intuitive tool; it reflects existing processes and the way schools work, whilst pro-actively prompting you to meet and exceed the new General Data Protection Regulations.

### Managing suppliers

Our Suppliers area forms an integral part of demonstrating your compliance under GDPR.

It offers a comprehensive list of suppliers and their products, with instant mapping. As part of our product mapping process GDPRiS stores information on the standard data processed by each supplier. GDPRiS goes a step further by capturing the legal basis for processing, retention information and how the rights of the data subject are met.

### **Documents and training**

Under GDPR it is a requirement to demonstrate that all staff have undertaken Data Protection training. This area will make up part of the evidence that you are complying with GDPR.

The Documents and Training area is great for sharing internal policy and process documents, training materials and to access GDPRiS training materials and videos.

#### **Data breaches**

Under GDPR certain types of data breach must be reported to the relevant supervisory authority (In the UK the Information Commissioners Office - ICO) within 72 hours, and in some cases to the individuals affected.

A tight timescale considering you need to find out about the breach, establish if it is a reportable breach then report it to the ICO.

The true meaning of a breach under GDPR is a breach of security leading to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This means that a breach is more than just the loss of personal data it is about whether the breach is likely to result in a risk to the rights and freedoms of individuals.

Whilst we hope you will never need to use this area, GDPRiS is designed to streamline the process of breach reporting and enable you to track and manage breaches ensuring you are able to respond within these tight new timescales. The breach reporting process in GDPRiS follows the guidance provided by the ICO.

All staff should be pro-active in reporting anything they believe may be a breach of GDPR from within their individual user account. The Data Protection Manager for the school and/or the DPO can then assess if it is a reportable breach or not and take the necessary actions to ensure your school complies with GDPR.



#### **Internal Audits**

Under GDPR the new accountability principle requires you to demonstrate that you comply with the principles and states explicitly that this is your responsibility.

A data audit is a step-by-step process that examines every stage of a data processing mechanism. As data controller, a school must be 100% satisfied that everything a data processor says it is doing is true and can be seen clearly and checked. An audit should highlight any issue that arises at any step of the processing. Moreover, an audit will produce comprehensive records and reports to demonstrate that the data controller has done everything in its power to check that it's personal data is processed safely, legally and ensures that the full rights of the data subject are met.

Within GDPRiS, suppliers have provided data maps of the information they process for a school, and have shared documentation to demonstrate their compliance status. Whilst having full access to this information in your GDPRiS system, it is still the duty of the data controller (the school), through their Data Protection Officer, to regularly carry out their own due diligence to confirm that they believe the information provided is correct.

At the highest level, a data audit should ask questions about the data processing mechanism in school.

- 1. What data have you collected?
- 2. Why do you have this data?
- 3. Where is it located?
- 4. How is it used and accessed?
- 5. Are the rights of the data subject met?
- 6. How do you protect data?
- 7. Are all staff fully trained in data protection awareness?
- 8. What records and reports do you keep as evidence?

The Internal Audit area within GDPRiS allows you to fully address each of these questions by reviewing and recording at each step within the audit.



### Think of your Internal Audit as 'Stop the clock'

Let's look at what we know and carryout a planned due diligence to be fully satisfied all is correct.

Q1-5 are addressed within the data mapping section of suppliers. During an Internal Audit within GDPRiS, a DPO can review the supplier's data maps and documentation which demonstrate their compliance. They can confirm they have reviewed each supplier's information and select **Approved** or **Not approved**. Not approved suppliers will need to be revisited.

Q6 focuses on the security, infrastructure, policies, and the ethos of the school's data protection procedures. Self-assessment questionnaires are provided on:

- Reviews and improvements
- Operation
- School-wide Support
- Privacy Impact Assessments
- Leadership
- The role of the school

Q7 is probably the most important question of all. The most sophisticated networks and security have little use unless EVERY member of staff embraces their responsibilities to protect personal data and the rights of the individual. Within GDPRiS there is a section for every member of school staff, and regular outside supporters, to carry out their own Data protection self-assessment questionnaire. This is the Staff Data Protection Audit section of the Internal Audit. Here staff are reminded of their responsibilities, confirm that they comply with the school's DP policies and record any DP training.

Q8 asks for documented proof that you have carried out due diligence and that's exactly what GDPRiS stores. It takes a school through its GDPR journey to compliance, recording and reporting along the way, each step of the journey. In the event of an inspection everything you need is in one place and demonstrates the efforts you have made to ensure you keep personal data safe, you process data legally and you address the rights of your data subjects.

The Internal Audit is the final step to compliance. Once completed the information will need ongoing input to keep it up-to-date so it is important to perform regular Internal Audits to ensure compliance.



## **Getting started with GDPRiS**

You will have received a username and password to allow you to activate your 'live' GDPRiS site, *it is important to note that any data you enter in your 'live' site will remain there forever therefore only clean data should be entered*.

We will provide you with a FREE Practice Site in order that you can familiarise yourself with the tasks you will need to perform in your 'live' site and of course carry out training for your staff. Data entered in your practice site is not transferrable to your live site. It is important to note that you will not be expected to add products to our supplier product directory in your 'live' site - we are engaging with all suppliers to get their products mapped for you.

You should activate your 'live' site account so that it is ready for use when you have familiarised yourself with GDPRiS using your 'practice' site.

Download our guick guide to activating and personalising your site.

Watch our video about GDPRiS

### Your GDPRiS Practice Site

Once you have received an invitation to activate your Practice Site you will be able practise every task you will need to perform in your 'live' site without having to worry about compromising any data! Use the guides available on our support site to find your way around and get to know GDPRiS.

# **GDPRiS** support

Our customer support team is always on hand to help with any queries or assistance you need.

Call: 0203 287 0074 Email: support@gdpr.school

We hope you enjoy using GDPRiS and we are delighted that you have chosen us to accompany you on your journey to compliance with GDPR.