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GDPR Action Plan 2017-18

Action	What Needs to Happen	By Who	By When	Success Criteria	Update January 18	Update March 18
<p>Review and document relevant policies for GDPR compliance. This includes the privacy policy, privacy notices, data protection policy, data sharing policy and information security policy.</p> <p>MOVE TO ONE SHARED POLICY ACROSS THE TRUST IN EACH CASE</p>	Review Data Protection Policy to ensure compliance – include data impact assessment, Governor protocols, maintenance of recording of protection activity, openly demo how you comply	HH/KR	Spring 2018	The Policy supports the Trust's compliance with the GDPR through the inclusion of the Breach Notification Procedure		
	Review Privacy Notice – include consent processes and regulations around children	HH/KR	Spring 2018	The Notice supports the Trust's compliance		
	Draft Data Sharing Policy	HH/KR	Spring 2018	Data Sharing Policy in place and known and GDPR Action Plan understood by all staff		
	Draft Information	HH/KR	Spring 2018	Information Security Policy in Place and		

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	Security Policy			known and understood by all staff		
	Formally adopt DfE March 15 Information Sharing Protocol	Board	Spring Board Meeting	Information Sharing Protocol to be adopted and reviewed alongside DfE review		
	Create a Data Breach Policy and Procedure	HH/KR	Spring 2018	The Policy supports the Trust's compliance with the GDPR through the inclusion of the Breach Notification Procedure		
	Review Freedom of Information Policy	HH/KR	Spring 2018	The Policy supports the Trust's compliance		
	Ensure that school and trust websites inform third parties as to how we are compliant	KP	Ongoing	Website statements in place		
Review and document the mechanisms that you use to collect consent from data subjects.	Specific training for central, HTs and Front Office, Governors, staff	SLT and then KP/KR (?)	Spring 2018	Trust's mechanisms support compliance		
Appoint at DPO/Business Administrator	Finalise NJC	HH	Spring 1 2018	DPO in place		
	Ensure that the person spec outlines the	HH	Spring 1 2018	DPO in place		

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Ensure that the GDPR is on your Board or management team's agenda and that sufficient resources and budget are allocated to GDPR compliance.	required statutory qualifications					
	Create timeline for appointment and appoint individual	SLT/HH	Spring 1 2018	DPO in place		
	Induct and train individual. If there is a delayed starting point, consider using KR in the interim period	KP (?)	Spring 2018	DPO in place		
	Identify the Trust Board as the Data Controller – consider role for Governors?	CEO/ Board	Spring 2018	To ensure the Trust is compliant.		
	Identify the Data Processors in each school	Board	24 th July 2017	Allocation of responsibility to a range of individuals to ensure improved overall compliance		
	Appoint GDPR/Data Protection Special Interest Trustee (?)	Board	End of January 2018	A Special Interest Trustee in place as part of the Board's Data Controller role.		
	Add data protection to Risk Register	JS	Spring 2018	Risk is regularly reviewed and actions taken accordingly.		

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	Add to Spring term Trustee's agenda	Clerk	Spring 2018	Standing item on each board's agenda with only updates to report and no breaches being identified or having to be considered/notified to the ICO (?)		
	Allocate resources as appropriate. Data Processors and Data Controller to be appropriately supported in carrying out their role.	Board	Ongoing	Resources allocated to enable statutory processes to be effective.		
Alongside the updating of the data protection policy, ensure the Trust's insurance policies cover GDPR risks.	Review insurance policies in light of increase obligations and potential fines	RC	Spring 2018.	To ensure any potential risk is appropriately covered		
Deliver GDPR training for your employees. This should be carried out before May 2018.	Deliver GDPR Training to all staff – including Governors	Outside company – SB/HH	Various	All staff aware of the new GDPR requirements		
Audit where data is stored in schools.	Carry out audit	RC/KP/KR	15 th March	To have a full knowledge of where data is stored and to		

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				adapt procedure and policy to ensure compliance.		
Audit where data is stored centrally	Carry out audit	KP/KR/HH	15 th March	To have a full knowledge of where data is stored and to adapt procedure and policy to ensure compliance.		
Review your existing contracts and make any necessary amendments.	Review Sims Contract (CAPITA)	RC	Spring 2018	To be fully compliant with a sentence in the contract from the company on how the comply to cover GDPR		
	Review Target Tracker Contract – if still available	RC	Spring 2018	To be fully compliant with a sentence in the contract from the company on how the comply to cover GDPR		
	Review Reading Eggs Contract – TBC with schools	HT/KP/KR	Spring 2018	To be fully compliant with a sentence in the contract from the company on how the comply to cover GDPR		
	Review Mathletics Contract – TBC with schools	HT/KP/KR	Spring 2018	To be fully compliant with a sentence in the contract from the company on how the comply to cover GDPR		
	Review Entry Sign Contract	HT/KR	Spring 2018	To be fully compliant with a sentence in the contract from the		

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				company on how the comply to cover GDPR		
	Contact LAs re: GDPR and the safe transfer of data	KR	End Spring 2018	To be fully compliant with a sentence in the contract from the company on how the comply to cover GDPR		
	Contact Bexters, Occupational Health and Schoo, Nurses to gain a GDPR statement	HH	End of Spring 2018	To be fully compliant with a sentence in the contract from the company on how the comply to cover GDPR		
	Review any other educational contracts including DfE timestable testing and NCA.	HT/KP/KR	Spring 2018	To be fully compliant with a sentence in the contract from the company on how the comply to cover GDPR		
Ensure that personal data is processed in easily accessible and searchable databases.	Review Keyholders of all personnel cabinets	HT	Spring 2018	Keys to personnel cabinets held by the appropriate roles		
	Review archive access across the Trust	HT/KR	Spring 2018	Access is only granted to appropriate roles		
	Create guidenlines for what to use for the safe storage of and sending of	KR	Spring 2018	All data is secure and staff know how to send/store personal information.		

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	data.				
	HTs to deliver this in schools and train staff on new procedures	HTs			
	Review Sims and other remote services viewing rights – set up a log to know who has access and implement policy as necessary on exit	KR	Spring 2018	Access is only granted to appropriate roles	
	Review Target Tracker viewing rights – TBC	HT/KR	Spring 2018	Access is only granted to appropriate roles	
	Review Reading Eggs viewing rights – TBC	HT/KR	Spring 2018	Access is only granted to appropriate roles	
	Review Mathletics viewing rights – TBC	HT/KR	Spring 2018	Access is only granted to appropriate roles	
	Review any other educational databases	HT/KR	Spring 2018	Access is only granted to appropriate roles	
	Identify if you transfer personal data outside the UK and, if so, review these	Investigate where data is stored for all of	KR/RC RC – TT and Capita	Spring 2018	The Trust is fully compliant with no breaches resulting in a

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arrangements to ensure you are GDPR-compliant.	our databases and ensure contracts and policies align.	KR – EIS, ATS, LAs and other backup providers		fine.		
Schedule regular GDPR review meetings throughout 2018 to ensure that we are on track with your GDPR compliance plan.	Add to every board and LGB meeting as an agenda item	Clerk	Spring 2 and half termly thereafter	The Trust is fully compliant with no breaches resulting in a fine.		
	Add to SLT, SLT and HT agendas as a standing item	CEO/KP/LHTs	Spring 1 and thereafter	The Trust is fully compliant with no breaches resulting in a fine.		
Ensure we have paid the ICO fee.	Investigate how much the fee is and how it will be paid	RC	April 2018	The Trust is compliant with the ICO.		
	Ensure schools and central are displaying their certificate	KP				

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