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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	Update April 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>	<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</p>	HH/KR	Spring 2018	<p>The Policy supports the Trust’s compliance with the GDPR through the inclusion of the Breach Notification Procedure</p>	<p>All policies are currently being rewritten and due to be ratified by Governors/Trustees at the next round of FGBs and Board Meetings – 6.3.18</p>	<p>Review once the new DPO is in place</p>	<p>Review once the new DPO is in place</p>
	<p>Review Privacy Notice – include consent processes and regulations around children</p>	HH/KR	Spring 2018	<p>The Notice supports the Trust’s compliance</p>	<p>All policies are currently being rewritten and due to be ratified by Governors/Trustees at the next round of FGBs and Board Meetings – 6.3.18</p>	<p>Review once the new DPO is in place</p>	<p>Review once the new DPO is in place</p>
	<p>Draft Data Sharing Policy</p>	HH/KR	Spring 2018	<p>Data Sharing Policy in place and known</p>	<p>All policies are currently being</p>	<p>Await DPO advice</p>	<p>Await DPO advice</p>

THE PRIMARY FIRST TRUST

				and GDPR Action Plan understood by all staff	rewritten and due to be ratified by Governors/Trustees at the next round of FGBs and Board Meetings – 6.3.18		
	Draft Information Security Policy	HH/KR	Spring 2018	Information Security Policy in Place and known and understood by all staff	All policies are currently being rewritten and due to be ratified by Governors/Trustees at the next round of FGBs and Board Meetings – 6.3.18	Await DPO advice	Await DPO advice
	Formally adopt DfE March 15 Information Sharing Protocol	Board	Spring Board Meeting	Information Sharing Protocol to be adopted and reviewed alongside DfE review	All policies are currently being rewritten and due to be ratified by Governors/Trustees at the next round of FGBs and Board Meetings – 6.3.18	KP action	Complete
	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	All policies are currently being rewritten and due to be ratified by Governors/Trustees at the next round of FGBs and Board Meetings – 6.3.18	Review once the new DPO is in place	Review once the new DPO is in place
	Review Freedom of	HH/KR	Spring 2018	The Policy supports the Trust's	All policies are currently being	Review once the new	Review once the

THE PRIMARY FIRST TRUST

	Information Policy			compliance	rewritten and due to be ratified by Governors/Trustees at the next round of FGBs and Board Meetings – 6.3.18	DPO is in place	new DPO is in place
	Ensure that school and trust websites inform third parties as to how we are compliant	KP	Ongoing	Website statements in place	All schools and central have been sent action plan and information to upload to website – 27.2.18	Awaiting from DPO	Awaiting from DPO
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		ACTION: KR/HH/AH creating a consent form	End of play Tuesday 24/04/18
Appoint at DPO/Business Administrator	Finalise NJC	HH	Spring 1 2018	DPO in place	Completed – 12.12.17	Awaiting DPO appointment	Complete
	Ensure that the person spec outlines the required statutory qualifications	HH	Spring 1 2018	DPO in place	Completed – 12.12.17	Awaiting DPO appointment	Complete
	Create timeline for appointment	SLT/HH	Spring 1 2018	DPO in place	JD and Person Spec. written – timeline for advertising	Awaiting DPO appointment	Complete

THE PRIMARY FIRST TRUST

Ensure that the GDPR is on your Board or management team's agenda and that sufficient resources and budget are allocated to	and appoint individual				currently being mapped. Additional consultant support being costed - 27.2.18		
	Induct and train individual. If there is a delayed starting point, consider using KR in the interim period	KP (?)	Spring 2018	DPO in place		Awaiting DPO appointment	Complete
	Identify the Trust Board as the Data Controller – consider role for Governors?	CEO/ Board	Spring 2018	To ensure the Trust is compliant.		ACTION: KP taking to the Board	Complete
	Identify the Data Processors in each school	Board	March 2018	Allocation of responsibility to a range of individuals to ensure improved overall compliance		ACTION: KP	Complete
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.	For the next Board meeting – March 2018	KP at the Board meeting	Complete	

THE PRIMARY FIRST TRUST

GDPR compliance.	Add data protection to Risk Register	JS	Spring 2018	Risk is regularly reviewed and actions taken accordingly.	For the next Board meeting – March 2018	KP at the Board meeting	Complete
	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 (?)	For the next Board meeting – March 2018	KP at the Board meeting	Complete
	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.		KP at the Board meeting	Complete
Alongside the updating of the data protection policy, ensure the Trust's insurance policies cover GDPR	Review insurance policies in light of increase obligations	RC	Spring 2018.	To ensure any potential risk is appropriately covered		Complete	Complete

THE PRIMARY FIRST TRUST

risks.	and potential fines						
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	Booked – dates to be confirmed with schools – 27.2.18	Send to KP final attendees list	Complete
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 adapt procedure and policy to ensure compliance.	Schools have until 15.3.18 to complete this with or without Facilities support	Advice to be issued to schools around data	Complete
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.		Advice to be issued to centrally around data	AH to carry this out by next meeting.
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		Complete	Complete
	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	Statement received – awaiting further information as they finalise their own policies – 1.3.18	Complete	Complete

THE PRIMARY FIRST TRUST

				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		Complete	Complete
	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		Complete	Complete
	Review Entry Sign Contract	HT/KR	Spring 2018	To be fully compliant with a sentence in the contract from the company on how the comply to cover GDPR		Complete	Complete
	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		Complete	Complete
	Contact Baxters,	HH	End of Spring 2018	To be fully compliant with a		Complete	Complete

THE PRIMARY FIRST TRUST

	Occupational Health and School Nurses to gain a GDPR statement			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		Complete	Complete
	Sports coaches, IRIS connect, therapists and any other third party	AH	Summer 1 2018	To be fully compliant with a sentence in the contract from the company on how the comply to cover GDPR			AH to contact and feedback at next meeting
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	Schools have until 15.3.18 to complete their school-based audit	Action in place	Complete
	Review archive access across the Trust	HT/KR	Spring 2018	Access is only granted to appropriate roles	Schools have until 15.3.18 to complete their school-based audit	Action in place	In process
	Create guidelines for what to use for the safe	KR	Spring 2018	All data is secure and staff know how to send/store personal		In process	Going out on 25.04.18

THE PRIMARY FIRST TRUST

	storage of and sending of data.			information.			
	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 Ensure Central Team personnel do not have HR access.		Complete	AH to contact all schools to ensure remote access is up to date.
	Review Target Tracker viewing rights – TBC	HT/KR	Spring 2018	Access is only granted to appropriate roles		Complete	Complete
	Review Reading Eggs viewing rights – TBC	HT/KR	Spring 2018	Access is only granted to appropriate roles		Complete	Complete
	Review Mathletics viewing rights	HT/KR	Spring 2018	Access is only granted to appropriate roles		Complete	Complete

THE PRIMARY FIRST TRUST

	– TBC						
	Review any other educational databases	HT/KR	Spring 2018	Access is only granted to appropriate roles		Complete	Complete
Identify if you transfer personal data outside the UK and, if so, review these arrangements to ensure you are GDPR-compliant.	Investigate where data is stored for all of our databases and ensure contracts and policies align.	KR/RC RC – TT and Capita KR – EIS, ATS, LAs and other backup providers	Spring 2018	The Trust is fully compliant with no breaches resulting in a fine.		Complete	Complete
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.	Spring FGB agenda	Ongoing	Ongoing
	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.	Ongoing	Ongoing	Ongoing
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.		ACTION: KR	ACTION: KR
	Ensure schools and central are displaying their certificate	KP					

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Governor compliance	KP to go out with a termly checklist	KP	Summer 2	Governors are up to date on items.			KP to send out the checklist.
	Iris connect – AH to contact and then email KP	AH	Summer 1				
	All central personnel who are not HR to not have access to SIMs and HR to have access.	AH/KR	Summer 1				
	Contact EIS and BTEch to ask about Office 365 and its pros and cons versus any other system.	AH	Summer 1				
	Egress and Igfl – AH to find information out about whether Igfl clients are able to have	AH	Summer 1				

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	Egress free.						
	Create individual school action plans out of the DPO's GDPR audits.	SB	Summer 3				