

GDPR FOR SCHOOLS

GDPR: privacy notice checklist guidance

Communicating how you will use personal data is most commonly done in a privacy notice. **Lisa Griffin** offers a checklist to help create your privacy notices and guidance on gaining consent.

A privacy notice should, at a basic level, tell people who you are, what you are going to do with their information and who it will be shared with.

It ensures you are being completely open with regards to your use of personal data.

Your privacy notices should be a work in progress and open to review. Update it as necessary to reflect any changes in your collection and use of personal data.

What to include

Once you have audited your data and mapped the information you hold, you will be able to determine what to include in your privacy notice.

You'll know what personal information you hold, what you do with it and what you are planning to do with it.

You'll also have reviewed what you actually need, whether you are collecting the information you need and whether there are multiple data controllers. All this information should be included in your privacy notice.

The DfE have published some [suggested privacy notices](#) for schools and local authorities to issue to staff, parents and pupils.



Gaining consent

Consent is strengthened under the GDPR and should be 'freely given, specific, informed, unambiguous'. You need to consider how you will gain and record individuals' consent, if a positive opt-in is needed.

When relying on consent, you should:

- display it clearly and concisely
- make it prominent and separate from other matters (e.g. terms and conditions)
- ask individuals to positively opt-in
- give your audience sufficient information to make a choice
- explain the different ways you will use their information and clearly provide a way for them to agree to these different types of processing.

Available methods of consent include:

- signing a paper consent statement
- ticking an opt in box
- clicking an opt in button or link
- selecting from yes/no options
- choosing technical settings/through a dashboard
- responding to an email
- answering 'yes' orally to a clear request
- volunteering information for a specific purpose.

Withdrawing consent

Under GDPR you need a lawful basis to send direct marketing to an individual. If consent is your lawful basis, include a separate opt-in method for direct marketing in your privacy notice.



You should also consider how you can obtain consent following any changes to your privacy notice, and how individuals can revoke this consent if they do not agree with these changes.

It should be as easy for consent to be withdrawn as it is to give it, so make it clear how an individual can do this. You should keep evidence of consent – who, when, how, and what you told people.

For more information, see the [ICO website](#).