

MAT GDPR

Practical insights on how to make a DPO structure work across a MAT

Dai Durbridge, Browne Jacobson LLP

Ian Sharpe, COO and DPO, Northampton Primary Academy Trust



brownejacobson
education advisors

How are we getting on?

Status check:


- Documents
- DPO appointed
- Training
- Culture change
- Breaches and/or near misses?

How are we getting on?

Status check:

- What's left to do?
- What's your biggest worry?
- What would you do differently?

This session

- 
1. Governance structure
 2. Discharging the duty across a MAT
 3. Training and updating
 4. Culture change
 5. Your top tips

But first, a real MAT case study...

NPAT Trust history

- Established 2012
- 11 primary schools
- 14 sites
- 4,500 children
- 700 staff and volunteers



Our approach to GDPR: Changing the culture

- May 2018 - GDPR month within the Trust:
- Training by Browne Jacobson and DPO for SLT and GB
- All staff and volunteers complete online training
- Regular drip-feed of GDPR Bulletins



Our approach to GDPR: Changing the culture

- May 2018 - GDPR month within the Trust:
 - All staff admin receive specific training and support data mapping
 - All staff have GDPR support cards
 - DPO -v- DSL analogy

Data Protection Officer (DPO)



DPO

V

DSL

What will the DPO do.....

- Named single point of contact for the Trust with the ICO
- Keep up with developments in legislation
- Implementation of policy and train employees
- Data audits
- Suitably qualified and have an understanding of Data Protection
- Deal with Subject Access Requests, Data Breaches and processes

Don't reinvent the wheel!

Educational Excellence: Creating Opportunities and Enriching Lives

Help cards

GDPR SUPPORT

GENERAL DATA PROTECTION REGULATIONS

NPAT has a responsibility to keep all data it uses safe and secure. Please contact the NPAT Data Protection Officer if you have any GDPR queries regarding processing data, Subject Access Requests or Data Breaches.

Name:

www.npatschools.org

DPO: Ian Sharpe 07766 011391 dpo@npatschools.org



Contact the DPO IMMEDIATELY if you have lost data

Questions the DPO will ask when you contact them about lost data:

- *Who was responsible for the data?*
Your name, school and position.
- *When did you last have possession of the data?*
Date and time.
- *What form was the data being stored in?*
Hardcopy, written notes, email, photos, audio, video.
- *Where was the data being stored at the time it went missing?*
Describe where the data was when it was lost.
- *What data has gone missing?*
Describe the information contained in the data.
- *Who will the missing data affect?*
Names of individual people whose data is at risk.

Remember, if in doubt, contact the DPO!

Bulletins

GDPR 4

GENERAL DATA PROTECTION REGULATIONS

Processing Data

• Why do we need the data?
If we don't need it, we shouldn't be processing it.

GDPR 3

GENERAL DATA PROTECTION REGULATIONS

Subject Access Requests

With both Subject Access Requests (SAR) and Data Breaches we must respond as a Trust in an effective, efficient and timely manner to any issues. Time is of the essence!

In this week's bulletin I will go through the time frames, procedures and what you will need to contribute.

Subject Access Requests (SARs) are nothing new. We have had one SAR so far in 2017/18. However, there could be an increase in SARs as the new legislation embeds itself. A SAR must be submitted in writing which may include, letter, email or even a message posted on social media. If your school or you as an individual receives a SAR please send it to me immediately. I will check that the SAR is clear about what personal data is required. I will then acknowledge the SAR and inform the sender of the next stages in the process. As DPO I will coordinate the response and handle all communication with the person who has submitted the SAR. We have one calendar month to respond to the SAR and this includes weekends and school holidays. Requests made over the summer holidays may mean some delay in responding due to us not having access to the data requested while schools are closed. Your

Topics Covered This Week:

- GDPR Dos and Don'ts
- Processing Data

If you have any questions

GDPR 2

GENERAL DATA PROTECTION REGULATIONS

Two Weeks To Go!

All NPAT staff and governors **MUST** complete this training. The first school in the Trust that gets all of its staff and governors to complete the training will be handsomely rewarded! It's getting competitive with two weeks to go!

So far, a third of our people in the Trust have registered and started to complete the training. There have been a few teething problems this week but the attached help sheet from Spongy Elephant will resolve the issues some staff have had. The help sheet will also help those who are using it for the first time.

Everyone gets a certificate on completion and the resources can be accessed on any device. To get started click on the link below:

<https://www.spongyelephant.com/npat/>

spongyelephant

ALL NPAT Staff and Governors MUST complete by May 25th

If you have any questions

GDPR 1

GENERAL DATA PROTECTION REGULATIONS

What is GDPR?

Welcome to Northampton Primary Academy Trust's GDPR Bulletin. The new General Data Protection Regulations (GDPR) came into force across Europe on the 25th May 2018.

This is the first of four bulletins which will be released every Friday to help ALL staff and governors in NPAT to understand what the new regulations mean for us. It doesn't matter what your role is in our Trust, we all need to get on board with this new piece of legislation.

The data picture looks very different now to what it did in 1998 when the current Data Protection legislation came into force. 90% of all data in the world today has been created in the past few years. There is now a wealth of information at our fingertips in many different forms. Unfortunately, there have been many cases reported where the sharing of individuals personal data without their permission has happened. The new regulations aim to make the use of personal data more secure than ever before.

The Information Commissioner's Office (ICO) is the UK's independent public body responsible for upholding information rights and data privacy. They may take enforcement action against any UK organisations that do not process a person's data correctly or keep it secure. They will have the ability to fine an organisation that is found to be at fault up to a maximum fine of 20 million euros! Although organisations have been fined on several occasions under the current legislation, no schools have ever been fined. So, what does this all mean for NPAT?

Schools have always had to process personal data and have usually been very good at keeping it safe and secure. However, schools like any other public, private or charitable organisation must now meet the requirements of the new GDPR legislation. Last Monday evening our training as a Trust got off to a great start for senior leaders and governors with a session led by Philip Wood, a solicitor from Browne Jacobson, our legal advisors. Over the next few weeks we will be training staff and governors on the new GDPR legislation so everyone understands what it means. Please take the time to take part in the required training and read the weekly bulletins. Thank you!

lan Sharpe NPAT Data Protection Officer (DPO)

GDPR 1

GENERAL DATA PROTECTION REGULATIONS

Types of Personal Data

- Name
- Address
- Localisation
- Online identifier
- Health information
- Income
- Cultural profile
- and more

Since 25 May: Working with people

- New staff GDPR induction
- Sharing what's gone well...and what has not
- 7 near misses - but procedures worked
- NPAT on receiving end of a near miss
- Bulletins and data audits
- Forms and advice



NPAT's MAT top tips

1. People are the biggest GDPR risk...work with them
2. Appoint the right DPO for your MAT
3. Purchase Browne Jacobson toolkit and helpline
4. Use DPO -v- DSL analogy as staff and volunteers understand this already

NPAT's MAT top tips

5. Do the paperwork and create processes that are “done with” not “done to”
6. Be consistent and use common sense
7. Change the culture!



Governance structure

- Do you report to your trustees?
- If so, how and when?
- Do you have a GDPR lead trustee?
- Is GDPR a standing item on their meeting agenda?
- Risk register

Discharging the duty across a MAT

- Consistent policies and procedures
 - Retention
 - Breach
 - SARs
 - Overall compliance
- Your team
- Two way information sharing

Discharging the duty across a MAT

- Do your academies tell you about:
 - Near misses
 - Breaches
 - SARs
 - Good ideas
 - Learning opportunities
- DPO team meetings
- Audit

Training and updating

- Have you?
- What methods?
- What about ongoing updating?
- Remember what the ICO has said...

What the ICO has said to schools

*Reviewing the effectiveness of your current data protection training in order to promote a culture of improvement...the ICO would recommend **more active learning**, for example using knowledge based testing of GDPR to ensure staff awareness of their responsibilities*



What the ICO has said to schools

Also consider your methods of control, delivery and monitoring of such training...

should also be tailored to specific roles



What the ICO has said to schools

*ICO recommends, as good practice, that **refresher training is carried out annually**. However, the ICO also recognises that some organisations may be restricted by available resources but would recommend that, in such cases, **refresher training does not exceed two years***



Training and updating

- Did you measure outcomes?
- What is your ongoing training and updating plan?

Culture

How have you gone about it?



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Sharing; it's good for the soul...

What are your top tips?

What processes can you share?

What didn't go so well?

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