

This statement has been prepared by Mrs D. Byron in line with the school's Data Protection Policy. It is an analysis of the last 12 months activity and covers the period from September 2017 to August 2018.

Data Protection Officer					
Name	Miss Monique Ring				
E-mail Contact	office@marlborough.harrow.sch.uk				
Training Undertaken in Said Period	Harrow Legal Briefing, 1 st February 2018 (Headteacher and School Business Manager) GDPR Compliance Training Illuminate Education, 7 th February 2018 (Headteacher, School Business Manager and School Secretary) NAHT GDPR CPD, 29 th February 2018 (Headteacher and School Business Manager) GDPR CPD (All Staff)				
The Post Is	An In-house Appointment	X	Shared with Other Schools		External Provision

Headline Information			
Number of Data Protection Audits Undertaken This Year	1	Number of Requests for Viewing Data Held	0
Number of Data Breaches Identified this Year	0	Number of Requests for Amendments of Data Held	0 (as of May 2018)
Number of Issues Referred to Information Commissioners Office	0	Number of Requests for the Removal of Data from Records	0
Total Income from Data Protection Issues	£0	Total Cost of Data Management This Year	£

Work Undertaken	
Policies Reviewed	Data Protection Policy All policies as outlined for review within the summer term section of the annual policy schedule
Improvements to Practice Undertaken	Audit of existing data protection policy and procedures Revised data protection policy Scoping exercise completed for all existing data processes Review and updates to data collection requests (bringing practice in line with GDPR compliance requirements) Introduction of data amendment parental requests and auditable trail (bringing practice in line with GDPR compliance requirements)

	<p>GDPR compliance questionnaire completed, analysed and evaluated by all third parties, SLAs and contractors to inform provision, school actions and response where required.</p> <p>External GDPR Compliance CPD (DPO, Headteacher, School Business Manager and School Secretary)</p> <p>Whole staff CPD led by DPO and SLT</p> <p>Governing Body CPD</p> <p>GDPR CPD Registers and evaluations retained by DPO / CPD Lead</p> <p>Effective communication of GDPR with all staff through a wide range of mediums including planned parent and carer workshops</p> <p>Prohibition on the use of non-encrypted portable storage devices within school</p> <p>Prohibition on the use of communication via personal email amongst the Governing Body</p> <p>Reinforced expectations of procedures to follow when staff leave learning environments where data is present and accessible</p> <p>Updated school website to include information on GDPR compliance and parental rights, placing this alongside the school's high regard for child protection and safeguarding.</p>
Training Undertaken / Provided	<p>Harrow Legal Briefing, 1st February 2018 (Headteacher and School Business Manager)</p> <p>GDPR Compliance Training Illuminate Education, 7th February 2018 (Headteacher, School Business Manager and School Secretary)</p> <p>NAHT GDPR CPD, 29th February 2018 (Headteacher and School Business Manager)</p> <p>GDPR CPD (All Staff)</p>
Other Work	<p>Recruitment of Designated Data Protection Officer</p> <p><i>See also priorities for 2018-2019</i></p>

Review Record

Reviewed by Headteacher	Mrs D. Byron
Reviewed by Governing Body	Mr K. Ward
Reviewed by Other Designated Individuals (If Required)	<p>Miss M. Ring (DPO)</p> <p>Mrs M. Roberts (School Business Manager)</p> <p>Mrs C. Robinson-Jones (Deputy Headteacher)</p> <p>Mrs J. Potter (School Secretary)</p> <p>Mrs D. Hamadouche (Admin and Finance Assistant)</p> <p>Mrs P. Yasui (Admissions Attendance and Welfare Officer)</p> <p>Mr D. Boyle (Site Manager)</p> <p>Mr O. Abdi (Assistant Site Manager)</p> <p>Mr M. Jefford (ICT Apprentice)</p> <p>Mrs D. Fadairo (Inclusion Coordinator)</p> <p>Mrs T. Kanji (SENDco)</p> <p>Full Governing Body (Refer to FGB Minutes)</p>

Priorities for The Next Year

Aspect	Objective	Who Is Involved?	Timescale?	Resources Required	Expected Outcomes
School Management & Curriculum	Ensure data protection audits are completed termly	DPO Headteacher School Business Manager	End of Autumn term 2018 End of Spring term 2018 End of Summer term 2019	Data Protection Audit Proforma Agreed format for each termly data protection audit focus	The school's data protection policy, procedures and practice remain GDPR compliant at all times and can withstand scrutiny and rigour.
School Management & Curriculum	Ensure privacy impact assessments are completed for all new data processing systems	DPO School Business Manager Headteacher Staff	Ongoing	Privacy impact letter (Third parties, SLAs and Contractors) questionnaire	The school is secure in its knowledge of how third parties use, store and secure school data and that all third party, SLAs and contractors are also GDPR compliant.
School Management & Curriculum	Data protection CPD to be encompassed within annual CPD for all staff	DPO Headteacher Deputy Headteacher SLT SMT All Staff	End of Autumn Term (1 st Half) 2018	Staff induction checklist Safeguarding Umbrella Policies Staff Declaration	All staff receive annual GDPR CPD. This is also encompassed within the induction for new starters and annual safeguarding umbrella policies staff declaration form. Staff are secure in the role in securing personal data so as to safeguard children and families and prevent the possibility of a data breach.
School Management & Curriculum	Reduction to filing and storing paper copies holding personal data within school where possible	School Secretary Admissions, Attendance and Welfare Officer Receptionist and Reprographics Assistant	End of Autumn Term 2018 and Ongoing	Revised data collection sheets Newly introduced data amendment parent request proforma Secure electronic filing system;	Data collections sheets to be scanned and filed securely following each first version / amended data entry into SIMs. Data amendment requests to also be scanned and filed separately to aid audit trail and security of data. HR Files, SEN Files, CP and Safeguarding Files

				<i>Data Collection Form Completion Data Amendment Parent Requests</i>	
School Management & Curriculum	Introduction of systems to record requests amendments to data	School Secretary Admissions, Attendance and Welfare Officer Receptionist and Reprographics Assistant	September 2018	Newly introduced data amendment parent request proforma	A new and transparent trail of addition and / or amendment to individual's personal data within SIMs is introduced and auditable.
School Management & Curriculum Communications	Privacy statement to be updated to all policies as per the annual policy review schedule	All Staff	As per the annual policy schedule 2018-2019	GDPR CPD for all staff School's standard policy frontpage (updated version)	All policies included within the annual policy schedule for review include a data privacy statement making explicit how data is used, stored and retention duration.
Communications	Continue to publicise parents' rights regarding data protection and privacy via the school website, email communication and 'The Magic of Marlborough' fortnightly newsletter Following staff training, school to host GDPR parent and carer workshop	School Business Manager School Secretary ICT Apprentice	End of autumn term and Ongoing	Marlborough's GDPR CPD presentation and parent leaflet Safeguarding and GDPR designated area on website Data Protection Policy, February 2018 GDPR School Privacy Statement	The introduction of GDPR legislation and changes and reinforcing of data protection policy and procedure is continually emphasised via a variety of mediums. Parents and carers are secure in their understanding of their rights with regard to how the school uses their data, their right to access, amend and 'be hidden'. They know are confident in the role of the DPO and how to contact them to discuss and / or report concerns. GDPR Parent and Carers Workshop – Summer 2 nd Half
School Management & Curriculum	Further develop the systems and practices for ensuring accuracy when making amendment to the personal data held by the school	DPO Headteacher Governing Body School Business Manager Inclusion Team Safeguarding Team ICT Apprentice Admin Team	Autumn term 2018 and ongoing	Newly introduced data amendment parent request proforma	Systems are developed to reduce hard-copy storing and access to personal data to more secure electronic formats with layered approach to provision of access rights. Procedures and practice for sharing data with third parties assumed to be compliant e.g. Social Care are strengthened through submission of password

					encrypted personal data, USO-FIX, EGRESS or other equally secure means of data sharing.
School Management & Curriculum Communications Utilities & Facilities	Following the move away from communicating via personal email to use of LGfL Staffmail accounts explore secure file sharing systems	DPO Chair of Governors Clerk to Governors Headteacher	Autumn Term 2018	Cost of secure file hosting / sharing extranet	Best practice guidance and procedures are further developed to reduce the possibility of a data breach and secure sensitive and confidential information about the school.
School Management & Curriculum Communications	The school's recruitment process makes explicit how personnel data is used by the school in addition to the periods of retention for all prospective and employed members of staff.	DPO Headteacher / Governing Body Deputy Headteacher School Business Manager School Secretary Inclusion Coordinator	September 2018	Revised application forms and privacy statement	At the point of application all prospective staff are informed of how and how long the school uses, stores and retains personnel's personal data. This is further reinforced at the point of induction.
School Management & Curriculum Communications	Introduced a staggered approach to ensuring the accuracy of personal data held by the school.	DPO School Business Manager Admissions, Attendance and Welfare Officer	Termly and Ongoing	Revised data collection forms including GDPR privacy statement alongside paperless systems to storing data	A monthly system for ensuring the accuracy of data retained by the school to be introduced – following the processing of new arrivals in September, data collection form requests to be sent home a registration group at a time. These will then be updated to SIMs and scanned before storing securely in a password protected folder with tier access rights.