

West End Primary School GDPR Environmental Audit 2023/24

Purpose of Visit: To ensure the school is compliant with the GDPR and demonstrating best practise whilst dealing with any personal data. Please note this template is not exhaustive and should not be your sole method for ensuring compliance.

ITEMS FOR CONSIDERATION	DISCUSSION POINTS	Notes
Data Breaches	<p>Has the school had any data breaches? If so, could they have been avoided? Was the breach procedure followed?</p> <p>Resources available: Data Breach Flow Chart. 5 minute GDPR refresher slides that can be added to any in house staff training.</p>	None
Subject Access Requests	<p>Has the school had any SARs? If so, were there any complexities or concerns when replying to the SAR?</p> <p>Resources available: SAR Flow Chart. 5 minute GDPR refresher slides that can be added to any in house staff training. ICO Model Publication Scheme and Schools Guide to Information briefing note/documents. Support from DPO with this</p>	None
Staff Training	<p>Has training been provided to the staff to ensure they know how to comply with GDPR day to day? Does induction training for new staff include a section on GDPR?</p> <p>Resources available: GDPRiS Posters. 5 minute GDPR refresher slides that can be added to any in house staff training. Full staff training from DPO.</p>	It was agreed by the Headteacher and DPO that staff would require refresher training and the DPO would send the GDPR refresher presentation over for completion.
Retention of Personal Data	<p>Has the school adopted the Records Management Schedule? Any support needed from the DPO?</p> <p>Resource available: NCC Records Management Schedule if not yet in use.</p>	Yes
Destruction of Personal Data	<p>How do you destroy personal data? Could personal data easily be located and erased at request?</p> <p>Primary- retain whilst the child is at the school.</p>	Small quantities are shredded in-house and big quantities are externally shredded by a company that provide a certificate of

	<p>Secondary- Date of birth + 25 years. Resource available: NCC Records Management Schedule</p>	destruction.
ICO Registration	<p>Is the school registered with the ICO? Resource available: https://ico.org.uk/for-organisations/data-protection-fee/ and https://ico.org.uk/ESDWebPages/Search</p>	Yes
Policies and Procedures	<p>Are all new projects, systems and initiatives reviewed during the planning stage to ensure data is handled correctly? Is the GDPR management tool updated accordingly to make sure the schools privacy notices are also up to date? Any updates needed now? Resource available: GDPR Management Tool</p>	The DPO, Headteacher and School Business Manager have updated the asset list for West End.
Electronic Devices	<p>Are memory sticks still in use? Are chrome books or laptops being used instead for better encryption? Emails- are all staff and governors using a secure email account? Even better a school email for governors?</p>	Memory sticks are no longer in use – school uses Google Drive. All staff and pupil devices are encrypted and password protected. Staff emails encrypted. Governors either use an encrypted work email or school email, no personal.
Website Compliance	<p>Are privacy notices and audit reports published on the schools website? Social media posts are uploaded with consideration of the GDPR? Resource available: adding a pinned post to the top of a facebook or twitter page along the lines of ‘Our school ** page has strict Safeguarding rules which we must adhere to if we wish to continue running the page. One of these rules is that we will never post the name of a pupil as this is an open forum that anyone can view. By posting their name, this poses a Safeguarding risk to your child. We respectfully ask parents to not identify their child by name in anything they may comment on. Sadly, if a child is identified by name, we will have no alternative than to remove the whole post. Thank you for your cooperation. We will always be fully committed to keeping your child safe in school and online.’</p>	An annual full GDPR website/social media compliance check is completed by the school’s DPO in the Spring term.
Environment Audit	Consider:	<ul style="list-style-type: none"> Classroom displays PII compliant.

	<ul style="list-style-type: none"> ● Data on walls in classrooms, corridors and offices ● Lockable storage ● Information around the teachers area- desk, computer, notice board etc ● Tracking, SEND, healthcare folders/sheets ● Kitchen and communal areas such as library, intervention spaces and play spaces clear of data 	<ul style="list-style-type: none"> ● Teachers' desks are PII compliant – no information left on desks and noticeboards / class lists are PII compliant. Computers locked when not in use. ● Most special category data is secure on cloud storage / CPOMS and any paper records securely locked away in Headteacher's office / school office. ● Corridor displays PII compliant. ● Kitchen and communal areas PII compliant – allergy information is out of view and stored away securely when external visitors are in the kitchen. ● Visitor book is GDPR compliant. ● Staff room PII compliant.
<p>Any questions / comments / recommendations from the DPO</p>	<p>West End Primary School demonstrates strong GDPR practices, and all aspects of the school environment are GDPR / PII compliant. The DPO has no concerns.</p> <p>Refresher training has been provided to the Headteacher, and it is recommended staff receive a small refresher annually. All staff know to contact the DPO with any specific GDPR queries or concerns.</p>	