

# GDPR Policy

## Organisation LSEAT

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<b>Responsible post holder</b>	Group Data Protection Officer
<b>Approved by / on</b>	
<b>Next Review</b>	May 2018
<b>Relationship to Strategic Goal</b>	Goal 3 - Investing in Excellence
<b>Publication Method</b>	SharePoint

The Statement of Intent sets out the Trust's Management's commitment to GDPR and describes the approach by which the Trust meets its data protection obligations.

## 1. Scope

The Trust's GDPR policy applies to all paper and electronic information and covers all schools as well as activities off premises but under the Trust's control.

## 2. Policy

Under the law the Trust has a number of legal duties. This documents how the Trust discharges those duties and specifies the responsibilities of key roles within the organisation. This policy should be read in conjunction with the Scheme of Delegation.

Role	Responsibility
The Trust	<ul style="list-style-type: none"> <li>• Overall responsibility for the GDPR Policy</li> <li>• Agreeing the GDPR Policy Statement.</li> <li>• Approve the terms of reference of the Trust GDPR Committee.</li> <li>• To ensure that the Trust has suitable arrangements in place to make staff are aware of their data protection responsibilities and their need to comply with relevant data protection legislation.</li> </ul>
CEO	<ul style="list-style-type: none"> <li>• Executive responsibility for all GDPR matters and for ensuring the implementation of relevant Trust policy.</li> <li>• To ensure the Trust has in place the appropriate organisation and methods for the implementation of the GDPR Policy and for making all persons aware of their responsibilities.</li> <li>• To receive immediate verbal advice followed by written reports from the appropriate Manager on any fatality or serious occurrence out of or in connection with operations controlled by the Trust (including off-site collaborative provision and work placements) and to ensure that all statutory bodies are notified and relevant forms are completed.</li> <li>• To ensure that the correct emphasis is maintained on GDPR matters by all managers and ensure that correct standards of safe working are maintained for all staff and students and that appropriate resources are allocated to achieve this.</li> <li>• To ensure that Trustees are advised of the policy and that appropriate systems are in place to enable Trustees to supervise the Trust GDPR arrangements; to report to Trustees on an annual basis on the implementation of the GDPR Action Plan.</li> <li>• To set a personal example by following all rules and regulations when on site.</li> <li>• To have an understanding of the requirements laid down under the GDPR and data protection associated regulations, and any other statutory regulations, and ensure they are observed.</li> </ul>
CFO	<ul style="list-style-type: none"> <li>• Corporate responsibility for GDPR is delegated to the Deputy CEO</li> <li>• Oversee the actions of the data protection and appropriate liaison with Directors, Curriculum Managers and support team managers.</li> <li>• To set in place and manage the organisation and method for implementing the GDPR Policy, and ensure that Trust Management, employees, students and contractors are aware of their responsibilities and the means of how they can be met.</li> </ul>

	<ul style="list-style-type: none"> <li>• To ensure the GDPR management systems, policies and amendments to them are disseminated through the Trust to all relevant staff and other persons.</li> <li>• To have an understanding of the requirements laid down under the GDPR at GDPR, associated regulations, and any other statutory regulations, and ensure they are observed.</li> <li>• To ensure that policies are appropriately implemented by: <ul style="list-style-type: none"> <li>○ Establishing monitoring and feedback arrangements</li> <li>○ Receiving formal reports regarding GDPR and acting on the information provided</li> </ul> </li> <li>• To monitor Trust GDPR policies and procedures.</li> <li>• To set a personal example by following all rules and regulations when on site.</li> </ul>
Group Data Protection Officer	<ul style="list-style-type: none"> <li>• To Chair the GDPR Committee.</li> <li>• To ensure that arrangements are in place for monitoring internal compliance, inform and advise on your data protection obligations, provide advice regarding Data Protection Impact Assessments (DPIAs) and act as a contact point for data subjects and the supervisory authority.</li> <li>• To ensure data controllers within the various areas of the organisation are competent and trained to monitor and safeguard data and supply sufficient support to allow accountability at all levels of the institution.</li> <li>• The DPO must be independent, an expert in data protection, adequately resourced, and report to the highest management level.</li> <li>• To report any serious incidents or occurrences to the CEO and Trust Board at the earliest opportunity.</li> </ul>
Executive Head Teacher	<ul style="list-style-type: none"> <li>• Daily operational responsibility for GDPR is delegated through the scheme of delegation to the Executive Head Teacher</li> <li>• To manage the organisation and method for implementing the GDPR Policy, and ensure that Trust Management, employees, students and contractors are aware of their responsibilities and the means of how they can be met.</li> <li>• To ensure the GDPR management systems, policies and amendments to them are disseminated through the Trust to all relevant staff and other persons.</li> <li>• To have an understanding of the requirements laid down under the GDPR at data protection associated regulations, and any other statutory regulations, and ensure they are observed.</li> <li>• To ensure that policies are appropriately implemented by: <ul style="list-style-type: none"> <li>○ Establishing monitoring and feedback arrangements</li> <li>○ Receiving formal reports regarding GDPR and acting on the information provided</li> </ul> </li> <li>• To monitor Trust GDPR policies and procedures.</li> <li>• To set a personal example by following all rules and regulations when on site.</li> <li>• To manage the data controller of the institution.</li> </ul>
Data Controllers	<ul style="list-style-type: none"> <li>• To have an understanding of the requirements laid down under the GDPR and data protection associated regulations, and any other statutory regulations, and ensure they are observed.</li> <li>• To ensure data impact assessments are completed where necessary to ensure data process are mapped and demonstrate how information is collected, stored, retrieved and removed.</li> <li>• To ensure arrangements are in place for annual GDPR assessments and review to be held at each Trust Centre.</li> </ul>

	<ul style="list-style-type: none"> <li>• Deliver and/or arrange data protection training to staff to increase their knowledge and awareness and to fulfil statutory obligations as required.</li> <li>• To ensure employees receive training in GDPR matters as appropriate.</li> <li>• To ensure the Trust receives appropriate external advice, guidance and support where required to implement the GDPR Policy.</li> </ul>
Heads of School or delegates	<ul style="list-style-type: none"> <li>• Represent the trust leadership in terms of health and safety</li> <li>• Be initial point of contact in GDPR matters and data breach</li> <li>• Record events, investigate and communicate findings</li> <li>• Liaise with senior management and the DPO</li> <li>• Understand limits of competence and know when to escalate.</li> <li>• Ensure the effective planning, organisation, control, monitoring, review and auditing of the trust GDPR provision.</li> <li>• Submit GDPR reports and statistics where appropriate and where required.</li> <li>• Organise and manage the various levels of data processing and impact assessments.</li> <li>• Report on any matters which require their input in ensuring the effective GDPR of employees, learners, visitors and others.</li> </ul>
Teachers and support staff	<ul style="list-style-type: none"> <li>• Read and understand the trust's GDPR policy and supporting guidance documents to ensure that its provisions are being effectively carried out and maintained.</li> <li>• To have an understanding of the requirements laid down under the GDPR at data protection regulations and other appropriate regulations, and ensure they are observed.</li> <li>• Bring the provisions of this policy and the requirements of the GDPR to the attention of all employees and learners under their control.</li> <li>• Ensure all GDPR statutory documents and information electronic or paper are kept and stored securely and made available when required.</li> <li>• To ensure all employees in their areas receive mandatory GDPR training.</li> <li>• Always work within the frame work of GDPR and promote a positive culture and respect for data and information belonging to all data subjects.</li> <li>• To ensure that the updating, review and maintaining of GDPR related documents e.g. DPIAs are completed.</li> </ul>
All staff	<ul style="list-style-type: none"> <li>• Responsible for ensuring that they have a full understanding of GDPR and data protection.</li> <li>• Understand what to do in the event of a breach of data protection</li> <li>• Employees are responsible for adhering to the safeguarding of data as defined in the Statement of intent and the overarching data principles defined with the GDPR.</li> <li>• Take reasonable care around the safety and safekeeping of personal data. And understand that others may be affected by their acts or omissions.</li> <li>• Not to intentionally or recklessly interfere with or misuse anything provided in the interests of data protection in pursuance of any of the relevant statutory provisions.</li> <li>• Reporting of all data breaches within 24 hours of the breach or loss of data.</li> </ul>
Behaviour and Safeguarding Team	<ul style="list-style-type: none"> <li>• Student health and welfare teams - are to ensure that all data shared with third party agencies has received the additional authority to require from the data subject to authorised person or guardian representing the interest of the data subject.</li> </ul>

	<ul style="list-style-type: none"><li>• Adhere to the GDPR policy and its associated links in relation to data sharing as defined in the Safeguarding Policy.</li><li>• Understand the requirements under the GDPR policy to use the designated software to encrypt data when sharing with internal and external departments and organisations.</li><li>• To restrict the sharing of information through email and use SharePoint and OneDrive to store and retain information in a safe and protected environment.</li><li>• Up skill and develop other staff to participate effectively in data protection.</li></ul>

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