

# General Data Protection Regulation

**Hackney Learning Trust Framework for  
Compliance: 8 Key Tasks**

March 2018

<b>Control Sheet: GDPR Introductory Note</b>			
<b>Reference:</b>	n/a		
<b>Date produced:</b>	27 March 2018	<b>Status:</b>	Final
<b>Valid until:</b>	Revisions to current GDPR guidance; Annual Review from 1 March 2019		
<b>Short description/ notes:</b>	With implementation of GDPR from May 2018, HLT has developed a framework of <b>8 Key Tasks</b> for schools to complete to ensure your compliance. This briefing note introduces the 8 key tasks and sets out resources available from HLT to support GDPR implementation in Hackney Schools.		
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<b>Reporting cycle:</b>	Updated as new guidance becomes available		
<b>Next report due:</b>	TBC		
<b>Report location:</b>	<ul style="list-style-type: none"> <li>▪ Strategy, Policy &amp; Governance networked folders – file 00 Intro to GDPR Compliance framework FINAL</li> <li>▪ Services for Schools website</li> </ul>		
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<b>Authorised for use by:</b>	Frank O'Donoghue	<b>Role:</b>	Head of Business Services
<b>Updates in this briefing are included for the following areas of the data matrix:</b>			
N/a at this point			

## 1. GDPR Compliance

The General Data Protection Regulation (GDPR) comes into force on 25 May 2018, replacing the existing Data Protection Act (DPA). The GDPR is not a complete overhaul of the existing legislation. The core principles remain largely the same with a few key updates designed to reflect the changes in how we use personal data since the original DPA was written back in 1998. With these updates to the law come new requirements for data controllers and processors in terms of protecting people's personal data and respecting their rights.

The various updates and changes brought by GDPR can be categorised into 3 main step changes;

- (i) **Transparency** - means telling people more about what we are doing with their personal data. This will largely happen in your updated Privacy Notice, which is the most outwardly visible sign of your compliance with the GDPR.
- (i) **Control** - means giving people more control over what we do with their data. The GDPR gives people new rights, such as the right to erasure and the right to rectification. This should not impact too much on schools as they are not absolute rights. If you have a compelling reason to keep the records (such as a legal obligation) you are not required to erase all records relating to an individual.
- (ii) **Accountability** - while we have always been required to comply with the principles set out in the Data Protection Act, we must now comply and also be able to demonstrate how we comply with the principles set out in the GDPR. This means we must have a heightened awareness of the data processing activities we are involved in, know clearly what the legal basis for it is, and keep detailed records of it all to prove it.

With these key changes in mind, HLT is using a framework of **8 Key Tasks** to complete in order to ensure your compliance with the GDPR. While we are working toward the enforcement date of 25 May, it is worth stating that this date is not a cliff edge that schools will fall off if they are not 100% compliant – schools must, however, be able to demonstrate their awareness of the new requirements and their plans to satisfy them.

## 2. The 8 Key Tasks to complete are as follows;

1. Appoint a DPO
2. Complete an Information Asset Register and information audit
3. Review and update your Privacy Notice
4. Review and update arrangements with 3<sup>rd</sup> party data processors
5. Review and develop internal procedures and policies
6. Review your Subject Access procedures
7. Review your data breach management procedures
8. Embed Privacy by Design in your school

## 3. Further information

To support schools with this we will be issuing a series of 8 written guidance notes in the next few months, supported by tools and template documentation. Some examples being;

- A template Privacy Notice
- A template Information Asset Register
- A Retention Schedule setting out how long you need to keep different types of records
- Template policy documents for schools to adapt

## 4. Further information & support

If you have any queries please contact; **Sean O'Regan**, Freedom of Information and Data Protection Officer, Email: [Sean.O'Regan@learningtrust.co.uk](mailto:Sean.O'Regan@learningtrust.co.uk), Tel: 0208 820 7382