



DATA PRIVACY PROGRESS CHECK

College Town
Primary School

ABSTRACT

This report is the culmination of discussions and observations made during my recent progress check visit to College Town Primary School. The sections are organised in line with the agenda of the visit, including an overview of observations, actions and discussion points where applicable.

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[Course title]

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Executive Summary

The school has an informal supplier compliance check process, however the Information Commissioners Office would expect, if challenged, a formal process including documentary evidence.

There have been some changes to the impact assessment templates provided by the Information Commissioners Office. Whilst I don't believe we need to re-visit the existing Impact assessments already completed by the school, I would advise that the new more extensive templates are used for and new assessments moving forward.

1/ Procurement – Cath Wadsworth

Areas discussed:

New systems or services recently procured.

The school has recently procured a new cloud based safeguarding system called CPOMS. Whilst widely used by schools and authorities across England, the school is still required to complete a Data Protection Impact Assessment (DPIA), due to the nature of the personal data processed (sensitive and of a vulnerable group), and its environment (cloud based systems).

Actions: **DR** to complete a DPIA on CPOMS.

Supplier compliance

To date the school has performed informal compliance checks on suppliers. This process would identify supplier with non compliant or unsafe data processing activities, however it would not meet the requirements of the Information Commissioners Office, if challenged. It is recommended that the school have a formal supplier compliance check process including a policy, control documents and a central suppliers list containing relationship, written instruction, data sharing or processing agreement review and due diligence status.

Actions: **DR** to provide a draft supplier due diligence policy, control documents and central supplier list populated with a compliance check on the schools current IT support company.

2/ HR – Cath Wadsworth

Areas discussed:

General record keeping

The school currently use Bracknell Forest local authority HR services and web portal, the personnel module within the SIMS MIS system and physical locations within the Bursars Office to process and store personal data as part of the HR function.

Payslips are in electronic format and are produced and sent directly to staff's personal email address by the local authority HR team.

Staff contracts are based on the local authority staff contract template and include all elements required for data protection compliance.

Pre-employment medical questionnaire's are completed online through a supplier called Cordell Health on behalf of Bracknell Forest LA. School staff input basic contact information, for the new staff member, which is then used to contact the staff member directly.

Staff induction process – Prior to arrival, safeguarding training, government prevent training, health and safety and child protection policies are required to be read. An induction booklet, provided to new staff, summarises the policies required, the order to be completed and how to access them on the staff zone of the school website.

Pre-employment checks such as DBS and barred list check, are completed online via a web portal provided by Bracknell Forest local authority.

Staff leaver process – Currently the school does not have a leaver declaration to cover the eventuality of staff members having pupil or staff personal data in their possession at the time of leaving. The school is advised to add a line to the existing leavers form – *"I have returned or destroyed all personal data, obtained from the school"*.

Action: **CW** to update the staff leavers form with the personal data declaration.

Right to work documentation – retained in the school in the locked HR filing cabinet and a copy sent to the local authority. Copies sent via email to Bracknell – Look at the process of handing the right to work physical copies. Consider a locked post box..

Unsuccessful applications – the school does not retain any application forms of promising candidates and instead operates the normal data retention and destruction process of 6 months for unsuccessful candidates.

Website used - The school currently use Jobs go public, TES, Teacher Governor website, Green sheets [Spike publications] local schools, to advertise staff vacancies.

The school does not accept prospective CV's as it only accepts CV's against an advertised role and only then in tandem with the LA application form.

HR record Archiving – The school retains HR records in line with common practice including; 6months for unsuccessful applicants which are sealed in an envelope, with retention and destruction dates on the cover, and then summarised on the data retention and destruction spreadsheet, and retained in a locked filing cabinet situated in a non contact room.

Interview panels – The school currently run interview panels based on the application forms, with scoring cards which are distributed to the panelists, in advance, by hand. No head or deputy interviews have been conducted since 2007.

Guidance provided to interview panelists – The school utilises the Bracknell Forests Safer recruitment toolkit as instruction to interview panelists.

Staff training – Previously the school asked staff to complete training via video links sent via email and then recorded manually on a spreadsheet. The school has identified that this process does not prove understanding or a robust reporting method and therefore is in the process of implementing an online eLearning package which will ease administration, allow post course questions, to prove understanding, and reporting to the board of governors.

Action: **DR & CW** to complete the roll-out of the SelectSkills eLearning package.

3/ Safeguarding – Helen Collin, Cath Wadsworth, Emilie Newell

Areas discussed:

General record keeping – The school has recently implemented CPOMS from a physical record based process.

Currently a Notice of a cause for concern is brought to the school Designated Safeguarding Lead [DSL] or other Safeguarding team member, immediately and handed to them directly.

Onward school document transfers – Currently the school deliver safeguarding records in person or via recorded mail with request for receipt to out of area or overseas transfers. The school sends the pupil school report with the parents but directly contacts the onward school, via telephone or email for any safeguarding concerns.

Record handling during home visits – no home school visits carried out for the cohort as the local authority still uses an Educational Welfare Officer [EWO], who is normally allocated this task.

Medical alert sheets/SSIP's – The school follows the DfE guidelines on notices required for safeguarding including medical alert sheets etc, by ensuring they are accessible but not on public display.

Record handling on school trips – The school uses a product called Front line data, which has been provided by the local authority and allows the secure sharing and storage of risk assessment, student lists, contact lists and student medical records.

Care plans are produced from the SIMS MIS system and provided to the teachers on the morning of the trips. The teacher stores the plans securely and returns to school, on the completion of the trip, for secure destruction.

Security measures (electronic/Physical) – All Physical trip records are locked in a dedicated filing cabinet within the locked safeguarding office.

Archiving – The school retain electronic trip records for 2 yrs, in an archive folder.

Data taken/sent out of the school grounds – External meetings are held with the local authority safeguarding team or parents in the school grounds. Notes are made in the DSL's jotter pad, prior to the visit but no school records are printed or accessed during the meetings or off-site visits.

Please note: While the GDPR is not applicable to unstructured personal data, a recent addition to the Data Protection Act 2018, allows a data subject to request copies of personal data stored in unstructured format, such as diaries, jotters etc. through a Freedom of Information Request.

4/ Communications – Katheryne Dove

Areas discussed:

Parent / Pupil portal – The school currently has a website which was created 3 years ago during the school merger. There are some aspects of the website which may need reviewing.

Texting services – The school currently use a product called School Comms which extracts the priority 1 contact details [tel/mobile number and email address] of parents to enable the sending of a text. Parents can reply to the text.

Parent photo and image consent – The school currently collects student image consent through the photos section of the admissions form.

Data collection sheets – The school has not sent out data collection sheets this year. This may cause issues in data integrity over the coming months therefore signage at collection points is recommended, asking...

“Are our medical records and emergency contact details up to date for your child?”.

Action: **KD** to review if the collection point signage should be used.

Social media – There are currently no official school social media accounts. No staff re-emphasis on social media, Staff handbook contains personal responsibility in the handbook which is issued every year.

The school should possibly consider including the school's position on social media accounts to staff during the yearly refresher training.

5/ Admissions – Helen Collin

Areas discussed:

General record keeping – The school currently uses the admissions module of the SIMS MIS system as well as the local authority student admissions portal [SAM] and manual school admissions forms to process student admissions into the school.

Source of new pupils – The local authority admissions team allocated pupils for normal intake but school uses a manual admissions process to administer and allocate nursery places.

Nursery – The school use a manual process to manage the nursery admissions. This process collects and records; The contact details of the parents, Date of application, Yr of admission, Name, DOB, Seen Cert and Council Tax bill, date of offer and date of rejection in an Excel spreadsheet.

Registration form – Once a parent accepts a place in school, the school send out a registration form, electronically, to parents to complete and bring in on the first day of attendance.

Some parents return the school registration form via email. This can introduce an additional risk as the registration form contains categories of data defined as special category [sensitive]. It is advised to provide guidance to parents on not returning the form via email. Possibly via a note on the registration form itself i.e.

“As this form contains sensitive personal data of your child, it is strongly advised that it is delivered by hand or sent to us via recorded post. We strongly advise you against sending this form via email, due to the unsecure nature of email.”.

The school currently gathers confirmation that consent has been provided, by extra contacts, at the point of collection from the parent.

6/ SEND – Jade Fairclough, Helen Collin

Areas discussed:

SEND support staff – The school has several directly employed staff as well as external 3rd party organisations including Berkshire & Maidenhead NHS for Speech and Language. EP local authority, Behaviour Support and Autism via teams, as well as a play therapy service provided by Create hope, which is a charity sourced through Bracknell Forest local authority.

Transfer of SEND data to onward schools - SEND data is currently sent via recorded mail to onward school situated outside of the Bracknell Forest local authority area but hand delivered, in a sealed envelope, to onward school within the Bracknell Forest local authority area.

A summary report of the number of items within the transfer, is generated listing the number of supporting documents shared for confirmation.

Recommendation: It is recommended that all staff transporting SEND records outside of school grounds receive both the avoiding common mistakes and Secure handling of SEND records training modules within the SelectSkills eLearning package.

EHCP review panels – Prior to an EHCP review panel, the school SENDCo and parents review the supporting documents, which are shared with parents either via email or printed out and given directly to the parent, 10 days prior to the review panel.

Recommendation: It is recommended that the school review the process of emailing the supporting SEND records to ensure the appropriate level of protection is given to the records both in transit, as an email and in storage, i.e. when retained within the email box of the sender.

Archiving of SEND records – Currently electronic copies of SEND records are moved into an archive and organised by cohort. Retention to be confirmed in line with Bracknell Forest Data retention schedule.

Classroom records – currently all teachers receive a handover documents at the start of each year containing Summer born pupils, SEN Y/N, handover notes to new teacher and Individual Education Plans's which are printed and stored in the inclusion records [Blue folders] within each classroom.

Security measures (electronic/Physical) – Currently physical SEND records are stored in the school business managers office, and securely on the SEND (H) Drive or within the CPOMS online system.

During summer holidays the blue folders are collected and stored securely in the school business managers office.

Recommendation: It is recommended that the school review the holiday process for all school holidays, including half term, and determine if the Blue folders can be secured within the classroom in either lockable filing cabinets or store cupboards.

7/ IT – Cath Wadsworth

Areas discussed:

The school has an acceptable use policy which is distributed to all staff on induction.

User account creation and management – Currently account creation management is achieved through support tickets which are created by the IT support provider.

User access control – Currently the school use security group level control to control and record access to personal data on the school network.

Recommendation: It is strongly recommended that the school complete a review and document all members of the administrator group, as this group has the highest level of access on the school network.

ISMS Documentation and record keeping – the school has not completed an Information Security Management Systems (ISMS) self audit.

Recommendations: It is recommended that CW forward a copy of the ISMS self audit form to the IT support provider and forward the responses to the DPO for review.

Action: **CW** to forward the ISMS self audit form to the external IT support company.

Hardware; end of life processing – The school currently stores old IT equipment in a locked cupboard until a minimum number of 20 units is reached, when an external company will collect, destroy data and recycle the equipment and provide the school with a certificate of destruction.

Email retention – The school does not currently have an email retention policy.

Recommendation: It is recommend that the IT support company show CW how to access and use the security and compliance panel, within the Office 365 admin panel, and then propose, a retention policy with the school SLT.

Action: **CW** to request training on the security and compliance panel from the IT support provider and discuss an email retention period with the SLT for implementation in the next academic year [22/23].

Security of IT equipment – The school currently has a single physical Server, located in a dedicated secure area with an airconditioning unit. Access to the area is restricted to only authorised individuals.