

GDPR compliance statement

As you will be aware, on 25th May 2018, a new landmark privacy law called the General Data Protection Regulation (GDPR) takes effect in the European Union (EU). The GDPR expands the privacy rights granted to EU individuals, and it places many new obligations on organisations that process EU personal data.

Chess Valley Primary Learning Trust (CVPLT) already has a consistent level of data protection and security across our school and we are actively working towards compliance with the GDPR, for 25th May and beyond. In preparation for GDPR, we have produced a statement which sets out how we comply with the GDPR in the processing of personal data, and how we ensure compliance of third parties. Our compliance statement can be found on our school website here:

If you have any queries regarding our compliance with GDPR, please email the Executive Headteacher via ceo@chessvalleyplt.org.uk

Introduction

The EU General Data Protection Regulation ("GDPR") comes into force across the European Union on 25th May 2018 and introduces the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

The new regulation aims to standardise data protection laws and processing across the EU, to provide individuals with stronger and more consistent rights to access, and to better control their personal information.

Our commitment

Chess Valley Primary Learning Trust is committed to ensuring the security and protection of the personal information that we process and to provide a compliant and consistent approach to data protection. We have always had a robust and effective data protection policy in place which complies with existing law and abides by the data protection principles. However, we recognise our obligations in updating and expanding this programme to meet the demands of the GDPR and the UK's Data Protection Bill.

Chess Valley Primary Learning Trust is dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation. Our preparation and objectives for GDPR compliance have been summarised in this statement and include the development and implementation of new data protection policies, procedures, controls and measures to ensure maximum and ongoing compliance.

How we are preparing for the GDPR

Chess Valley Primary Learning Trust already has a consistent level of data protection and security, and we are actively working towards compliance with the GDPR, for 25th May and beyond.

Our preparation includes:

- Information audit – carrying out a trust-wide information audit to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed.
- Policies and procedures – revising data protection policies and procedures to meet the requirements and standards of the GDPR and any relevant data protection laws, including:
 - Data protection – our main policy and procedure document for data protection is being overhauled to meet the standards and requirements of the GDPR.
 - Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities.
 - Data retention and erasure – we are updating our retention policy and schedule.
 - Data breaches – our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time.

- Subject Access Request (SAR) – we are revising our SAR procedures to accommodate the revised timeframe for providing the requested information and for making this provision free of charge.
- Legal basis for processing – we are reviewing all processing activities to identify the legal basis for processing and ensuring that each basis is appropriate for the activity it relates to.
- Privacy notice/policy – we are revising our Privacy Notice(s) to comply with the GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.
- Obtaining consent – we are revising our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information.
- Data Protection Impact Assessments (DPIA) – where we process personal information that is considered highly sensitive, or includes special category data, we are developing stringent procedures and assessment templates for carrying out impact assessments that comply fully with the GDPR's Article 35 requirements.
- Processor agreements – where we use any third-party to process personal information on our behalf (i.e. Payroll, Recruitment, Family Details), we have obtained verification from those third-parties that they meet and understand their/our GDPR obligations. These processors include (but are not limited to):
 - Capita SIMS
 - ParentMail
 - Serco
 - HCSS Education
 - HCL (Herts Catering Limited)
- Special categories data – where we obtain and process any special category information, we do so in order to fulfil contractual obligations.

Information security

Chess Valley Primary Learning Trust takes the privacy and security of individuals and their personal information very seriously and take every reasonable measure and precaution to protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures.

GDPR roles and employees

Chess Valley Primary Learning Trust has designated Mr Nick Moorhouse (Vice-Chair of Governors & Chair of Finance Committee) as our Data Protection Officer and has appointed a data privacy working group (Headteacher & Finance Administrator) to develop and implement our plans for complying with the new data protection Regulation. The team are responsible for promoting awareness of the GDPR across the organisation, assessing our GDPR readiness, identifying any gap areas and implementing the new policies, procedures and measures.

Chess Valley Primary Learning Trust understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and have involved our employees in our preparation plans.