London East Teacher Training Alliance

General Data Protection Regulation

Statement

Nov 2019

Annual review

The General Data Protection Regulation

What does the GDPR apply to?

The GDPR applies to 'personal data', which means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. You can find more detail in the key definitions section of our Guide to the GDPR.

What is the GDPR?

The General Data Protection Regulation (GDPR) is a new, Europe-wide law that replaces the Data Protection Act 1998 in the UK. It is part of the wider package of reform to data protection processes that includes the Data Protection Bill. The GDPR sets out requirements for how organisations will need to handle personal data from 25th May 2018.

Source: https://ico.org.uk

GDPR Compliance Improvement Plan					
No.	**Action**	**Person responsible for action**	**Monitoring action**	**Timescale**	**Evidence /Evaluation**
1	**Right of rectification and data quality** LETTA should keep all personal data accurate and up to date Data may be erased at the request of the individual unless LETTA can uphold a valid reason to holding the data.	LETTA Administrator LETTA Business Manager	ITT Programme Leader	Ongoing	LETTA is registered with the Independent Commissioner's Office (ICO) LETTA is registered with the Office of the Independent Adjudicator (OIAHE) to ensure complaints and appeals processes are compliant. The SCITT board is responsible for reviewing and implementing policies. These are passed to the LETTA Steering board for feedback.
2	**Accountability** LETTA follows its Data Protection Statement & Freedom of Information Policy. LETTA updates the Steering Board & partner schools about any changes to legislation and implementation	LETTA Administrator LETTA Business Manager ITT Programme Leader	Accounting Officer	Ongoing	Personal information is requested from the trainees at the start of the training year. Reasons for this request have been made clear. The GDPR is made known to trainees and mentors. All LETTA staff are responsible for the implementation of the GDPR.
3	**Data Security** Firewalls and encryption of the data in any software LETTA uses and/or strong passwords in place to be frequently changed. Data physically secure. Data security regularly checked.	LEVITT Consultancy ITT Programme Leader LETTA Administrator LETTA Business Manager	Accounting Officer	Ongoing	LETTA has secure access to several govt websites eg., UCAS, SLC, TfL. All are password protected. Mobile and off-site devices are password protected Data breaches reported to ITT Programme Leader. 'Hard' data disposal via shredding. Only key personnel have data access. LEVITT Consultancy oversee electronic security and updates. **See Appendix 1**

4	**Consent** Must be specific (i.e. the exact purpose for the processing must be clearly explained), informed (the data subject must be told about it and understand what the data is to be used for) and it must be an unambiguous indication of the data subject's wishes. Consent under GDPR has to be in the form of a clear, affirmative action. There will be no pre-ticked boxes and consent cannot be inferred from silence or inactivity (no phrases such as '…if we do not hear from you we will assume you consent).	ITT Programme Leader LETTA Administrator LETTA Business Manager	Accounting Officer	Annually	Consent forms reviewed to ensure compliance Checklist supports review. **See Appendix 2**
5	**Right of Access** Individuals have an increased right to access their data and its use. On receipt of a Subject Access Request (SAR) LETTA must supply all the data to the individual within one month of the date on the SAR. Data Protection Officer appointed.	**Stage One** **SAR is received** LETTA Administrator LETTA Business Manager Data Protection Officer	**Stage Two** **SAR considered** ITT Programme Leader Accounting Officer **Stage Three** SAR outcome **Stage Four** Appeal to LETTA Steering Board	Within one month of formal SAR	SAR requests must conform to the FOI policy, Data Protection Statement and must be consideration in relation to the FOI Act (2004) & Data Protection Act (1998) and whether releasing requested information breaches the personal information of another individual or company. LETTA has appointed Mark Causton to be the Data Protection Officer **See Appendix 3**
6	**Staff Training** LETTA updates the Steering Board & partner schools about any changes to legislation and implementation. LETTA staff access training on GDPR, Data Protection and safeguarding	LETTA Administrator LETTA Business Manager LETTA tutors Mentors Accounting Officer	LETTA Steering Board	Termly	LETTA staff accessed GDPR podcast on best practice in schools and for HEI
7	**Information held** LETTA records the personal data held, where it came from & who it is shared with.	LETTA Administrator	ITT Programme Leader	Annual	List of personal documentation and partners **See Appendix 4**

Appendix 1

General Data Protection Regulations

DATA SECURITY CHECKLIST

Management of Information Security

☐ Identify, assesses and manage information security risks.

☐ Policies in place to manage information.

☐ Responsibilities in place to keep information secure.

☐ Written agreements with all third party service providers to ensure the personal data that they access and process on our behalf is protected and secure.

Staff & Information Awareness

☐ Regular information security awareness training for all staff, including temporary staff to ensure they are all aware of and fulfil their responsibilities.

Physical Security

☐ Entry controls restrict access to premises and equipment.

☐ Secure storage arrangements.

☐ Securely dispose of records and equipment when no longer required.

☐ Ensure the security of mobile working and the use of mobile computing devices.

☐ Manage the use of removable media.

☐ Assign user accounts to authorised individuals to provide minimum access.

☐ Appropriate password security procedures.

☐ Detect any unauthorised access or anomalous use.

☐ Anti-malware defences to protect computers from malware infection.

☐ Back-up electronic information to help restore information in the event of disaster.

☐ Monitor user and system activity.

☐ Software up-to-date.

☐ Boundary firewalls.

☐ Identified, documented and classified hardware and software assets and assigned ownership of protection responsibilities.

Personal Data Breach Management

☐ Processes to identify, report, manage and resolve any personal data breaches.

☐ Training in place to ensure staff know how to recognise and what to do if they detect a personal data breach

☐ Breaches reported to affected individuals, where necessary.

Appendix 2

General Data Protection Regulations

CONSENT CHECKLIST

Asking for consent

☐ We have made the request for consent prominent and separate from our terms and conditions.

☐ We ask people to positively opt in.

☐ We don't use pre-ticked boxes or any other type of default consent.

☐ We use clear, plain language that is easy to understand.

☐ We specify why we want the data and what we're going to do with it.

☐ We give separate distinct ('granular') options to consent separately to different purposes and types of processing.

☐ We name our organisation and any third parties who will be relying on the consent.

☐ We tell individuals they can withdraw their consent.

☐ We ensure that individuals can refuse to consent without detriment.

☐ We avoid making consent a precondition of a service.

Recording consent

☐ We keep a record of when and how we got consent from the individual.

☐ We keep a record of exactly what they were told at the time.

Managing consent

☐ We regularly review consents to check that the relationship, the processing and the purposes have not changed.

☐ We have processes in place to refresh consent at appropriate intervals

☐ We consider using privacy dashboards or other preference-management tools as a matter of good practice.

☐ We make it easy for individuals to withdraw their consent at any time, and publicise how to do so.

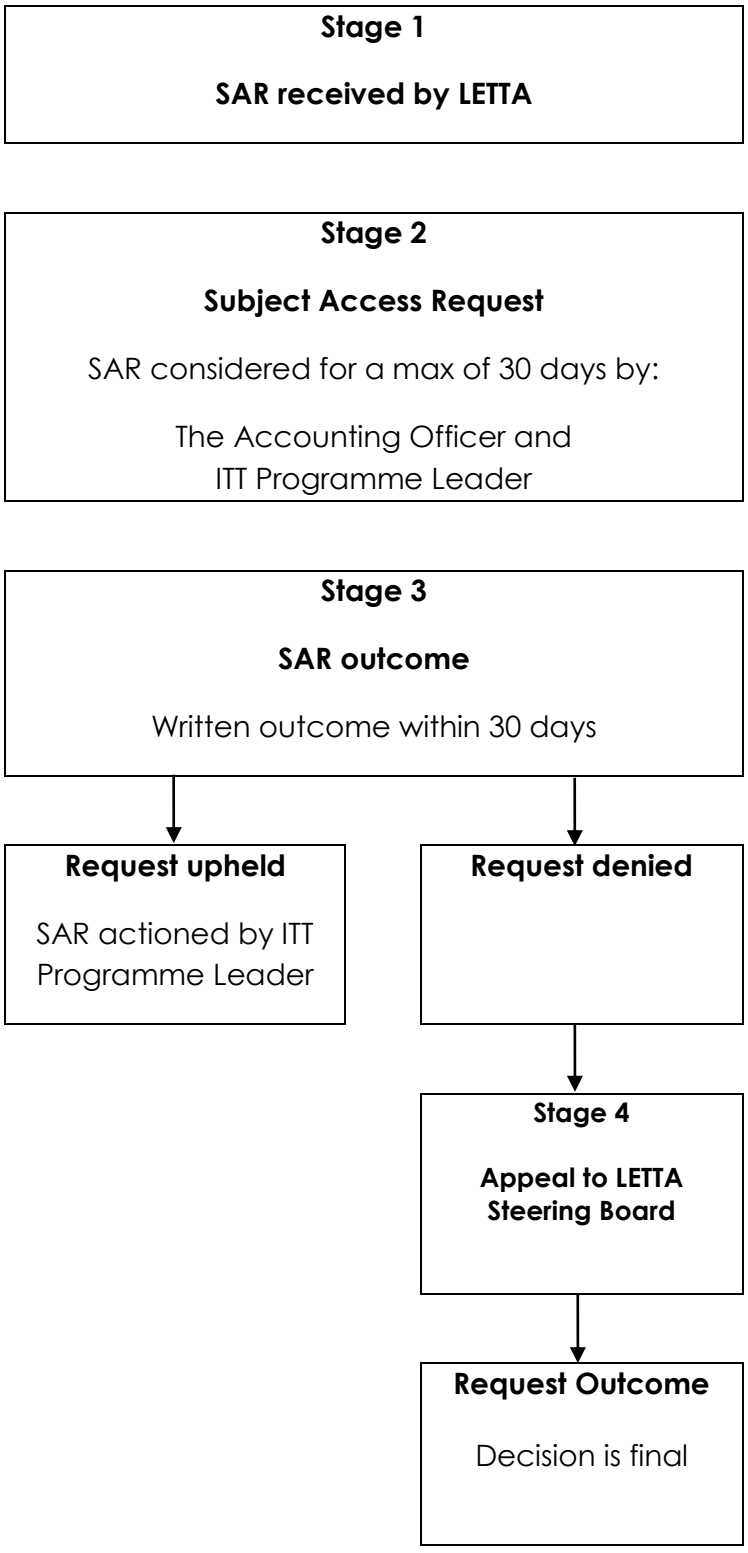
☐ We act on withdrawals of consent as soon as we can.

☐ We don't penalise individuals who wish to withdraw consent.

Appendix 3

Subject Access Request

PROCESS



General Data Protection Regulations

Subject Access Request (SAR) Form

REQUEST

Request made by: (Name) **Date of request**:

(Signed)

Nature of request:

SAR received by LETTA representative/s: **Date received**:

(Name)

(Signed)

Subject Access Request (SAR) Form

OUTCOME

Request made by: (Name)

(Signed)

Date of request:

Date of outcome:

Outcome of Request:

SAR outcome given to: (Name)

(Signed)

SAR outcome actioned by LETTA representative/s:

(Name/s)

(Signed)

Appendix 4

General Data Protection Regulations

INFORMATION HELD

	Personal data	Source of data	Data sharing	Consent required
1.	Name, age, address, email, phone	UCAS application form	Partner school. SHU	No
2.	References	UCAS application form	Partner school, SHU	No
3.	Name, email, phone	Group contacts sheet	Trainees, mentors, tutors	Yes
4.	Assessments and grades	Mentor reports	Trainees, mentors, tutors	No
5.	QTS outcomes	Mentor reports	Final Assessment Board Dataprovision website TRA	No
6.	PGCE assignment grades	SHU assignments	SHU, tutors	No
7.	DBS number, date of issue. Content	DBS Employer Access	Tutors LETTA admin	Yes
8.	Fit for Post	Fit for Post self-questionnaire outcome	School and tutors, as necessary	Yes
9.	Disability	UCAS application form	Partner school, SHU, tutors, as necessary	Yes
10.	Image - public	Photos, videos in LETTA marketing, The Newsletta, twitter, Instagram, facebook WhatsApp	Social media	Yes
11.	Image – private	Recordings while teaching	Trainee & tutor and/or mentor	Yes