**GDPR Outline of the Compliance Process undertaken by School Improvement Liverpool**

School Improvement Liverpool recognises that GDPR compliance is not about a specific date but a commitment to an ongoing process of ensuring that we attain compliance and introduce procedures to safeguard that compliance.

School improvement Liverpool in line with the requirements of the GDPR appointed a Data Protection Officer who is not part of the School Improvement team. Part of the local authority team has offered to fulfil this post, Chris Walsh. Our external data protection advisor, will take responsibility for data protection compliance and has the knowledge, support and authority to carry out their role effectively.

School Improvement Liverpool recognises that it does ‘process’ a great deal of personal data for schools with whom it has a contractual relationship, we recognise that the school are the ‘data controllers’. The GDPR places greater emphasis on the documentation that data controllers must keep to demonstrate their accountability. One aspect of this has been to review the contracts and other arrangements we have in place when sharing data with other organisations.

The following outline maybe of use to schools seeking reassurance about the process School Improvement Liverpool has undertaken to ensure compliance. To prepare for compliance before 25th May School Improvement has undertaken a service wide review which included:

* Commissioning outside agencies with expertise on GDPR to train staff and support senior leadership in ensuring compliance. This led to evaluating current practice and undertaking further actions with team leaders.
* A data audit was undertaken by the teams, to identify all ‘personal’ data held and how it is held. This has led to actions if needed to ensure compliance.
* Policies and procedures were reviewed including the data retention policy to ensure it was fit for purpose.
* Data sharing agreements between School Improvement Liverpool and its partners including school have been re- drafted or reviewed. These are or will be in place before 25th May.
* School Improvement Liverpool as part of this process has sought assurance from its sub-processors of schools data to ensure their compliance. These have been received.

School Improvement Liverpool undertakes a large number of processing tasks for schools commissioned by them as data controllers around personal data. This can be done on a yearly or termly basis for statutory purposes primarily or more frequently directed by the school as the data controller. School Improvement Liverpool has reviewed what is processed and ensured that there is a lawful reason for this under the GDPR legislation.

The data sharing agreement does outline the major sources of personal data shared, how it is kept secure and the frequency of the requests or sharing. The primary purpose in processing this personal data on the schools behalf is either to ensure their compliance with a statutory duty or to provide analysis to support schools in ensuring school improvement. All processing of data takes place within the UK and is subject to UK legislation.

To ensure that any data is stored and transferred securely good use is made of encryption at all stages and these systems meet with the Public Sector Network Standards (ISO27001 accredited) and are managed by Liverpool City Council on behalf of School Improvement Liverpool.

These encrypted outlook systems and encrypted devices undergo regular tests to ensure their resilience and correct processing. These systems have also been audited as part of the management agreement to ensure GDPR compliance. It should be noted that does also includes a data recovery protocol should a system wide failure or other action take place. As part of School Improvements monitoring arrangements it has quarterly meetings with our ICT provider at which data security is a fixed agenda item.

Liverpool City Council is one of our data partners who share personal data from schools with us for the purposes of supporting schools with their statutory duties or to facilitate school evaluation and improvement. School Improvement Liverpool also commissions other partners to undertake sub processing these include Angel solutions, Evolve and Wirral Council. We have ensured that their systems are accredited (ISO27001). No sub processor is based outside the UK.

To ensure that all staff are aware of their duty to process personal data School Improvement Liverpool has undergone training across all teams on lawful processing as well as reviewing retained data. Hill Dickinson have been commissioned to support leaders in the service review

and lead training sessions, as well as additional training events lead by Liverpool City Council to all staff.

This has led to the adoption of procedures and working practices which ensure that this is in accordance with GDPR. Part of this has been to understand ‘what is the GDPR requirements?’ as well as ‘what is a data breach?’ under the GDPR legislation, how they may occur if not aware of the requirements and what actions to take if staff feel that a breach has taken place. This has been done to make sure we have the right procedures in place to detect, report and investigate a personal data breach.

School Improvement Liverpool has used the Information Commissions online self-assessment tool for processors this reviews current compliance and identifies next steps for organisations. School Improvement Liverpool was identified as green and has noted suggested feedback for review and further development. A self-assessment for controllers is also available at the end of the link. <https://ico.org.uk/for-organisations/resources-and-support/data-protection-self-assessment/>

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