



Annual Statement of Compliance

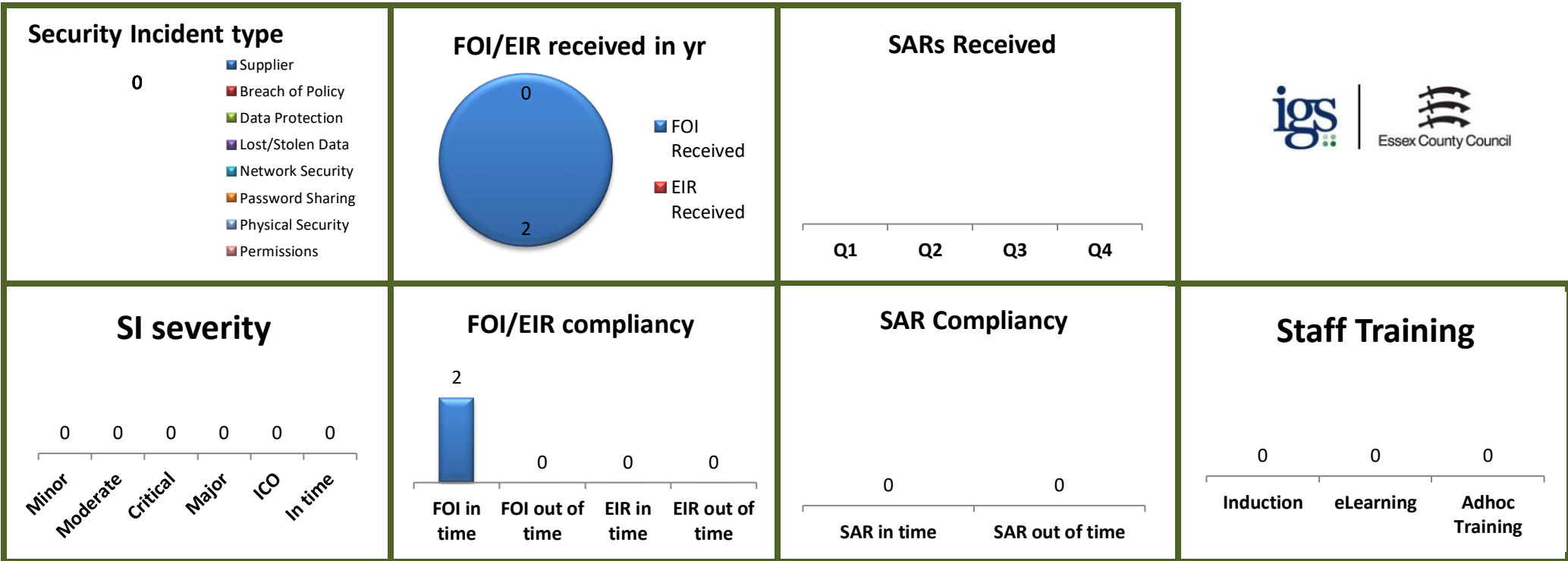
1. Summary of Audit Findings

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|--|------------------------|---|-------------------------|--------------------------|----------------------------|--------------------------|---|
| Organisation: | Overall Opinion | Limited Assurance | Previous outcome | Limited Assurance | Direction of Travel | Compliance static | |
| Matching Green Church of England (Voluntary Controlled) Primary School | Audit Sponsor | Amy Wareham | | | Report Issued | 19/02/2020 | |
| Summary Findings | | Audit Areas Overview: | | | Colour Key | | |
| <p>There have been some examples of good practice, such as ensuring staff sign to say they have read the policies. There is still some work to do to position the school where they can adequately defend themselves if challenged over data protection practices. As a priority, the school need add to the list of data flows to ensure all areas where personal data are held are covered and ensure a process is in place for completion of Data Protection Impact Assessments. The B1 report must be completed and maintained as this will provide the evidence if necessary to assure the ICO of the school's awareness and compliance with data protection legislation. Finally, IGS provide eLearning which is included as part of our service, and the school should take advantage of this to ensure all staff are trained to the same standard, and that this is repeated on an annual basis. Please remember IGS are there to support you with advice and guidance should you need it.</p> | | Roles | Policy | Reporting | Notification | Assets | Critical priority issues identified |
| | | Flows | Training | Retention | Risk | Suppliers | Moderate priority issues identified |
| | | Requests | Incidents | Assessment | Notices | Consent | No / Minor Issues identified |
| | | Biometrics | Photo/Video | CCTV | Marketing | Security | Not assessed as part of this audit by request or not applicable |
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Action Plan Recommendations

| Audit Action Plan | | |
|-------------------|------------|--|
| Ref | Audit Area | Description |
| 1 | General | Ensure your online privacy notices name your DPO and how to contact them |
| 3 | General | There is a current entry on the ICO's Register of Data Controllers (ICO website) at the correct tier |
| 7 | Reporting | Decide on what GDPR performance data you wish to report to the appropriate decision-making body within your existing annual reporting process. |
| 8 | Reporting | Minute the Governing Body's consideration of the report and any resulting actions |
| 15 | Procedures | Identify which Privacy Notices are relevant to the School and publish them on your website |
| 16 | Procedures | Review the forms you use to obtain data ensuring you provide links to the right Privacy Notice for the type of data you're asking for. |
| 17 | Procedures | Publish a Data Protection Policy Statement on your website alongside your privacy notices |
| 19 | Procedures | Maintain clear records of requests for consent so that withdrawals can be managed effectively and are accessible to all relevant staff |

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|-----------|--------------------|--|
| 24 | Procedures | Ensure you clearly display information to show that surveillance is in operation, and how individuals can exercise their rights |
| 28 | Procedures | Ensure that you have scheduled annual reviews to identify records due for review and destruction, ensuring all those records in excess of the retention period have been either destroyed, or if retained, the rationale for retention is clearly documented and a new review date set |
| 29 | Procedures | A comprehensive Retention Schedule is in place |
| 31 | Procedures | To ensure staff remain focussed on legal compliance with data protection issues, ensure their eLearning is refreshed annually |
| 40 | Statutory Requests | All statutory requests for information must be logged to enable you to respond to any challenges from the regulator relating to your compliance with the relevant legislation - Framework Document B1 |
| 42 | Statutory Requests | Ensure your website carries a Publication Scheme as required by law - see Framework document F4 |
| 44 | Risk Management | Identify (on your Information Asset Register) the assets which will require Impact Assessments if there is a change to the way you manage that data in the future |
| 45 | Risk Management | Identify the individual who will conduct Data Protection Impact Assessments and liaise with the DPO over approval |
| 47 | RoPA | The Data Flow Register is complete |



DPO commentary

Your compliance level remains the same as your previous audit. Please ensure that you use your audit recommendations to tackle outstanding tasks and position yourself to adequately defend any challenges to your data protection practice, either from the regulator or from the general public.

The regulator has published their view that this second year of GDPR will be focussed on evidence of accountability. This means you must have available documentary evidence of your compliance, and this is what the framework we provided is designed to do. It will only provide the required evidence if it is completed and maintained.

We look forward to seeing the evidence of outstanding work completed at your next audit. Should you need any further advice or guidance on progressing any of the recommendations, please do contact us at IGS@essex.gov.uk or by calling 0333 032 2970 for support.

