



WLS

Warwickshire Legal Services

Welcome Back!

Welcome to our first official bulletin of the academic year. This one is packed full of information so please take the time to read through so that you can be sure you remain up to date on all things data protection.

Action Points

1. Review the advice note on data protection and remote learning.
2. Review the Remote Learning exemplar policy
3. Review the exemplar DPIA for the provision of remote education
4. Read the update regarding international data transfers.
5. Complete the feedback form with any feedback you may have for us

Within this bulletin, you will find advice on the data protection considerations required when looking to deliver education remotely. We have also included an exemplar Data Protection Impact Assessment and an exemplar Remote Learning Policy.

You will also find an update regarding international data transfers. This is important for schools as there are lots of education apps/third party data processors used by schools that are based outside of the UK/EEA and, particularly, based in the USA.

Finally, we have also included information on what you can expect from us over the course of the academic year. You will also find a link at the end of this bulletin to 'Meet your DPO Team'. This will hopefully allow those who haven't

met all of us, or any of us, to put a face to the name! We have also had some staff changes recently so we thought it would be a good time to introduce our new recruits.

We are always looking for ways to drive the service forward and ensure that our customers feel they are receiving value for money. We know you are all extremely busy at the moment but if you do have a spare 2 minutes, we would be very grateful for any feedback you may have for us. There is a link to our feedback form included in the links below.

Data Protection and Remote Education

As you will already be aware, the Secretary of State issued a direction for schools to ensure they have a continuity plan for the provision of education, in the event children are unable to attend school as a result of the pandemic. This would include the school's full or partial closure, or where children are in periods of self-isolation. The direction came into force on 22nd October 2020.

Within this bulletin, we have provided resources that may be of use to you when implementing your continuity plan. This includes advice on the relevant data protection considerations, an exemplar Remote Learning Policy and an exemplar Data Protection Impact Assessment (DPIA). We are aware that schools will have differing requirements so we have tried to cover as much as we possibly can. Should you need any further support, please remember that we are always on hand to assist you in any way we can to ensure you are complying with your data protection obligations.

As with all your data processing activities, you will need to make the relevant updates to your Privacy Notices to reflect the data processing activities for the purposes of remote education. We have recently reviewed our exemplar Privacy Notice for Parents/Pupils. In this review, we have made some minor amendments to the standard wording, included the Covid-19 amendments and amended the reasons for processing to include remote learning. All amendments are written in blue text.

We have included all links to relevant documents at the foot of this bulletin.

What We Are Working on Bringing You Throughout This Academic Year

We are currently carrying out a review of all of our exemplar documents. The GDPR has been in place for over 2 and a half years and the legislation is now well established and found its feet within our day-to-day duties. As time has gone on, people's knowledge and understanding has improved and there has been much updated guidance to help us ensure we are operating good practice. In light of this, we have started to review the exemplar policies and documents that we have provided to our subscribing schools over the last couple of years. We will detail any relevant updates to these documents in our future bulletins, and we will also be looking to provide a checklist for schools to be able to check that they have the relevant documents and procedures in place to demonstrate data protection compliance.

We are also working on more comprehensive guidance for carrying out Data Protection Impact Assessments. This bulletin will give you further guidance on how to screen for a DPIA so you can be sure you are completing them when required, as well as more in-depth guidance on what should be included in your DPIA. This will also include more exemplars for circumstances we feel would be applicable to schools.

There will also be a bulletin after Easter/in the summer term. If you have any ideas on what you would like this bulletin to include, please let us know via the feedback form below.

Audits

Firstly, we would like to offer an update on the audit process from last year. A very big thank you to all schools who managed to get the required documentation to us before the summer holidays. We are continuing to move forward with this process and if you haven't already heard from us, we will be contacting you over the next few weeks to complete the discussion part of the process. For a reminder of how this will work, please refer to the COVID-19 update that was sent out in the summer term. You can access this by clicking [here](#)

If you didn't manage to get your audit paperwork to us, please do not worry. We

will be producing a report based on a review of information that is available on your website and giving general advice on any areas we were unable to review.

Due to the current pandemic and some recent staff changes, we have fallen a little behind schedule. However, please rest assured that we are continuing to work through all reports and will hopefully have these out to you all by the new year. At which point, we will be able to pick up the process for next year's audit.

Due to the ongoing challenges brought about by the covid-19, we will need to continue to remotely carry out the audit process for next year. We thoroughly enjoy coming out to visit you all and work with you on your data protection compliance. However, we need to ensure that we all remain safe and adhere to the government guidelines.

In December, we will be sending you all the information you will need in order to prepare for your audit. It is proposed that we will use your Year 2019/2020 audit as our starting point so we can ensure that there are no gaps in identifying any support that your school might need from us. We will book some time in with you to talk through how we carry out your audit and hopefully use the time to ensure we help you move forward with any areas that seem challenging for you. Please keep an eye out for further information coming soon.

Links

[Advice Note on data protection and Remote Education](#)

[DPIA for Remote Education](#)

[Remote learning policy](#)

[Updated Privacy Notice for Parents/Pupils](#)

[Update on International data transfers](#)

[Meet the DPO Team](#)

[Feedback Form](#)



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