

**Privacy by Design**

Under the new GDPR regulations schools are required to improve the measures we take to integrate data protection into our processing activities and to be able to demonstrate that we have done so.

Privacy by design is an approach that promotes privacy and data protection compliance. Most schools will automatically think about equalities and diversity when they consider how to deliver services both in terms of its pupils and employees. We need to start thinking about privacy in the same way, especially when we are:

* Building new IT systems for storing or accessing personal data;
* Delivering new projects that involve the redesign of services or business processes involving personal data collection
* Developing policy or strategies that have privacy implications;
* Agreeing new contracts where the personal data of your pupils or employees is being collected and/or processed
* Embarking on a data sharing initiative; or
* Using data for new purposes.

**What is a Data Protection Impact Assessment?**

A data protection impact assessment (also known as privacy impact assessments or PIAs) is a tool which can help your school to identify the most effective way to comply with its data protection obligations and meet the new GDPR requirements including the privacy obligations to your pupils and staff.

An effective PIA will help services to identify and fix problems at an early stage, reducing the associated costs and damage to reputation, which might otherwise occur.

**What are we doing to get ready for GDPR?**

In order to ensure that you are compliant with GDPR regulations by May 2018 we need to make sure that all of your current IT systems and processes are compliant with the new regulations.

PIA’s should be completed for all IT systems and other high risk processes where you are collecting or sharing personal and sensitive data. The completed PIA’s will help to put in place plans to mitigate any risks identified.

**What do you need to think about?**

1. Are you collecting personal and sensitive data?
2. Have you clearly documented your lawful basis for collecting and processing personal data?
3. Are automated decisions made, based on the data you?
4. Are you, or are you planning to, share any personal data with anyone else?
5. Do you rely on contractors to process personal data for you?
6. Do you have an up to date privacy notice in place?

If you can say yes to question 1 but are unsure about 2-6 you probably need to complete
a [PIA Step 1 form](http://www.luton.gov.uk/Council_government_and_democracy/Lists/LutonDocuments/GDPR-for-schools/gdpr-Privacy-impact-assessment-step-1.docx).

The Information Governance Team at Luton Borough Council will then help you to decide how to make sure the personal data you collect and process is kept secure. Please return your completed form to GDPR@Luton.gov.uk for advice and support.