

Committee(s):	Dated:
Board of Governors of the City of London School	28 November 2017
Subject: Head's Report	Public
Report of: The Head, City of London School	For Discussion
Report Author: Richard Brookes, Acting Head of City of London School	

Main Report

This report contains entries regarding:

1. GDPR: Data Protection Report and Training
2. London Youth Choir Proposal
3. CoL Staff Diversity Network
4. The Progress of CLS's Brand Development – Verbal Update

1. GDPR: Data Protection Report and Training

The School is aware that its IT policies are in need of restructuring and bringing into line with current reasonable practice as well as recent and ongoing changes to regulatory frameworks. Our policies fall into a number of categories:

- CoL Corporation staff policies.
- CoL Corporation teaching staff policies.
- CoL Independent School policies.
- CLS policies.

We are also subject to, and/or guided by, a number of guidelines and directives, notably:

- The Information Commissioner's Office (ICO), regarding the Data Protection Act and GDPR.
- The ISI.
- DfE.
- ISBA.
- ISC.

The GDPR was introduced in 2016 as an EU Regulation (EU harmonised legislation) to update the 1998 EU Directive (non-regulatory) that is currently reflected in the DPA 1998. The GDOR will be enforced from May 2018 and has significant implications for institutions, including schools that process significant volumes of personal and sensitive data.

The ICP, ISBA and indeed the Corporation are currently in the process of updating their policies and guidelines. In many cases these remain subject to further change in view that the Data Protection Bill remains at the committee stage in the House of Lords and will not pass to the Commons until the New Year.

The Comptroller & City Solicitor's Office have identified that *whilst much detail and in particular the domestic legislation and ICO guidance is not yet available the Corporation needs to review its organisational and technical processes both Corporately and Departmentally*. To this end the School is following the guidelines provided by the Corporation and closely monitoring the situation. The GDPR will impact all staff and a working party has been assembled, and will be extended, under the direction of the Assistant Head Strategic Development, the Bursar, our School AIN Representative and the School Data Manager.

The Data Protection Officer (DPO) for the School is the City Solicitor. Data Protection issues for the School are managed by the School AIN Representative under the supervision of the Assistant Head Strategic Development. The School AIN Representative reports to the Corporation Assistant information officer.

The working party will ensure that:

- The School is ready to amend its policies in response to the various organisations listed above.
- That our staff are briefed on their GDPR responsibilities.
- Staff with heightened responsibilities due to their roles and data processing needs are trained appropriately.

- The School has processes in place to meet GDPR ‘privacy by design’ requirements.
- Where the School contracts services to process data on its behalf, contracts reflect the needs of the GDPR.

Summary of GDPR:

<p>What does GDPR actually do? GDPR does a few things:</p> <ul style="list-style-type: none"> • It defines what is meant by ‘personal data’ • It confers rights on ‘data subjects’ • It places obligations on ‘data controllers’ and ‘data processors’ • It creates principles relating to the processing of personal data • It provides for penalties for failure to comply with the above 	<p>Six principles of GDPR</p> <ul style="list-style-type: none"> • Processed fairly, lawfully and transparently • Used for specified, explicit and legitimate purposes • Adequate, relevant and limited use • Accurate and up to date • Held no longer than necessary • Processed securely 	<p>Enhanced rights of data subjects</p> <ul style="list-style-type: none"> • Right to be informed • Right to object • Right to rectification • Right to erasure • Right to restrict processing • Right to data portability <p>Lawful bases for handling data</p> <ul style="list-style-type: none"> • Consent • Contractual necessity • To protect vital interests • Public interest • Legitimate interest
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Next Steps:

- The School GDPR working party will provide a framework for the transition to GDPR compliance with a target date, set by the School DPO, the City Solicitor, of March 2018.
- The School will start a data audit and compile a GDPR compliant Data Asset Register of our data processing activities will continue to be populated. This is a currently a matrix provided by Farrer & Co (who incidentally are contracted to IBSA to advise on GDPR compliance). CLS may need to harmonise this with Corporation templates.
- The School will prepare to meet the CoL requirements and templates, specifically:
 - Recording of Processing Activities (RoPA) – awaiting further instruction
 - Impact assessments
 - Data breach reporting requirements
- The School will also compile a Contract Register for data handling/processing suppliers and contractors, and audit it contracts; asking its suppliers to data processing services to provide confirmation of GDPR compliance.
- An annual cyclical data protection training and induction programme will be formulated for School staff, contractors, volunteers and all persons with access to School data.

- Four levels of training will be identified:
 - General staff training
 - Enhanced training for roles dealing with special category (sensitive data)
 - Specialised training for roles dealing with special category (sensitive data)
 - Visitor training
- The School will review the role of School AIN Representative as School Data Protection Coordinator, with a responsibility to report to the DPO.
- Staff training is already largely GDPR compliant, but a GDPR briefing will be given to all staff at the outset of the Spring Term, 2018 and further updates will be disseminated where appropriate.
- Staff with data processing responsibilities will conduct risk mitigating actions.
- The School has identified that the following policies require immediate attention and will be amended and brought into force in December, recognising that further adjustments may be necessary as the ICO, CoL and DfE bring out further guidance once the Data Protection Bill is finalised in Parliament:
 - Acceptable Use Policies (AUPs) for staff
 - Privacy Notice
 - Digital Storage Policy
- Governors will be briefed on the impact of the GDPR on their roles through a training session on 28 November.

2. London Youth Choir (LYC) Proposal

- 2.1. The School has been approached by the LYC with a request to use the School's facilities for choir rehearsals on a Monday evening during term time. The LYC is a charity operating throughout London aiming to bring children without a musical background into a choir and to provide choral training. The LYC patrons include Gareth Malone OBE and the Lord Mayor Dr Andrew Parmley. The referral comes from the Governors.
- 2.2. This would comprise an important piece of outreach for the School, as well as potentially feeding into admissions and the School's strong choral tradition. The LYC is a registered charity with the following stated aims:
 - The London Youth Choir (LYC) is a family of five choirs, established in 2012 by Suzi Digby OBE and Rachel Staunton to provide singers living or educated within Greater London with an outstanding choral education through exceptional musical training and high-level performance opportunities.
 - The choir's vision is to inspire young people to achieve the highest possible standard in choral singing, musicianship and vocal production in a supportive and welcoming environment, whilst representing the city of London.
 - Alongside regular weekly rehearsals, LYC also leads '[Aspire](#)', a community engagement programme in collaboration with music hubs across all 33 London boroughs.
 - The choir is aimed at children and young adults from 7 – 21 years of age.

- 2.3. The School has agreed to provide its facilities on a Monday evening during the Spring and Summer term at a notional cost, as a trial run. If successful we would hope to offer the LYC a permanent home for its work.

3. CoL Staff Diversity Network

The School has become a co-sponsor of the CoL Staff Diversity Network [see Appendix 1]. Upcoming activity from this committee will include City Pride Sponsorship. This aligns well with in-School work to raise awareness of and acceptance of diversity (e.g. through the creation last year of the LGBT+ Society), and also aims to raise the profile of CLS within CoL.

4. The Progress of CLS's Brand Development

Edward Lord and Bob Roberts will be invited to give a verbal update.

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