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| **GDPR and Place2Be – FAQs for schools** |

Following the introduction of GDPR, we understand that you may have questions about our use of data and what safeguards we have in place in order to be compliant. The following are answers to frequently asked questions that we have been receiving from schools:

**What is the GDPR?**

The General Data Protection Regulation is a new regulation from the European Union dealing with the processing of personal data and the free movement of that data. The GDPR repeals the directive on which the current data protection legislation is based (Directive 95/46/EC) and therefore will repeal the Data Protection Act 1998 itself. As an EU Regulation, this piece of legislation is implemented directly into UK Law.

**When does it come into effect?**

The Regulation comes into effect on 25 May 2018, but Place2Be has already undertaken work to reflect the effects of the Regulation on the work we do now and that which we have planned for the future e.g. updating our current consent forms.

**Will GDPR change the way Place2Be treats personal data?**

Place2Be continues to treat all data with the required level of security, sensitivity and confidentiality.

**Are we compliant with GDPR rules?**

In order to be ready for the GDPR to come into force, our planning has entailed working through the ICO’s requirements to be compliant with the GDPR and getting expert legal advice where necessary. Given the rapidly changing ways in which data can be used and the legislation that protects it, we will also continue to review the way we handle data and the ways we protect it on a regular basis.

**What data do we hold in relation to schools?**

* **Schools data:** We hold publicly available school level data: school name, address, Unique Reference Number, Local Authority area, number on roll, school phase and free school meals percentage.
* **Service users:** We hold information about children and parents who access our service in the school which we use to monitor and evaluate our service. The data we collect includes the following. Further details are available in our Summary of Data Collected (which is available on our website [www.place2be.org](http://www.place2be.org)) and includes:
* Demographics;
* Measures of mental health and academic engagement, attendance and exclusions from school;
* Session attended and issues discussed;
* Safeguarding concerns.

**How is data used**

The data we gather about the children (and adults we work with) is used by our clinicians (the School Project Manager in your school) to assess the individual’s needs and to deliver the service including monitoring the support provided, safeguarding and through clinical supervision. The data is used by Place2Be’s Research and Evaluation team with all names removed to monitor and evaluate the service.

**How is data stored/protected?**

Place2Be stores the clinical data in our secure online database (School Services System) that is password-protected with access restricted to those members of staff who are associated with the delivery in the school and the Research and Evaluation team. It is stored on secure servers and can only be accessed online and cannot be downloaded by our school-based staff. The dataset used for analysis has all names removed.

Place2Be stores school data in software including: ThankQ, School Services System, Exchequer and on-premise server file shares. This data is hosted and backed up in UK data centres that are geographically separate for Disaster Recovery purposes. Real-time replication of our data ensures we have online backups of our data at any given time. These data centres are ISO 27001 certified and PCI-compliant, which ensures our data is protected by exceptional levels of both physical and virtual security at all times.

**What access do we have to school data?**

Normally schools provide the School Project Manager with data on children Place2Be works with, including but not limited to the UPN, demographics, attainment, attendance and exclusions, or any other data which Place2Be may reasonably request, to enable Place2Be to deliver, monitor and evaluate the services.

**What is Place2Be’s data retention policy.**

We keep information about the children (and adults) we work with for 6 years and then it is destroyed.

**Is data encrypted in transit?**

The data we gather about children and young people who receive our services is entered by our school-based teams into a secure online database. No transit takes place.

Data is encrypted when updating the School Services System.

**How does Place2Be ensure safety of its data?**

Staff are trained in Data Protection and GDPR and are contractually obliged to comply with all our data protection policies.

Our School Services System is password protected with access restricted to those members of staff who are associated with the delivery in each school and the Research and Evaluation team.

Data is stored within Sys-Pro and Microsoft environments that are ISO 27000 and 27002 compliant. Data stored within these environments are encrypted across multiple data centres within the UK, which allows us to have reliable, geo-redundant data protection which means that the data is stored in two geographical locations to ensure we are not at risk if one fails.

**How data is deleted?**

We have access to Eraser ([www.eraser.heidi.ie](http://www.eraser.heidi.ie)) software which can erase hard disks sector by sector should it be necessary.

**How do you dispose of IT hardware?**

All our obsolete hard disks undergo physical destruction or, where necessary, are erased then physically destroyed using the services of innovent-technologies.co.uk.

**How is Place2Be approaching the issue around consent for counselling?**

Please see our detailed *Letter to Schools - GDPR* document which covers our approach. It can be found on our website and outlines our approach to legal bases, consent and parental agreement for counselling.