One West Newsletter #3

Welcome to the One West Newsletter.

This issue as well as on GDPR focuses on Business Continuity which is a key aspect of our service and especially relevant at this time of year.

We also want to introduce you to some of the other services we offer as the breadth of our professional services is increasing. More on this on Page 4.

Our services are also detailed on our web site **www.onewest.co.uk .** We are getting good and constructive feedback on our content but always welcome more.

One West is a trading arm of Bath & North East Somerset Council providing specialist professional services.

Inside this issue:

Business Continuity

So whats business continuity all about ……..?

The Department for Education places a requirement on all schools and academy trusts to have a business continuity plan in place.

Schools come under intense scrutiny from media, parents and the wider public during an incident so it is imperative to have a robust, working plan in place.

The implications of poor preparation are significant. Staff making critical decisions in a highly stressful environment often get it wrong.

Negative media comment is common and with social media the news travels fast. Even worse it takes longer to get back to 'business as usual.'

Many schools don't have a business continuity plan or what they have is not comprehensive.

Also often there is confusion as to who is responsible for it.

The bottom line is that for continuity plans to be effective they need to be managed through an ongoing governance process.

Another issue is that very few schools validate their plans through testing. This is vital to ensure that when the need arises, plans work and continuity is achieved.

No matter how well designed a business continuity strategy or business continuity plan appears to be, robust and realistic exercises will normally identify issues that require attention.

If you'd like to find out more or would like a review of your current business continuity capabilities, we would be happy to talk with you.




Data Protection Do's and Don'ts

We want to help promote good practice in data protection & believe prevention is better than cure!

We've listed some of the major do's and don'ts which could go a long way to helping you and other staff to reduce risks of a data breach problem. A downloadable poster is also available on our web site .

Do's

If you are away from your screen lock it (**top tip**; use Windows Key ÿ + L as a shortcut).

Put away sensitive files when you aren't using them.

Use first names where names are on display.

Dispose of personal data using a secure method either shredding or in confidential waste.

Use 'strong' passwords (**top tip**; consider using a password manager)

Use Blind Copy (BCC) when emailing multiple people externally.

Use an email sending delay to give you a safety net to react to any errors.

Recognise that a request for personal data is a Subject Access Request and needs to be processed formally by your Data Protection Lead.

Promptly report any concerns, breaches or incidents .

Additionally, if you are working elsewhere make sure you:

Take only the personal data you need.

Where possible look to access/process data electronically – its safer.

When writing de-personalise records – use initials not names.

When transporting hard copy documents put them in a secure holder in the boot of your car.

If you still have documents when going home keep them safely and discretely stored.

Don't

Leave sensitive documents out on show wherever you are.

Reuse passwords across multiple sites / systems.

Treat post as secure – if you have to post sensitive data use recorded / special delivery.

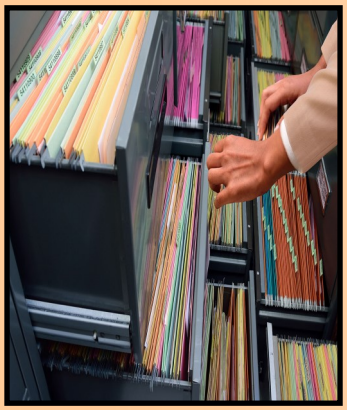
If you are working elsewhere make sure you dont:

Take more personal data than you need with you.

Take sensitive and/or include special category data offsite unless absolutely essential.

Download or save electronic files to your personal device – use your main network.

Leave email logged in on your personal device – login each time instead.



Data Breaches—knowing what to look for & what to do.

One of the most common questions we get is what exactly makes a breach & what to do next whether there is one or not. Our data breach flow chart explains this. Its available as a stand alone document so if you want it let us know **One_West@bathnes.gov.uk**

Phase 1 Initial Action

Has a Breach occurred?

A breach occurs when personal data has been;

- Disclosed to someone It shouldn't have been.
- Lost and unknown where it has been lost.
- Deleted or destroyed when it shouldn't have been.
- Accessed inappropriately.
- Processed illegally.

Should there be any doubt then consulting with the organisation's nominated data protection lead is advised.

Yes or No

Yes

No

Phase 2 Report to DPO

Contain the breach and report to the nominated internal data protection individual immediately using the Data Incident Reporting Form or similar document.

When containing consider doing the following;

- Recover the information from the unintended recipient.
- Isolate the source of the loss of data, this may be a computer, a mailing system or a publically placed piece of information i.e. on a notice board.

Although a breach did not occur a near miss may have occurred in where personal data could have been inappropriately disclosed. You should raise this with your organisation's Data Protection representative, Head Teacher or other suitable individual i.e. IT representative.

Phase 3 Final Actions

The Organisations Data Protection Representative or nominated person should receive an incident report form from the person who has identified that a breach has occurred.

The Data Protection Representative should then contact the DPO using the Security Incident Management (SIM) Record of Work and include the original report. This will be completed with the DPO. The DPO is responsible for reporting to the ICO and managing a breach that meets the threshold for reporting.

The organisation may wish to raise this with the DPO to ensure that appropriate measures are being taken to ensure the security of data.

This may include:

- Revision of existing practices or policy
- Additional training requirement
- Engagement with IT to correct an issue.

In the news:

- **Google has been fined 50 million euros (£44m) by the French data regulator CNIL, for a breach of the EU's data protection rules.**

CNIL said it had levied the record fine for 'lack of transparency, inadequate information and lack of valid consent regarding ads personalisation'.

In a statement, Google said it was 'studying the decision' to determine its next steps.

- **Entertainment streaming giants including Amazon, Apple, Netflix and Spotify have been accused of breaking the EU's data regulations.**

General Data Protection Regulation (GDPR) rules say EU customers have the right to access a copy of the personal data companies hold about them.

However, privacy group noyb said it found that most of the big streaming companies did not fully comply. It has filed formal complaints, which if upheld could result in large fines.

One West - additional services to support our clients needs.

In One West we are expanding the range of specialist professional services we offer. You might not know about them all . We will be saying more in future newsletters but here are some that might be of interest right now.

Business Continuity and resilience :

As a provider of education you should have a documented Business Continuity Plan in your school. Both the SFVS and the Academies Financial Handbook specifically mentions it as an important document that would assist in recovering quickly from a disruptive incident. If you would like to discuss this further and see if we can help you please contact us directly.

Cyber Security (Top Threat in 2019) :

Nobody likes it when there is an attack on their IT. Whether in a school or at home, by email or otherwise it's a real problem and its getting more and more common. Our Cyber Security Assessment (endorsed by the Police Regional Organised Crime Unit) is straightforward. We can assess whether your website, network and activity is safe and will give you an understanding of what areas you may need to tighten up on to give you peace of mind.

Teachers Pensions return :

Our experts can help you with your pension return to central government. This is a start to finish piece of work that will give you assurance that the work has been completed to a high standard whilst remaining independent.

Coaching and mentoring

It makes sense for employers to invest in their employees because its well established that's the way to bring about success. We can help with behaviour change management, talent management and organisational design and development.

If you are interested or would simply like to have a chat about any of our services just let us know - we would be happy to talk with you at your convenience.