

huish | RICHARD HUISSH COLLEGE

Minutes of a Meeting of The Audit Committee

on Monday 5 February 2018 at 5.30pm in Room M4, Maple Building

In Attendance: Sasha Burns (Chair), David Griffin (Vice Chair), Pat Flaherty, and Nicki Reid.

Also in Attendance: John Abbott (Principal), Caroline Fry (Assistant Clerk to the Corporation), Paul Lonsdale (Vice Principal-Finance), and Laura Rice (Data Protection Officer).

Apologies: Clive FitzGerald (TIAA Director of Audit) and Lee Ballard (Staff Governor).

AUD 23 **Declarations of Interest (agenda item 2)** Action

There were no declarations of interest.

AUD 24 **Risk Register - Risk No 7: Compliance with Legal and Statutory Requirements (agenda item 3)**

GDPR presentation by Principal and College Data Protection Officer

The Chair reminded the Committee that, at the previous meeting of the Audit Committee on 20 November 2017, it had been agreed that an additional meeting of the Committee would be necessary to focus on progress with implementing the GDPR, since the next scheduled meeting on 23 April 2018 would be too close to the implementation date of 25 May 2018.

The Principal and the College Data Protection Officer gave a presentation to the Committee, describing what had been done since the last meeting and plans for moving forward.

The Principal began by reminding Governors of the College management structure:

- SMT (Senior Management Team) = Principal, plus Deputy Principal – Curriculum and Quality, Vice Principal – Finance and Resources, HR Director and Assistant Principal – Student Support.
- SLT (Senior Leadership Team) = SMT plus the three Heads of School
- CMT (College Management Team) = SMT plus SLT plus the Support Services Managers

The Data Protection Officer had delivered training on GDPR to CMT. Compliance requirements had been outlined and groups were asked to undertake tasks relating to the data which they held. Staff had engaged with the subject and feedback had been positive.

A single Data Register and Retention Schedule form had been designed staff members had been asked to complete this documentation by the end of March. This would provide the information required and highlight actions to be compliant with the regulations. CMT managers would need to know their own areas and take responsibility for them. The process would be led from SMT downwards.

All staff had been required to attend a staff meeting on 10 January 2018. The Principal had delivered a GDPR presentation. All new staff would have GDPR training with the DP Officer. It was noted that a number of GDPR requirements were already in place as a result of existing data protection legislation but it was timely to review practice and issue reminders.

The College shared information with other bodies e.g. ALPS, the ESFA, exam boards etc. and

these organisations would have produced a data privacy notice.

In response to questions from Governors, the following points were made:

- Consent would need to be obtained from students to collect and hold their data.
- The College stored personal data held for overseas students and was compliant in all aspects.
- There was the potential for fraud and irregularity when dealing with overseas agents.
- The legislation could sometimes be conflicting, for example HR information relating to pensions had to be retained but an ex staff member could ask for their personal data to be destroyed. The College would have to demonstrate a legitimate interest in retaining it.
- In terms of external guidance, the DP Officer had attended one day GDPR training provided by the AoC. The meeting noted that the ICO (Information Commissioner’s Office) was a good source of information but it was very general and they would not answer specific questions.
- The College was working towards becoming ‘paperless’.
- There would be resource implications as not all staff had access to lockable cabinets/drawers.
- It would be helpful to ask internal auditors to undertake reviews of specific areas, for example declarations, privacy notices, opt outs/ins, etc.
- The ICO would be likely to undertake desktop audits, looking at privacy notices and risk assessments.
- The large fines were likely to be for systematic failures.

It was acknowledged that the requirements of GDPR would not all be in place by the deadline date of 25.05.18. When the Data Register/Retention Schedule had been returned at the end of March, an action plan and risk management plan would be produced and the risks identified and prioritised. The aim was to be fully compliant by September 2018 and it was agreed that this was more realistic.

In response to a question from the Chair, Governors felt that they had been given enough information but it was too soon to say whether they had received assurance on GDPR compliance. However, Governors confirmed that preparations at RHC were in line with, or slightly ahead of, preparations in their own workplaces.

The Chair thanked the Principal and CIS and Exams Manager for their presentation and felt assured that preparations were moving in the right direction.

AUD 25 Any Other Business/ Items for Next Agenda (agenda item 4)

The date of the next meeting was noted as Monday 23 April 2018.

The GDPR action plan and risk management plan, following the return of all Data Register/Retention Schedule forms, would be considered at the next Committee meeting.

With no further business the meeting concluded at 6.15 pm.

The minutes were agreed and signed.

Chair.....Date.....

**PLO/
LRI/
Clerk**