Meeting of the South Bank Academies Board

4.00 - 6.00 pm on Thursday, 28 March 2019
in University Academy of Engineering - Trafalgar Street, London SE17 2TP

Agenda

Date of next meeting
4.00 pm on Tuesday, 14 May 2019

Members: Richard Flatman (Vice-Chair, in the Chair), Douglas Denham St Pinnock, Tony Giddings, Nicole Louis, Lesley Morrison, Chris Mallaband, Fiona Morey and David Phoenix

Apologies: Hitesh Tailor

In attendance: Michael Broadway, Clym Cunnington, Dan Cundy, Natalie Ferer and Alexander Enibe

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	CONFIDENTIAL
Paper title:	CEO Report
Board/Committee:	South Bank Academies Board Meeting
Date of meeting:	28 March 2019
Author(s):	Nicole Louis, SBA Chief Executive Officer
Sponsor(s):	Nicole Louis, SBA Chief Executive Officer
Purpose:	To Review
Recommendation:	To review CEO update since previous SBA Board meeting

Executive Summary

The CEO report will cover updates from the following areas:

- UTC Ofsted inspection. This took place 22-23 February 2019
- Compliance and audit updates and reports
- Sponsor Activity update
- Student Numbers and Recruitment
- People and HR
- Business Development

This covers both the University Academy of Engineering South Bank and the South Bank Engineering UTC.

CEO's Report: March 2019

1.   UTC Ofsted Inspection

The UTC underwent its first inspection by Ofsted on the 22/23 February and has now received its final report. The school was judged to be good in two of the five categories covered by the inspection framework and as requiring improvement in the remaining three. This drove an overall rating of 'Requires Improvement'.   There were no safeguarding or compliance concerns identified. The inspection identified several strengths and these include the unique learning environment, the role and contribution from sponsors and governors, leadership, student destinations and the care and wellbeing of pupils. The areas judged as requiring improvement were; the quality of teaching, learning and assessment which was inconsistent across the school, outcomes for pupils - particularly linked to the 2018 A Level cohort, and the 16-19 study programme. A plan to address rapid improvement in the key areas has been developed and this will be overseen by the UTC's independent School Improvement Advisor.

2. Compliance & Audit

GDPR Compliance: Data Audits
A data audit conducted by Judicium was carried out on the 18 January at the UTC and on the 4 March at the UAE. This was to support GDPR compliance by identifying any areas requiring improvement in relation to data protection and handling in line with GDPR guidance. For the UTC, the main area of concern related to identifying that specific policies are required to cover email retention, the use of cookies on the school website, the use of passwords, communications and CCTV. There were three amber-rated issues (RAG Rating System) linked to the retention of data. A copy of the audit report is submitted with this report.

The report following the audit at the UAE is due to be received on Friday 22 March 2019.

Health & Safety Audit
A Health and Safety Audit was carried out at the UTC this month by Judicium and this highlighted required actions in the areas of: Manual Handling, Management of Risk and emergency, and use of Work Equipment. An action to address all outstanding points is currently being developed and is being overseen by the School Principal with the highest priority actions due to be completed by June 2019. A copy of this action plan is submitted with this report.

The UAE have a Health and Safety Audit scheduled for 2 April 2019.

Asbestos Update
A management survey took place on 22 February 2019 at the UAE.* The findings of this survey were that there were no asbestos materials detected for independent analysis. In the Bowmer and Kirkland Construction Regulations (2015) which were conducted for the construction of the Brixton Hill site, it states that 'the use of asbestos was totally prohibited in construction from 1999; it is therefore safe to assume that no Asbestos Containing Materials were used in the construction of the new colleges.' According to LSBU's Health and Safety lead, this covers the UTC in relation to the asbestos register.

A management survey is a standard survey that identifies the presence and extent of any potential asbestos containing materials (ACMs) in the building.

3. Sponsor Activity

LSBU Engagement Update
There has been a significant programme of support delivered by the University to support academic enrichment and skills development. The UAE have embedded sponsor time in to the curriculum through the 'Day 10' programme and activities supported by the University include the Wellbeing Hackathon/App development with Y8s, the Ethical Hacking (Cyber Security) project with Y9s and the Sustainable Architectures with Y10s. These sessions are timetabled for once/fortnight. At the UTC the *InvenEUrs* project continues with the Y10s and is a 1 week intensive project to develop an app. This worked well last year and takes place in the summer term. Guest lectures are also being arranged for both schools delivered by LSBU academics.

Additionally, the Trust is currently working with LSBU's Outreach team to evaluate implementation of the Peerz online mentoring platform to facilitate peer-to-peer mentoring between UAE and UTC students, with Y13s mentoring Y11s in the other school. This online platform can also be programmed as a tutoring facility, with extra Maths, English and Science support.

Employability workshops were delivered in the Autumn term and there are further workshops for Y12s planned in the Summer term.

UCAS Applications to LSBU
There has been a marked increase in the number of applications to LSBU during the current recruitment cycle. In total, 30 students have included LSBU as one of their five options and this is approximately double the number of applicants received last year. The LSBU outreach team is delivering bespoke engagement activities to SBA applicants.

Subject	Total number of Applicants from both	UTC	UAE		
Civil Engineering	10	4	6	BEA	
Quantity Surveying / Construction	3	1	2	BEA	13
Mechanical Engineering / AVE	5	5	1	ENG	
Computer Science	5	5	0	ENG	
Electrical Eng	1	1	0	ENG	
Engineering Foundation	1	0	1	ENG	12
Marketing	2	0	2	BUS	
Accounting and Finance	2	1	1	BUS	4
Drama	1	1	0	ACI	1
Totals	30	18	13		

4. Student Numbers and Recruitment

Current Enrolled Students AY 2018/19

UAE Student Totals For Year Groups								
	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Total
October 2018	144	127	143	132	101	18	30	695
March 2019	147	133	143	137	98	21	27	706
Commentary	Only Y11 and Y13 have fewer students currently than at the beginning of the Academic Year. All the other year groups have stayed the same or risen in number. Overall there are 11 more students now than at the beginning of the year.							

UTC Student Totals For Year Groups					
	Year 10	Year 11	Year 12	Year 13	Total
September 2018	39	53	79	48	219
March 2019	40	54	80	44	218
Commentary	The four students that have exited Y13 are due to following reasons: - One student moved to a college nearer to home - Two students have moved on to apprenticeships - One student, on the edge of exclusion has moved to another college				

Applications for September 2019

UAE Year 7 Entry

	Internal Applicants	External Applicants	Total
At March 2019	n/a	381	382
At March 2018	n/a	372	372
Commentary			

UAE Year 12 Entry

	Internal Applicants	External Applicants	Total
At March 2019	40	17	57
At March 2018	0	61	61
Commentary	One of the main reasons for lower numbers of external applicants is the higher entry criteria. The majority of external candidates last year did not achieve the entrance criteria and so were not admitted to 6th form (as seen by our lower numbers in Year 12) and, although the numbers of external candidates have dropped, the quality (based upon target grades) is higher than last year.		

UTC Year 10 Entry

	Internal Applicants	External Applicants	Total
At March 2019	n/a	39	39
At March 2018	n/a	38	38
Commentary			

UTC Year 12 Entry

	Internal Applicants	External Applicants	Total
At March 2019	12	130	142
At March 2018	20	143	163
Commentary	There are less internal applicants this year than last year because of the structure of the current cohort of Y11. UTC Principal can expound on this.		

5.   People and HR

There have been a number of people related developments with the Trust supported by the Trust HR Manager. Most notable are:-
-   The appointment of a new Vice Principal at the UAE
-   A restructure of admin resources at the UAE to improve productivity is currently under way
-   The appointment of a Finance Manager shared between the UAE and the Trust to support sound financial administration
-    A re-structure of the senior management team at the UTC in response to the post Ofsted improvement plan
-   The appointment of a full time marketing and admissions officer at the UTC

6. Business Development
We are actively seeing opportunities to expand the Trust to create a more sustainable operating model and are considering both mergers and new school opportunities. In recent months, first stage discussions have been held with a small number of possible partners including:

-   GSTT regarding new U18 provision focussed on Health and Social Care. Options include introduction of a dual specialism at the UTC and a less likely option of new school application in Greenwich
-   LGC Group (life sciences) regarding a potential application for a new school which could be delivered through a partnership which includes LGC and Kingston Hospital Foundation Trust
-   Spa of Elutec (UTC) in Dagenham who are looking to join a MAT
-   Archbishop Tennisons re a possible UTC franchise campus in Croydon

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SOUTH BANK ACADEMIES
A Multi-Academy Trust

	CONFIDENTIAL
Paper title:	Management Accounts to January 2019
Board/Committee:	South Bank Academies Board Meeting
Date of meeting:	28 March 2019
Author(s):	Clym Cunnington, Trust Business Manager
Sponsor(s):	Natalie Ferer, Financial Controller
Purpose:	To Review
Recommendation:	To review the Management Accounts to January 2019

Executive Summary

Submitted for the SBA Board to review are the Management Accounts to January 2019 for the UAE and the UTC

Executive Summary - UAE

- Management accounts for the University Academy of Engineering show a surplus of income to expenditure of £10,941. In addition, there is a built in full year surplus of £217,217 which remains intact.
- Income is more or less on target with further investigation into the SEN funding as this looks to have been miscoded. This is being addressed so that it is split out in the income section in order to be able to track.
- Expenditure is on the whole as planned; whilst Capital expenditure is as planned has been applied to the accounts and has comfortably been assumed by the current year budget.
- While some individual cost centres may look as if they will overspend, the ordering for non-essential or direct debit items closes in the third week of June 2019. Either cost centres have a "life-span of 9 months or 10 months, not 12 months.
- Salaries are performing as expected and are on target across both teachers and support staff.
- UAE financial reporting and forecasting show that the UAE finances are performing well and on the whole within budget.

Executive Summary UTC

- Management Accounts for the UTC show a surplus of income to expenditure of £163,198. When Central Services Costs are deducted there is still a healthy surplus of £36,919.
- There is a built-in surplus to the UTC Accounts of £94,035 and the UTC is on target to achieve this to date. This is 5% of the total budgeted income.
- The GAG Clawback is a front-loaded charge and full payment has now been made. An accrual was made for this and adjusts accordingly.
- Salaries are performing as expected and are on target despite the imbalance between teaching staff and support staff. The average of these show they are on target.
- There is a £205k contingency in the staffing budget for the current academic year.
- Whilst some budgets tend to look as if they will overspend, they are not budgets that run to the end of the financial year. Curriculum Budgets will close at the end of the third week in June 2019 in order to enable swifter, more efficient end of year close down ready for year end audit.

SOUTH BANK ACADEMIES
A Multi-Academy Trust

Title	**Management Accounts to January 2019**
Details	Analysis and Comment for University Academy of Engineering
Date	2019-03-05

UAESB

Current Forecast for Academic Year 2018/19 (As at 31st January 2018) — **Percentage of Year completed**

Income	Current	Forecast	Budget	Variance	Current/ Forecast %	Comment
GAG Income - Pre-16	2,039,521	4,894,850	4,894,850	0	42%	
GAG Income - Post-16	153,324	367,979	364,309	3,670	42%	
Start Up Grants	82,500	82,500	82,500	0	100%	Start Up Grants Front ended - now all paid
Other Government Income	164,542	394,901	437,633	42,732	42%	Pupil Premium + SEN - RPA (SEN funding not yet released by Southwark)
Other Income	72,826	174,782	306,234	131,452	42%	Catering, rates relief, interest, trips
Capital Grant	0	0		0	0%	On Target
Income Total	**2,512,713**	**5,915,011**	**6,085,526**	**170,515**		

Expenditure	Current	Forecast	Budget	Variance	Current/ Forecast %	
Teaching Salaries	1,085,314	2,604,754	2,806,852	202,098	42%	Staff salaries only + supply+ contingency
Other Salaries	452,702	1,086,484	1,435,042	348,558	42%	Premises, TA, Finance + Admin + contingency
Other Staff Costs	27,020	43,500	43,500	0	62%	recruitment, staff development
Building Maintenance & Occupancy Costs	266,576	329,892	329,892	0	0%	MUGA Payment re funding
Curriculum Budgets	338,447	481,813	481,813	0	0%	Books close end June 2019
Consultancy/Professional Services	70,710	127,278	48,085	(79,193)	0%	Advertising, SIMS
Catering Costs	95,647	191,294	270,782	79,488	0%	On Target
Exams	2,213	5,310	66,000	60,690	0%	On Target
IT Costs	32,712	78,509	70,216	(8,293)	0%	North Pallant + uunbudgeted for consumables.
Capital Costs	0	0	0	0	0%	On Target
Central Services	115,403	276,966	276,966	0	0%	On Target
Other Costs	15,028	36,068	39,161	3,093	0%	
Expenditure Total	**2,501,772**	**5,261,869**	**5,868,309**	**606,440.35**		
Surplus/(Deficit)	**10,941**	**653,143**	**217,217**	**(435,926)**		SEN Income
	0%	11%	4%			

1.	**Executive Summary**
	Management accounts for the University Academy of Engineering show a surplus of income to expenditure of £10,941. .
	In addition, there is a built in surplus of £217,217 which remains intact.
	Income is more or less on target with further investigation into the SEN funding as this looks to have been miscoded. This is being addressed so that it is split out in the income section in order to be able to track.
	Expenditure is on the whole as planned; whilst Capital expenditure is as planned has been applied to the accounts and has comfortably been assumed by the current year budget.
	While some individual cost centres may look as if they will overspend, the ordering for non-essential or direct debit items closes in the third week of June 2019. Either cost centres have a "life-span of 9 months or 10 months, not 12 months.
	Salaries are performing as expected and are on target across both teachers and support staff. UAE financial reporting and forecasting show that the UAE finances are performing well and on the whole within budget.
2.	**Income**
	Income for the AWPU and the other GAG related income already included the Pupil Number Adjustments (PNA) for 18-19.
	Start Up grants have been received as per the income schedule with Sixth form funding performing slightly better to date.
	Pupil Premium Grant (PPG) is paid quarterly in October, January, April and July. The first two payments have been received in full to date.
	The Rates Rebate looks not to have been claimed since the 16-17 Academic Year. There is no information on the system to show that rates costs have been claimed from the ESFA. As a result, these have been claimed as far back as the ESFA permits which is the 15-16 academic year. Calculations show that there is a potential amount of income due for these claims of £238,320. Confirmation will be in approx. 2 months.
	Catering income is not performing well and presents one of the major concerns for the income section. Outstanding income is being chased.
3.	**Expenditure – Salaries**
	Teaching salaries are showing a large underspend as a result of a built in budget contingency of £200k. It is unlikely that this will be used up in the year as there is very close oversight by the Executive Team of salary expenditure and a well-managed process of recruitment authorisation. Apart from this, salaries are on target.
	With an increase in student number from September 2019, there will be an increase in teaching staff costs and on-costs, which will be included in the budgeting cycle for the 19-20 Academic Year and offset by the increased income from increased student numbers.
	Non-teaching salaries are also on target though they do look over budgeted. Ongoing close scrutiny is taking place.
	Agency Supply cover was budgeted at £170,000 and is currently at £142,000. There are some coding errors which are being corrected which will reduce the current total. Sickness absence is being closely monitored as this has a considerable impact on the Supply/Cover budget.
4.	**Expenditure – Other**
	Most other expenditure is performing as expected except for Consultancy and Professional Services is over spent, which is an extension of software licences to include an additional software cost for absence reporting.
	Catering Costs look to be underspend for the rest of the year and I would recommend that the Trust looks at offsetting any underspend in the current year to clear the parent pay accounts that haven't been recoverable.
	Capital Expenditure
	MUGA costs have been applied to the UAE accounts. The overspend on the premises section is a result of this is easily subsumed into the overall accounts without leaving a deficit.

	Exam Expenditure The majority of exam registrations and expenditure occurs in Period 6 March and is budgeted at £66,000. This cost centre will show an increase in late March or early April.
5	**Summary** Income and expenditure for Period 5 shows a small surplus where income and expenditure more or less balance for the period. This is the result of a contingency in Teaching Staff budget of £205k The income and expenditure is on target for the period.

SOUTH BANK ACADEMIES
A Multi-Academy Trust

Title   Management Accounts to January 2019
Details Analysis and Comment for UTC School Advisory Board Meeting
Date   2019-02-22

UTC

Current Forecast for Academic Year 2018-19 (as at the 31st January 2019)

Percentage of Academic Year passed = 41%

Income	Current	Forecast	Budget	Variance	Current / Forecast %	Comment
GAG Income	576,270	1,419,314	1,419,314	-	41%	PNA Due in February but taken into account already in overall GAG due
Start Up Grants	63,250	100,000	100,000	-	63%	Find payment shedule and compare - front loaded- next one due?
GAG Clawback	(19,687)	(19,687)	(19,687)	-	100%	Pupil number clawback - not as high as previous year. Now all repaid
Transition Funding	200,000	200,000	200,000	-	100%	On target
Other Government Income (SEN,PPG,Pay Award)	52,154	168,087	168,087	-	31%	£21,972 Pupil Premium (Actual) + Funding Received + £5,466 Teachers' funded pay award + Teachers pay award funding
Other Income	4,055	45,000	45,000	-	9%	Catering income £2,455 ,lettings of £1,600
Capital Grant	0	0	0	-		
Income Total	**876,042**	**1,912,714**	**1,912,714**	**-**	46%	Catering income now being collected

Expenditure	Current	Forecast	Budget	Variance	Current/ Forecast %	
Teaching Salaries	313,483	1,066,381	1,066,381	-	29%	Including salary step increases and cost of living award in December 18. (£33,093 Pension £27,604 NI)
Other Salaries	163,696	283,865	283,865	-	58%	No Premises Staff at UTC - buying into Trinity staff with SLA includes £4k of supply staff
Other Staff Costs	7,597	11,219	11,219	-	68%	CPD costs high
Building Maintenance & Occupancy Costs	16,487	48,708	48,708	-	34%	Utilitities, Health and Safety, Buiildings Trinity invoicing late plus o/s invoices from July last year
Curriculum Budgets	82,373	101,101	101,101	-	81%	Capitation ordering closes late June2019
Consultancy/Professional Services	71,916	87,022	87,022	-	83%	
Catering Costs	30,269	65,500	65,500	-	46%	Parent pay debt chasing in progress £5k
Exams	21,110	35,000	35,000	-	60%	BTEC Exam registrations to date - A Level Registrations take place in March
IT Costs	(5,329)	27,500	27,500	-	-19%	Credit note from 17-18 repaid re CVI
Capital Costs	0	0	0	-		New build
Central Services Cost	32,243	77,383	77,383	-	42%	Deducted at Year end last financial year - to be amended and deducted monthly and backdated
Other Costs	7,243	15,000	15,000	-	48%	Marketing
Expenditure Total	**741,087**	**1,818,679**	**1,818,679**	**-**	**-**	
Surplus/(Deficit)	**134,955**	**94,035**	**94,035**	**-**		
	15%	4.9%	4.9%			

1.	**Executive Summary**
	Management Accounts for the UTC show a surplus of income to expenditure of £163,198. When Central Services Costs are deducted there is still a healthy surplus of £36,919.
	There is a built-in surplus to the UTC Accounts of £94,035 and the UTC is on target to achieve this to date. This is 5% of the total budgeted income.
	The GAG Clawback is a front-loaded charge and full payment has now been made. An accrual was made for this and adjusts accordingly.
	Salaries are performing as expected and are on target despite the imbalance between teaching staff and support staff. The average of these show they are on target.
	There is a £205k contingency in the staffing budget for the current academic year.
	Whilst some budgets tend to look as if they will overspend, they are not budgets that run to the end of the financial year. Curriculum Budgets will close at the end of the third week in June 2019 in order to enable swifter, more efficient end of year close down ready for year end audit.
2.	**Income**
	GAG Income
	Income for the AWPU and other GAG related income already included the Pupil Number Adjustments for 18-19.
	Transition funding was received in January 2019 and will continue for a final year in the next academic year. It is believed it will continue after this year.
	Start-Up Grants have been received as per the income schedule
	Pupil Premium Grant PPG, which was budgeted at £39,270 or four payments of £9,8175 Recent payments show an increase in income in this area. .
	SEN funding has not been received as no invoice has been submitted to the Local Authority requesting payment for the students for which SEN Top Up Funding is received. The amount of £24,715 if for the correct number of Southwark Students. Analysis of the eligible students would indicate that this income was ove rbudgeted.
	Catering income for the year was budgeted at £35,000 providing the majority of income for this category. This income is extensively under collected. The amount of income collected to date is £2,451.
3.	**Expenditure – Salaries**
	Overall Salary expenditure for the period from September 18 to January 2019 show an underspend. Budgeted salary expenditure to January 2019 should be at 41% while actual spending shows it at 36%.
	The saving is from 2 main areas: spreadsheet budgeting gives a surplus from a flat rate application of National Insurance rates across the upper and lower thresholds. Teaching staff costs are well under budgeted levels as a result of strong oversight and control of staffing costs plus underspends in some non-teaching staffing areas.
4.	**Expenditure Other**
	Curriculum Budgets
	At first glance curriculum budgets look overspend, however, this is misleading. Expenditure in this area is dependent on the Teaching and Learning needs and these will vary according to the timing of the curriculum being taught. In order to help with the efficient and timely year end accounting process, budget spending will stop in the last week of June 2019.
	Catering Costs
	On target and forecast to be underspent. Catering costs run up until the third week of July 2019. New hospitality forms are being put in place to ensure this is properly monitored with the appropriate audit trail.
	IT Costs
	Exceptionally, there has been a credit note from the previous financial year, putting the cost centre into credit.
	Utility Costs

	These have been monitored closely as the amounts are calculated as a pro rata, per square footage ratio by Trinity Academy. This cost centre is likely to be overspent at the yearend as invoices have not previously been sent. There are a number of invoices dating back to June 2018 in the previous financial year. Premises costs are subcontracted from Trinity Academy.
5.	**Summary** In regards to income, the UTC has one main area in which funding hasn't been received; this is in hand with extensive correspondence and follow through with the Local Authority. Expenditure is on target in terms of both salaries and non-salary expenditure. Catering income is now being analysed and outstanding debts followed up on in order to meet budgeted income forecasts. Catering costs are on target and forecast to come in under budget.

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Paper title:	SBA Budget Planning Assumptions
Board/Committee:	South Bank Academies Board Meeting
Date of meeting:	28 March 2019
Author(s):	Clym Cunnington – Trust Business Manager
Sponsor(s):	Nicole Louis – Chief Executive Officer
Purpose:	For Discussion
Recommendation:	The Board is requested to discuss the key assumptions for the 2019/20 SBA budget including the indicative outturn for each school in terms of income growth and surplus

Executive Summary

SBA management is currently preparing the 2018/19 budget which will be brought to the Board for approval in June / July*. Key assumptions underpinning the 2019/20 budget are the enrolment forecast for each of the two academies which show different levels of growth. In addition, next year the budget needs to address a number of challenges in terms of funding and increasing costs, including increases in the annual pension contributions which are set to increase for both the TPS and LGPS. For both academies, when factoring in the assumptions highlighted within this paper and allowing for essential staff increases, both institutions are likely to generate a budget which creates a surplus greater than 5%, whilst maintaining, or allowing for the ability to slightly increase the charge paid to SBA to support central overheads – currently around 5% of GAG income. Any additional surplus above 5% can be reinvested in schools to support curriculum enhancement and improvement of the academic environment, based on agreed priorities.

Enrolment Growth and Income Assumptions

- Student numbers for the University Academy of Engineering are predicted to increase from 701 to 780 based on the new Year 7 intake and anticipated attrition between years 11 and 12
- The UTC has received a funding notification from the ESFA based on 223 pupils which reflects zero growth from 2018/19. The budget will be planned with a pupil number adjustment (PNA) of +32 pupils based on management's estimation of the likely intake. This increase is felt to be realistic given the current applicant pipeline and the recent appointment of a full-time marketing and admissions officer
- The UTC has received confirmation that the Transition Funding of £200k will continue for 2019/20

Other Assumptions

- TPS and LGPS pension contribution increases have been accounted for at 23.48% and 20% respectively (to be confirmed)
- Increasing staffing costs from salary step increases as well as cost of living increases - calculated at 2%
- Additional staff investment at the UTC, particularly around middle management positions to support the school improvement plan following the 2019 Ofsted inspection

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- At the UAE, there will be a small increase in teaching staff of approx. 3 teachers for September '20 to account for the increase in student numbers.
- At the UTC, there will be a small increase in teaching staff of approx. 2 teachers for September '20 to account for the increase in student numbers
- No additional staff increases in the Trust central team but continuing with the additional shared financial resource (with UAE) appointed in March 2019
- Operational inflation is still to be applied across the Trust and is likely to be between 1.5% and 2% depending on the category of spend.
-

UTC High Level Forecast

South Bank Engineering UTC - Income/Expenditure	2018 - 19	2019 - 20	2020 - 21	2021 - 22
Total Revenue Income	1,818,239	2,307,810	2,545,835	2,817,505
Student Numbers	162	223	246	300
Total Staffing	1,176,713	1,488,400	1,518,571	1,549,344
Total Indirect employee expenses	10,011	10,708	10,708	10,708
Total Staff development	10,416	10,416	10,416	10,416
Total Premises - Maintenance	39,500	39,500	39,500	39,500
Total Other Premises	40,000	40,000	40,000	40,000
Total Supplies and Services - Educational IT	27,500	27,500	27,500	27,500
Total Supplies and Services - Educational Other (exclude IT)	106,424	106,356	106,356	106,356
Total Supplies and Services - Non Ed	107,021	108,721	108,721	108,721
Total Other Support costs	171,419	211,199	231,842	235,973
Total Revenue Expenditure	1,689,004	2,042,800	2,093,614	2,128,518
Surplus	129,235	265,010	452,221	756,463

Notes

An increase in staffing costs to account for an increase in student numbers for academic years 2021-22 and 2022-23 has not been included

- Increases in income and expenditure based on an additional specialism are not yet factored in
- Inflationary increases - TBC

UAE High Level Forecast

Description	2018 - 19	2019 - 20	2020 - 21	2021 - 22
Basic Entitlement Age Weighted Pupil Unit (AWPU)	3,794,682	3,877,690	4,168,220	4,251,229
Student Numbers (PNS Below)	701	738*	847	847
Deprivation	867,041	886,008	952,390	971,357
Prior Attainment	175,165	178,996	192,407	196,239
English as an Additional Language (EAL)	57,962	59,230	63,668	64,936
Lump Sum	137,400	137,400	137,400	137,400
Total School Allocation	5,032,951	5,139,324	5,514,933	5,622,008
Start Up Grants	82,500	0	0	0
Total Post Opening Grant (Start Up Grant)	82,500	0	0	0
Total Programme Funding Formula	358,188	241,934	219,940	816,920
Student financial support funding	6,115	5,042	5,042	5,042
Total 16-19 Allocation	364,303	246,976	224,982	821,962
Rates Rebate	54,000	54,000	54,000	54,000
Total 20% Rates Relief	54,000	54,000	54,000	54,000
PPG	297,798	294,525	294,525	294,525
Total Pupil Premium	297,798	294,525	294,525	294,525
PNA 44 students *	0	260,876	0	0
Total Pupil Number Adjustment	0	260,876	0	0
Teachers Pay Award	21,800	0	0	0
FSM Supplementary Grant	16,060	0	0	0
Year 7 Catch Up Grant	7,463	7,463	7,463	7,463
Total (2016) Other non-GAG grants	45,323	7,463	7,463	7,463
SEN Top Up Funding	118,035	120,000	120,000	120,000
Total Local authority: Revenue income	118,035	120,000	120,000	120,000
Lettings	1,000	1,600	1,600	1,600
Trips	0	200	200	200
Catering	114,000	114,000	114,000	114,000
Charities Income	0	200	200	200
Total (2016) Voluntary Income Other	115,000	116,000	116,000	116,000
Total Revenue Income	**6,109,910**	**6,239,164**	**6,331,903**	**7,035,958**

Notes

The allocation statement for the UAE has yet to be uploaded by the ESFA for collection from the portal. The only income that has been notified to date is the 6th Form funding which shows a decrease in numbers and therefore funding. All other funding for the UAE is based on estimated student numbers, calculated by the newly introduced budgeting software. Staffing costs for the UAE are stable and will show minor increases in staffing to account for the increased number of students. Full income and expenditure details will be available at a later date. The late posting of income for the UAE has been raised with the ESFA.

* Pupil Number adjustments for 19-20. Total UAE numbers are projected to be 780. Subsequent years include total student number forecast in the GAG income figures.

Budget Timescales

15th January 2019   Allocation Funding Statement for 16-19 funding available for both UTC and UAE

22nd January 2019   Allocation Funding Statement for KS4 available for UTC only

31st March 2019   Due date for Allocation Funding Statement for UAE – ESFA legal deadline

10th April 2019   Final set up of Budgeting software for preliminary budgets.

11th April 2019   Executive Team meeting to discuss budgeting parameters

15-27th April 2019   Working with Principals to set budgets.

9th May 2019   Executive Team meeting to agree Principals' budgets

13th-31st May 2019   AY 19-20 Budgets finalised as far as notified

27th June 2019   Board Budget Approval

9th July 2019   Budget Upload to ESFA

9th July 2019   Upload Budget to ESFA portal (SBA Board meeting is for 9th July 2019)

30th July 2019   ESFA deadline for reporting 19-20 Budget

End

	CONFIDENTIAL
Paper title:	Judicium data audit report
Board/Committee:	South Bank Academies Board Meeting
Date of meeting:	28 March 2019
Author(s):	Judicium
Sponsor(s):	Nicole Louis, SBA CEO
Purpose:	For Information
Recommendation:	The Board is requested to note the reports

Executive Summary

The Board is requested to note the Judicium data audit reports for the University Academy of Engineering and South Bank Engineering UTC.

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Data Protection Audit Report

25th March 2019

University Academy of Engineering South Bank

A report to the Headteacher and to Governors

NAME OF ACADEMY	University Academy of Engineering South Bank
AUDITOR	Charlotte Armstrong
DATE OF AUDIT	4th March 2019

DATA PROTECTION AUDIT REPORT

Introduction

This audit considers the Academy's level of compliance with data protection laws and the General Data Protection Regulation (GDPR). The auditor has also considered the current legislation in force and the codes of practice issued by the ICO when making its recommendations.

This report can be used to evidence progress and compliance with Data Protection legislation as required by the GDPR. It is recommended that this report is shared with governors who have a responsibility to ensure ongoing compliance with the regulations.

In order to complete this report, I attended The University Academy of Engineering South Bank on 4th March 2019 and met with the Deputy Headteacher, Jason Phillipsz.

This audit was completed at the start of the Academy's Data Protection Officer service to identify the Academy's data structures as well as to review and advise on compliance with the GDPR.

Scope

The areas that are covered in my report are wide ranging and enable the Academy to reach data protection compliance once the recommendations are implemented. This report reflects the legal position set out in the GDPR and the existing guidance that is available at the time of writing this report.

The audit comprises an analysis of the Academy's current data structures and whether they are compliant with the GDPR. Following this in-depth analysis, there is then an action plan which sets out recommendations for the Academy to ensure GDPR compliance. I have also provided deadlines and urgency level to those recommendations.

The action plan will be used by Judicium to monitor and review data protection compliance including to assess whether the recommendations have been actioned for future audit purposes.

Follow Up

Judicium will continue to review the Academy's progress on a termly basis and a provisional date has been set for the next audit for Thursday 6th February 2020 at 09:30.

SUMMARY OF FINDINGS

Some measures have been implemented to reach data protection compliance however, there are several improvements to be made in order to meet the expectations of GDPR. The main priorities are to implement data-related policies and privacy notices, to carry out third party GDPR due diligence, to create a register of data protection activities carried out by the Academy and to establish a refresher-programme of training for all staff in order to increase awareness of GDPR and responsibilities.

Audit Report Guidance

Each area is set out into sections, a summary of each heading is set out below: -

Area

Describes the area being audited.

Analysis

My analysis of the area being audited, with comments on the level of compliance and any areas for concern/improvement.

Compliance Level

Sets out my recommendation on whether that particular function is compliant with the GDPR. The levels are set out below: -

Red	This area is not compliant with the GDPR AND that immediate action is required to ensure compliance with the regulation so the Academy do not fall foul of the regulations. Generally where the level is red, the recommendations provided are better seen as obligations and steps the Academy has to take rather than best practice guidance.
Amber	This area is not fully compliant with the GDPR in this area but that the recommendations proposed are not urgent and do not necessarily require immediate attention. Areas highlighted red will require priority but following this, the amber areas should be addressed to ensure compliance with the GDPR.
Green	This area is compliant with the GDPR. However recommendations may still be issued to ensure ongoing compliance.

Actions/Recommendation

The actions or recommendations that need to be taken by the Academy to ensure GDPR compliance (these will also be reflected in the action plan at the end of the audit report).

Data Protection Audit – Findings

Area	Analysis	Compliance Level	Actions / Recommendation
Roles and awareness of data protection within the Academy.	The main post-holder responsible for data protection within the Academy is the Deputy Headteacher. The Academy have raised some initial awareness of GDPR with staff by way of requiring them to undertake some of the core Judicium e-learning modules. Parents and pupils have not yet been updated with regard to GDPR. At present it is not clearly stated who the data protection lead in the Academy is, however, staff would likely come to either the Headteacher or the Deputy Headteacher for any data protection related issues. The Academy has not received any subject access or freedom of information requests previously. It would be beneficial for the Academy to keep a log of these requests in future as and when they are submitted.		• To keep a log of all data related requests (as and when required). The log should include the date of the request, details of the requester, the date the request was complied with and the outcome. • To raise awareness of data protection amongst parents/carers and pupils, for example through sending updated privacy notices to parents/carers and raising awareness with pupils during assemblies. • Academy should ensure that there are named contacts for handling data protection with their data-

Policies and procedures	The Academy has an Online Safety Policy in place which needs updating in-line with GDPR.		• To update the Academy's Online Safety Policy to reflect GDPR. A template policy are available on the Judicium portal.
	As a priority the Academy should implement the following data-related policies:		
	- Data Protection; - Data Retention; - Data Breach; - Information Security; - CCTV; and - Freedom of Information.		• To implement Data Protection, Data Retention, Data Breach, Information Security and Freedom of Information Policies and make them available to parents/carers and staff. Template policies are available on the Judicium portal if required. We can review any drafts ahead of implementation.
	The Data Protection, Data Retention and Freedom of information Policies should be made available on the Academy's website and all policies should be placed on the internal shared drive for staff.		
	Policies are not currently reviewed regularly for compliance.		• To implement a CCTV Policy which details what type and how many cameras the Academy has, where they are located and how long the footage is retained for. A template policy is available on the Judicium portal.
	Staff are not currently required to confirm that they have read and understood the policies however, the Academy should consider making this a requirement.		• To require staff members to confirm that they have

(top of page, continued from previous) related policies and privacy notices.

			read and understood the data-related policies. • To regularly review data-related policies for compliance.
Contracts of employment	The Academy's employment contracts have not been updated in-line with GDPR.		• To ensure that new starter contracts are updated in-line with GDPR. There is a template GDPR clause on the Judicium portal if needed.
Reviews and assessments of data and privacy notices	The Academy does not carry out impact assessments or risk assessments for data protection (for example when introducing new technology/software) but are aware of the need to do this and will do this in future. The Academy do not currently have any privacy notices. As a priority they should implement privacy notices for: - Parents/Pupils; - Staff; and - Job Applicants.		Impact Assessments • To use data protection impact assessments for any new technologies used or any new system which may affect personal data. It is required in certain circumstances but best to start doing it as a matter of course. Privacy Notices • To implement privacy notices for Parents/Pupils, Staff and Job Applicants and to make them available on the Academy's website and in job application

		■	packs. Template privacy notices are available on the Judicium Portal.
Training	All staff were required to complete some of the core Judicium e-learning modules at the end of 2018. The Academy are now in the process to rolling out the remaining modules. The Deputy Headteacher also completed a Data protection online course in 2018 run by London Southbank University. With regard to on-going/refresher training, it may be beneficial for the Academy to use staff briefings/inset days for updates and further awareness. The Academy keep records of all data related training.		• To finish initial data-protection related training and consider refresher programmes moving such as using inset days/covering data protection as part of inductions/briefings (and possibly to link e-training). For example you could require staff to complete a small number of e-learning modules during an inset day. • Ensure a log is kept of data-related training.
Personnel Files	Paper personnel files are stored in a locked cabinet in a locked room with restricted access. Only the Headteacher, HR Manager and the Deputy Headteacher are authorised to view each file. Some personnel information is also stored on SIMS and on the Academy's internal drives. Access to this information is restricted. Personnel files are not currently reviewed for duplicate or unnecessary content. Some guidance is set out below on items that should/should not be kept in the file: -		• To begin regularly reviewing personnel files for duplicate and unnecessary content.

	- That DBS certificates are no longer kept on the file, as the School is only required to keep the DBS number; - If requests for absences or sick days are retained on personnel files, there is no requirement to keep those for longer than a year, unless there is a specific issue (e.g. chronic ailments) that would require HR to retain that data for longer periods of time; - To remove duplicate/older versions of documents (for example if the file contains older versions of ID documents or if they keep yearly staff contact sheets with their up to date contact details on. Only the most recent version of those documents needs to be kept); and - All contractual and application documentation (including variation letters) need to be kept on file.		
Emails	The Academy uses LGFL. There is no retention procedure currently in place for deleting emails.		• To consider putting in place a retention procedure for emails which should reflect the Academy's Data Retention Policy.
Data Breaches And Reporting	The Academy does not currently have a Data Breach Policy. There is some initial awareness amongst staff as to what a breach is and how to report it, as most staff have completed the e-learning breach modules, however more awareness is needed. There has not been any reportable or non-reportable data breaches previously.		• To implement a Data Breach Policy and make it available to staff. A template policy is on the Judicium portal if needed. • To continue to raise awareness with all staff as to what data breaches are and how to report them.

			This can be achieved by ensuring that all staff complete the two breach modules of the Judicium e-learning programme. • To implement an internal breach register in order to record all reportable and non-reportable breaches. This register is to be kept up to date.
Reasons for Processing	There is some initial awareness amongst those who process data as to the data protection principles and processing conditions however more awareness is needed. The Academy does not currently keep a record of processing activities. No personal data is exported outside of the EEA.		• To put in place a record of processing activities. • To continue to raise awareness amongst staff as to the data protection principles and fair processing conditions. This can be achieved by ensuring that staff complete the relevant modules of the Judicium e-learning programme.
Data Sharing with Third Parties	The Academy corresponds with a number of third parties however do not currently carry out due diligence as to whether or not these third parties have adequate data protection/data security policies and procedures in place. This Academy should start doing		• To carry out third party due diligence to ensure that third parties the Academy shares personal data with have adequate data protection in place.

	this as a priority and continue to keep this area under review in conjunction with Judicium.		
Data Security Measures used for storage, use and communication (such as passwords, encryption, networks) for electronic use?	The Academy have put several secure functions in place. These include using lockable cabinets, rooms with restricted access, and having different levels of user access for SIMS and the internal shared drives. The Academy also regularly back up their servers and has disaster recovery in place. Staff are also required to have strong passwords and to change them yearly. The Academy is unsure if their website uses cookies, there is no cookie notice on their website.		• To check whether or not the Academy's website uses cookies and if it does then to put in place a cookie notice.
Record Retention and Disposal	The Academy uses shredders to dispose of physical data when no longer needed. Staff know how to use them however more awareness is needed as to what documents should be shredded. The Academy uses CCTV which is retained for 30 days before being overwritten. The Academy does not have a Data Retention Policy or a CCTV Policy. The Academy should implement these policies as a priority. The Academy does not have an archiving process in place as to date it has not been necessary (the Academy has only been opened for five years).		• To implement a CCTV Policy which details what type and how many cameras the Academy has, where they are located and how long the footage is retained for. A template policy and guidance are available on the Judicium portal. • To implement a Data Retention Policy. • To work towards disposing data (both electronic and paper) when no longer necessary. This should be

			- in accordance with the Data Retention Policy. - When it comes time for material to be archived, to ensure that it is stored in a locked room with restricted access.
Portable Media Devices	All staff have their own laptop (a limited number of staff have iPads and Surface Pros) which are used on and off site. Pupils use iPads on-site and they are locked away after use. All devices are password protected, encrypted and have anti-virus and firewall software installed. The Academy has one camera however the Academy are unsure whether or not is wiped after each use. All devices are issued via an asset register however this needs to be reviewed as currently it is not easily identifiable who has what device. The Academy do not issue memory sticks to staff and staff are encouraged not to use them. The Academy are looking to phase out the use of memory sticks altogether. The Academy may benefit from implementing an ICT Acceptable Use Policy and Agreement and require staff to sign that they have read and understood the Academy's Acceptable Use Policy.		- To review and update the Academy's asset register so that it is clear who is in possession of each device. - To consider implementing an ICT Acceptable Use Policy and Agreement for that staff are required to sign. - To phase out the use of memory sticks. - To ensure that the Academy's camera is downloaded and wiped after each use.

Data Protection Audit – Action Plan

Priority Number	Data Issue To Be Addressed	Recommendations	Urgency (High / Medium / Low)	Deadline
Page 35 1.	As a priority the Academy needs to implement key data protection policies.	The Academy needs to adopt key data protection policies. These should include the following: - Data Protection Policy; - Breach Policy; - Data Retention Policy; - CCTV Policy; - Information security policy; - Freedom of Information Policy; The key policies (Data Protection, Data Retention, CCTV Policy and Freedom of Information) should be published on the Academy' websites. The Also needs to update their Online Safety Policy in-line with GDPR.	High.	As soon as possible, no later than the end of April 2019.
2	As a priority the Academy needs to implement privacy notices and make them available to the relevant parties.	The Academy needs to implement privacy notices for staff, parents/pupils and for job applicants. Once they are in place they should be shared with the relevant individuals (for example with application packs for job applicants and within induction materials for staff and on the website for parents/pupils).	High.	As soon as possible, no later than the end of April 2019.

3	To ensure all staff continue data protection training as part of ongoing awareness.	Ensure that all staff complete the following modules: - What Is A Breach; - Breach Notification; - Introduction to GDPR and Data Protection; - DP Principles and Fair Processing Conditions; - Introduction to SAR and FoI Requests; - DP In the Workplace: Social Media. Senior members of the leadership team and staff handling large amount of personal data should consider completing more modules from the programme throughout the academic year. The Academy should also consider using staff briefings and inset days as a means for providing GDPR updates.	Medium	Ongoing throughout the academic year.
4	To update employment contracts in-line with GDPR.	To ensure that new starter contracts are updated in-line with GDPR. There is a template GDPR clause on the Judicium portal if needed.	Medium.	Where possible prior to the end of May 2019.
5	To create a register/record of data processing activities carried out by the Academy.	This register/record should document what personal data the Academy holds, how the data is collected and processed, where it came from, how it is secured and who it is share it with. There is a template record on the Judicium portal if needed.	Medium.	Where possible prior to the end of May 2019.
6.	To put in place a cookie notice if the Academy's website uses cookies,	The Academy needs to check whether or not their website uses cookies and if it does then a cookie notice needs to be put in place.	Medium.	As soon as possible, no later than the end of May 2019.

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| 7 | To carry out third party due diligence. | The Academy will need to ensure that a record of all third parties, with whom the Academy share personal data with, is kept, together with details of their compliance with GDPR. This includes reviewing third party privacy notices and current service level agreements. The Academy should also ensure that all contracts are updated to reflect the GDPR requirements. | Medium. | Ongoing due diligence to clarify with third parties what their level of compliance with GDPR is. |

Other recommended steps (as best practice, no deadline set for these measures): -

- To use data protection impact assessments for any new technologies used or any new system which may affect personal data. It is required in certain circumstances but best to start doing it as a matter of course;
- To require staff members to confirm that they have read and understood the data-related policies;
- To phase out the use of memory sticks;
- To ensure a log is kept of data-related training;
- To put in place retention procedures for emails;
- To put in place a data breach register;
- To regularly review personnel files for duplicate and unnecessary content;
- To continue to raise awareness of breaches amongst staff;
- To consider implementing an Acceptable Use Policy
- To continue to raise awareness of the data protection principles and the fair process conditions amongst staff; and
- To keep a log of subject access, freedom of information and all data related requests moving forward (should any future requests be made).

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Data Protection Audit Report

30th January 2019

South Bank Engineering - UTC

A report to the Headteacher and to Governors

NAME OF COLLEGE	South Bank Engineering - UTC
AUDITOR	Will Blanchard
DATE OF AUDIT	18th January 2019

DATA PROTECTION AUDIT REPORT

Introduction

This audit considers the College's level of compliance with data protection laws and the General Data Protection Regulation (GDPR). The auditor has also considered the current legislation in force and the codes of practice issued by the ICO when making its recommendations.

This report can be used to evidence progress and compliance with Data Protection legislation as required by the GDPR. It is recommended that this report is shared with governors who have a responsibility to ensure ongoing compliance with the regulations.

In order to complete this report, I attended the College on 18th January 2019 and met with Kam Bains, the Vice Principal, and Fiona Brown, the Data Manager. I also discussed a number of documents as agreed prior to my visit.

This audit was completed during the College's Data Protection Officer service to identify the College's data structures as well as to review and advise on compliance with the GDPR.

Scope

The areas that are covered in my report are wide ranging and enable the College to reach data protection compliance once the recommendations are implemented. This report reflects the legal position set out in the GDPR and the existing guidance that is available at the time of writing this report.

The audit comprises an analysis of the College's current data structures and whether they are compliant with the GDPR. Following this in-depth analysis, there is then an action plan which sets out recommendations for the College to ensure GDPR compliance. I have also provided deadlines and urgency level to those recommendations.

The action plan will be used by Judicium to monitor and review data protection compliance including to assess whether the recommendations have been actioned for future audit purposes.

Follow Up

Judicium will continue to review the College's progress on a termly basis and a provisional date has been set for your next audit of 18th January 2020.

SUMMARY OF FINDINGS

The College have started putting into practice data protection practices and procedures. This can now be bolstered by the Judicium e-learning courses. The College has all the relevant policies in place and they are GDPR compliant. There is a very good understanding and practical application of GDPR at South Bank Engineering - UTC.

Audit Report Guidance

Each area is set out into sections, a summary of each heading is set out below: -

Area

Describes the area being audited.

Analysis

My analysis of the area being audited, with comments on the level of compliance and any areas for concern/improvement.

Compliance Level

Sets out my recommendation on whether that particular function is compliant with the GDPR. The levels are set out below: -

Red	This area is not compliant with the GDPR AND that immediate action is required to ensure compliance with the regulation so the College do not fall foul of the regulations. Generally where the level is red, the recommendations provided are better seen as obligations and steps the College has to take rather than best practice guidance.
Amber	This area is not fully compliant with the GDPR in this area but that the recommendations proposed are not urgent and do not necessarily require immediate attention. Areas highlighted red will require priority but following this, the amber areas should be addressed to ensure compliance with the GDPR.
Green	This area is compliant with the GDPR. However recommendations may still be issued to ensure ongoing compliance.

Actions/Recommendation

The actions or recommendations that need to be taken by the College to ensure GDPR compliance (these will also be reflected in the action plan at the end of the audit report).

Data Protection Audit – Findings

Area	Analysis	Compliance Level	Actions / Recommendation
Roles and awareness of data protection within the College	There are clear officers responsible for data protection matters within the College namely Kam Bains, the Vice Principal, Fiona Brown, the Data Manager, and Ian Lloyd, the Director of Studies for Students and Parents. Parents, pupils and staff have been made aware of the changes through the privacy notice that was sent out by the College, included in the Terms and Conditions. Staff have been made aware of GDPR through training. It was also recommended that Judicium have courses that staff could do, about GDPR in Colleges, which is specifically focused training for their own benefit. This can be achieved through the bespoke Judicium e-learning courses. It is clear in the policies who to approach about data protection concerns: the data manager or the vice principal. No Subject Access Requests have been received in the past three years. Going forward any received must be added to the record of requests received.		

Policies and procedures	The College only have a data protection policy that has been updated to the new legislation. This policy includes information on data sharing, data retention and data breaches. We would advise that the College forward it to Judicium for review. Policies are to be regularly reviewed to ensure compliance. They should be reviewed at the end of the first year, and on an ad hoc basis during the course of the first twelve months in case of any changes to the processing of data bought about by the ICO. The GDPR policy should be added to the College's website in order that parents, pupils and staff can access them for transparency in knowing how their data is processed, if it has not been already.		
Contracts of employment	The College uses employment contracts that are bespoke. The contracts include a data protection clause and an intellectual property clause in them.		
Reviews and assessments of data and privacy notices	The College do not yet carry out impact assessments or risk assessments for data protection (for example when introducing new technology/software). This is not expected and is a new requirement for schools and academies. The College have sent out privacy notices for parents, pupils and the staff. These have been updated to reflect GDPR and they will published on the College website/shared internal secure drive, with access to all relevant parties accordingly.		Impact Assessments • To use data protection impact assessments for any new technologies used or any new system which may affect personal data. It is required in certain circumstances but best to start doing it as a matter of course.

Training	There is a good awareness throughout the College of changes to data protection through the GDPR and the Data Protection Bill 2018. The SLT have had data protection training, but this has not been provided to all staff members yet. We were advised at the time of the audit that the executive head had probably attended NAHT training, but this could not be confirmed. Should the College wish to even further bolster their staffs understanding of GDPR in the education sector we would recommend they can achieve this by also taking the Judicium e-learning.	
Personnel Files	Staff leavers' files are kept locked away in the filing cabinet where the current staff files are kept, although in a different section of the cabinet. These are currently retained for only nine months after their leaving date. Judicium would advise that all former staff files are retained for at least six years after the date that they left the college, in line with the statute of limitations for former staff members to be able to bring a claim against the college. Anything related to payroll is kept for six years after leaving, and right to work in the UK for two years. Now that the college has SIMs in place, electronic data is held securely regarding all staff and details of staff passports on SIMs will be kept in accordance with the two years retention rule. The exception to this would be for staff who came and went prior to September 2018 (SIMs date) and, for these, details are on an excel spreadsheet.	

| Emails | The College uses North Palent as their email provider, with Microsoft Office 365's Outlook as the façade. All systems have been updated in line with GDPR legislation.

Emails are stored and regularly backed-up by North Palent.

The retention policy will be updated to include the retention and storage of emails for no more than three to four years. However, the college has currently only been open for two years, so this will be formalised in the retention procedure at the start of the next academic year. | | • Update email retention procedure to ensure that emails are not retained for longer than four years. |
|---|---|---|---|
| Data Breaches And Reporting | There is an updated data breach and reporting policy included in the full data protection policy put in place for reporting data breaches. This is a new requirement under the GDPR so it is not expected that schools will currently be abiding by this but initial steps have been taken to comply with this aspect of the GDPR.

No matters regarding the College have ever been reported to the ICO.

Again staff can garner a greater understanding of data breaches and time limits for reporting them by undertaking the Judicium e-learning courses. However, the staff do have a very good understanding of what a data breach is. | | • To continue to raise awareness with all staff as to what data breaches are and how to report them. This is because schools will have an obligation under the GDPR to report breaches leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. |
| Reasons for Processing | There is a good general awareness amongst those who process data as to the data protection principles and processing conditions. | | . |

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	Some of this information is included in the Data Protection policy and Privacy Notices. These will be made available to parents and staff on the College's website. Furthermore, to meet the GDPR requirements, we would advise that the College begins to keep a record of processing activities.	■	
Data Sharing with Third Parties	The College corresponds with a number of third parties. The College currently keep records of those third parties and review them regularly. The College has recorded all parties that they share data with and confirmed receipt of GDPR updates from parties that they share data with, this information will be written down in a record of processing activities henceforth. Due to the level of third parties who handle personal information on behalf of the College, the College will need to continue monitoring those arrangements with those third parties to ensure ongoing data protection compliance.	■	• To continue to monitor with whom the College shares data and to keep an up to date record of this.
Data Security Measures used for storage, use and communication (such as passwords, encryption, and networks) for electronic use?	The College have enhanced security functions in place (such as locked cabinets, authorised access, and user access privilege). Electronic security is extremely high and channelled through user access privilege. The password procedure in place at the College requires all staff to update their passwords every six months. The College website uses cookies. Communitas, their website provider, will provide the college with a cookie policy and banner.	■	• The College must implement a cookie policy on their website.

Record Retention and Disposal	Data destruction does not currently take place for records at the end of their retention period because the College has not been open long enough. There is an archiving process in place. Staff leavers' files are kept locked away in the filing cabinet where the current staff files are kept, although in a different section of the cabinet. UTC retain these for nine months after the leaving date. Now that the College has SIMs in place, electronic data is held securely regarding all staff and we will have details of staff passports on SIMs to adhere to the two years retention rule. The exception to this would be for staff who came and went prior to September 2018 (SIMS date) and, for these, details are on an excel spreadsheet. The College has CCTV but has not implemented a CCTV policy. They will implement one in due course.		• Implement a data retention policy. • Implement a CCTV policy.
Portable Media Devices	The College issues laptops and tablets to all teaching and engineering staff respectively. There is an asset register that records all portable media devices and staff are made to sign an acceptable usage policy. There are tight restrictions within the College as to what websites and information on the internet can be viewed by pupils and staff in the College.		

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Data Protection Audit – Action Plan

Priority Number	Data Issue To Be Addressed	Recommendations	Urgency (High / Medium / Low)	Deadline
1.	To consider delivering a refresher programme of e-learning to staff on data protection and GDPR.	Judicium is now providing online e-training which can be accessed by staff to gain data protection training and refresher training. As a minimum, we would suggest all staff undertake a training session on breach notification to ensure they can report breaches in accordance with the GDPR.	Low	As staff have already undertaken training at South Bank Engineering - UTC and there is a record of this, we would advise further training to bolster their understanding in key areas.
2.	To continue to monitor with whom the College shares data.	This is already in place and doubtless will continue to be monitored closely by Vice Principal, Kam Bains, who is very conscientious and rigorous in her application of GDPR and the principles already.	Medium	Ongoing.
3.	To ensure that all data protection policies are updated in line with GDPR.	There are various template policies that are available on the Judicium portal that can be tailored to the requirements of the College.	High	Within 30 days of receipt of the Judicium audit report.
4.	To implement a CCTV policy.	It is a requirement to have a CCTV policy as the college uses CCTV on premises. We would recommend that the college includes the retention period of data in the policy. There is a template policy available on the Judicium portal.	High.	Within 30 days of receipt of the Judicium audit report.

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<u>Other recommended steps (as best practice, no deadline set for these measures): -</u>

- To continue carrying out third party due diligence.
- To use data protection impact assessments for any new technologies used or any new system which may affect personal data. It is required in certain circumstances but best to start doing it as a matter of course.
- Ensure the training log is maintained.