



GDPRiS Platform v2 Guidance for Users

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DP Staff

Internal Audit

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Internal Audit Overview

This document is to show you how to set up and run through an internal audit to review your GDPR compliance.

There are three sections which make up the Internal Audit process of question sets in the Internal Audit, **School Personal Questions**, **School Organisation Questions** and **Data Mapping Review**.

School Personal Questions will be questions which each member of staff would be required to answer regarding their data protection practices and what prior data protection training they have had.

School Organisation Questions would typically be answered by DP Staff users only. These are designed to cover the school, rather than individual responses.

The Data Mapping Review section would typically be answered by DP Staff users only. This section allows you to review the suppliers and products which your school are subscribed to making sure that you are happy with how your data is being handled.

Information from the audit such as user responses to questions can be found in the following reports in the Reports section:

Users and Staff Reviews: Shows how many questions each user has answered from each section.

Staff Data Protection Self-Assessment: Shows each question which a user has answered and their response.

All SAQ Responses: These are the responses from just the Organisation questions which the DP Staff users have answered.

Internal Audit Settings

Internal Audit Components

Click on **Internal Audit Settings** via the **Audits** area on the navigation pane.

There are three audits which you can schedule independently.

The **School Organisation Questions**, **School Personal Questions** and the **Data Mapping Review**.


Internal Audit Settings				
Audit Type	Status	Description	Start Date	End Date
School Organisation Questions	No Reminder Set			
School Personal Questions	No Reminder Set			
Data Mapping Review	No Reminder Set			

The **School Organisation Questions** address the ICO's Accountability Framework. These questions can be answered by any DP Staff user. The other DP Staff users will be able to see the saved responses.

The **School Personal Questions** are questions which are to be answered by all your users within the GDPRiS portal. These questions will cover what your staff do and do not know about data protection and your school's relevant processes and procedures.

The **Data Mapping Review** is again a section which can be reviewed by any DP Staff user. This section is to review your subscribed Suppliers and Products making sure that you have looked at the data maps provided and that you are happy with how your data is being handled.

Setting a Reminder to Start an Internal Audit

Before an Internal Audit is started, you can set a reminder in the GDPRiS portal to remind you when you are expected to start your Internal Audit for the relevant section via the 

A popup window will appear where you can provide a description for the audit which you are setting a reminder and choose a date which you want the audit to start on.

Once you are happy with your changes, click **Okay**.

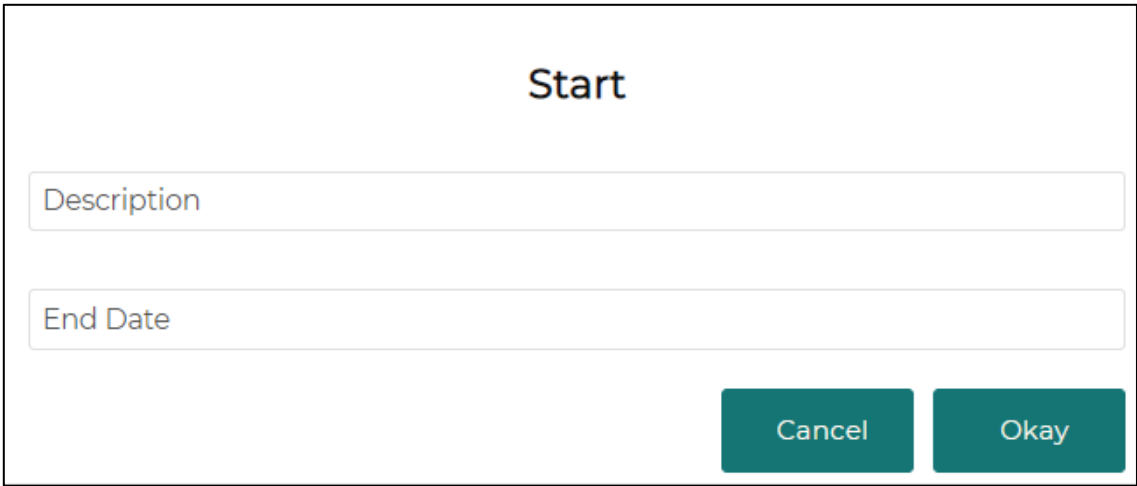
Set Reminder

CancelOkay

Start an Internal Audit

When you wish to start one of your Internal Audit sections, click on ▶ to the right-hand side of the relevant audit.

A popup window will appear where you can give a description and where you can set the end date.



The screenshot shows a modal window titled "Start". It contains two text input fields: "Description" and "End Date". At the bottom right, there are two buttons: "Cancel" and "Okay".

Note: The **End Date** will only allow you to go as far as 3 months from the **Start date**.

Once you are happy with the changes you have made, click **Okay** to save your changes and to start your Internal Audit for the relevant section.

School Organisation Questions

School Organisation Questions

The School Organisation Questions are expected to be answered by any DP Staff user. These are questions which need to be answered on behalf of the school as a whole as they cover various aspects such as your schools processes and procedures as well as if your school can provide evidence to back up the answers which you will put.

To start answering your Internal Audit questions, click on **Audits** in the navigation menu on the left-hand side of the page and choose **Internal Audit**.

Choose **School Organisation Questions** from the available audits in the drop-down box.

The screenshot shows the 'Internal Audit' interface. At the top right, it says 'Internal Audit'. On the left, there is a 'Select Type' dropdown menu with a downward arrow. The dropdown is open, showing three options: 'School Organisation Questions', 'School Personal Questions', and 'Data Mapping Review'. Below this, the main content area is titled 'Internal Audit'. At the top left of this area is another 'Select Type' dropdown menu, now showing 'School Organisation Questions'. At the top right are two buttons: 'Save' and 'Complete and Lock'. The main content area is divided into two columns. The left column is a sidebar with a list of categories: 'Leadership and Oversight' (highlighted in green), 'Policies and Procedures', 'Training & Awareness', 'Individuals' Rights', 'Transparency', 'Records of Processing and Lawful Basis', 'Contracts and Data Sharing', 'Risks and Data Protection Impact Assessments', 'Records Management and Security', and 'Breach Response and Monitoring'. The right column contains a list of questions, each with a plus sign on the left and a dropdown arrow on the right. The questions are:

- 11 Organisational structure**: There is an organisational structure for managing data protection and information governance, which provides strong leadership and oversight, clear reporting lines and responsibilities, and effective information flows.
- 12 Whether to appoint a data protection officer (DPO)**: If it is necessary to appoint a DPO under Article 37 of the GDPR, your organisation makes sure that the DPO's role is adequately supported and covers all the requirements and responsibilities.
- 13 Appropriate reporting**: The DPO is independent and unbiased. They must report to the highest management level and staff must be clear about how to contact them.
- 14 Operational roles**: Your organisation's operational roles support the practical implementation of data protection and information governance.
- 15 Oversight groups**: An oversight group provides direction and guidance across your organisation for data protection and information governance activities.
- 16 Operational group meetings**: In your organisation, operational level groups meet to discuss and coordinate data protection and information governance activities.

Note: When a DP Staff user answers any of the questions within the sections shown in the previous screen shot, those answers will be visible to each DP Staff user. DP Staff users will be able to either answer or edit an existing answer if the question section has not been saved as complete.

School Personal Questions

School Personal Questions

The School Personal Questions are expected to be answered by each user within the GDPRiS portal as these questions are designed to show what your users do and do not know regarding data protection and your school's processes and procedures.

To start answering your Internal Audit questions, click on **Audits** in the navigation menu on the left-hand side of the page and choose **Internal Audit**.

Select the **School Personal Questions** from the available audits in the drop-down box.

Use **Expand All** or **Collapse all** accordingly.

The screenshot displays the 'Internal Audit' interface. At the top, there is a title 'Internal Audit' and a 'Select Type' dropdown menu set to 'School Personal Questions'. To the right are two buttons: 'Save Progress' and 'Complete and Lock'. On the left side, there are two buttons: 'Expand All' and 'Collapse All'. Below these are two audit categories: 'Staff Data Protection Audit' (expanded) and 'School Data Protection Questionnaire - Test'. The main content area shows a question: 'Do you keep your passwords secure, change them regularly and never share them? - Test'. The question text reads: 'You need to ensure that your password is never shared with anyone else. Ideally you should never write your password down anywhere, but if you do, this should be stored away securely. It is also a good idea to change your password regularly.' Below the question is an 'Answer' text input field. To the right of the question is a dropdown menu with options: 'No', 'Partly', 'Yes', and 'Not applicable (NA)'.

Data Mapping Review

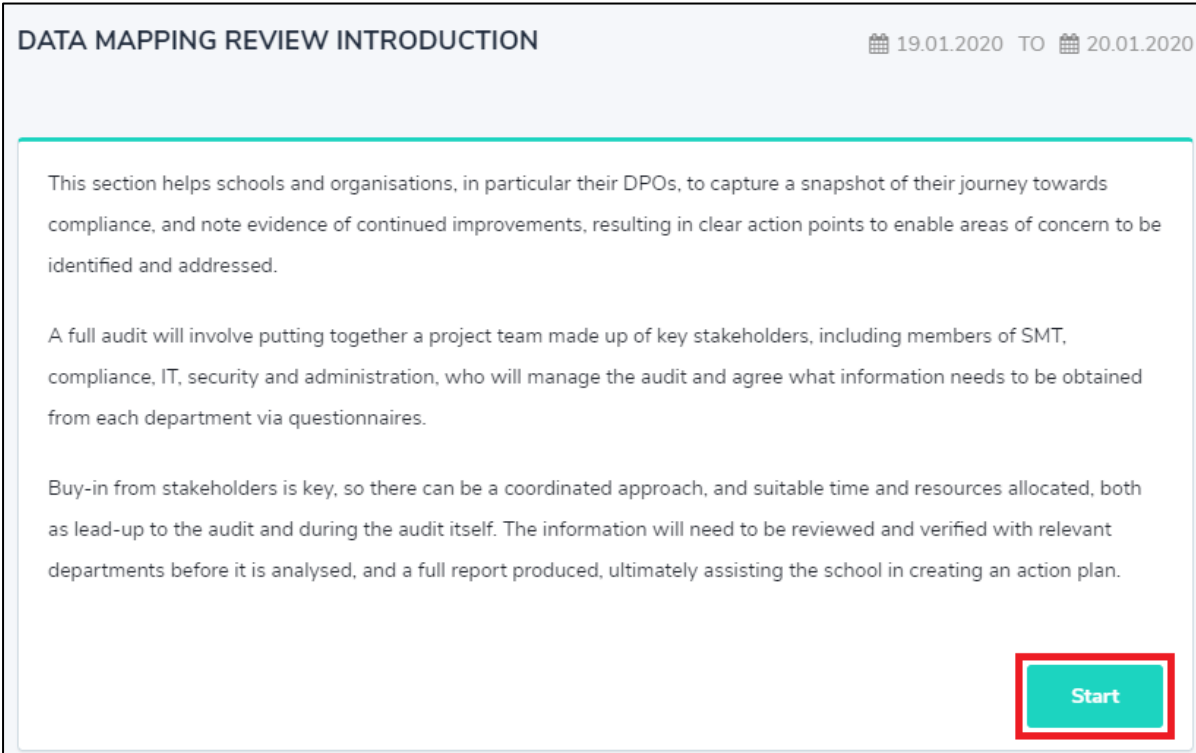
Reviewing your Suppliers and Products

Like the **School Organisation Question** section, the **Data Mapping Review** section can be completed by any DP Staff user. This section is designed to allow you to review each of your subscribed suppliers and the products they provide which you use.

To start reviewing your suppliers and products, select the **Data Mapping Review** from the drop-down list on the **Internal Audit** page

In the screen shot below is an example of what the Internal Audit section looks like from a DP Staff user's point of view.

To begin going through each of your suppliers, click on **Start** in the bottom right-hand corner of the main window.



DATA MAPPING REVIEW INTRODUCTION 19.01.2020 TO 20.01.2020

This section helps schools and organisations, in particular their DPOs, to capture a snapshot of their journey towards compliance, and note evidence of continued improvements, resulting in clear action points to enable areas of concern to be identified and addressed.

A full audit will involve putting together a project team made up of key stakeholders, including members of SMT, compliance, IT, security and administration, who will manage the audit and agree what information needs to be obtained from each department via questionnaires.

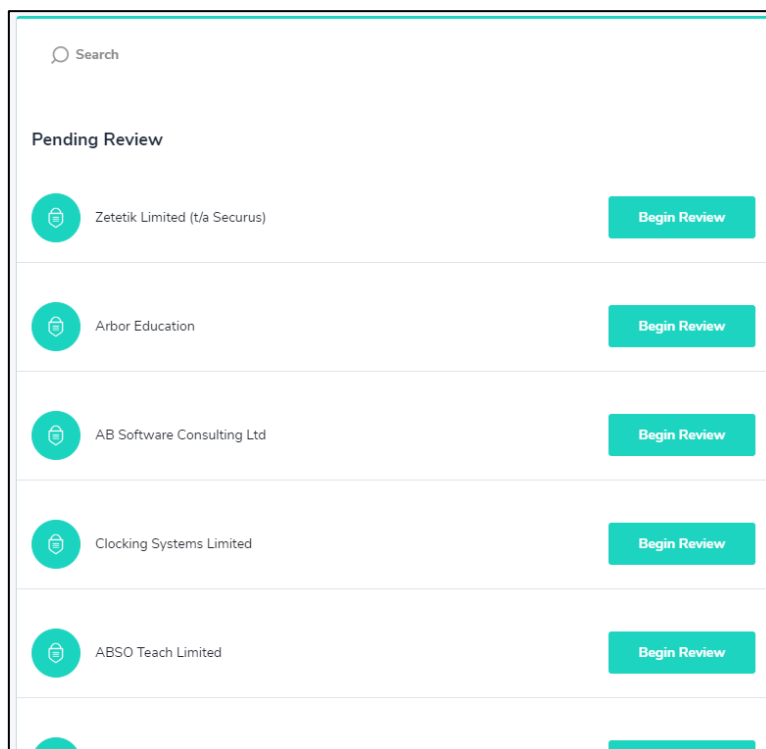
Buy-in from stakeholders is key, so there can be a coordinated approach, and suitable time and resources allocated, both as lead-up to the audit and during the audit itself. The information will need to be reviewed and verified with relevant departments before it is analysed, and a full report produced, ultimately assisting the school in creating an action plan.

Start

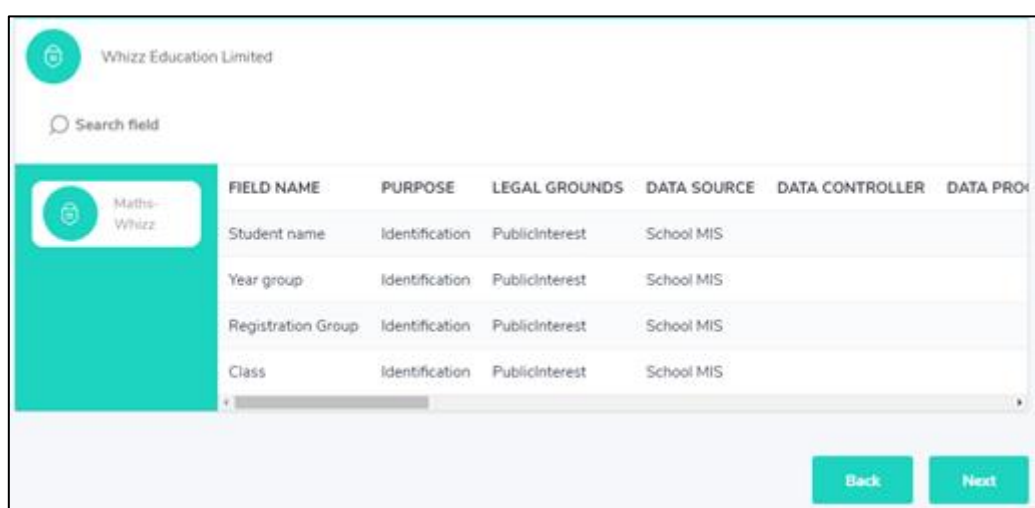
Data Mapping Review Process

Once you have clicked on **Start** you will be taken to the **Suppliers** section of the audit.

Make sure that you can see all your suppliers listed.



Click **Begin Review** to start the review process of the selected supplier.



When you are happy with the fields of data being captured, click **Next**.

In this section you will be able to see answers to questions which your suppliers have answered.

The screenshot displays a supplier profile for ParentPay Limited. The profile includes the following information:

- Company Name:** UAT ParentPay Limited
- Trading as:** ParentPay
- Company Address:** Flat 11, 13 New Cavendish Street, London, W1G 9UG
- Data Protection Contact:** uatesting-supplierdpo-3@gdpr.school
- ICO Number:** Z7380292

On the right-hand side, there is a section titled "Privacy Notices/Data Sharing Agreements/Key Documents" with the following links:

- [Privacy](#)
- [Use of Cookies](#)
- [Terms and Conditions](#)
- [T&Cs for Schools, includi...](#)

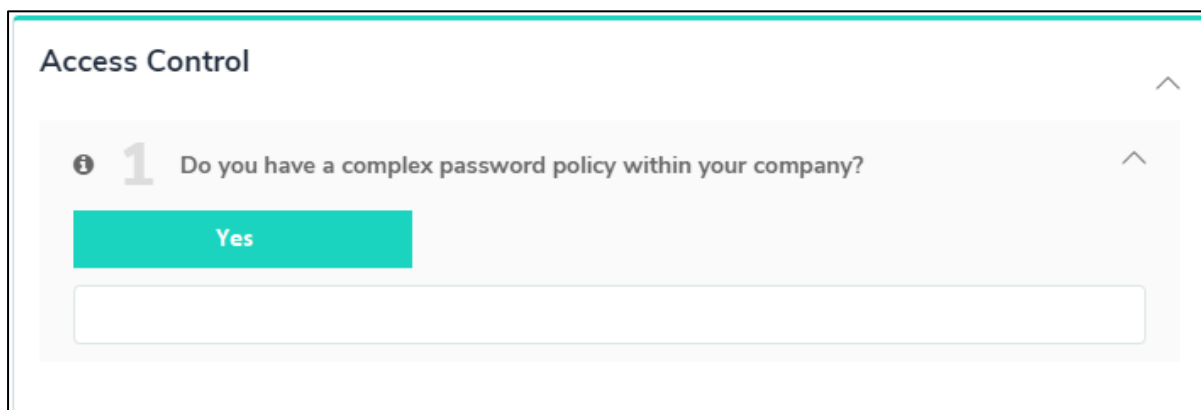
Below the company information, there are six expandable sections:

- Access Control
- Documentation
- Individual rights
- Accountability and governance
- Data security
- Compliance and Standards

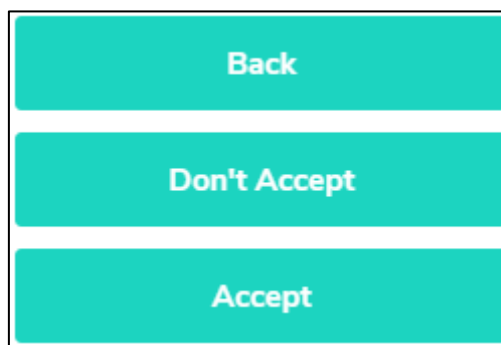
At the bottom of the form, there is a "Notes/Comments" text area and three buttons: "Back", "Don't Accept", and "Accept".

Down the right-hand side, you will be able to see links to the Privacy, Terms and Conditions and Cookie policies. Please take a minute to look at these when reviewing a supplier.

Each section on this page can be expanded to show the question which the supplier has answered. Click on the down arrow to show the question.



At the bottom right of this section are three buttons, “**Back**”, “**Don’t Accept**” and “**Accept**” as well as a blank box.



The blank box is for you to type in a note when reviewing the supplier before either accepting or not accepting to use the supplier moving forwards.

The **Back** button will take you back a page for you to review the previous page.

The **Don’t Accept** button can be used if you are not happy with the answers the supplier has provided within the Internal Audit or where you are not satisfied with the compliance practices or policies.

The **Accept** button can be used if you are happy with the answers the supplier has given to the questions and if you are happy to use the supplier moving forwards after reviewing their data mapping information from the previous page.

Click either **Don’t Accept** or **Accept** to continue with the audit.

Once you have reviewed the first supplier, if you selected **Accept** it will then appear under the **Completed** section.

The screenshot shows the 'Suppliers' interface. On the left is a dark sidebar with a navigation menu. The main area is titled 'Suppliers' and contains a search bar and two sections: 'Pending Review' and 'Completed'. Under 'Pending Review', there is a card for 'Groupcall Limited' with a 'Begin Review' button. Under 'Completed', there is a card for '123Comms Ltd' with a 'Review Again' button. A red rectangular box highlights the '123Comms Ltd' card.

Click **Begin Review** to review the remaining suppliers one by one.

Answering Questions

School Personal Questions

All the questions follow the same format. See this example.
There is a question, a multiple-choice answer selection and a free text box available, when you click on the question, where you can add to your answer.

The screenshot displays the 'Internal Audit' interface. At the top, there is a 'Select Type' dropdown menu set to 'School Personal Questions'. To the right are two buttons: 'Save Progress' and 'Complete and Lock'. On the left side, there are 'Expand All' and 'Collapse All' buttons, and a list of audit categories including 'Staff Data Protection Audit' and 'School Data Protection Questionnaire - Test'. The main content area features a question: 'Do you keep your passwords secure, change them regularly and never share them? - Test'. Below the question is a text box labeled 'Answer'. To the right of the question is a dropdown menu with the following options: 'No', 'Partly', 'Yes', and 'Not applicable (NA)'. Red boxes highlight the 'Select Type' dropdown, the 'Save Progress' and 'Complete and Lock' buttons, the 'Expand All' and 'Collapse All' buttons, and the multiple-choice dropdown menu.

Use **Save** if you need to leave the page or continue later.

Once you have completed this section **Complete and Lock**

Note: Once you have clicked **Complete and Lock**, you will not be able to either add to or amend your existing answers.

School Organisation Questions

GDPRiS holds the ICO's Accountability Framework as a set of questions that organisations can use to measure their compliance to the ICO's expectations for their data protection regime.

The way schools do this in GDPRiS, is to set up an Organisation Audit.

Any DP Staff can access and respond to questions. The latest set of responses will always be the one that gets reported on in dashboards and reports.

The questions and the sub-headings in the expanded view follow the ICO Accountability Framework as you can see here:

[ICO Accountability Framework](#)

If you are not too familiar with accountability you can complete the top-level questions which will automatically populate the answers in expanded view. This is sufficient at this point and shows that you are looking at accountability.

Once you are more familiar with the ICO's expectations for your data protection, and run another audit, you can complete the sub-headings and the multiple-choice answers can be set individually.

All the questions follow the same format. See this example.

There is a question, a hint, a multiple-choice answer selection, when you click on the question you will see sub sections and if you click on **More details** you can add to your answer.

The screenshot shows the 'Internal Audit' interface. At the top, there's a 'Select Type' dropdown set to 'School Organisation Questions', and buttons for 'Save Progress' and 'Complete and Lock'. A sidebar on the left lists categories like 'Leadership and Oversight', 'Policies and Procedures', etc. The main content area displays a question under the heading '11 Organisational structure'. The question text is: '11.1 The board, or highest senior management level, has overall responsibility for data protection and information governance.' A yellow hint box says: 'Hint: To meet this expectation you will need a Data Protection Policy which assigns responsibility to key individuals and to leadership protection in the culture of the organisation.' Below the question is a 'More details' section with a 'Target Date' field, a 'Staff assigned' dropdown, and 'Actions' and 'Comments' text areas. To the right of the question is a multiple-choice dropdown menu with options: 'Not Started', 'Partly', 'Achieved', 'Achieved Evidenced', and 'Not applicable'.

Use **Save Progress** if you need to leave the page or continue later.

Once you have completed this section **Complete and Lock**

Note: Once you have clicked **Complete and Lock**, you will not be able to either add to or amend your existing answers.

The responses that can be given to each question are as follows:

Not Started
Partly
Achieved
Achieved Evidenced
Not applicable

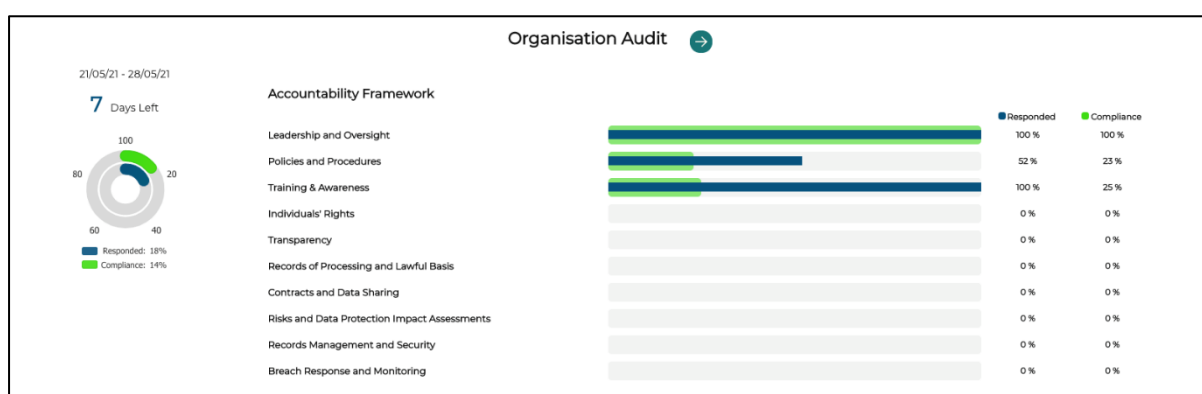
Each of these responses count in different ways towards the overall compliance result:

- Not started – this counts as 0%, as does a non-response
- Partly – this counts as 20%
- Achieved – this counts as 80%
- Achieved Evidenced – this counts as 100%
- Not applicable – the question is taken out of the calculation completely. It does not count towards the compliance rating.

You will see the compliance percentages on your organisation dashboard on the Organisation Audit Tile

The Screenshot below shows.

- **Leadership & Oversight** – 100% of all questions were answered, and all as **Achieved Evidenced** (100%)
- **Training & Awareness** – 100% of all questions were answered, but not many scored more than a **Partly**.
- **Policies & Procedure** – just over half of the questions were answered. But because the compliance bar is lagging well behind the completed bar, we can tell that the responses tended to be less than **Achieved**.



Edit Internal Audit

When you started your Internal Audit section you had to put in an **End date**. If you have passed your end date but you are still to complete some part of your audit, you have the option to extend your current audit.

In the **Internal Audit Settings** section, click on  next to the relevant section.

A popup window will appear where you can see the options to select a new end date. Type in a reason why you are extending the audit period as this goes towards the history of the audit.

Edit

Cancel

Okay

Note: The audit period can only be extended as far as 3 months from its original start date.

Once you have made your changes, click **“Okay”** to save.

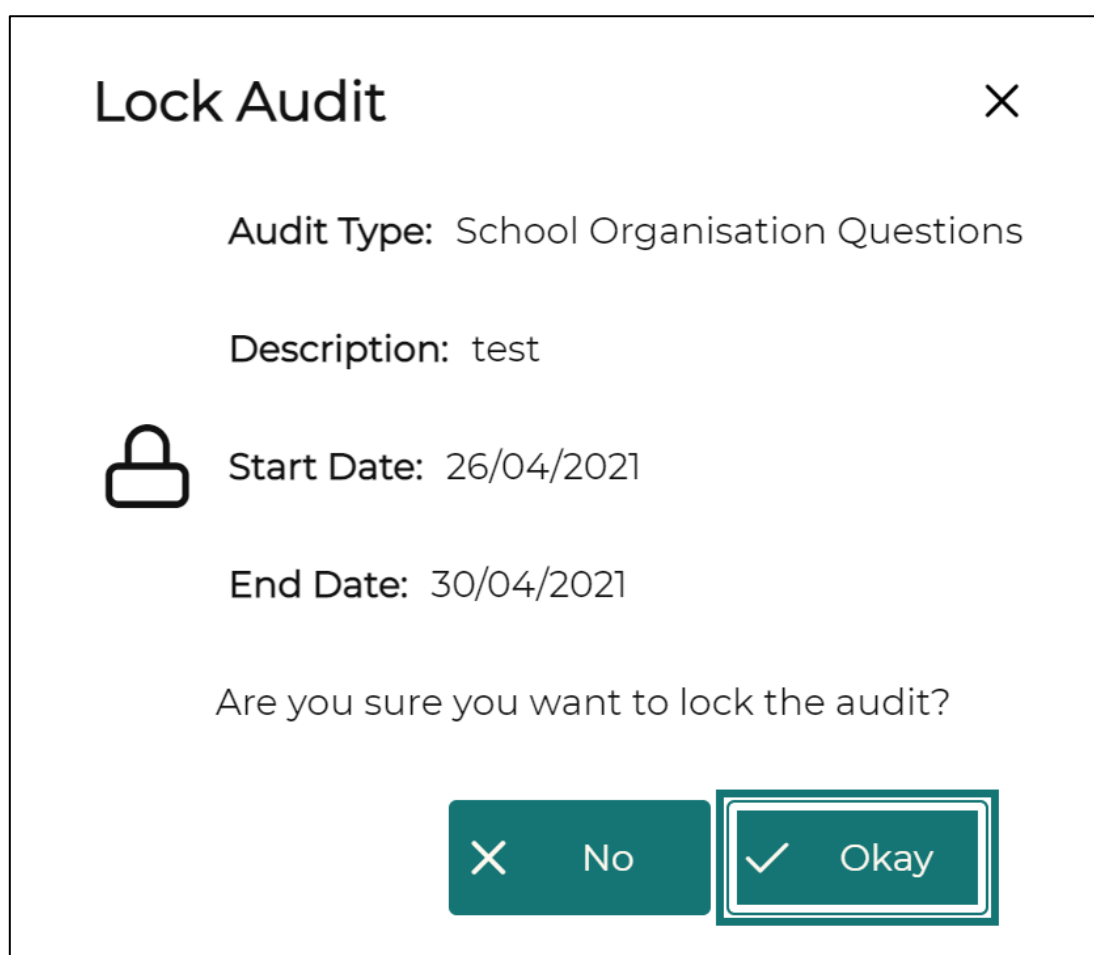
Lock Internal Audit

If you are confident that all of the relevant sections have been completed as part of the audit you have run through, you can **lock** the audit so that no more changes can be made.

Click on  next to the relevant audit section in the **Internal Audit Settings** section.


A popup window will appear.

If you are sure that you want to lock the audit section, click **Okay**, if not, click **Cancel** and go back and review all parts of the audit to make sure all relevant sections are complete.



Close Internal Audit

When an audit section has been locked, the next stage of the process is to close it.

Click on the  next to the relevant audit section in the **Internal Audit Settings** section.

A popup window will appear where you can select when you will want to run through the same audit section again and where you can add some notes to closing the audit.

Once you are happy with your changes, click **Close**.

Close

▼

Cancel
Close

Internal Audit History

Click on **Internal Audit History** via the **Audits** area on the navigation pane to see the information on current and historical audits.

Internal Audit History					
					Search...
Id	Description	Audit Type	Status	Start Date	End Date
6511	Spring Term DP Staff	School Organisation Questions	Closed	28/04/2021	28/04/2021
6512	Spring Term All Staff	School Personal Questions	In Progress	28/04/2021	29/04/2021
6513	Spring Term DP Staff	Data Mapping Review	In Progress	28/04/2021	29/04/2021

Reports

The Reports section is where you can track which users have started their Internal Audit as well as review answers to questions which your staff have answered. By reviewing these reports, you will be able to see where your areas are for improvement.

Please review the following reports for results from the Internal Audit:

Users and Staff Reviews
Staff Data Protection Self-Assessment
All SAQ Responses

Contact the Customer Success Team

Office hours

Mon-Thurs 09:00-17:00 GMT

Fri 09:00-16:00 GMT

If you require assistance regarding any section of this help guide, please do not hesitate to contact us via one of the following methods:

Tel: 02039 610 110

Mail: support@gdpr.school