

Compliance with GDPR

Case Study - Photocopier

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The photocopier. The over-used, under appreciated piece of machinery central to every school's life. The machine which I used to look at in terms of price per copy and how much electricity it used!

Our photocopier rental was up for renewal. Being a small school we had, over time, done away with expensive printers in classrooms and networked everything to the one machine. Cost effective – very. Annoying for teachers at times – very. However, it did present issues beyond just being irritating to have to keep walking to the machine to get your print outs and the niggles and concerns around potential data breaches were already in our minds.

GDPR heightened our awareness of matters which we already had concerns around, mainly using the machine for "office work" whilst it was still being used for classroom printing. Measures such as running down the corridor to grab the print outs before it was subsumed by other bits of paper was wearing thin and had the potential for a security breach if a piece of paper ended up where it shouldn't.

Looking for a new photocopier, we had our eyes opened beyond finding a solution to help prevent "paper breaches." Some of what I am about to say may be very obvious, but if we hadn't necessarily considered all of this before starting on this journey, then there will be other people out there too. Photocopiers have hard drives and can store your copies. The machines can be remotely accessed by the providers. The machine is linked in to our network. This machine is taken away at the end. What happens to it?

Solutions and more questions:

The most pressing and immediate need was:

- a) Stop people from pressing 'print' somewhere in the school and collecting it at their leisure. There could even be 3 or 4 people doing the same from their rooms at the same time. This had the potential for important documents to be left by the machine ("It's not mine") or documents of a sensitive nature to be interleaved with a class set of maths sheets or letters home.
- b) Have an audit trail of people using the copier.

The solution to this part was simple. Everyone has a code. This is not to berate people for the number of colour copies done, but to enable an 'audit trail' of usage, for accountability. This code is also used to enable 'print' to come off the machine. Staff have to be physically next to the machine and put the code in before their work comes out – no more pressing 'print' and picking it up later. Of course, human conduct has to be accounted for and the school will do spot checks to ensure codes are not being shared and that if there is sensitive information left around, that people spot it and ensure it ends up in the correct place (by creating a false document, leaving it and seeing if it is spotted and dealt with appropriately). It's a case of making staff aware that we are all responsible.

The other side, the more technical aspects, have required more investigation. Questions to be answered (and evidence provided to our satisfaction) included:

- What information does the hard drive on the photocopier hold?
- How long does it store it for? What is it used for? Who can obtain it?
- What happens to the machine when it is taken away?
- What proof/reassurances will we be given that the hard drive has been completely wiped?
- Remote access for servicing and toner replacements. How does the company access the photocopier? What else can they gain access to? How is the information from the machine used?

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- Networking within school. How is it networked? If there is any kind of breach/hacking could it come via the photocopier? If it is the case that data could be extracted in this way, what protection is in place to prevent this?

We spoke to three different photocopying companies about our basic requirements and then asked them what they felt we needed to consider regarding GDPR and what they already had in place to meet this. We asked all of the above questions of them and they were able to answer them. With every one, I asked them to send me written evidence of what they were telling me. One company immediately sent through a GDPR compliance document outlining each aspect.

Some of my questions may not have been relevant; some easily explained, but I used the support of our external IT support provider to make sure I understood the answers to these questions as it is easy to be blind non specialists with technical jargon. We are confident that we have found the best solution we can for our needs and that we have the information and evidence required to show we are doing everything we can to be GDPR compliant.