



Schools Data Protection Register

1.	PROCESS	Additional Learning Needs (ALN)
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SECTION 1: SCHOOL DETAILS		
1.	School Name	Parc Lewis Primary
2.	School Category	Primary School
3.	Information Asset Owner (IAO)	Alun Roberts
4.	School Data Protection Lead	Beth Gogherty

SECTION 2: FUNCTIONS/ PROCESSING ACTIVITIES	
1.	<p>Reason for processing activity</p> <p>Schools process data to enable a referral to Access & Inclusion for Additional Learning Needs</p>
2.	<p>Description of function/ processing activity</p> <p>Additional Needs Coordinators (ALNCO's) / Special Educational Needs Coordinators (SENCO's) share personal with the Local Authority and outside agencies, to refer pupils who have additional learning needs.</p> <p>This can be for the statutory assessment process, accessing specialist advice and guidance from the Learner Support Service and Educational Psychologist Service. They also provide ALN data to Central South Consortium for statistical returns and to external agencies such as examination boards and inspectors.</p>
3.	<p>Is data processed fully by automated means?</p> <p>No</p>
4.	<p>If processed by automated means, are decisions being made that would have a significant effect on individuals being made as a result of the automated processing?</p> <p>N/A</p>

SECTION 3: LAWFUL BASIS FOR PROCESSING PERSONAL INFORMATION	
1.	<p>Do you process personal identifiable information?</p> <p>Yes</p>
2.	<p>What classes of personal identifiable information do you process? (list all that apply)</p> <p>Personal details Family, lifestyle, social Education, training Other (please note) As these are additional needs referrals the reports can contain any appropriate information in the referral as seen fit by the professional involved.</p>
3.	<p>What is the lawful basis for processing personal identifiable information (which Article 6 condition applies)?</p> <p>Legal obligation Public Task Consent Vital interest</p>
4.	<p>Lawful basis (Article 6) supporting information:</p> <p>Education Act 2002 "The Special Educational Needs Code of Practice for Wales April 2002" – Welsh Government Equality Act 2010 Section 149 (Ethnic origin)</p>

SECTION 4: LAWFUL BASIS FOR PROCESSING 'SPECIAL CATEGORY' PERSONAL INFORMATION	
1.	<i>Do you process special categories of personal identifiable information?</i> Yes
2.	<i>Which special category data do you process?</i> Race Ethnic origin Religion Health Genetics Sex life Sexual orientation
3.	<i>What is the lawful basis for processing special category information (which Article 9 condition applies)?</i> Public Interest Explicit consent Choose an item. Choose an item.
4.	<i>Lawful basis (Article 9) supporting information:</i> Same as S3Q4

SECTION 5: RECIPIENTS OF DATA / DATA SHARING					
	Share 1	Share 2	Share 3	Share 4	Share 5
1. Recipients of data/ data sharing (i.e. name of organisation)	Access & Inclusion, SALT, CAMHS, Occupational Health, Physiotherapy, NHS NDT, CS/AS e.g. paed, consultant, CAFCAS	Parents	Examination Boards WG Moderation	Central South Consortium	The Local Authority for Special Needs Unit purposes only
2. Why do you share this information?	To facilitate the additional needs referrals and respond to professional requests for information on ALN	To fully engage parents/guardians in the additional learning needs process via a copy of all reports and gaining consent where appropriate	To arrange access arrangements or additional services needed for examinations or tests. e.g. scribes, JCQ inspector	For the purpose of school improvement in additional learning needs	To share the additional learning needs information that is only specifically processed for pupils attending specialist units
3. What classes of personal identifiable information do you share? (list all that apply)	Personal details Family, lifestyle, social Education, training Other (please note) As these are additional needs referrals the reports can contain any appropriate information in the referral as seen fit by the professional involved.	Personal details Family, lifestyle, social Education, training Other (please note) As these are additional needs referrals the reports can contain any appropriate information in the referral as seen fit by the professional involved.	Personal details Education, training Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Education, training Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Family, lifestyle, social Education, training Other (please note) As these are additional needs referrals the reports can contain any appropriate information in the referral as seen fit by the professional involved.

Commented [CP1]: Extra info needed for LA unit data procedures – attendance included in SIMS? Part integration, SENCO in unit class etc

4.	What is the lawful basis for sharing personal identifiable information (which Article 6 condition applies)?	Legal obligation Public Task Consent	Legal obligation Public Task Consent	Public Task Choose an item. Choose an item.	Public Task Contract Choose an item.	Legal obligation Public Task Consent
5.	Please provide further details to support the Article 6 condition (if different to that identified in Section 3 Q3)	Same	Same	Same	Same	Same
6.	Is 'special category data' shared? If so, please state what categories.	Race Ethnic origin Religion Health Sexual orientation Sex life As these are additional needs referrals the reports can contain any appropriate information in the referral as seen fit by the professional involved.	Race Ethnic origin Religion Health Sexual orientation As these are additional needs referrals the reports can contain any appropriate information in the referral as seen fit by the professional involved.	Health Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item.	Race Ethnic origin Religion Health Sexual orientation Sex life
7.	What is the lawful basis for sharing special category information (which Article 9 condition applies)?	Public Interest Explicit consent Choose an item.	Public Interest Explicit consent Choose an item.	Public Interest Explicit consent Choose an item.	Choose an item. Choose an item. Choose an item.	Public Interest Explicit consent Choose an item.
8.	Please provide further details to support the Article 9 condition (if different to that identified in Section 4 Q3)	Same	Same	Same		
9.	What type of agreement is required for this sharing? **The Information Management Team will provide support in determining this agreement at a later date but you should locate any details of any agreement you may have with the 3 rd party **					
10.	Is this agreement in place?	Yes	Yes	Choose an item.	Choose an item.	Choose an item.

11.	If yes, please provide details					
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SECTION 6: DATA SUBJECT/ DATA SOURCE	
1.	Is the information you are processing relating to: an adult? Yes 18+ a child? Yes (for the purpose of this register an 'adult' is defined as someone over the age of 18 – please remember this also relates to parent/carers, staff and 3 rd parties.)
2.	Who are your data subjects? Pupils
3.	Do you provide 'information society services' to children? No
4.	Is the data given to you by the data subject? Yes
5.	Is the data given to you by a 3rd party? (i.e. someone other than the data subject) Yes (if yes please state) Parents, social workers, outside agencies e.g. Local Authority services such as Access & Inclusion , Local Health Boards, police liaison officers

SECTION 7: 3rd PARTY DATA PROCESSING (e.g. commissioned service)						
		Processor 1	Processor 2	Processor 3	Processor 4	Processor 5
1.	Provide name of the 3rd party processor	SIMS				
2.	Please state the purpose for which this 3rd party processor is used	Management Information System for the school – in this instance to				

		additional learning needs data				
3.	What classes of personal identifiable information are processed by the 3rd party processor? (list all that apply)	Personal details Education, training Other (please note) As these are additional needs referrals the reports can contain any appropriate information in the referral as seen fit by the professional involved.				
4.	What is the lawful basis for the 3rd party processing personal identifiable information (which Article 6 condition applies)?	Legal obligation Public Task Choose an item.	Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.
5.	Please provide further details to support the Article 6 condition (if different to Section 3 Q3)					
6.	Is 'special category data' processed by the 3rd party processor? If so, please state what categories.	Race Ethnic origin Religion Health Sexual orientation Sex life	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.
7.	What is the lawful basis for sharing special category information (which Article 9 condition applies)?	Public Interest Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.
8.	Please provide further details to support the Article 9 condition (if different to Section 4 Q3)					
9.	In the case of system suppliers, does the 3rd party host the data?	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.

10.	<i>If yes to Q9, is the hosted data processed outside of the EU?</i>	Choose an item.				
11.	<i>Please state in which country the data is hosted.</i>					
12.	<i>Do you have a contract/ agreement with this 3rd party processor?</i>	Choose an item.				
13.	<i>If so, please provide details.</i>					
14.	<i>Please state your data protection relationship with this 3rd party processor.</i> **The Information Management Team will provide support in determining this relationship at a later date but you should locate details of the contract you have with the 3 rd party **	Choose an item.				

SECTION 8: DATA PROTECTION IMPACT ASSESSMENT (DPIA)	
1.	<p>DPIA required? (please note this process will be addressed with the Information Management Team at a later date)</p> <p>No (if yes please give details)</p>

SECTION 9: RETENTION	
1.	<p>Do you have a retention schedule in place that specifies how long the data in relation to this function/ processing activity is retained for?</p> <p>Yes (if yes please give details)</p> <p>We hold personal data in line with the guidance set out in the Retention Schedule, contained within the IRMS Toolkit for Schools.</p> <p>Following the retention period expiry, information will be destroyed securely and permanently.</p>

SECTION 10: PRIVACY NOTICE	
1.	<p>Do you have a privacy notice for this function / processing activity?</p> <p>Yes</p>

SECTION 11: INFORMATION RIGHTS							
Please indicate which information rights apply to this function / processing activity based on the Article 6 legal basis indicated in Section 3 Q2							
Lawful Basis article 6	Right to Access	Right to Rectification	Right to Erasure	Right to Restrict processing	Right to Portability	Right to Object	Auto-decision making
Consent	Yes	Yes	Yes	Yes	Yes	No - but right to withdraw consent	No - but right to withdraw consent
Contract	Yes	Yes	Yes	Yes	Yes	No	No
Legal obligation	Yes	Yes	No	No	No	No	No
Vital interest	Yes	Yes	Yes	No	No	No	Yes
Public Task	Yes	Yes	No	No	No	Yes	Yes
Legitimate Interest	Yes	Yes	Yes	Yes	No	Yes	Yes

SECTION 12: PAPER RECORDS	
1.	<p>Do you store data relating to this function/ processing activity in paper format?</p> <p>Yes</p>
2.	<p>Are these records live, historical or both?</p> <p>Both</p>

