



Schools Data Protection Register

1.	PROCESS	Assessment, Recording and Reporting
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SECTION 1: SCHOOL DETAILS		
1.	School Name	Parc Lewis Primary School
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.	Reason for processing activity	The school has a legal requirement to report on the attainment and progress of pupils to their parents/ carers and a statutory duty to report to the Local Authority.
2.	Description of function/ processing activity	The school records assessment details (levels/ grades and comments) against pupils in the school. Information is processed both on paper (teacher mark books) and electronically (through SIMS/ Microsoft packages and other software packages). Assessment data is processed for both internal and external purposes. Internally, the school uses the information to target, track and monitor pupil progress and put interventions in place where necessary (including the planning and targeting of support and resources for pupils with different needs). It is also used to inform teaching and learning. Externally, information is sent to RCT within statutory returns. Reports are produced and distributed to parents.
3.	Is data processed fully by automated means?	No
4.	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?	N/A

SECTION 3: LAWFUL BASIS FOR PROCESSING PERSONAL INFORMATION		
1.	Do you process personal identifiable information?	Yes
2.	What classes of personal identifiable information do you process? (list all that apply)	Personal details Education, training Choose an item. Choose an item. Choose an item. Choose an item.
3.	What are the lawful bases for processing personal identifiable information (which Article 6 condition applies)?	Legal obligation Public Task Choose an item. Choose an item.
4.	Lawful bases (Article 6) supporting information:	Education Act 2002 section Part 7, Section 97b: link

SECTION 4: LAWFUL BASIS FOR PROCESSING 'SPECIAL CATEGORY' PERSONAL INFORMATION		
1.	Do you process special categories of personal identifiable information?	Yes
2.	Which special category data do you process?	

	Ethnic origin Choose an item.	Health Choose an item.	Choose an item.	Choose an item.	Choose an item.
3.	What are the lawful bases for processing special category information (which Article 9 condition applies)?				
	Public Interest	Choose an item.	Choose an item.	Choose an item.	
4.	Lawful bases (Article 9) supporting information:				
	<p>Welsh Government guidance: 'Collecting and Recording Data on Pupils' Ethnic Background'</p> <p>https://gov.wales/sites/default/files/publications/2018-03/collecting-and-recording-data-on-pupils-ethnic-background.pdf</p>				

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)	Parents/ Carers	Local Authority Systems and Management Information Service	Local Authority SEN/ Safeguarding	Social Services	Cluster Moderation
2.	Why do you share this information?	To keep them informed of their child's attainment and progress	The school works with this team to create and submit statutory returns: NDC (National Data Collection) end of key stage levels and WNT (Welsh National Tests)	Part of the referral process requires assessment information	Assessment information is supplied to social services where children are classed as CLA	Assessment information shared to level children work within the cluster
3.	What classes of personal identifiable information do you share? (list all that apply)	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 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 Education,training Financial Choose an item. Choose an item. Choose an item.
4.	What are the lawful bases for sharing personal identifiable information (which Article 6 condition applies)?	Legal obligation Choose an item. Choose an item.	Public Task Choose an item. Choose an item.	Public Task Choose an item. Choose an item.	Public Task Choose an item. Choose an item.	Public Task 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' shared? If so, please state what categories.	Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item.	Special category data isn't processed for the purpose of assessment in LA shares	Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item.

3.	Do you provide 'information society services' to children? No
4.	Is the data given to you by the data subject? No
5.	Is the data given to you by a 3rd party? (i.e. someone other than the data subject) Yes (if yes please state) The staff at the school

SECTION 7: 3 rd 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	DEWI	Welsh Government HWB	INCERTS	FFT/ ALPs
2.	Please state the purpose for which this 3rd party processor is used	Management Information System for the school – in this instance to record assessment	Website used for secure uploading and downloading of data between school and RCT	Website used for pupils to take particular Welsh National Tests	System used for assessment purposes	Systems used for target setting
3.	What classes of personal identifiable information are processed by the 3rd party processor? (list all that apply)	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 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 Education,training Choose an item. Choose an item. Choose an item. Choose an item.
4.	What are the lawful bases for the 3rd party processing personal identifiable information (which Article 6 condition applies)?	Public Task Choose an item. Choose an item.	Public Task Choose an item. Choose an item.	Public Task Choose an item. Choose an item.	Public Task Choose an item. Choose an item.	Public Task Choose an item. Choose an item.

Commented [DK1]: Does the school use FFT/ ALPs for target setting etc?

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.	Ethnic origin 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. Choose an item. Choose an item. Choose an item.	Ethnic origin Health Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item.
7.	What are the lawful bases 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.	If yes to Q3, is the hosted data processed outside of the EU?	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.
11.	Please state the country in which the hosted data is processed.					
12.	Do you have a contract/ agreement with this 3rd party processor?	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.
13.	If so, please provide details.					
14.	Please state your data protection relationship with this 3rd party processor. **The Information Management Team will provide support in determining this relationship at a later date but you should locate	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.

Commented [DK3]: If a target setting system is used, is special category data processed within it e.g. SEN status/ ethnicity etc

Commented [DK2]: If an assessment package is used, these are the most likely special category data items to be processed but this needs to be checked on the school visit

	details of the contract you have with the 3 rd party **					
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SECTION 7: 3 rd PARTY DATA PROCESSING (e.g. commissioned service)						
		Processor 6	Processor 7	Processor 8	Processor 9	Processor 10
1.	<i>Provide name of the 3rd party processor</i>					
2.	<i>Please state the purpose for which this 3rd party processor is used</i>					
3.	<i>What classes of personal identifiable information are processed by the 3rd party processor? (list all that apply)</i>	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. 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.
4.	<i>What is the lawful basis for the 3rd party processing personal identifiable information (which Article 6 condition applies)?</i>	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.
5.	<i>Please provide further details to support the Article 6 condition (if different to Section 3 Q3)</i>					
6.	<i>Is 'special category data' processed by the 3rd party processor? If so, please state what categories.</i>	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.	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)?	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.
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.	If yes to Q9, is the hosted data processed outside of the EU?	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.
11.	If the data is hosted outside the EU, please state in which country.					
12.	Do you have a contract/ agreement with this 3rd party processor?	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.
13.	If so, please provide details.					
14.	Please state your data protection relationship with this 3rd party processor.	Choose an item.	Choose an item.	Choose an item.	Choose an item.	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>Choose an item.</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>
3.	<p>General location of paper records</p> <p>Staff markbooks. Storage</p>
4.	<p>Specific location of paper records</p>

Commented [DK4]: To be completed at school visit

5.	Are any of the paper files taken off site? Choose an item.
6.	If so please give details:

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