



Schools Data Protection Register

1.	PROCESS	Attendance
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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.	Reason for processing activity	The school has a legal requirement to record the attendance of pupils for the morning and afternoon sessions (AM and PM).
2.	Description of function/ processing activity	<p>The school records whether pupils are present or absent and if they are absent, reasons for absence, along with evidence (including medical) in some cases.</p> <p>The recording of attendance allows for further exploration of the reasons why pupils are absent, improving the safeguarding and tracking of pupils. In turn, strategies can be put in place to deal with specific problems effectively. Unexplained absences are followed up with contact home from the school. Schools are required to submit a statutory attendance return to the LA.</p> <p>There could be possible referrals from the school to support agencies to overcome barriers impacting on attendance and education.</p>
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

Commented [DK1]: Does the school do this and how? E.g. first day phone calls/ texts/ emails?

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 Family, lifestyle, social Education, training 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:	The Education (Pupil Registration) (Wales) Regulations 2010 – Section 6: link Education Act 2002 – Section 175: link All Wales Attendance Framework (Welsh Government): 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.	Religion Choose an item.	Health Choose an item.	Sexual orientation 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: The Education (Pupil Registration) (Wales) Regulations 2010 – Section 6: link			

Commented [DK2]: We could process this information e.g. travellers/ religious absences/ absences could be to do with a pupil's sexual orientation

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 Attendance Wellbeing Service	Local Authority SEN/ Safeguarding	Local Authority Systems and Management Information Service	
2.	Why do you share this information?	To inform them of their child's attendance	To make referrals to the AWS	Part of the referral process may require attendance information	The school submits the statutory attendance return to this team	
3.	What classes of personal identifiable information do you share? (list all that apply)	Personal details Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Family, lifestyle, social Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Family, lifestyle, social Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Family, lifestyle, social 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.	What are the lawful bases for sharing 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.	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' shared? If so, please state what categories.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Health Ethnic origin Religion Sexual orientation Choose an item.	Health Ethnic origin Religion Sexual orientation 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.

Commented [DK3]: Or is there something in law that says schools have to report attendance info to parents by law

Commented [DK4]: Schools are only required to provide attendance info without the need for the special category data in this instance

7.	What are the lawful bases for sharing special category information (which Article 9 condition applies)?	Choose an item. Choose an item. Choose an item.	Public Interest Choose an item. Choose an item.	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.
8.	Please provide further details to support the Article 9 condition (if different to Section 4 Q3)					
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 **	Home school agreement				
10.	Is this agreement in place?	Yes	Choose an item.	Choose an item.	Choose an item.	Choose an item.
11.	If yes, please provide details	Parents/ carers sign before child starts school				

Commented [DK5]: Are there agreements between the LA and the school for the sharing of this data that the school is aware of?

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 Family members/ carers of pupils
3.	Do you provide 'information society services' to children? No
4.	Is the data given to you by the data subject? Yes It can be provided by the parent/ carer and/ or the child itself.

5.	<p>Is the data given to you by a 3rd party? (i.e. someone other than the data subject)</p> <p>Yes (if yes please state)</p> <p>Reasons for absence could be provided by the AWS after home visits</p>
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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	Communications package?	Assessment package?	Behaviour Package?
2.	Please state the purpose for which this 3rd party processor is used	Management Information System for the school – in this instance to record attendance	Website used for secure uploading and downloading of data between school and RCT	System used for school to home communications	System used for assessment purposes	System used for behaviour purposes
3.	What classes of personal identifiable information are processed by the 3rd party processor? (list all that apply)	Personal details Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Choose an item. 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.
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.	Health Religion 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 are the lawful bases for sharing special category	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.

Commented [DK6]: If the school uses a communications system for home to school liaison then does that link in to attendance data?

Commented [DK7]: Are there any assessment packages used at the school that may process attendance data? E.g. GL/ INCERTS

Commented [DK8]: If the school uses a behaviour system/ package then does it process attendance data?

	information (which Article 9 condition applies)?	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 in which country 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 details of the contract you have with the 3 rd party **	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.

Commented [DK9]: If SIMS is hosted by RCT then it is not processed outside the EU

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

SECTION 9: RETENTION	
1.	<p><i>Do you have a retention schedule in place that specifies how long the data in relation to this function/ processing activity is retained for?</i></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><i>Do you have a privacy notice for this function / processing activity?</i></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><i>Do you store data relating to this function/ processing activity in paper format?</i></p> <p>Yes</p>
2.	<p><i>Are these records live, historical or both?</i></p> <p>Both</p>
3.	<p><i>General location of paper records</i></p>
4.	<p><i>Specific location of paper records</i></p>

Commented [DK10]: All of these questions need asking when visiting schools

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

NOTES