

Schools Data Protection Register

1.	PROCESS	Pupil Data Record
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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 have a legal requirement to create and maintain a pupil record and ensure the secure transfer of the record.</p>
2.	<p>Description of function/ processing activity</p> <p>This covers the initial collection, maintenance and transfer of the whole pupil record. This would include everything on a pupil's file within the school (both the educational record and the pupil record). Aspects of the pupil record are shared with RCTCBC under the school's public task. For detailed information please refer to the specific DPR.</p> <p>The information collected includes personal information for pupils and parents/carers including contact details, medical conditions, etc.</p> <ol style="list-style-type: none"> The initial data collection process gathers the following information: <ul style="list-style-type: none"> Legal Names/Chosen Name Date of Birth (DOB) Address and Post Code Telephone Numbers and Email Addresses Contact Persons' Details (Priority of contact, Name, DOB, Relationship to pupil, Name and Daytime Contact Details) Dietary Needs/Preferences Registered Medical Practice and Contact Details Medical Condition(s) and appropriate action Disabilities Religion First Language Welsh Language Details Ethnicity Service Child in Education Data Information is also collected electronically from the School Admissions Team via the use of Admissions Transfer Files (ATF), and from the current school via Common Transfer Files (CTF). All of the above information is collected, as well as full or summarised information in some or all of the following areas: <ul style="list-style-type: none"> Additional Learning Needs Information Assessment/Programme of Study Assessments Attendance Summary Child Looked After Details External Examination Results

	<ul style="list-style-type: none"> Free School Meals History School History <p>3. Consent forms for the use of pupil data (in any format) e.g. media, biometric etc</p> <p>4. The unique identifier numbers below are generated during the academic life of a person by 3rd party Management Information Systems either automatically or by informing the 3rd party of the relevant information such as name, date of birth and address</p> <ul style="list-style-type: none"> Unique Pupil Number (UPN) Unique Learner Number (ULN) Unique Candidate Identifier (UCI) Unique Pupil Identifier (UPI)
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]: Delete if there isn't a biometric system in the school

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) <table border="0"> <tr> <td>Personal details</td> <td>Family, lifestyle, social</td> <td>Education, training</td> <td>Employment</td> </tr> <tr> <td>Financial</td> <td>Other (please note)</td> <td colspan="2">can include any data relevant to the pupil</td> </tr> </table>	Personal details	Family, lifestyle, social	Education, training	Employment	Financial	Other (please note)	can include any data relevant to the pupil	
Personal details	Family, lifestyle, social	Education, training	Employment						
Financial	Other (please note)	can include any data relevant to the pupil							
3.	What is the lawful basis for processing personal identifiable information (which Article 6 condition applies)? <table border="0"> <tr> <td>Legal obligation</td> <td>Public Task</td> <td>Choose an item.</td> </tr> </table>	Legal obligation	Public Task	Choose an item.					
Legal obligation	Public Task	Choose an item.							
4.	Lawful basis (Article 6) supporting information: Education Act 1996, Part X, Chapter VI, Section 563: link "Education Act 2002": link "School Admissions Code July 2013": link "Section 84 Schools Standards and Framework Act 1998": http://www.legislation.gov.uk/ukpga/1998/31/pdfs/ukpga_19980031_en.pdf "Registered Education Provider SLA" ..\Supporting Information\EDUCATION & LIFELONG LEARNING\Registered Education Provider SLA.docx								

Commented [DK2]: As this covers all data on a pupil file then this could include anything

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? <table border="0"> <tr> <td>Ethnic origin</td> <td>Health</td> <td>Religion</td> <td>Biometrics</td> <td>Sex life</td> <td>Sexual orientation</td> </tr> </table>	Ethnic origin	Health	Religion	Biometrics	Sex life	Sexual orientation
Ethnic origin	Health	Religion	Biometrics	Sex life	Sexual orientation		

Commented [DK3]: As this covers all data on a pupil file then this could include anything

3.	What is the lawful basis for processing special category information (which Article 9 condition applies)? Public Interest Choose an item. Choose an item. Choose an item.
4.	Lawful basis (Article 9) supporting information: Education Act 1996, Part X, Chapter VI, Section 563 https://www.legislation.gov.uk/ukpga/1996/56/part/X/chapter/VI

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)	Other educational establishments	Police?			
2.	Why do you share this information?	Where the pupil file is sent to another educational establishment for the purpose of transfers, or to the lost pupil data base.	Police requests for a pupil file.			
3.	What classes of personal identifiable information do you share? (list all that apply)	Personal details Family, lifestyle,social Education,training Employment Financial Other (please note)	Personal details Family, lifestyle,social Education,training Employment Financial Other (please note)	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.	What is the lawful basis for sharing personal identifiable information (which Article 6 condition applies)?	Public Task Choose an item. Choose an item.	Legal obligation 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 that identified in Section 3 Q3)	Same	DPA 2018 Schedule 2 paragraph 2: link			
6.	Is 'special category data' shared? If so, please state what categories.	Any here	Any here	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.	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.

8.	Please provide further details to support the Article 9 condition (if different to that identified in Section 4 Q3)	Same	DPA 2018 Schedule 2 paragraph 2: link			
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?	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.
11.	If yes, please provide details					

SECTION 5 CONTINUED: RECIPIENTS OF DATA / DATA SHARING-THIS SECTION CAN BE DELETED IF THERE ARE 5 SHARES OR LESS						
		Share 6	Share 7	Share 8	Share 9	Share 10
1.	Recipients of data/ data sharing (i.e. name of organisation)					
2.	Why do you share this information?					
3.	What classes of personal identifiable information do you share? (list all that apply)	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.	What is the lawful basis for sharing personal identifiable information (which Article 6 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.
5.	Please provide further details to support the Article 6 condition (if different to that identified in 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. 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 that identified in 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 **					
10.	Is this agreement in place?	Choose an item.	Choose an item.	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 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, parents/carers, contacts
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) Data is provided by LA Admissions Team, previous school, parents/carers

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	S2S	SEESAW		
2.	Please state the purpose for which this 3rd party processor is used	To maintain academic records for pupils/students	To transfer ATF's and CTF's to the LA other educational establishments	To keep a portfolio of work.		
3.	What classes of personal identifiable information are processed by the 3rd party processor? (list all that apply)	Personal details Education,training Family, lifestyle,social Other (please note) Choose an item. Choose an item.	Personal details Education,training Family, lifestyle,social Other (please note) Choose an item. Choose an item.	Personal details 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.	What is the lawful basis 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.	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 Health Choose an item. Choose an item.	Race Ethnic origin Health Choose an item. Choose an item.	Race Ethnic origin 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.	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.	In the case of system suppliers, does the 3rd party host the data?	Choose an item.	Yes	Yes	Choose an item.	Choose an item.
10.	If yes to Q9, is the hosted data processed outside of the EU?	Choose an item.	No	No	Choose an item.	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.	No	No	Choose an item.	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> <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 3rd party **</i>	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>No</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							
Contract							
Legal obligation							
Vital interest							
Public Task	Yes	Yes	No	Yes	No	No	N/A
Legitimate Interest							

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

3.	General location of paper records
4.	Specific location of paper records
5.	Are any of the paper files taken off site? Choose an item.
6.	If so please give details:

NOTES
<p>The admissions process is handled by the local authority and the information is passed to the school via paper and electronic secure transfer. The school then uploads the information into their MIS (Sims)</p>