



Schools Data Protection Register

1.	PROCESS	Safeguarding
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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>To ensure the safeguarding of school pupils by via various processes including LA referrals, Child Protection, referral to the Multi Agency Safeguarding Hub (MASH) or the police for children/young people who may be at risk of abuse, neglect or other kinds of harm.</p>
2.	<p>Description of function/ processing activity</p> <p>The recording of any pupil data where any person has reported concerns or suspicions that a child is suffering, has suffered or is likely to be at risk of harm to a member of school staff.</p> <p>Appropriate information is sent to Children's/Adult services, MASH, emergency services and parent/carers to assist the referral and access the appropriate intervention.</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 Other (please note) As these are safeguarding referrals the reports can contain any appropriate information in the referral as seen fit by the professional involved. Choose an item.</p>
3.	<p>What is the lawful basis for processing personal identifiable information (which Article 6 condition applies)?</p> <p>Legal obligation Consent (consent is used when the assessment team does not classify the referral as safeguarding but it would be beneficial to receive support from another appropriate service) Choose an item. Choose an item.</p>
4.	<p>Lawful basis (Article 6) supporting information:</p> <p>Social Services & Wellbeing (Wales) Act 2014.</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 Sexual orientation Religion Health Sex life As these are safeguarding referrals the reports can contain any appropriate information in the referral as seen fit by the professional involved
3.	<i>What is the lawful basis for processing special category information (which Article 9 condition applies)?</i> Public Interest Vital interests Explicit consent Choose an item.
4.	<i>Lawful basis (Article 9) supporting information:</i> See 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)	MASH	Emergency Services	Parent	RCT LA (Children's / Adult Services)	
2.	Why do you share this information?	To refer the child/young person when safeguarding concerns are raised	In some cases, the safeguarding concerns are so serious that immediate emergency services intervention is needed	Where a MASH referral is appropriate but there is no safeguarding concern, consent from parents/guardians is obtained.	Where there are safeguarding concerns that school staff do not think reach the MASH threshold, or where there is existing involvement e.g. child protection, child conference etc	
3.	What classes of personal identifiable information do you share? (list all that apply)	Personal details Family, lifestyle, social Other (please note) As these are safeguarding referrals the reports can contain any appropriate information in the referral as seen fit by the professional involved.	Personal details Family, lifestyle, social Other (please note) As these are safeguarding referrals the reports can contain any appropriate information in the referral as seen fit by the professional involved.	Personal details Family, lifestyle, social Other (please note) As these are safeguarding referrals the reports can contain any appropriate information in the referral as seen fit by the professional involved.	Personal details Family, lifestyle, social 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.
4.	What is the lawful basis for sharing personal identifiable information (which Article 6 condition applies)?	Legal obligation Choose an item. Choose an item.	Legal obligation Vital interest Choose an item.	Consent Choose an item. Choose an item.	Legal obligation 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	Social Services & Wellbeing (Wales) Act 2014	Social Services & Wellbeing (Wales) Act 2014			

	different to that identified in Section 3 Q3)					
6.	Is 'special category data' shared? If so, please state what categories.	Race Ethnic origin Health Sex life Sexual orientation As these are safeguarding referrals the reports can contain any appropriate information in the referral as seen fit by the professional involved.	Race Ethnic origin Health Sex life Sexual orientation As these are safeguarding referrals the reports can contain any appropriate information in the referral as seen fit by the professional involved.	Race Ethnic origin Health Sex life Sexual orientation As these are safeguarding referrals the reports can contain any appropriate information in the referral as seen fit by the professional involved.	Race Ethnic origin Health Sexual orientation 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 Vital interests Choose an item.	Explicit consent Choose an item. Choose an item.	Public Interest 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.	<i>If yes, please provide details</i>					
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SECTION 5 CONTINUED: RECIPIENTS OF DATA / DATA SHARING- <i>THIS SECTION CAN BE DELETED IF THERE ARE 5 SHARES OR LESS</i>						
		Share 6	Share 7	Share 8	Share 9	Share 10
1.	<i>Recipients of data/ data sharing (i.e. name of organisation)</i>					
2.	<i>Why do you share this information?</i>					
3.	<i>What classes of personal identifiable information do you share? (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.
4.	<i>What is the lawful basis for sharing 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 that identified in Section 3 Q3)</i>					

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.
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					

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? Children/young person Parents/carers

	Relevant involved people e.g family members, members of the public
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) Any relevant person who has the safeguarding concerns

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					
2.	Please state the purpose for which this 3rd party processor is used					
3.	What classes of personal identifiable information are processed by the 3rd party processor? (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 the 3rd party processing 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 Section 3 Q3)					

6.	Is 'special category data' processed by the 3rd party processor? 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.
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.	Please state in which country the data is hosted.					
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.

SECTION 8: DATA PROTECTION IMPACT ASSESSMENT (DPIA)	
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><i>Yes (if yes please give details)</i></p> <p>No (if yes please give details)</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><i>Yes (if yes please give details)</i></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>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><i>Do you store data relating to this function/ processing activity in paper format?</i></p> <p>Choose an item.</p>
2.	<p><i>Are these records live, historical or both?</i></p> <p>Choose an item.</p>

Commented [LS(M1)]: To be completed by each school as appropriate

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