

Schools Data Protection Register

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	Processing personal information for the purpose of providing school meals.
2. Description of function/ processing activity	Personal information relating to pupils is processed on a daily basis for the purpose of maintaining accurate and up to date school meal records including free school meals, payments and dietary requirements etc
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 Family, lifestyle, social Choose an item. Choose an item. Choose an item. Choose an item.
3. What is the lawful basis for processing personal identifiable information (which Article 6 condition applies)?	Public Task Choose an item. Choose an item. Choose an item.
4. Lawful basis (Article 6) supporting information:	In line with LA financial procedures Healthy Eating in Mainstream Schools 2014

Commented [CP1]: Infers low income if FSM

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?	Health Biometrics Religion Choose an item. Choose an item. Choose an item.
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.

Commented [CP2]: Biometrics for Comp only
Religion regarding Halal, Kosher etc

4.	Lawful basis (Article 9) supporting information: As above
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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)	LA (Finance department)	3 rd party catering providers (e.g. RCT Catering)			
2.	Why do you share this information?	To recover arrears of dinner money and administer the free school meals process	To record special dietary requirements e.g. nut allergy, halal etc			
3.	What classes of personal identifiable information do you share? (list all that apply)	Personal details Financial 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.		Choose an item. Choose an item. Choose an item. Choose an item. 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.	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 that identified in Section 3 Q3)	Same	Same			
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.	Religion 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. 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)					
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.	<i>If yes, please provide details</i>					
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SECTION 6: DATA SUBJECT/ DATA SOURCE	
1.	<i>Is the information you are processing relating to:</i> an adult? Yes 18+ and school staff 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.	<i>Who are your data subjects?</i> Pupils, parents/carers, staff
3.	<i>Do you provide 'information society services' to children?</i> No
4.	<i>Is the data given to you by the data subject?</i> Yes
5.	<i>Is the data given to you by a 3rd party? (i.e. someone other than the data subject)</i> Yes (if yes please state) Parents/carers LA/Catering Direct

SECTION 7: 3 rd PARTY DATA PROCESSING (e.g. commissioned service)						
		Processor 1	Processor 2	Processor 3	Processor 4	Processor 5
1.	<i>Provide name of the 3rd party processor</i>	SIMS	Cashless System e.g. Cunninghams			
2.	<i>Please state the purpose for which this 3rd party processor is used</i>	To record FSM details, payment details, dietary requirements, health conditions	To provide a cashless dinner money process			

3.	What classes of personal identifiable information are processed by the 3rd party processor? (list all that apply)	Personal details Financial Choose an item. Choose an item. Choose an item.	Personal details Financial Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. 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.	Choose an item. 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)	Same	Same			
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.	Biometrics Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. 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 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.	<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? 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? 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? Yes</p>
2.	<p>Are these records live, historical or both? Both</p>
3.	<p>General location of paper records Classrooms, office</p>
4.	<p>Specific location of paper records office</p>

5.	<i>Are any of the paper files taken off site?</i> No
6.	<i>If so please give details:</i>

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