



Schools Data Protection Register

1.	PROCESS	Secure Disposal
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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 To securely dispose of all confidential information according to GDPR.
2.	Description of function/ processing activity The removal and or destruction of confidential records regardless of the format e.g. paper, electronic by third parties.
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) <div> <div>Personal details</div> <div>Family, lifestyle,social</div> <div>Education,training</div> <div>Employment</div> </div> <div> <div>Financial</div> <div>Other (please note)</div> </div> Any classes of personal information that are processed in a school may be processed for the purposes outlined above
3.	What is the lawful basis for processing personal identifiable information (which Article 6 condition applies)? <div> <div>Legal obligation</div> <div>Choose an item.</div> <div>Choose an item.</div> <div>Choose an item.</div> </div>
4.	Lawful basis (Article 6) supporting information: Article 5 of the General Data Protection Regulation

SECTION 4: LAWFUL BASIS FOR PROCESSING 'SPECIAL CATEGORY' PERSONAL INFORMATION	
1.	<p><i>Do you process special categories of personal identifiable information?</i></p> <p>Yes</p>
2.	<p><i>Which special category data do you process?</i></p> <p>Race Ethnic origin Politics Religion Trade Union</p> <p>Health All categories may be processed</p>
3.	<p><i>What is the lawful basis for processing special category information (which Article 9 condition applies)?</i></p> <p>Public Interest Choose an item. Choose an item. Choose an item.</p>
4.	<p><i>Lawful basis (Article 9) supporting information:</i></p> <p>IRMS /ISSUU Toolkit for schools</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)					
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					

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? Staff Pupils Parents/carers 3 rd parties eg agency staff, visitors
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 3 rd party? (i.e. someone other than the data subject) No (if yes please state)
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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 3 rd party processor	3 rd party e.g. RCTCBC, Data Shred, Elite				
2.	Please state the purpose for which this 3 rd party processor is used	To undertake the secure disposal of confidential waste.				
3.	What classes of personal identifiable information are processed by the 3 rd party processor? (list all that apply)	Personal details Family, lifestyle, social Education, training Employment Financial Other (Any classes of personal information that are processed in a school may be processed for the purposes outlined above)	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. 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 3 rd party processing personal identifiable information (which Article 6 condition applies)?	Contract Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.	Choose an item. 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 [HN1]: School to specify who they use, if they use anyone. If they don't use a 3rd party school to explain how they dispose of confidential items.

5.	Please provide further details to support the Article 6 condition (if different to Section 3 Q3)	A contract or SLA will be in place dependant on the provider of the service.				
6.	Is 'special category data' processed by the 3rd party processor? If so, please state what categories.	Race Ethnic origin Politics Religion Trade Union Genetics Biometrics Health Sex life Sexual orientation All special category data could be processed.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. 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.	Choose an item. Choose an item. Choose an item.	Choose an item. 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)	INFORM users agree to SLA at point of booking the service.				
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?	Yes	Choose an item.	Choose an item.	Choose an item.	Choose an item.

13.	<i>If so, please provide details.</i>	SLA – RCT Contract – 3 rd party supplier/service provider				
14.	<i>Please state your data protection relationship with this 3rd party processor.</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 3 rd party **	DC = DP (inside EU)	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>Yes (if yes please give details)</p> <p>Should a DPIA be done if the schools are going to use a 3rd Party??</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>Yes</p> <p>To be written</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>Historical</p>
3.	<p>General location of paper records</p> <p>Any office/room that has a confidential waste bag</p>
4.	<p>Specific location of paper records</p> <p>Various locations</p>
5.	<p>Are any of the paper files taken off site?</p> <p>Yes</p>
6.	<p>If so please give details:</p> <p>RCT or the 3rd party will need to remove the data to enable it to be destroyed and or archived??</p>

NOTES
<p>Disposal will be within the IRMS Guidelines for Schools (Retention & Disposal Policy) ISSUU Toolkit for schools...</p> <p>For RCT services use INFORM > Support Services > Business Support Unit > PrintConfidentialWasteMail > Confidential Waste</p> <p>For Customers who are not on INFORM please email ConfidentialWaste@RCTCBC.gov.uk</p> <p>For Customers with access to INFORM RCT's Retention & Disposal Policy and Retention & Disposal toolkit is available in Policy search.</p>

