



# Schools Data Protection Register

1.	<b>PROCESS</b>	Statutory Returns
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SECTION 1: SCHOOL DETAILS		
1.	<b>School Name</b>	Parc Lewis Primary
2.	<b>School Category</b>	Primary School
3	<b>Information Asset Owner (IAO)</b>	Alun Roberts
4.	<b>School Data Protection Lead</b>	Beth Gogherty

SECTION 2: FUNCTIONS/ PROCESSING ACTIVITIES		
1.	<b>Reason for processing activity</b>	The school has a statutory duty to send pupil level reports to the Local Authority, they also have a statutory duty to submit workforce information to the LA.
2.	<b>Description of function/ processing activity</b>	<p>RCT request pupil level information in the form of the following statutory returns:</p> <ul style="list-style-type: none"> <li>• Pupil Count - pupils on roll on particular dates</li> <li>• <b>Pupil Level Annual School Census (PLASC)</b></li> <li>• *National Data Collection (NDC) – end of Key Stage levels</li> <li>• *Welsh National Tests (WNT) – reading/ reasoning/ procedural tests</li> <li>• **School Attendance Return</li> <li>• Learning Resource Base return</li> <li>• Post 16 Plasc</li> <li>• SWAC/SWAC HR (for schools who have not signed up for the HR/payroll SLA = will submit both)</li> </ul> <p>*NB these are also covered in the individual DPR for Assessment  **NB this is also covered in the individual DPR for Attendance</p>
3.	<b>Is data processed fully by automated means?</b>	No
4.	<b>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?</b>	N/A

**Commented [DK1]:** This would be the 'Education Other Than At School' return (EOTAS) for the PRUs

SECTION 3: LAWFUL BASIS FOR PROCESSING PERSONAL INFORMATION			
1.	<b>Do you process personal identifiable information?</b> Yes		
2.	<b>What classes of personal identifiable information do you process? (list all that apply)</b> Personal details                      Family, lifestyle, social                      Education, training                      Choose an item. Choose an item.                      Choose an item.		
3.	<b>What are the lawful bases for processing personal identifiable information (which Article 6 condition applies)?</b> Public Task                      Legal obligation                      Choose an item.                      Choose an item.		
4.	<b>Lawful bases (Article 6) supporting information:</b> <ul style="list-style-type: none"><li>• Education Act 2002 <a href="#">link</a></li><li>• The Education (Pupil Registration) (Wales) Regulations 2010 <a href="#">link</a></li><li>• The Education (Information About Individual Pupils) (Wales) Regulations 2007 <a href="#">link</a></li><li>• The Pupil Information (Wales) Regulations 2011 <a href="#">link</a></li></ul>		

	<ul style="list-style-type: none"> <li>• Education &amp; Inspections Act 2006 <a href="#">link</a></li> <li>• The Special Educational Needs Code of Practice for Wales April 2002 <a href="#">link</a></li> <li>• The Education (Areas to which Pupils and Students Belong) Regulations 1996 <a href="#">link</a></li> <li>• Pupil Level Annual School Census (PLASC) Guidance 2018 <a href="#">link</a></li> <li>• Welsh National Tests Data Collection and reporting arrangements <a href="#">link</a></li> <li>• Welsh in Education Strategic Plans 2017 <a href="#">link</a></li> <li>• EOTAS Return Guidance <a href="#">link</a></li> <li>• School Workforce Annual Census (SWAC) <a href="#">link</a></li> </ul>
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<b>SECTION 4: LAWFUL BASIS FOR PROCESSING 'SPECIAL CATEGORY' PERSONAL INFORMATION</b>				
<b>1.</b>	<b><i>Do you process special categories of personal identifiable information?</i></b> Yes			
<b>2.</b>	<b><i>Which special category data do you process?</i></b> Ethnic origin      Health      Choose an item.      Choose an item.      Choose an item. Choose an item.			
<b>3.</b>	<b><i>What are the lawful bases for processing special category information (which Article 9 condition applies)?</i></b> Public Interest      Choose an item.      Choose an item.      Choose an item.			
<b>4.</b>	<b><i>Lawful bases (Article 9) supporting information:</i></b>  Welsh Government guidance: 'Collecting and Recording Data on Pupils' Ethnic Background': <a href="#">link</a>			

SECTION 5: RECIPIENTS OF DATA / DATA SHARING						
		Share 1	Share 2	Share 3	Share 4	Share 5
1.	<b>Recipients of data/ data sharing (i.e. name of organisation)</b>	RCTCBC - Systems and Management Information Service	RCTCBC - Finance (LMS) department	RCTCBC – HR and Payroll Section		
2.	<b>Why do you share this information?</b>	The school works with this team to create and submit statutory returns	The school submits the pupil count returns to this team	The school submits the return to DEWI, where HR/Payroll are expected to check the information against their records.		
3.	<b>What classes of personal identifiable information do you share? (list all that apply)</b>	Personal details Education,training Family, lifestyle,social 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 Employment Education,training Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. 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.	<b>What are the lawful bases for sharing personal identifiable information (which Article 6 condition applies)?</b>	Public Task Choose an item. Choose an item.	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.
5.	<b>Please provide further details to support the Article 6 condition (if different to Section 3 Q3)</b>	Same	Same	Same		
6.	<b>Is 'special category data' shared? If so, please state what categories.</b>	Ethnic origin 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.	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. Choose an item. Choose an item. Choose an item. Choose an item.

7.	<b>What are the lawful bases for sharing special category information (which Article 9 condition applies)?</b>	Public Interest Choose an item. Choose an item.	Choose an item. 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.	<b>Please provide further details to support the Article 9 condition (if different to Section 4 Q3)</b>	Same		See link to WG information on submitting the SWAC (HR) return		
9.	<b>What type of agreement is required for this sharing?</b> **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 <sup>rd</sup> party **					
10.	<b>Is this agreement in place?</b>	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.
11.	<b>If yes, please provide details</b>					

SECTION 6: DATA SUBJECT/ DATA SOURCE	
1.	<b>Is the information you are processing relating to:</b> <b>an adult?</b> Yes <b>a child?</b> 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 <sup>rd</sup> parties.)
2.	<b>Who are your data subjects?</b> Pupils Workforce
3.	<b>Do you provide 'information society services' to children?</b> No
4.	<b>Is the data given to you by the data subject?</b> No

5.	<b>Is the data given to you by a 3<sup>rd</sup> party? (i.e. someone other than the data subject)</b> Yes (if yes please state) The staff at the school HR
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SECTION 7: 3 <sup>rd</sup> PARTY DATA PROCESSING (e.g. commissioned service)						
		Processor 1	Processor 2	Processor 3	Processor 4	Processor 5
1.	<b>Provide name of the 3<sup>rd</sup> party processor</b>	SIMS	DEWI			
2.	<b>Please state the purpose for which this 3<sup>rd</sup> party processor is used</b>	Management Information System for the school	Website used for secure uploading and downloading of data between school and RCT			
3.	<b>What classes of personal identifiable information are processed by the 3<sup>rd</sup> party processor? (list all that apply)</b>	Personal details Education,training Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Education,training Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. 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.	<b>What are the lawful bases for the 3<sup>rd</sup> party processing personal identifiable information (which Article 6 condition applies)?</b>	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.	<b>Please provide further details to support the Article 6 condition (if different to Section 3 Q3)</b>	Same	Same			

6.	<b>Is 'special category data' processed by the 3<sup>rd</sup> party processor? If so, please state what categories.</b>	Ethnic origin Health Choose an item. Choose an item. Choose an item.	Ethnic origin 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.	<b>What are the lawful bases for sharing special category information (which Article 9 condition applies)?</b>	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.	<b>Please provide further details to support the Article 9 condition (if different to Section 4 Q3)</b>	Same	Same			
9.	<b>In the case of system suppliers, does the 3<sup>rd</sup> party host the data?</b>	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.
10.	<b>If yes to Q3, is the hosted data processed outside of the EU?</b>	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.
11.	<b>Please state the country in which the hosted data is processed.</b>					
12.	<b>Do you have a contract/ agreement with this 3<sup>rd</sup> party processor?</b>	Choose an item.	N/A	Choose an item.	Choose an item.	Choose an item.
13.	<b>If so, please provide details.</b>		This is a system that Welsh Government system, which LAs and Schools are required to use			
14.	<b>Please state your data protection relationship with this 3<sup>rd</sup> party processor.</b> **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 <sup>rd</sup> 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><b><i>DPIA required? (please note this process will be addressed with the Information Management Team at a later date)</i></b></p> <p>No <i>(if yes please give details)</i></p>

SECTION 9: RETENTION	
1.	<p><b><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></b></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 <b>IRMS Toolkit for Schools</b>.</p> <p>Following the retention period expiry, information will be destroyed securely and permanently.</p>

SECTION 10: PRIVACY NOTICE	
1.	<p><b><i>Do you have a privacy notice for this function / processing activity?</i></b></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><b><i>Do you store data relating to this function/ processing activity in paper format?</i></b></p> <p>Yes</p>
2.	<p><b><i>Are these records live, historical or both?</i></b></p> <p>Choose an item.</p>
3.	<b><i>General location of paper records</i></b>
4.	<b><i>Specific location of paper records</i></b>

Commented [DK2]: To be completed at school visit

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

<b>NOTES</b>