

# Schools Data Protection Register

1. <b>PROCESS</b>	Off Site Activities and Educational Trips
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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>	<p>To aid the safe running of all off site trips and school activities. To have a record of all activities and trips including overnight stays and overseas trips.</p>
2. <b>Description of function/ processing activity</b>	<p>EVOLVE system is used to process and approve all off-site activities for pupils.</p> <p>It processes all personal data for the pupils leaving the school to attend an Educational Visit/Activity. It assists the staff running the activity/trip in ensuring it has been pre-approved by Central South Consortium (CSC) and that the appropriate risk assessments have been undertaken.</p> <p>CSC decide if the activity can go ahead if it's an overnight visit or a 'high risk' activity and will give the Educational Visit Co-ordinator authorisation to run the trip.</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]:** Does this apply to all schools?

**Commented [LS(M2)]:** Is EVOLVE used in every case?

**Commented [HN3R2]:** Evolve is the System recommended by WG so it's not guaranteed but highly advised. Check with the school.

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>	<p>Personal details      Family, lifestyle, social      Choose an item.      Choose an item. Choose an item.      Choose an item.</p>
3. <b>What is the lawful basis for processing personal identifiable information (which Article 6 condition applies)?</b>	<p>Public Task      Choose an item.      Choose an item.      Choose an item.</p>
4. <b>Lawful basis (Article 6) supporting information:</b>	Education Act 1996

**Commented [LS(M4)]:** The lawful basis to process the data for the purpose of the trip is public task. Parents may be asked to give their authorisation for a child to go on the trip but this is NOT data protection Consent.

SECTION 4: LAWFUL BASIS FOR PROCESSING 'SPECIAL CATEGORY' PERSONAL INFORMATION	
1.	<p><b><i>Do you process special categories of personal identifiable information?</i></b></p> <p>Yes</p>
2.	<p><b><i>Which special category data do you process?</i></b></p> <p>Health Choose an item. Choose an item. Choose an item. Choose an item.</p>
3.	<p><b><i>What is the lawful basis for processing special category information (which Article 9 condition applies)?</i></b></p> <p>Public Interest Choose an item. Choose an item. Choose an item.</p>
4.	<p><b><i>Lawful basis (Article 9) supporting information:</i></b></p> <p>The data is used to risk assess the activity, to ensure appropriate safeguarding, H&amp;S requirements.</p>

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>	CSC	Travel Companies e.g. Schools into Europe	Urdd	Leisure Centres and trip/visit venue staff	
2.	<b>Why do you share this information?</b>	To undertake a risk assessment and give the appropriate authorisation for the activity.	To make the necessary travel arrangements for the pupils and staff.	To make the necessary arrangements for the pupils and staff.	To ensure that the pupils needs are provided for from certificates to dietary/health issues	
3.	<b>What classes of personal identifiable information do you share? (list all that apply)</b>	Personal details Family, lifestyle,social Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Family, lifestyle,social Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Family, lifestyle,social 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.
4.	<b>What is the lawful basis for sharing personal identifiable information (which Article 6 condition applies)?</b>	Public Task Choose an item. Choose an item.	Contract Choose an item. Choose an item.	Contract Choose an item. Choose an item.	Public Task 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 that identified in Section 3 Q3)</b>	CSC needs to be able to carry out its safeguarding duties.	The school enters into a contract with them.	same	same	
6.	<b>Is 'special category data' shared? If so, please state what categories.</b>	Health Religion Choose an item. Choose an item. Choose an item.	Health Religion Choose an item. Choose an item. Choose an item.	Health Religion Choose an item. Choose an item. Choose an item.	Health Religion 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 is the lawful basis 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.	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.

**Commented [HN5]:** Not sure if this is a true share or are they just a processor? Evolve is the processor for all trips but CSC HAVE to approve overnight and high risk activities ..however the school DOES NOT directly share with CSC they still process this trip through EVOLVE.

**Commented [LS(M6):** Individuals pay for trips and membership of the Urdd. Do the schools have a contract with the Urdd?

**Commented [HN7R6]:** I am not sure a I have not have any dealings with the Urdd. We would have to ask the individual schools .

8.	<b>Please provide further details to support the Article 9 condition (if different to that identified in Section 4 Q3)</b>	CSC needs to be able to carry out its safeguarding duties.	Information required to ensure appropriate H&S, safeguarding requirements are met.	Information required to ensure appropriate H&S, safeguarding requirements are met.	same	
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 **	Not known	Not Known	Not Known		
10.	<b>Is this agreement in place?</b>	Choose an item.	Yes	Choose an item.	Choose an item.	Choose an item.
11.	<b>If yes, please provide details</b>	Not known	As and when required. Not for every trip just ones leaving the country.			

SECTION 5 <b>CONTINUED: RECIPIENTS OF DATA / DATA SHARING-THIS SECTION CAN BE DELETED IF THERE ARE 5 SHARES OR LESS</b>						
		Share 6	Share 7	Share 8	Share 9	Share 10
1.	<b>Recipients of data/ data sharing (i.e. name of organisation)</b>					
2.	<b>Why do you share this information?</b>					

3.	<b>What classes of personal identifiable information do you share? (list all that apply)</b>	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. 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 is the lawful basis for sharing personal identifiable information (which Article 6 condition applies)?</b>	Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.	Choose an item. 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 that identified in Section 3 Q3)</b>					
6.	<b>Is 'special category data' shared? If so, please state what categories.</b>	Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item.	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 is the lawful basis for sharing special category information (which Article 9 condition applies)?</b>	Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.	Choose an item. 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 that identified in Section 4 Q3)</b>					
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.	<i>If yes, please provide details</i>					
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SECTION 6: DATA SUBJECT/ DATA SOURCE	
1.	<p><b><i>Is the information you are processing relating to: an adult? Yes a child? Yes</i></b> (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.)</p>
2.	<p><b><i>Who are your data subjects?</i></b></p> <p>Staff taking the pupils 'off-site' Pupils going 'off-site' Volunteers</p>
3.	<p><b><i>Do you provide 'information society services' to children?</i></b></p> <p>N/A</p>
4.	<p><b><i>Is the data given to you by the data subject?</i></b></p> <p>Yes</p>
5.	<p><b><i>Is the data given to you by a 3<sup>rd</sup> party? (i.e. someone other than the data subject)</i></b></p> <p>Yes <b><i>(if yes please state)</i></b></p> <p>Parents/ carers for any health/ medical information etc RCT Finance department to notify the school of trip payments made through the Civica website</p>

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>	EVOLVE				
2.	<b>Please state the purpose for which this 3<sup>rd</sup> party processor is used</b>	Software used to process all details pertaining to an 'off-site' trip/activity.				
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 Family, lifestyle,social Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. 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 is the lawful basis 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.	Choose an item. Choose an item. Choose an item.	Choose an item. 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>					
6.	<b>Is 'special category data' processed by the 3<sup>rd</sup> party processor? If so, please state what categories.</b>	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. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.
7.	<b>What is the lawful basis 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.	Choose an item. 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>	Risk assessments uploaded				
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 Q9, 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 in which country the data is hosted.</b>					
12.	<b>Do you have a contract/ agreement with this 3rd party processor?</b>	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.
13.	<b>If so, please provide details.</b>					
14.	<b>Please state your data protection relationship with this 3<sup>rd</sup> party processor.</b> <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 **</b>	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.

**Commented [HN8]:** Evolve consider themselves a data controller AND a data processor??



SECTION 8: DATA PROTECTION IMPACT ASSESSMENT (DPIA)	
1.	<p><b>DPIA required?</b> (please note this process will be addressed with the Information Management Team at a later date)</p> <p>N/A (if yes please give details)</p>

SECTION 9: RETENTION	
1.	<p><b>Do you have a retention schedule in place that specifies how long the data in relation to this function/ processing activity is retained for?</b> 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>Do you have a privacy notice for this function / processing activity?</b> 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>Do you store data relating to this function/ processing activity in paper format?</b></p> <p>Choose an item.</p>
2.	<p><b>Are these records live, historical or both?</b></p> <p>Choose an item.</p>

3.	<b>General location of paper records</b>
4.	<b>Specific location of paper records</b>
5.	<b>Are any of the paper files taken off site?</b>  Yes
6.	<p><b>If so please give details:</b></p> <p>When a trip goes out the teachers may take the consent forms with them. If the trip involves an overnight stay then a full pack containing pupils:</p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• DOB</li> <li>• SEN</li> <li>• Parents contact details</li> <li>• Next of kin</li> <li>• Dietary requirements including allergies</li> <li>• Medical information</li> <li>• Photographs of each pupil (in case they get lost)</li> <li>• Staff member's names and contact details</li> </ul> <p>Maybe taken off site</p> <p>Or the school may have a key contact back at school who will have access to all of this information.</p>

**Commented [LS(M9)]:** Does this happen in each school? Amend as relevant.

**Commented [HN10R9]:** I have amended as this was the DPR for Garth Olwg's Trips

## NOTES

Key legislation in relation to school trips is 'The Health & Safety at Work etc. Act 1974. The Act requires employers to ensure the Health & Safety of their employees and non-employees, so far as is reasonably practicable. The Act also places duties on individuals to take care for the Health & Safety of themselves and others.

The Act is supplemented by regulations which make the general requirements more explicit.

Key regulations include:

- the Management of Health and Safety Regulations 1999, which require employers to undertake risk assessments and put measures in place to control the significant risks;
- the Adventure Activities Licensing Regulations 2004, which require certain providers of facilities for adventure activities to be licensed.

Who enforces legislation for school trips?

Some educational visits in Great Britain will be to premises licensed under the Adventure Activities Licensing Regulations 2004. In broad terms, HSE is the enforcing authority for sites run by educational providers, including all centres run by local authorities (LAs). Many LAs have their own centres, although these may be some distance from the LA itself. LAs will be the enforcing authority for the remaining providers, including commercial providers such as multi-activity holiday centres.