

# Schools Data Protection Register

1.	<b>PROCESS</b>	School Governance
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SECTION 1: SCHOOL DETAILS		
1.	<b>School Name</b>	Parc Lewis Primary School
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>  <i>Appointment of Governors, budget setting, school based complaints and termly school reports</i>
2.	<b>Description of function/ processing activity</b>  The appointment of School Governors and maintenance of the School Governors list  The setting, processing, reconciling and monitoring of school budgets by central staff to support schools in budgetary issues.  To assist with a school based complaint or disciplinary that has been made against the school.  The preparation and distribution of school's termly reports.  Administration of Governors' Committees.
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

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 Choose an item.	Education,training Choose an item.	Employment Financial
3.	<b>What is the lawful basis for processing personal identifiable information (which Article 6 condition applies)?</b>		
	Legal obligation	Public Task	Choose an item. Choose an item.
4.	<b>Lawful basis (Article 6) supporting information:</b> The Government of Maintained Schools (Wales) Regulations 2005 The Government of Maintained Schools (Change of Category) (Wales) Regulations 2015 Education Act 2002 (setting the school budget) Schools Standards and Framework Act 1998 (supporting the school)		

	"Complaints procedures for school governing bodies in Wales – Guidance 011/2012" Welsh Government
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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> Politics      Race      Religion      Trade Union      Health      Sexual orientation (complaint detail could contain all/any of the above)
<b>3.</b>	<b><i>What is the lawful basis 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 basis (Article 9) supporting information:</i></b> See S3Q4

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>	Governor Support LA / independent governance provider	Governor Support LA / independent governance provider	Governor Support LA / independent governance provider	Governor Support LA / independent governance provider	Parents/guardians
2.	<b>Why do you share this information?</b>	School Governor appointment and updating of Governor list	To facilitate the process of setting, processing, reconciling and monitoring of school budgets	To obtain advice on and facilitate the school complaints procedure	Headteachers report to governors sent to GS then through to Governors termly meeting	To facilitate the Parent Governor appointment process
3.	<b>What classes of personal identifiable information do you share? (list all that apply)</b>	Personal details Education,training Employment Choose an item. Choose an item. Choose an item.	Personal details Financial Employment Choose an item. Choose an item.	Personal details Education,training Employment Family, lifestyle,social Other (please note) (as complaint can compromise of anything submitted)	Personal details Education,training Employment 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>	Legal obligation Public Task Choose an item.	Legal obligation Public Task Choose an item.	Legal obligation Public Task 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>	Same as  S3Q3	Same as S3Q3	Same as S3Q3		
6.	<b>Is 'special category data' shared? If so, please state what categories.</b>	Politics Choose an item. Choose an item. Choose an item. Choose an item.	N/A	Race Ethnic origin Religion Genetics 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.

**Commented [CP1]:** Classify if LA GOV Support or independent or both

				Sexual orientation (complaint detail could contain all/any of the above)		
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.	N/A	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 that identified in Section 4 Q3)</b>	S4Q3	N/A	S4Q3		
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 **		One way – Data sharing agreement			
10.	<b>Is this agreement in place?</b>	Choose an item.	No	Choose an item.	Choose an item.	Choose an item.
11.	<b>If yes, please provide details</b>					

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.	<b>Recipients of data/ data sharing (i.e. name of organisation)</b>	Governors				

2.	<b>Why do you share this information?</b>	To facilitate the various committee meetings and termly school reports				
3.	<b>What classes of personal identifiable information do you share? (list all that apply)</b>	Personal details Education, training Employment Family, lifestyle, social Other (please note) (as complaint can compromise of anything submitted)	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. 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.	Choose an item. Choose an item. Choose an item.	Choose an item. 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>	Same				
6.	<b>Is 'special category data' shared? If so, please state what categories.</b>	Race Ethnic origin Religion Genetics Health Sexual orientation (complaint detail could contain all/any of the 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.
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 that identified in Section 4 Q3)</b>	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 **					
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> School governors, school staff, parents/carer and pupils

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> Yes
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) Depending on the complaint information may be supplied by a 3 <sup>rd</sup> party

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>	Selima / Vision	Civica Financials			
2.	<b>Please state the purpose for which this 3<sup>rd</sup> party processor is used</b>	Employee records and payroll for budget setting	Employee records and payroll for budget setting			
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 Employment 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.
4.	<b>What is the lawful basis for the 3<sup>rd</sup> party processing personal identifiable information (which Article 6 condition applies)?</b>	Legal obligation Public Task Choose an item.	Legal obligation 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.
5.	<b>Please provide further details to support the Article 6 condition (if different to Section 3 Q3)</b>	S3Q3	S3Q3			

6.	<b>Is 'special category data' processed by the 3<sup>rd</sup> party processor? 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 Section 4 Q3)</b>					
9.	<b>In the case of system suppliers, does the 3<sup>rd</sup> party host the data?</b>	No	No	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>	N/A	N/A	Choose an item.	Choose an item.	Choose an item.
11.	<b>Please state in which country the data is hosted.</b>	N/A	N/A			
12.	<b>Do you have a contract/ agreement with this 3<sup>rd</sup> party processor?</b>	Yes	Yes	Choose an item.	Choose an item.	Choose an item.
13.	<b>If so, please provide details.</b>	N/A	N/A			
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 **	DC = DP (inside EU)	DC = DP (inside EU)	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>  Yes <i>(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 <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>  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>Choose an item.</p>
2.	<p><b><i>Are these records live, historical or both?</i></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>  Choose an item.
6.	<b>If so please give details:</b>

<b>NOTES</b>