

Schools Data Protection Register

1.	PROCESS	Health & Safety
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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.	<p>Reason for processing activity</p> <p>Recording/reporting to HSE personal information in compliance with Health and Safety requirements.</p>
2.	<p>Description of function/ processing activity</p> <p>Records are retained and information processed to demonstrate compliance with Health & Safety requirements:</p> <ul style="list-style-type: none"> • non-fatal accidents in respect of non-workers (e.g. members of the public) to the HSE • maintain a record off occupational diseases • work related accidents; to record, but not report, a worker that has been incapacitated for more than 3 consecutive days in an accident book • to record and report on accidents, where an employee is unable to perform their normal work duties for more than 7 consecutive days • to ensure the safety of staff, pupils and visitors while on site • for all personnel to be accounted for should there be an emergency situation <p>Records will be kept pertaining to, for example:</p> <ul style="list-style-type: none"> • Visitor signing in book/IPad visitor log • School trip forms/Evolve • Swimming forms • Emergency contact forms – Staff/Pupils/Volunteers/Visitors etc. • Accident logs • Work related accidents/incidents
3.	<p>Is data processed fully by automated means?</p> <p>No</p>
4.	<p>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?</p> <p>N/A</p>

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	Employment	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 Legal obligation Choose an item. Choose an item.
4.	Lawful basis (Article 6) supporting information: In line with Health and Safety Executive guidance for schools. https://www.gov.uk/government/publications/health-and-safety-advice-for-schools/responsibilities-and-duties-for-schools The Health and Safety at Work etc. Act 1974 determines British health and safety law. The Health and Safety Executive (HSE), with local authorities, enforce this Act. The Management of Health and Safety at Work Regulations 1999 supports the Act. Social Security (Claims & Payments) Regulations 1979. Visitors books are used in accordance with the Council's WorkWell HS 15 Visitors in the Workplace Policy.

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 Choose an item. Choose an item. Choose an item. Choose an item. 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.
4.	Lawful basis (Article 9) supporting information: Please refer to Section 3 above.

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)	School trip organisers / companies	Leisure centres / swimming instructors	HSE (Health & Safety Executive)	RCT	
2.	Why do you share this information?	To ensure that providers are aware of the pupils and staff attending, including any health / medical issues that they should be aware of.	To ensure that the instructor is aware of the pupils attending swimming lessons, including any health / medical issues that they should be aware of.	The HSE is the enforcement body for health & safety in schools. This means that its inspectors are entitled to offer schools information and advice , warn them that they are failing to comply with the law, serve prohibition or improvement notices and prosecute.	Is any data shared with RCT Corporate Estates and Insurance regarding health and safety?	
3.	What classes of personal identifiable information do you share? (list all that apply)	Personal details Choose an item. 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.	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.	Public Task Legal obligation 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)	N/A	N/A			

6.	Is 'special category data' shared? If so, please state what categories.	Health Choose an item. Choose an item. Choose an item. Choose an item.	Health Choose an item. Choose an item. Choose an item. Choose an item.	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.
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.	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.	Please provide further details to support the Article 9 condition (if different to that identified in Section 4 Q3)	N/A	N/A			
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 **			Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)		
10.	Is this agreement in place?	Choose an item.	Choose an item.	Yes	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.
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.	<i>Is this agreement in place?</i>	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.
11.	<i>If yes, please provide details</i>					

SECTION 6: DATA SUBJECT/ DATA SOURCE	
1.	<i>Is the information you are processing relating to: an adult? Yes a child? Yes</i> (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 Staff Members of the public
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> <i>Yes (if yes please state)</i> e.g. witnesses, LA Health & Safety staff etc

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>	3rd party applications e.g.				

		Halo for signing in etc ?????				
2.	Please state the purpose for which this 3rd party processor is used					
3.	What classes of personal identifiable information are processed by the 3rd party processor? (list all that apply)	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. 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.	Choose an item. Choose an item. Choose an item.	Choose an item. 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)					
6.	Is 'special category data' processed by the 3rd party processor? If so, please state what categories.	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.
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)					
9.	In the case of system suppliers, does the 3rd party host the data?	Yes	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.	If so, please provide details.					
14.	Please state your data protection relationship with this 3rd party processor. **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 **	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?</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>

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>Both</p>
3.	<p>General location of paper records</p> <p>The head teachers office</p>
4.	<p>Specific location of paper records</p> <p>The Office</p>

Commented [LS(M1)]: To be completed during visit

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

NOTES

Retention – Refer to ISSUU Toolkit for Schools for further information this is just a basic overview:

- Visitor management systems (including electronic systems, visitor's books and signing-in sheets) – Last entry in the visitor's book + 6 years – then secure disposal.
- H&S Policy Statements – Life of Policy + 3 years
- H&S Risk assessments – Life of Risk assessment + 3 years
- Accident Reporting records relating to individuals who are over 18 years of age at the time of the incident – The accident book BI 510 – 3 years after last entry (further information regarding this in ISSUU Toolkit)
- Accident reporting records relating to individuals who are under the age of 18 at the time of the incident – The accident book – BI 510 - 3 years after last entry
- RIDDOR Records – Date of incident + 3 years
- Control of substances Hazardous to Health (COSHH) – Date of incident + 40 years
- Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos – Last action + 40 years
- Process of monitoring of areas where employees and persons are likely to have come into contact with radiation. Maintenance records or controls, safety features and PPE – 2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination – Further details can be found ISSUU Toolkit for Schools.
- Fire Precautions Log – Current + 3 years
- H&S file to show current state of building, including all alterations to be passed on in case of change of ownership- Pass to new owner on sale or transfer.