

Schools Data Protection Register

SECTION 1: SCHOOL DETAILS	
1. School Name	Llanharan Primary School
2. School Category	Primary School
3. Information Asset Owner (IAO)	Bethan Price Headteacher
4. School Data Protection Lead	Bethan Price 01443237831 Bethan.m.price@rctcbc.gov.uk

SECTION 2: FUNCTIONS/ PROCESSING ACTIVITIES	
1. Reason for processing activity	Processing personal information in relation to school Finance processes, e.g. sales of school uniform, school uniform grants, etc.
2. Description of function/ processing activity	<p>Personal information for some suppliers (e.g. sole traders) and individuals hiring premises is recorded by the school. This information is used to issue purchase orders or sales invoices.</p> <p>Data is also processed in order to receipt payments from parents/carers for exam entries, extra-curricular activities, etc., as well as payments from individuals who hire school premises.</p>
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)	Personal details Financial 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)?	Contract Public Task Choose an item. Choose an item.
4. Lawful basis (Article 6) supporting information:	In line with Rhondda Cynon Taf financial regulations: <ul style="list-style-type: none"> Financial Procedure Rules Scheme for Financing Schools

SECTION 4: LAWFUL BASIS FOR PROCESSING 'SPECIAL CATEGORY' PERSONAL INFORMATION	
1. Do you process special categories of personal identifiable information?	No
2. Which special category data do you process?	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.
3. What is the lawful basis for processing special category information (which Article 9 condition applies)?	Choose an item. Choose an item. Choose an item. Choose an item.

4. Lawful basis (Article 9) supporting information:

SECTION 5: RECIPIENTS OF DATA / DATA SHARING						
		Share 1	Share 2	Share 3	Share 4	Share 5
1.	<i>Recipients of data/ data sharing (i.e. name of organisation)</i>	Local Authority	RCT Audit			
2.	<i>Why do you share this information?</i>	To allow the LA Finance Department to generate payments to suppliers and record income for the school.	When auditing the school income / expenditure.			
3.	<i>What classes of personal identifiable information do you share? (list all that apply)</i>	Personal details Financial Choose an item. 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.
4.	<i>What is the lawful basis for sharing personal identifiable information (which Article 6 condition applies)?</i>	Public Task Choose an item. Choose an item.	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.
5.	<i>Please provide further details to support the Article 6 condition (if different to that identified in Section 3 Q3)</i>					
6.	<i>Is 'special category data' shared? If so, please state what categories.</i>	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.		Choose an item. Choose an item. 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.	<i>What is the lawful basis for sharing special category information (which Article 9 condition applies)?</i>	Choose an item. Choose an item. Choose an item.	Choose an item. 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.	<i>Please provide further details to support the Article 9 condition (if</i>					

SECTION 7: 3rd PARTY DATA PROCESSING (e.g. commissioned service)						
		Processor 1	Processor 2	Processor 3	Processor 4	Processor 5
1.	Provide name of the 3rd party processor	Civica Financials	SIMS FMS	Other - barclaycard		
2.	Please state the purpose for which this 3rd party processor is used	Processing payments to/from suppliers and from individuals hiring school premises.	Processing payments to/from suppliers and from individuals hiring school premises.	Processing payments to/from suppliers		
3.	What classes of personal identifiable information are processed by the 3rd party processor? (list all that apply)	Personal details Financial Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Financial Choose an item. 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.
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.	Public Task Contract 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.
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.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. 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	Choose an item. Choose an item.	Choose an item. Choose an item.	Choose an item. Choose an item.	Choose an item. Choose an item.	Choose an item. Choose an item.

	information (which Article 9 condition applies)?	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	No	No	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	Yes	Yes	Choose an item.	Choose an item.
13.	If so, please provide details.	Via Local Authority	Via Local Authority SIMS SLA	Via local authority		
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 3 rd party **	DC = DP (inside EU)	DC = DP (inside EU)	DC = DP (inside EU)	Choose an item.	Choose an item.

SECTION 8: DATA PROTECTION IMPACT ASSESSMENT (DPIA)	
1.	<i>DPIA required? (please note this process will be addressed with the Information Management Team at a later date)</i> No <i>(if yes please give details)</i>

SECTION 9: RETENTION	
1.	<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> Yes <i>(if yes please give details)</i> We hold personal data in line with the guidance set out in the Retention Schedule, contained within the IRMS Toolkit for Schools . Following the retention period expiry, information will be destroyed securely and permanently.

SECTION 10: PRIVACY NOTICE	
1.	<i>Do you have a privacy notice for this function / processing activity?</i> Yes General Privacy Notice in place. Specific Privacy Notice to be developed.

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.	<i>Do you store data relating to this function/ processing activity in paper format?</i> Yes
2.	<i>Are these records live, historical or both?</i> Both
3.	<i>General location of paper records</i> Finance cupboard/office computer

4.	Specific location of paper records Finance cupboard/office computer/ office desk
5.	Are any of the paper files taken off site? No
6.	If so please give details:

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