

GDPR

Records of Processing Activity

This document is intended to represent how the school meets its responsibilities to maintain Records of Processing Activities under Article 30 of the General Data Protection Regulations (GDPR).

Contact Details

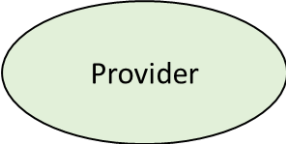
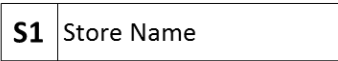
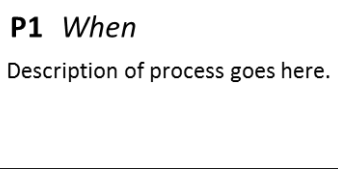
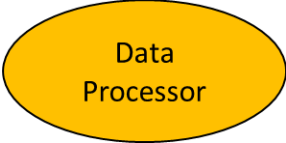

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TABLE OF CONTENTS

Key to Flowcharts.....	1
Business Areas	2
Governors.....	2
Workforce	3
Nursery Waiting List & Admissions	4
Pupils.....	5
Providers	6
Stores	9
Data Processors.....	11
Recipients.....	12
Data Breach/Concern Record	15

KEY TO FLOWCHARTS

The flowcharts which accompany this document use a standard convention; this is outlined below:

Providers		These are external sources of personal data for the school.
Stores		These are where personal data is stored within the school. They are numbered, with "S" simply representing "Store".
Processes		These are processes within the school where personal data is manipulated. They are numbered within each flowchart; the "P" simply represents "Process"
Data Processors		These are other organisations who process personal data on behalf of the school. The school remains responsible for directing how the personal data is used.
Recipients		These are external organisations who the school sends personal data to.

BUSINESS AREAS

Governors

Ref.	Description	Risk	Risk Mitigation	Consistent with Lawful Basis for Processing & outlined on Privacy Notice?
P1	Details recorded on DfE's Get Information About Schools (GIAS) website.	L	Only basic details are collected, as required by legislation. Only mandated information will be made publicly available by the DfE, other data will be stored securely.	Yes
P2	Record details on management information system and School Central Record (SCR).	M	Only basic details are collected and stored securely.	Yes
P3	Annually update Register of Business & Financial Interests, file in school and publish on school website.	L	Only minimal data is collected and this is required to be published on the website.	Yes
P4	Details removed from SCR and MIS.	L	This is part of the leaver's process within school.	Yes
P5	Details removed from School Website and other documents securely destroyed.	L	This is part of the leaver's process within school.	Yes

Risk: L=Low; M=Medium; H=High

Workforce

Ref.	Description	Risk	Risk Mitigation	Consistent with Lawful Basis for Processing & outlined on Privacy Notice?
P1	Completed application form received and securely stored.	M	Personal information provided by candidates as part of the recruitment process. Application forms will be kept securely.	Yes
P2	Copies of application form made for panel members and stored securely prior to interview.	M	Personal information provided by candidates will remain anonymous and applications only made available to the selection panel. Safer recruitment procedures will be followed. Copies of the application forms, interview notes and unsuccessful applications will be destroyed after 6 months.	Yes
P3	Personnel file created and stored securely.	M	Sensitive and personal information relating to staff members will be held in personal files stored securely.	Yes
P4	Personnel details added to MIS.	L	Stored securely on MIS.	Yes
P5	Personnel details sent to HR for payroll purposed.	M	Cryptshare email used.	Yes
P6	Information provided to IT support and secure websites – email set up and usernames for secure websites such as CPOMS.	M	IT user account deleted upon leaving. Secure websites used.	Yes
P7	Performance management of staff.	L	Performance management documents held on server. Line Manager access.	Yes
P8	School Workforce Census completed and submitted to the DfE's COLLECT website via the LA.	L	Secure website and completed by Senior Admin.	Yes
P9	Leaver form to WMDC Payroll Team.	M	Cryptshare email used.	Yes
P10	Staff added to SCR.	L	Secure website. Delete from SCR upon leaving +1 year.	Yes
P11	Staff leaving. Information held on MIS.	L	Securely destroy all remain personnel documents and delete from MIS +75 years.	Yes

Risk: L=Low; M=Medium; H=High

Nursery Waiting List & Admissions

Ref.	Description	Risk	Risk Mitigation	Consistent with Lawful Basis for Processing & outlined on Privacy Notice?
P1	Completed application form received and securely stored.	M	Personal information provided by parents during the admission procedure. Application forms will be kept securely. Nursery application form securely destroyed once pupil reaches Reception age.	Yes
P2	Record details on management information system. This includes children on the waiting list.	L	Pupil deleted from MIS where application is withdrawn or children reach Reception age and do not attend our school.	Yes
P3	Information from the application forms processed during the admissions procedure and places allocated.	M	Application forms will be kept securely. Where children are not allocated a place, application forms are still kept securely until children reach Reception age or the application is withdrawn.	Yes

Risk: L=Low; M=Medium; H=High

Pupils

Ref.	Description	Risk	Risk Mitigation	Consistent with Lawful Basis for Processing & outlined on Privacy Notice?
P1	Place agreed and data added to management information system (MIS).	M	Pupil deleted from MIS when they turn 30.	Yes
P2	Basic pupil details passed to IT provider to provision network account.	L	Pupil deleted from web based platforms and computer network upon leaving.	Yes
P3	Termly - Statutory School Census completed and submitted to COLLECT via the LA.	L	Secure website.	Yes
P4	Annually - Statutory submission of EYFSP, phonics and KS1 results to the LA	L	Headteacher submits via secure website.	Yes
P5	Annually - Statutory submission of KS2 teacher assessments.	L	Headteacher submits via secure website.	Yes
P6	Provision of basic pupil details to NHS.	M	Cryptshare email.	Yes
P7	Basic details added to Teachers 2 Parents.	L	Secure website.	Yes
P8	Provision of basic information to web based platforms / resources.	L	Secure website.	Yes
P9	Upon leaving - Provision of basic information to web based platforms / resources.	L	User accounts deleted from the websites.	Yes
P10	Upon leaving - Safeguarding files transferred if held.	M	Transferred via CPOMS or by hand delivery.	Yes

Risk: L=Low; M=Medium; H=High

PROVIDERS

Name	What personal data is transferred?	Any Sensitive Data?	Purpose and Lawful Basis for Processing	How is the data transferred?	Is this detailed in a Privacy Notice?
Appointee / Candidates	Information held from the recruitment process. See flow chart.	Yes	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.	HR Encrypted / MIS	Yes
Governor	<p>“For all maintained school governors, and academy trustees, members and local governors, the data we will collect in Edubase and make publicly available is:</p> <ul style="list-style-type: none"> •full name (including title) •appointing body (eg board, foundation, parents etc) •date of appointment •date term of office ends / ended if in last year •for maintained schools whether they are the chair of governors or a member of the governing body, and for academies whether they are a trust member, a trustee, the chair of trustees, or a local governor on a local governing body <p>In addition, for all these individuals we will collect within Edubase, but not publish, a range of information to help us to identify specific individuals:</p> <ul style="list-style-type: none"> •postcode •date of birth 	No	Section 538 of the Education Act 1996: http://www.legislation.gov.uk/ukpga/1996/56/section/538	Secure Website	Yes

Name	What personal data is transferred?	Any Sensitive Data?	Purpose and Lawful Basis for Processing	How is the data transferred?	Is this detailed in a Privacy Notice?
	<ul style="list-style-type: none"> •previous names •nationality •direct email address for chair” <p>Information is also collected annually for the Register of Financial and Business Interests</p>				
Parent	All personal data relating to children attending our school in addition to parental contacts and other emergency contacts held on the schools MIS.	Yes	Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.	Secure Website	Yes
Previous School	<p>Maintained schools are required to send a Common Transfer File (CTF). The content of a CTF is defined by the DfE:</p> <p>CPOMS file transfers may also be undertaken to safeguard children.</p>	https://www.gov.uk/government/collections/common-transfer-file	<p>Education (Pupil Information) (England) Regulations 2005 Statutory Instrument (S.I.):</p> <p>http://www.legislation.gov.uk/uksi/2005/1437/introduction/made</p> <p>And subsequent amendments in The Education (Pupil Information) (England) (Amendment) 2008:</p> <p>http://www.legislation.gov.uk/uksi/2008/1747/contents/made</p>	Secure Website	Yes
WMDC Admissions Team	All personal data relating to children attending our school.	Yes	<p>Legal requirement for children to attend school.</p> <p>https://www.ackworthhowardschool.co.uk/parents/admission-information</p>	Secure Website	Yes
WMDC Governor Services	As per “Governor” entry.	No	The data subject has given consent to the processing of his or her personal data for one or more specific purposes. In this	Secure Website / Encrypted email etc.	Yes

Name	What personal data is transferred?	Any Sensitive Data?	Purpose and Lawful Basis for Processing	How is the data transferred?	Is this detailed in a Privacy Notice?
			instance it is because they wish to become a school governor.		

STORES

Ref	Name	Holds data on	Location	Risk	Risk Mitigation	Retention Period and Reasoning	Deletion
S1	Central Records	Governors Workforce	Locked cabinet in School Business Managers Office	M	Access is restricted to HT and SBM only. Only authorised people (eg Ofsted inspectors etc) will be allowed supervised access.	Retained during employee's time at school. Record is deleted on leaving. https://www.gov.uk/government/publications/keeping-children-safe-in-education--2	Deleted from systems
S2	Register of Business Interests	Governors	Located in School Business Managers Office	L	Office is locked with limited access to the keys. Data is required to be published on the school's website.	Records are destroyed upon a governor leaving post.	Securely shredded
S3	Secure Temporary Storage	Job applicants	Locked cupboard in HT's office	L	Cupboard is locked with limited access to the keys.	Retained for 12 months as per WMDC Family Services retention guidelines: http://www.wakefield.gov.uk/Documents/schools-children/childcare/family-services-retention-schedule.pdf	Securely shredded
S4	Staff Personnel Files	Workforce	Locked cabinet in School Business Managers Office	M	Access is restricted to HT and SBM only. Only authorised people (eg Ofsted inspectors etc) will be allowed supervised access.	Date of leaving + 6 years Limitation Act 1980 (Section 2): https://www.legislation.gov.uk/ukpga/1980/58/section/2	Securely shredded
S5	Secure Storage	Nursery applicants	Locked cupboard in school office	L	Cupboard is locked with limited access to the keys.	Records are destroyed either when a pupil reaches reception age but hasn't accepted a nursery place. If they have accepted a place then their nursery application is added to their pupil file.	Securely shredded
S6	Pupil Files	Pupils	Locked cupboard in school office	M	Cupboard is locked with limited access to the keys.	Transferred to new school when pupil leaves.	n/a

Ref	Name	Holds data on	Location	Risk	Risk Mitigation	Retention Period and Reasoning	Deletion
S8	Admission Register	Pupils	School MIS	M	This is a frequently used document so must be readily accessible. Only a minimum of information is recorded in this document.	See flow chart.	Deleted from MIS when pupils reach 30 years of age.

Risk: L=Low; M=Medium; H=High

DATA PROCESSORS

Name	Description	GDPR Compliance Details	Is data transferred outside the EU/EEA?	Is this detailed in a Privacy Notice?
MIS	The school's current management information system (MIS) is called Integris G2 and is provided by RM.	http://www.rmplc.com/gdpr/rm-education/rm-integris	No	Yes
Eduspot	The school's communication tool. School money and communication services with parents.	https://eduspot.co.uk/gdpr-statement/	No	Yes
School Website	The school's website is hosted by Easable. Content is uploaded by the Headteacher and other designated staff. The only personal data shared is to facilitate user accounts.	https://www.easable.net/privacy-policy	No	Yes
Insight Tracker	The school uses Insight to record and track pupils' performance.	https://kb.insighttracking.com/article/H6LyNyYaP5-gdpr-compliance	No	Yes
itsLearning VLE	The school uses the itsLearning Virtual Learning Environment (VLE).	https://itslearning.com/uk/gdpr/	No	Yes
3plearning	The school uses resources that are part of the 3plearning platform such as Mathletics.	http://www.3plearning.com/privacy/	No	Yes
EdShed	The school uses resources that are part of the platform such as Spelling Shed.	https://www.edshed.com/en-ie/privacy	No	Yes
Times Tables RockStars	Resource accessed by teachers and pupils.	https://trockstars.com/page/gdpr	No	Yes
Scratch	Computing tool for coding.	https://scratch.mit.edu/info/faq Children are not using their full name (or other identifying information) on the Scratch website.	No	Yes
CPOMS	The school's Safeguarding recording system.	https://www.cpoms.co.uk/privacy-statement/	No	Yes
Trackit Lights	The school's behaviour system.	https://trackitlights.com/privacy/	No	Yes
Tapestry	Early Years assessment tool. Recording of observations.	https://tapestry.info/security.html	No	Yes

RECIPIENTS

Name	What personal data is transferred?	What is the basis for the transfer?	How is the data transferred?	Is this detailed in a Privacy Notice?
COLLECT Website	<p>For the <u>School Workforce Census</u>: https://www.gov.uk/education/school-workforce-censuses</p> <p>For the <u>School Census</u>: https://www.gov.uk/education/school-censuses-and-slasc</p>	<p>Sections 113 and 114 of the Education Act 2005: https://www.legislation.gov.uk/ukpga/2005/18/section/113 https://www.legislation.gov.uk/ukpga/2005/18/section/114</p> <p>Section 537A of the Education Act 1996: http://www.legislation.gov.uk/ukpga/1996/56/section/537A</p>	Secure Website	Yes
Get Information About Schools (GIAS) Website	<p>“For all maintained school governors, and academy trustees, members and local governors, the data we will collect in Edubase and make publicly available is:</p> <ul style="list-style-type: none"> •full name (including title) •appointing body (eg board, foundation, parents etc) •date of appointment •date term of office ends / ended if in last year •for maintained schools whether they are the chair of governors or a member of the governing body, and for academies whether they are a trust member, a trustee, the chair of trustees, or a local governor on a local governing body <p>In addition, for all these individuals we will collect within Edubase, but not publish, a range of information to help us to identify specific individuals:</p> <ul style="list-style-type: none"> •postcode 	<p>Section 538 of the Education Act 1996: http://www.legislation.gov.uk/ukpga/1996/56/section/538</p>	Secure Website	Yes

Name	What personal data is transferred?	What is the basis for the transfer?	How is the data transferred?	Is this detailed in a Privacy Notice?
	<ul style="list-style-type: none"> •date of birth •previous names •nationality •direct email address for chair” 			
IT Provider	Mint Support	<p>Public task: the processing is necessary for the school to perform a task in the public interest or for an official functions, and the task or function has a clear basis in law.</p> <p>In this case it is instrumental to the education of the child.</p>	By hand	Yes
Primary Assessment Gateway Website	https://www.gov.uk/guidance/using-the-primary-assessment-gateway	<p>“The following legislation underpins the provision and publication of this information:</p> <ul style="list-style-type: none"> • the Education Act 1996 s29(3) • the Education (School Performance Information)(England) Regulations 2007 • regulations 5 and 8 School Information (England) Regulations 2008” 	Secure Website	Yes
New School	<p>Maintained schools are required to send a Common Transfer File (CTF). The content of a CTF is defined by the DfE:</p> <p>https://www.gov.uk/government/collections/common-transfer-file</p> <p>CPOMS transfer.</p>	<p>Education (Pupil Information) (England) Regulations 2005 Statutory Instrument (S.I.):</p> <p>http://www.legislation.gov.uk/uksi/2005/1437/introduction/made</p> <p>And subsequent amendments in The Education (Pupil Information) (England) (Amendment) 2008:</p>	Secure Website	Yes

Name	What personal data is transferred?	What is the basis for the transfer?	How is the data transferred?	Is this detailed in a Privacy Notice?
		http://www.legislation.gov.uk/ukxi/2008/1747/contents/made		
NHS				Yes
Potential Employer	Information held within a reference.	Requirement.	By post/email	Yes
WMDC Admissions Team	Parents and pupil's personal information.	Legal requirement.	Secure Website	Yes
WMDC Data Team	For <u>EYFSP</u> : https://www.gov.uk/childcare-parenting/early-years-foundation-stage-profile-return For <u>KS1 & Phonics</u> : https://www.gov.uk/education/key-stage-1-and-2-assessments-data-collection	"The return of data to the department and its subsequent publication is underpinned by the following legislation: • the Education Act 1996 s29(3) • the Education (School Performance Information)(England) Regulations 2007 • regulations 5 and 8 School Information (England) Regulations 2008"	Secure Website	Yes
WMDC Disclosure and Barring Service (DBS) Team	Personal information of staff members.	To ensure the safeguarding of the school community.	Cryptshare Email	Yes
WMDC Payroll Team	Personal information of staff members.	To ensure employees are paid.	Cryptshare Email	Yes

DATA BREACH/CONCERN RECORD

Date	What has happened?	What is the impact?	Risk	Steps Taken
7/9/18	The school was broken into. 2 laptops and a memory stick were taken.	<p>Limited as a result of effective security processes:</p> <ul style="list-style-type: none"> • Encrypted laptops. • Password protected log ins. • No local data storage. • Server storage. <p>As the memory stick did not have any sensitive data stored, this is deemed low risk.</p> <p>No legal obligation to inform citizens affected by data breach as low risk.</p>	Low	<ul style="list-style-type: none"> • Police contacted. • Information commissioner informed and advice sought. • Staff reminded about memory stick use and leaving teacher laptops in line of sight.
30/1/20	<p>An email has been sent in error with a completed reference attached.</p> <p>The recipient contacted school to inform us and deleted the email.</p> <p>Only name and telephone number of the referee where visible.</p>	No impact as the email was deleted upon arrival.	Low	<ul style="list-style-type: none"> • Advice from the ICO: <ul style="list-style-type: none"> ○ Internal record of the breach as detailed in article 33(5) of the GDPR including what happened, the effects of the breach and the remedial actions taken. No requirement to contact the ICO. • Employee who the breach was in relation to was informed.