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**Signed…………………………………………………(chair of Trust board)**



**Records of Processing Activities**

**Guidance to the Records of Processing Activities Template**

The GDPR (article 30) requires the Academy Trust (or maintained School) to keep records of its processing activities.

There are two levels of obligation for records of processing activities, one for an organisation with 250+ employees and one for organisation with fewer than 250 employees. However the lower level obligation for those with under 250 employees does not apply where the processing includes special category personal data. This is sensitive information such as medical information and in practice all schools will be processing that so for the purposes of this guidance, we have assumed that all academy trusts / schools will need to meet the higher obligation.

The current ICO registration will tell you what you have already said about the data you are processing. You should have a copy but if not then you can check on this link:

[https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers](https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/)

This register may disappear because under the GDPR the ICO is not required to maintain a register of data controllers so print a copy while you still can.

Your audit should have provided you with the information you need.

The template below, lists ‘categories of data subjects’ and ‘categories of personal data’ the GDPR does not say what ‘categories’ means but the draft European level Article 29 Working Party guidance on data breaches says:

‘WP29 suggests categories of data subjects to refer to the various types of individuals whose personal data has been affected by a breach: depending on the descriptors used, this could include, amongst others, children and other vulnerable groups, people with disabilities, employees or customers. Similarly, categories of personal data records can refer to the different types of records that the controller may process, such as health data, educational records, social care information, financial details, bank account numbers, passport numbers and so on.’

**Records of Processing Activities Template**

**1. The following pieces of information should be listed:**

(a) the name and contact details of the controller and, where applicable, the joint controller, the controller's representative and the data protection officer;

Equals Trust, is the data controller not individual schools.

(b) the purposes of the processing;

(c) a description of the categories of data subjects and of the categories of personal data;

(d) the categories of recipients to whom the personal data have been or will be disclosed including recipients in third countries or international organisations;

(e) where applicable, transfers of personal data to a third country or an international organisation, including the identification of that third country or international organisation and, in the case of transfers referred to in the second subparagraph of Article 49(1), the documentation of suitable safeguards;

(f) where possible, the envisaged time limits for erasure of the different categories of data;

(g) where possible, a general description of the technical and organisational security measures referred to in Article 32(1).

2. Each processor and, where applicable, the processor's representative shall maintain a record of all categories of processing activities carried out on behalf of a controller, containing:

(a) the name and contact details of the processor or processors and of each controller on behalf of which the processor is acting, and, where applicable, of the controller's or the processor's representative, and the data protection officer;

(b) the categories of processing carried out on behalf of each controller;

(c) where applicable, transfers of personal data to a third country or an international organisation, including the identification of that third country or international organisation and, in the case of transfers referred to in the second subparagraph of Article 49(1), the documentation of suitable safeguards;

(d) where possible, a general description of the technical and organisational security measures referred to in Article 32(1).

3. The records referred to in paragraphs 1 and 2 shall be in writing, including in electronic form.

4. The controller or the processor and, where applicable, the controller's or the processor's representative, shall make the record available to the supervisory authority on request.

5. The obligations referred to in paragraphs 1 and 2 shall not apply to an enterprise or an organisation employing fewer than 250 persons unless the processing it carries out is likely to result in a risk to the rights and freedoms of data subjects, the processing is not occasional, or the processing includes special categories of data as referred to in Article 9(1) or personal data relating to criminal convictions and offences referred to in Article 10.