**Processing, Personal Data and Data Subjects**

**PROCESSING, PERSONAL DATA AND DATA SUBJECTS**

1. The Data Receiver shall comply with any further written instructions with respect to processing by the Council.

2. Any such further instructions shall be incorporated into this Schedule.

**Contractor Name:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Contract Date:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Contract Title:** \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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| --- | --- |
| **Description** | **Details** |
| Subject matter of the processing | Referrals may include names and address of the young person’s home and school, including parent/carer details and phone numbers, emergency contact details and some information on personal care or medical needs.  Invoices may be sent from the provider via email which include the young person’s name and their school.  Incident reporting and risk assessments completed by the provider may include names and schools attended by the young person. |
| Duration of the processing | The information is kept by the contractor paper based and or electronically. All data will be maintained securely in accordance with GDPR guidance 2018. |
| Nature and purposes of the processing | Invoices may be sent by email from the provider into the council.  Incident and risk assessment reporting will happen as a risk or incident becomes apparent, and the provider will complete the assessment and or review and send this electronically to Medway Council. Providers may also share names with schools and other health or social care providers of the child or young person they are providing a service for where appropriate.  Providers will maintain records which include names address and school with emergency contact details. These will be kept securely in the provider’s premises and not to go home with staff. |
| Type of Personal Data | Pupils name, address, school, health and or medical information. May include strategies of managing behaviour. |
| Categories of Data Subject | Children and young people and their parents/carers. |
| Plan for return and destruction of the data once the processing is complete UNLESS requirement under union or member state law to preserve that type of data | Data will be deleted when the provider no longer has the contract to provide the individual with a service. |

# Privacy impact assessment screening questions

*These questions are intended to help you decide whether a PIA is necessary. Answering ‘yes’ to any of these questions is an indication that a PIA would be useful.* ***Please answer YES or NO to the below questions:***

* Will the project involve the collection of new information about individuals?
* Will the project compel individuals to provide information about themselves?
* Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?
* Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?
* Does the project involve you using new technology that might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.
* Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?
* Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be private.
* Will the project require you to contact individuals in ways that they may find intrusive?