

## Key Roles and Definitions in Data Protection

Part of GDPR regulations includes definitions of different roles and their responsibilities.

Before starting to understand requirements and begin implementing GDPR, it is important to understand the key roles:

**Data Subject** – any person whose personal data is being collected, held or processed. In schools, a data subject would include a pupil, parent/guardian, staff and board of management members

**Data Controller** – the person, legal authority or body which determines the purpose and means of processing the data. In the case of schools, this is normally the Board of Management

**Data Processor** – any external person, authority, agency or body which is not an employee of the controller that processes personal data on behalf of the controller. Examples in a school context would include payroll processing company, IT support company or a cloud based administration software company (e.g. Aladdin)

**Data Protection Officer** – Certain organisations are required to appoint Data Protection Officers. This is if the processing is being carried out by a public authority, where the core activities consist of processing operations on a large scale, including special categories of data. Schools are not required to appoint Data Protection Officers.

**Personal Data** – this is any information relating to an identified or identifiable living person who can be identified by reference to e.g. name, identification number, location, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the natural person or 'data subject'

**Special Categories of Personal Data**- special categories of personal data relating to revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation require the data subject's explicit consent and cannot be implied or assumed

**Data Processing** - means doing anything with the data, including "collection, recording, organising, structuring, storage, adaptation, or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure or destruction". A copy of the data must be made available to the data subject, on request.