



Slaley First School

GDPR Asset Register

Date: 16/05/2026

Data Protection Officer: Karen Carnaffin

Introduction

Under the General Data Protection Regulations (GDPR), individuals have a right to be informed about how the school uses any personal data that we hold about them. This report provides information on the kinds of personal data we hold as a school and why and how we might use it.

Schools use a variety of personal data as part of their work and we take great care to ensure that this information is kept safe and secure. Personal data includes things like names, addresses and age, information that we need in order to comply with our statutory role in educating pupils.

Most of this data is essential and does not require your consent to use it. Some personal data is not essential and for that, depending on age, we require the consent of either the pupil or parent. An example of the kind of data that needs consent would be using pupil photographs on the school website.

In this GDPR asset register you will find a complete list of all the systems the school uses which hold personal data. The report also contains additional information such as what personal data items are held, the legal basis for doing this, along with a description of the system and why the school processes the data.

If you have any queries about this document or any other issue relating to personal data, please contact the school Data Protection Officer, whose name is on the front of the pack.

Systems included in this report

| System Name | Description | Special Category |
|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|
| Accident book | Log of accidents / minor injuries in school | |
| Accident Report Form | ACC1 form for reporting accidents to NCC | |
| Assessment Records | Electronic and paper mark books | |
| Attendance file | Attendance information about pupils and classes | yes |
| BBC Bitesize | BBC Bitesize is a free online study support resource designed to help with learning, revision and homework! Bitesize provides support for learners aged 5 to 16+ across a wide range of school subjects. It also supports children and young people's wellbeing and career choices. Bitesize also has hundreds of published lessons to help students across the UK with home schooling. Bitesize guides are written by teachers and subject experts and are mapped to follow the curricula of the UK. Secondary Bitesize follows exam board specifications for the main exam boards in the UK, including for GCSE in England, Wales and Northern Ireland and National 4, National 5 & Highers in Scotland, ensuring students are preparing for the right exams | |
| BBC Super Movers | Fun curriculum linked resources to get your class moving while they learn | |
| Behaviour Files - Paper (in class) | Information relating to the behaviours of particular pupils | yes |
| Bikeability | The Bikeability Trust run on behalf of Department of Transport. Courses and resources for schools in England | |
| Black and Banton | Black and Banton is one of the North East of England's leading providers of occupational and physical health services. Established in 2001 we have experienced strong growth each year based on our successful focus on our client's needs, many of whom we've partnered for more than ten years. They include leading names across a wide range of sectors including oil & gas, manufacturing, chemical, pharmaceutical, transport, housing , construction and demolition industry. We also private clients with health services, including sports injury treatment, shoulder, back and joint pain programmes, vaccinations, massage and pilates. Our approach is simple. We provide the highest level of bespoke occupational and physical health services, cost effectively and efficiently both empathetically and at times and locations to suit | yes |

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| | our clients | |
| Child Protection Records - Electronic | Records relating to child protection issues for individual pupils | yes |
| Child Protection Records - Paper | Records relating to child protection issues for individual pupils | yes |
| Class Charts | Because Class Charts is designed by an ex-teacher, we understand the issues schools face and we make a big impact in schools by improving behaviour, attendance and teaching & learning. Schools that use Class Charts equip themselves with a BETT Award winning solution that is effective & easy to use for everyone involved. We streamline every aspect of classroom management, reducing teacher workload and empowering SLT with real time data for informed decision making. | |
| Class Dojo | Class Dojo is a classroom management and behaviour rewards system which includes a digital portfolio for pupils which can be accessed by staff, pupils and parents?/carers. | |
| Classroom Secrets | Classroom Secrets was founded by Claire and Ed Riley in 2013 after Claire took a supply role in a primary school. Being a trained secondary school teacher of performing arts, Claire was used to differentiating by outcome rather than by activity. When planning for her Year 4 class, she came across a problem – the activities and resources available did not allow all children in the same class to access them. Claire was used to providing the same activity for all children, with a choice of levels that would suit each child. And with that, the idea for Classroom Secrets was born... Based in Claire and Ed's hometown of Halifax, we have seen rapid growth since the spring of 2018. We now have over 50 employees working hard on a daily basis to bring you resources that help children learn and teachers reduce their workloads. | |
| Consent for educational visits | Consent information for all educational visits including day trips and residential visits | yes |
| Covid-19 Lateral Flow Testing | About 1 in 3 people with coronavirus do not have symptoms but can still pass it on to others. Regular testing of people without symptoms is important to help stop the virus spreading and protect your loved ones. As lockdown restrictions gradually ease we all need to play our part to help protect each other. The following people in England will have access to regular rapid lateral flow testing made available to them as schools reopen: secondary school pupils primary and secondary school staff households, childcare and support bubbles of primary and secondary-age pupils households, childcare and support bubbles of primary and secondary staff | yes |

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| CPOMS | CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral welfare for schools. CPOMS is software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Working alongside a school's existing safeguarding processes, CPOMS is an intuitive system to help with the management and recording of child protection, behavioural issues, bullying, special educational needs, domestic issues and much much more. Using CPOMS, schools can ensure that students are safe and fully supported, whilst school staff can focus on teaching and providing support, instead of administration. | yes |
| Data tracking spreadsheets | Spreadhseets (excel) to track progress of children over the course of their school career. | yes |
| DFE-Census and workforce Census | The school workforce census is a statutory data collection that takes place each autumn. You must complete statutory censuses by law unless there's a good reason not to. The census collects data on all teaching and support staff in regular employment, including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data. | |
| Dietary requirements information sheets | Required documents for specific children with severe allergies / intolerances and religious observations (food) | yes |
| Discovery Education | Discovery Education is a trusted partner for schools, supporting them in realising their vision and achieving their goals with curriculum-matched content, professional development solutions and professional networking opportunities. | |
| Ed Shed | EdShed, or Education Shed Ltd. as our accountant calls us, is the umbrella for several educational products and brands. These include The Literacy Shed, Literacy Shed Plus, Spelling Shed and MathShed. We are a company run by teachers for teachers and we try to maintain particular values within all of our products: The best quality product we can create Making the most educational impact possible Transparent and affordable pricing The least hassle for teachers and schools | |

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| Education City | EducationCity offers a flexible range of teaching resources, linked to teaching, planning and assessment. | |
| Eschools Website Provider | On-line school website building tool | |
| EVOLVE visits | An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities. | |
| Google Classroom | A free and easy tool helping educators efficiently manage and assess progress, while enhancing connections with learners from school, from home, or on the go. | |
| Google drive for education | suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom. | |
| Google Meet | Google Meet is a video-communication service developed by Google. It is one of two apps that constitute the replacement for Google Hangouts, the other being Google Chat | |
| Governance | Details of all members of the Governing Body | |
| Hamilton Trust | Hamilton Trust is a UK charity working to support inspirational teaching and learning through its website and projects. Mike O'Regan founded Hamilton in 1988 to support the education of children in the Blackbird Leys, Rose Hill and Barton estates in Oxford - children whose educational potential had long been underestimated. Hamilton aims to enable children from areas of socio-economic disadvantage to create for themselves the life opportunities they deserve through high-quality education and high expectations. Hamilton continues to work closely with primary schools in Oxford and to derive enormous amounts of inspiration for improving educational opportunities from doing so. Professor Ruth Merttens joined Hamilton in 1996 as Co-director. With Mike, she set up and directed the Hamilton Maths and Reading Projects to boost those subjects in Oxford schools located in areas of significant deprivation. As word leaked out about Hamilton's planning materials, demand for them spread, and Hamilton started providing them to teachers in other schools. These formed the basis of Hamilton's original 'Save teachers' Sundays!' website, which enabled a much wider audience to access these plans. Hamilton's website continues to provide high quality, fully adaptable planning and resources to primary school teachers to help them teach robust and engaging lessons. Hamilton also supports and runs various education projects that provide support to its local community and across the country. | |
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| Health & Safety | Records pertaining to Health & Safety | |
| Interactive Resources | Pupil / teacher online learning resources for Numeracy. | |
| Kahoot | Elevate learning at your entire school or district with Kahoot! EDU: Easily roll out a site license across your school, district or campus Empower teachers with interactive teaching and assessment tools Engage and motivate students in class and via distance learning Get more control and visibility into Kahoot! usage We believe that there should be no limits to when and where you can learn. Engage students in learning when your school is out and stay on track with curriculum while instructing online. | |
| Letter join | Letter-join is the teacher's companion for teaching cursive handwriting combining interactive animations and worksheets for real handwriting practice. Letter-join includes animations of all the letters of the alphabet with a spoken commentary on how to write each letter. Patterns, Letters and Words can all be watched and traced on-screen. Magic Words lets you trace over your own words on a number of exciting backgrounds and Custom Words lets you input your own words, replay the video and trace over the words for IWB practice. | |
| National Tutoring Programme (NTP) | The National Tutoring Programme offers highly tailored tuition support for pupils, to help those whose education has been most impacted by the pandemic. | yes |
| NFER | Assessment materials, reading test and pupil progress data | |
| Northumberland School Readiness Passport | The School Readiness Passport is primarily a transition document. It will be used to gather information about key events in a child's early life. | |
| Nuffield Early Language Intervention (NELI) | The Nuffield Foundation is an independent charitable trust with a mission to advance educational opportunity and social well-being. We fund research that informs social policy, primarily in Education, Welfare and Justice. We also provide opportunities for young people to develop skills and confidence in science and research. | yes |
| Padlet | Padlet is a free online tool that is best described as an online notice board. Padlet can be used by students and teachers to post notes on a common page. The notes posted by teachers and students can contain links, videos, images and document files | |
| ParentPay | ParentPay is an online payment service for schools and families. | yes |
| Performance Management | Staff appraisals | |
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| Photographs and videos of staff and pupils. | Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms. | |
| Recruitment information | Part of the job application process | yes |
| Registers | Daily register, after school club registers, lunch register | |
| Safeguarding Records - Electronic | Records relating to safeguarding of children | yes |
| Safeguarding Records - Paper | Records relating to safeguarding of children | yes |
| School360 | Learning platform for Northumberland schools with links to 3rd party educational resource providers. | yes |
| Schoolcomms | Communication app for parents | |
| Scratch | With Scratch, you can program your own interactive stories, games, and animations — and share your creations with others in the online community. Scratch helps young people learn to think creatively, reason systematically, and work collaboratively — essential skills for life in the 21st century. Scratch is a project of the Lifelong Kindergarten Group at the MIT Media Lab. It is provided free of charge. | |
| Senso Cloud | The Cloud Based Platform for Device Monitoring and Management. All-In-One Software for Network, Classroom, Safeguarding and Asset Management, and for managing and monitoring any Windows and Chrome device from a Centralised Web portal | |
| Social media sites e.g. Twitter, Facebook | Social Media tool used to inform parents about events in school and celebrate children's achievement. | |
| STEM | Developing teachers and leaders Explore programmes and resources that support professional development and drive the impact of teaching across schools and colleges. o support parents and carers, our subject experts have put together a selection of activities and materials, which are free for everyone to access. | |
| Y4 Multiplication Check | What is the Multiplication Tables Check. The Multiplication Tables Check (MTC) is a key stage 2 assessment to be taken by pupils at the end of year 4 (in June). From the 2019 / 2020 academic year onwards. The purpose of the MTC is to make sure the times tables knowledge is at the expected level. | |

System used: Accident book

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|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Log of accidents / minor injuries in school |
| Personal Data Items | Pupil <ul style="list-style-type: none">• Name• class• Injury• first aid• |
| Why is it being processed? | To record injuries in school |
| Legal Basis | Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | File in office |
| Is it secure and/or encrypted? | No |
| Who can access data? | School staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Parents |
| Legal basis for sharing | Legal obligation |
| How is data shared? | Verbally |

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| Description | ACC1 form for reporting accidents to NCC |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Gender • Address • Telephone number • Date and time of accident • nature of injury • Place of accident • First aid • Circumstances • Action taken • Witness information • <p>Staff member</p> <ul style="list-style-type: none"> • Name • Occupation • DOB • Gender • Address • Telephone number • Date and time of injury • nature of injury • place of accident • First aid • Circumstances • Action taken • Witness information • |
| Why is it being processed? | Statutory obligations to comply with Health and Safety regulations. |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
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| Where is data stored? | Secure filing cabinet in office |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | SLT |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | NCC / parents |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | Carbon copy |

System used: Assessment Records

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|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Electronic and paper mark books |
| Personal Data Items | <p>Child</p> <ul style="list-style-type: none"> • Name • Gender • Disadvantaged cohort • SEND Code • Key Stage 2 Assessment data • Internal Assessment Data |
| Why is it being processed? | To track student achievement and report to parents |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO lawful basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | On-site Secure Network Google Drive On paper- Class Context Files |
| Is it secure and/or encrypted? | On-site Network- This solution has user authentication and access controls which determine the level of access to data that a user requires. The solution also utilises the Schools' Information Security policy which includes password, physical and network security controls. Google Drive- authentication and access controls which determine the level of access to data that a user requires. G-Suite complies with the Schools' Information Security policy which includes password security controls. Class Context Files- teachers follow privacy culture procedures |
| Who can access data? | Staff |
| How long is data kept? | 3+ years |
| Who is data shared with? | Parents |
| Legal basis for sharing | Legal obligation, Public task |
| How is data shared? | Parents evenings, reports |

System used: Attendance file

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| Description | Attendance information about pupils and classes |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Class • Gender • UPN • Address • Telephone number • Parental contact • Ethnic origin • Current attendance • Past attendance |

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

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| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Verbally, Secure cloud, |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To regularly check pupil's attendance towards a desired goal |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing</p> |

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| | 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 |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Attendance file and electronically |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | EWO and other agencies as required / parents |
| Legal basis for sharing | Legal obligation/ Public task |
| How is data shared? | Electronically |

System used: BBC Bitesize

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| Description | BBC Bitesize is a free online study support resource designed to help with learning, revision and homework! Bitesize provides support for learners aged 5 to 16+ across a wide range of school subjects. It also supports children and young people's wellbeing and career choices. Bitesize also has hundreds of published lessons to help students across the UK with home schooling. Bitesize guides are written by teachers and subject experts and are mapped to follow the curricula of the UK. Secondary Bitesize follows exam board specifications for the main exam boards in the UK, including for GCSE in England, Wales and Northern Ireland and National 4, National 5 & Highers in Scotland, ensuring students are preparing for the right exams |
| Personal Data Items | <p>teacher</p> <ul style="list-style-type: none"> • Name • email address <p>child</p> <ul style="list-style-type: none"> • Name • Age • Year group |
| Why is it being processed? | https://www.bbc.co.uk/usingthebbc/privacy/ |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "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"</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://www.bbc.co.uk/usingthebbc/privacy/ |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://www.bbc.co.uk/usingthebbc/privacy/ |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.bbc.co.uk/usingthebbc/privacy/ |
| Legal basis for sharing | Public Task |
| How is data shared? | https://www.bbc.co.uk/usingthebbc/privacy/ |

System used: BBC Super Movers

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| Description | Fun curriculum linked resources to get your class moving while they learn |
| Personal Data Items | Teacher <ul style="list-style-type: none"> • Name • Email |
| Why is it being processed? | https://www.bbc.co.uk/usingthebbc/privacy/ |
| Legal Basis | Public task Article 6(1)(e) gives you a lawful basis for processing where: “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 |
| Evidence for legal basis | ICO legal basis tool |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://www.bbc.co.uk/usingthebbc/privacy/ |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://www.bbc.co.uk/usingthebbc/privacy/ |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.bbc.co.uk/usingthebbc/privacy/ |
| Legal basis for sharing | Public Task |
| How is data shared? | https://www.bbc.co.uk/usingthebbc/privacy/ |

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| Description | Information relating to the behaviours of particular pupils |
| Personal Data Items | <p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Health Needs • Educational Behavioural Needs • Social Care Status • <p>Parents/Carers</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>External Support Workers</p> <ul style="list-style-type: none"> • Name • Organisation • Position • Address • Contact Details |

This system has been identified as containing Special Category Information

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- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

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| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> <p>Significant Public Interest</p> <p>Processing is required for reasons of significant public interest on the basis of Union or Member State Law that is equivalent to the aim pursued</p> |
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| | and which contains suitable safeguards. |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Verbally & by Secure Messenger |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To ensure access to education appropriate to needs |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis tool |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Secure cabinet |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Head Teacher, Class Teacher and key workers as appropriate |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | External support workers as applies |
| Legal basis for sharing | Public Task & Legal Obligation |
| How is data shared? | Verbal or secure messenger |

| System used: Bikeability | |
|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | The Bikeability Trust run on behalf of Department of Transport. Courses and resources for schools in England |
| Why is it being processed? | https://bikeability.org.uk/privacy-policy/ |
| Legal Basis | Public task Article 6(1)(e) gives you a lawful basis for processing where: “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 |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://bikeability.org.uk/privacy-policy/ |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://bikeability.org.uk/privacy-policy/ |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://bikeability.org.uk/privacy-policy/ |
| Legal basis for sharing | Public Task |
| How is data shared? | https://bikeability.org.uk/privacy-policy/ |

System used: Black and Banton

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| Description | Black and Banton is one of the North East of England’s leading providers of occupational and physical health services. Established in 2001 we have experienced strong growth each year based on our successful focus on our client’s needs, many of whom we’ve partnered for more than ten years. They include leading names across a wide range of sectors including oil & gas, manufacturing, chemical, pharmaceutical, transport, housing , construction and demolition industry. We also private clients with health services, including sports injury treatment, shoulder, back and joint pain programmes, vaccinations, massage and pilates. Our approach is simple. We provide the highest level of bespoke occupational and physical health services, cost effectively and efficiently both empathetically and at times and locations to suit our clients |
| Personal Data Items | <p>All Staff</p> <ul style="list-style-type: none"> • Name • all employment details |

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- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

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| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| Special Category Evidence for legal basis | ICO legal basis tool kit |
| How is the Special Category data shared? | Securely with staff |
| Legal basis for sharing Special Category data | Consent |
| Why is it being processed? | Staff wellbeing and to allow investiagtion of any health problems for school HR processes |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> |

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| | Public task Article 6(1)(e) gives you a lawful basis for processing where: “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 |
| Evidence for legal basis | ICO legal basis tool kit |
| Is Consent Required? | yes |
| Data Source | School |
| Where is data stored? | Both |
| Is it secure and/or encrypted? | secure & encrypted on Black & Banton Server/Staff PC |
| Who can access data? | Staff member and Senior Leadership team |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Staff and those who staff may nominate e.g. professional association. HR provider |
| Legal basis for sharing | public task/legal obligation |
| How is data shared? | https://www.blackandbantton.co.uk/ |

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|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Records relating to child protection issues for individual pupils |
| Personal Data Items | <p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Child Protection Plan/Actions • <p>Parents</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>Social Care Worker</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>External Support Workers</p> <ul style="list-style-type: none"> • Name • Organisation • Position • Address • Contact Details |

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- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

Special Category Data Legal Basis

Obligation

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| | Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement. |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Verbally or secure cloud sharing (Google or Office 365 etc) |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | Statutory obligations and to support educational entitlement |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis tool |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | School computer, laptop |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Designated Child Protection Lead & Deputy, Designated Admin Staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Social Workers, Parent/Carers as appropriate, some information shared with key workers, health care professionals and Police, receiving school |
| Legal basis for sharing | Statutory & Legitimate interest |
| How is data shared? | Verbally or secure cloud sharing (Google or Office 365 etc) |

| | |
|----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Records relating to child protection issues for individual pupils |
| Personal Data Items | <p>Pupils</p> <ul style="list-style-type: none"> • Name • • Date of Birth • Address • Health Needs • Social Care Status • Educational needs • Child Protection Plan/Actions <p>Parents/Carers</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>Social Care Worker</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>External Support Workers</p> <ul style="list-style-type: none"> • Name • Organisation • Position • Address • Contact Details |

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

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| Special Category Data Legal Basis | Obligation |
|------------------------------------------|-------------------|

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| | Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement. |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Verbal or secure messenger |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | Statutory obligations and to support educational entitlement |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis tool |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Secure cabinet |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Designated Child Protection Lead & Deputy; Designation admin staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Social Workers, Parent/Carer as appropriate, some information shared with key workers, health care professionals and Police, receiving school |
| Legal basis for sharing | Statutory and Legitimate interest |
| How is data shared? | Verbal or secure messenger |

System used: Class Charts

| | |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Because Class Charts is designed by an ex-teacher, we understand the issues schools face and we make a big impact in schools by improving behaviour, attendance and teaching & learning. Schools that use Class Charts equip themselves with a BETT Award winning solution that is effective & easy to use for everyone involved. We streamline every aspect of classroom management, reducing teacher workload and empowering SLT with real time data for informed decision making. |
| Personal Data Items | <p>teacher</p> <ul style="list-style-type: none"> • Name <p>child</p> <ul style="list-style-type: none"> • Name <p>age</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | https://www.edukey.co.uk/gdpr-compliance/ |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO- Legal Basis tool |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://www.edukey.co.uk/gdpr-compliance/ |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://www.edukey.co.uk/gdpr-compliance/ |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.edukey.co.uk/gdpr-compliance/ |
| Legal basis for sharing | Public Duty |
| How is data shared? | https://www.edukey.co.uk/gdpr-compliance/ |

System used: Class Dojo

| | |
|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Class Dojo is a classroom management and behaviour rewards system which includes a digital portfolio for pupils which can be accessed by staff, pupils and parents?/carers. |
| Personal Data Items | Staff <ul style="list-style-type: none">• Name• Phone number• email• Password• Device id• Gender• School• School address• Geo Location• Photos, Videos, Docs and audio• IP address Pupil <ul style="list-style-type: none">• Name• Password• Age• School• IP Address Parent/carers <ul style="list-style-type: none">• Name• Phone number• Email address• Password• Device id• Gender• School• Geo location• IP Address |
| Why is it being processed? | To provide access to the online curriculum and classroom management? tools |
| Legal Basis | Public task Article 6(1)(e) gives you a lawful basis for processing where: "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 |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Secure Class Dojo servers |
| | |

| | |
|---------------------------------------|--------------------------------------------------------------------------------------------------|
| Is it secure and/or encrypted? | Yes, comprehensive approach to security provided by Class Dojo |
| Who can access data? | School account users. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Shared within school |
| Legal basis for sharing | Public task |
| How is data shared? | Online through secure login. |
| References | Click to download Class Dojo 1 Click to download Class Dojo 2 |

System used: Classroom Secrets

| | |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Classroom Secrets was founded by Claire and Ed Riley in 2013 after Claire took a supply role in a primary school. Being a trained secondary school teacher of performing arts, Claire was used to differentiating by outcome rather than by activity. When planning for her Year 4 class, she came across a problem – the activities and resources available did not allow all children in the same class to access them. Claire was used to providing the same activity for all children, with a choice of levels that would suit each child. And with that, the idea for Classroom Secrets was born... Based in Claire and Ed’s hometown of Halifax, we have seen rapid growth since the spring of 2018. We now have over 50 employees working hard on a daily basis to bring you resources that help children learn and teachers reduce their workloads. |
| Personal Data Items | <p>Teacher</p> <ul style="list-style-type: none"> • Name • • <p>child</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | https://classroomsecrets.co.uk/privacy-policy/ |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO toolkit |
| Is Consent Required? | yes |
| Data Source | School 360 |
| Where is data stored? | https://classroomsecrets.co.uk/privacy-policy/ |
| Is it secure and/or encrypted? | secure |
| Who can access data? | https://classroomsecrets.co.uk/privacy-policy/ |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://classroomsecrets.co.uk/privacy-policy/ |
| Legal basis for sharing | Public Task |
| How is data shared? | https://classroomsecrets.co.uk/privacy-policy/ |

System used: Consent for educational visits

| | |
|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Consent information for all educational visits including day trips and residential visits |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Health conditions • Medication • Dietary requirements • Contact information • Family doctor |

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

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| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Shared by phone |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To ensure school has up to date information when taking children off site |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis toolkit |

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| Is Consent Required? | No |
| Data Source | Parent |
| Where is data stored? | Paper records kept in school and taken on visit |
| Is it secure and/or encrypted? | no |
| Who can access data? | Staff involved with visit |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | NCC or medical practitioners / providers |
| Legal basis for sharing | Public task & Legal obligation |
| How is data shared? | summarised document |

System used: Covid-19 Lateral Flow Testing

| | |
|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | About 1 in 3 people with coronavirus do not have symptoms but can still pass it on to others. Regular testing of people without symptoms is important to help stop the virus spreading and protect your loved ones. As lockdown restrictions gradually ease we all need to play our part to help protect each other. The following people in England will have access to regular rapid lateral flow testing made available to them as schools reopen: secondary school pupils primary and secondary school staff households, childcare and support bubbles of primary and secondary-age pupils households, childcare and support bubbles of primary and secondary staff |
|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Personal Data Items | <p>Child</p> <ul style="list-style-type: none"> • Name • Date of Birth • Postcode • Test Result <p>Parent</p> <ul style="list-style-type: none"> • Name • Email address • Telephone number |
|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

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| Special Category Data Legal Basis | Public Interest / Public Health Processing necessary for reasons of public interest in the area of public health such as protecting against serious cross-border threats to health or guaranteeing high standards of healthcare and of medical products or medical devices. |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Electronically/verbally with PHE |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To support the national effort in the fight against Covid-19. Under |

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| | instruction from the DfE and PHE. |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | Yes |
| Data Source | Parent |
| Where is data stored? | Electronic school system |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff |
| How long is data kept? | 3+ years |
| Who is data shared with? | Public Health England |
| Legal basis for sharing | Legal obligation & public task |
| How is data shared? | Electronically through secure servers. |

System used: CPOMS

Description

CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral welfare for schools. CPOMS is software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Working alongside a school's existing safeguarding processes, CPOMS is an intuitive system to help with the management and recording of child protection, behavioural issues, bullying, special educational needs, domestic issues and much much more. Using CPOMS, schools can ensure that students are safe and fully supported, whilst school staff can focus on teaching and providing support, instead of administration.

Personal Data Items

Pupil

- Name
- Class
- Details of incident
- Admission Date
- DOB
- SEN, with status
- Medical Conditions
- UPN
- Pupil Premium
- Religion
- EAL
- LAC
- Year Group
- Ethnicity
- First Language
- Pregnancy

Main contact

- Name
- Telephone Number

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- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

Special Category Data Legal Basis

Obligation

Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.

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| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Verbally, secure messenger, online secure servers. |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To comply with statutory obligations regarding safeguarding and child protection. To provide a secure repository for personal data and ensure that records are effectively maintained. |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | SIMS |
| Where is data stored? | Meritec secure servers. |
| Is it secure and/or encrypted? | Meritec Limited (CPOMS) is an accredited ISO27001 and GCloud supplier. As part of that accreditation, we have annual penetration/ vulnerability test performed by a trusted 3rd party partner. In addition to these tests Meritec Limited (CPOMS) uses a UK based Data Centre supplier who is also also accredited to ISO27001 and thus subject to the same security audits. Meritec is accredited to the latest version of the ISO27001 standard (2013) Accreditation requires annual external audits by the accreditation providers and regular internal audits by the senior management including persons at Director level. |
| Who can access data? | School staff, subsequent school if using CPOMS, Meritec for support and outside agencies. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | School staff, subsequent school if using CPOMS, Meritec for support, outside agencies, parents. |
| Legal basis for sharing | Legal obligation & public task |
| How is data shared? | Secure cloud based systems and secure servers. |
| References | Click to download CPOMS Cloud Services for Schools |

System used: Data tracking spreadsheets

| | |
|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Spreadhseets (excel) to track progress of children over the course of their school career. |
| Personal Data Items | <p>pupil</p> <ul style="list-style-type: none"> • Name • date of birth • gender • class • year • FSM • SEN • Assessment info |

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- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

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| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Secure google drive and paper copies |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | Processing this data is necessary for the completion of a public task and for the school to meet statutory requirements |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |

| | |
|---------------------------------------|------------------------------------------------------------------------------------------------------------|
| Where is data stored? | Secure Google Drive/cloud based storage. |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Teachers in school |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Different elements of data are shared with different parties including: other staff, Governors and parents |
| Legal basis for sharing | Public task |
| How is data shared? | Electronically by secure encrypted communication |

System used: DFE-Census and workforce Census

| | |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | The school workforce census is a statutory data collection that takes place each autumn. You must complete statutory censuses by law unless there's a good reason not to. The census collects data on all teaching and support staff in regular employment, including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data. |
| Personal Data Items | Staff <ul style="list-style-type: none"> • Name |
| Why is it being processed? | https://www.gov.uk/help/privacy-notice |
| Legal Basis | Legal Obligation <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "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"</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | yes |
| Data Source | School |
| Where is data stored? | https://www.gov.uk/help/privacy-notice |
| Is it secure and/or encrypted? | secure |
| Who can access data? | https://www.gov.uk/help/privacy-notice |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.gov.uk/help/privacy-notice |
| Legal basis for sharing | public task/legal obligation |
| How is data shared? | https://www.gov.uk/help/privacy-notice |

System used: Dietary requirements information sheets

| | |
|----------------------------|----------------------------------------------------------------------------------------------------------------------------|
| Description | Required documents for specific children with severe allergies / intolerances and religious observations (food) |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Dietary information |

This system has been identified as containing Special Category Information

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- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

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|------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Paper records |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | Health and safety - to avoid children coming into contact with specific foods |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "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"</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |

| | |
|---------------------------------------|-----------------------------------|
| Data Source | Parent |
| Where is data stored? | Accessible only to kitchen staff |
| Is it secure and/or encrypted? | Secure - in locked kitchen office |
| Who can access data? | kitchen staff / school staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | n/a |
| Legal basis for sharing | n/a |
| How is data shared? | n/a |

System used: Discovery Education

| | |
|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Discovery Education is a trusted partner for schools, supporting them in realising their vision and achieving their goals with curriculum-matched content, professional development solutions and professional networking opportunities. |
| Personal Data Items | <p>Teacher</p> <ul style="list-style-type: none"> • Name <p>Child</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | https://www.discoveryeducation.co.uk/privacy-policy |
| Evidence for legal basis | ICO-Legal basis toolkit |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://www.discoveryeducation.co.uk/privacy-policy |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://www.discoveryeducation.co.uk/privacy-policy |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.discoveryeducation.co.uk/privacy-policy |
| Legal basis for sharing | Public Task |
| How is data shared? | https://www.discoveryeducation.co.uk/privacy-policy |

| System used: Ed Shed | |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | EdShed, or Education Shed Ltd. as our accountant calls us, is the umbrella for several educational products and brands. These include The Literacy Shed, Literacy Shed Plus, Spelling Shed and MathShed. We are a company run by teachers for teachers and we try to maintain particular values within all of our products: The best quality product we can create Making the most educational impact possible Transparent and affordable pricing The least hassle for teachers and schools |
| Personal Data Items | <p>Teacher</p> <ul style="list-style-type: none"> • Name <p>Child</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | https://www.edshed.com/en-gb/privacy |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO Legal Basis tool |
| Is Consent Required? | No |
| Data Source | School 360 |
| Where is data stored? | https://www.edshed.com/en-gb/privacy |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://www.edshed.com/en-gb/privacy |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.edshed.com/en-gb/privacy |
| Legal basis for sharing | Legal Obligation/public Task |
| How is data shared? | https://www.edshed.com/en-gb/privacy |

System used: Education City

| | |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | EducationCity offers a flexible range of teaching resources, linked to teaching, planning and assessment. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • Email • School <p>Pupil</p> <ul style="list-style-type: none"> • Name • Gender • Age • Class |
| Why is it being processed? | To provide access for teachers and pupils to a range of online teaching and learning tools. |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Education City secure servers in the U.K> |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School users with login, Education city for technical? support |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Shared with school |
| Legal basis for sharing | Public task |
| How is data shared? | Secure online server |
| References | Click to download Education City |

System used: Eschools Website Provider

| | |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | On-line school website building tool |
| Personal Data Items | <p>School Information</p> <ul style="list-style-type: none"> • Name • Address • Contact information • Class names • Staff names • Governor names • Year group information (planning, homework) • Newsletters <p>Pupil</p> <ul style="list-style-type: none"> • Photographs • • |
| Why is it being processed? | To inform parents and the wider community about the life of the school |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | Consent not required to put on school information. Consent required to use pupil photographs |
| Data Source | School |
| Where is data stored? | On eschool secure server through school 360 platform 4. Transfer of School Data 4.1. The School hereby consents to eSchools accessing School Data held on the Management Information System through Wonde, for the purpose of extracting and transferring such School Data to eSchools. 4.2. Prior to leaving the School premises by electronic means (via HTTPS) the School Data will be encrypted by Wonde and eSchools. |
| Is it secure and/or encrypted? | Yes 4.2. Prior to leaving the School premises by electronic means (via HTTPS) the School Data will be encrypted by Wonde and eSchools. 5.1. The School Data shall always remain the property of the School. 5.2. eSchools shall have no responsibility to maintain the security of any School Data held or controlled by the School. 5.3. eSchools shall keep all Confidential Information and School Data confidential and shall not:- 5.3.1.1. use any Confidential Information or School Data except for the purpose of performing the services it provides to the School; or 5.3.1.2. |

| | |
|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | disclose any Confidential Information in whole or in part to any third party, except as expressly permitted by this Agreement, or as required for the purpose of any services provided by eSchools to the School, or to the extent required by law. 6.1. Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing to be carried out by eSchools, as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, eSchools shall in relation to the School Data implement appropriate technical and organisational measures to ensure a level of security appropriate to that risk. 6.2. In assessing the appropriate level of security, eSchools shall take account in particular of the risks that are presented by processing of the School Data, in particular from a Personal Data Breach. |
| Who can access data? | Parents and wider community. Information available to the public on the internet. Eschools can access the data. DFE |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | The general public eschools is a public facing website |
| Legal basis for sharing | Public interest & legal obligation |
| How is data shared? | On the school's website page with designated URL |
| References | Click to download Eschools data agreement |

System used: EVOLVE visits

| | |
|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • e-mail address • IP address • Location data • Qualifications <p>Pupil</p> <ul style="list-style-type: none"> • Name • Date of Birth • UPN |
| Why is it being processed? | To reduce paperwork, simplify procedures, produce self-review and inspection preparation data, and improve staff confidence in that they automatically follow both employer, and National Guidelines. |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | Yes |
| Data Source | SIMS |
| Where is data stored? | 'We store all of the Customer Data (including your personal data) on servers which are located in the United Kingdom. These servers are protected by passwords and firewalls.' |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Evolve staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | 'The only time that any information will be shared by us outside of our services is where our Customer has asked us to configure the service so that it shares certain data with specified third party programs including calendars.' |
| Legal basis for sharing | Public task & legal obligation |
| How is data shared? | See contract/agreement |

| | |
|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | http://edufocus.co.uk/assets/files/gdpr/Data%20Processing%20Details.pdf |
| References | Click to download Evolve eduFOCUS Global Data Privacy |

System used: Google Classroom

| | |
|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | A free and easy tool helping educators efficiently manage and assess progress, while enhancing connections with learners from school, from home, or on the go. |
| Personal Data Items | <p>Teacher</p> <ul style="list-style-type: none"> • Name <p>Child</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | https://policies.google.com/privacy?hl=en-GB#infocollect |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal tool kit |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://policies.google.com/privacy?hl=en-GB#infocollect |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://policies.google.com/privacy?hl=en-GB#infocollect |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://policies.google.com/privacy?hl=en-GB#infocollect |
| Legal basis for sharing | Public Task/legal obligation |
| How is data shared? | https://policies.google.com/privacy?hl=en-GB#infocollect |

System used: Google drive for education

| | |
|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • Classes / groups • Gmail address <p>Pupil</p> <ul style="list-style-type: none"> • Name • Classes / groups • Gmail address <p>Governor</p> <ul style="list-style-type: none"> • Name • Gmail address |
| Why is it being processed? | To provide Google drive for education to staff, pupils and governors. |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis toolkit. |
| Is Consent Required? | No |
| Data Source | School 360 |
| Where is data stored? | Google secure servers in Europe |
| Is it secure and/or encrypted? | Yes secure and encrypted |
| Who can access data? | Individual users can access their own accounts. School360 and ICT Team can access management tool. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Staff and Pupils |
| Legal basis for sharing | Public task |
| How is data shared? | Secure google cloud. |
| References | <p>Click to download Google Drive Policy Notice</p> <p>Click to download Google GSuite Privacy Policy</p> |

System used: Google Meet

| | |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Google Meet is a video-communication service developed by Google. It is one of two apps that constitute the replacement for Google Hangouts, the other being Google Chat |
| Personal Data Items | <p>teacher</p> <ul style="list-style-type: none"> • Name • • <p>child</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | https://policies.google.com/privacy?hl=en-GB |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal tool kit |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://policies.google.com/privacy?hl=en-GB |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://policies.google.com/privacy?hl=en-GB |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://policies.google.com/privacy?hl=en-GB |
| Legal basis for sharing | Public Task |
| How is data shared? | https://policies.google.com/privacy?hl=en-GB |

System used: Governance

| | |
|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Details of all members of the Governing Body |
| Personal Data Items | <p>Name</p> <ul style="list-style-type: none"> • Name • Address • Contact Details • Photos • Attendance at Meetings • Pecuniary Interests |
| Why is it being processed? | Statutory Requirement |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Secure school systems |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Admin staff/ SLT |
| How long is data kept? | 3+ years |
| Who is data shared with? | Local Authority and the general public |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | Electronically via a secure server. |

System used: Hamilton Trust

| | |
|----------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Description</p> | <p>Hamilton Trust is a UK charity working to support inspirational teaching and learning through its website and projects. Mike O'Regan founded Hamilton in 1988 to support the education of children in the Blackbird Leys, Rose Hill and Barton estates in Oxford - children whose educational potential had long been underestimated. Hamilton aims to enable children from areas of socio-economic disadvantage to create for themselves the life opportunities they deserve through high-quality education and high expectations. Hamilton continues to work closely with primary schools in Oxford and to derive enormous amounts of inspiration for improving educational opportunities from doing so. Professor Ruth Merttens joined Hamilton in 1996 as Co-director. With Mike, she set up and directed the Hamilton Maths and Reading Projects to boost those subjects in Oxford schools located in areas of significant deprivation. As word leaked out about Hamilton's planning materials, demand for them spread, and Hamilton started providing them to teachers in other schools. These formed the basis of Hamilton's original 'Save teachers' Sundays!' website, which enabled a much wider audience to access these plans. Hamilton's website continues to provide high quality, fully adaptable planning and resources to primary school teachers to help them teach robust and engaging lessons. Hamilton also supports and runs various education projects that provide support to its local community and across the country.</p> |
| <p>Personal Data Items</p> | <p>Teacher</p> <ul style="list-style-type: none"> • Name • Email <p>name</p> <ul style="list-style-type: none"> • Name • Age • year group |
| <p>Why is it being processed?</p> | <p>https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/</p> |
| <p>Legal Basis</p> | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "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"</p> |
| <p>Evidence for legal basis</p> | <p>ICO legal basis toolkit</p> |
| <p>Is Consent Required?</p> | <p>Yes</p> |
| <p>Data Source</p> | <p>School</p> |
| <p>Where is data stored?</p> | <p>https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/</p> |
| <p>Is it secure and/or encrypted?</p> | <p>Secure</p> |
| <p>Who can access data?</p> | <p>https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/</p> |
| <p>How long is data kept?</p> | <p>3 years after date closed</p> |
| | |

| | |
|---------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Who is data shared with? | https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/ |
| Legal basis for sharing | Public Task |
| How is data shared? | https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/ |

System used: Health & Safety

| | |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Records pertaining to Health & Safety |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • Contact details • D.o.B • Record of Accident/Incident <p>Child</p> <ul style="list-style-type: none"> • Name • Contact details • D.o.B • Record of Accident/Incident <p>Visitor</p> <ul style="list-style-type: none"> • Name • Contact details • D.o.B • Record of Accident/Incident |
| Why is it being processed? | To ensure Health and Safety Regulations are followed |
| Legal Basis | Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | School network Paper copies- secure private office |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | NCC, school staff and parents |
| Legal basis for sharing | Public task and legal obligation. |
| How is data shared? | Electronically via a secure server. |

System used: Interactive Resources

| | |
|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Pupil / teacher online learning resources for Numeracy. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • Class / Year group • School <p>Pupil</p> <ul style="list-style-type: none"> • Name • Class / Year group • School |
| Why is it being processed? | Necessary to provide access to learning resources through School360 |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis toolkit. |
| Is Consent Required? | No |
| Data Source | School 360 |
| Where is data stored? | Interactive Resources secure servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Individual users can access their own accounts. Interactive Resources staff to enable support. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | N/A |
| Legal basis for sharing | N/A |
| How is data shared? | N/A |
| References | Click to download Interactive Resources Privacy Notices |

System used: Kahoot

| | |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Elevate learning at your entire school or district with Kahoot! EDU: Easily roll out a site license across your school, district or campus Empower teachers with interactive teaching and assessment tools Engage and motivate students in class and via distance learning Get more control and visibility into Kahoot! usage We believe that there should be no limits to when and where you can learn. Engage students in learning when your school is out and stay on track with curriculum while instructing online. |
| Personal Data Items | <p>Teacher</p> <ul style="list-style-type: none"> • Name <p>Pupil</p> <ul style="list-style-type: none"> • Name • Age |
| Why is it being processed? | https://kahoot.com/privacy-policy/ |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO-Legal Basis tool kit |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://kahoot.com/privacy-policy/ |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://kahoot.com/privacy-policy/ |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://kahoot.com/privacy-policy/ |
| Legal basis for sharing | Public Task |
| How is data shared? | https://kahoot.com/privacy-policy/ |

System used: Letter join

| | |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Letter-join is the teacher's companion for teaching cursive handwriting combining interactive animations and worksheets for real handwriting practice. Letter-join includes animations of all the letters of the alphabet with a spoken commentary on how to write each letter. Patterns, Letters and Words can all be watched and traced on-screen. Magic Words lets you trace over your own words on a number of exciting backgrounds and Custom Words lets you input your own words, replay the video and trace over the words for IWB practice. |
| Personal Data Items | <p>School</p> <ul style="list-style-type: none"> • Name <p>Staff</p> <ul style="list-style-type: none"> • Name • Class <p>Pupil</p> <ul style="list-style-type: none"> • Name • Class |
| Why is it being processed? | To provide online access to a range of teaching and learning materials for staff and pupils. |
| Legal Basis | Public task Article 6(1)(e) gives you a lawful basis for processing where: "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" |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Green and Tempest secure servers |
| Is it secure and/or encrypted? | In line with the General Data Protection Regulation (GDPR) we understand our obligation to store securely the contact details of our customers; those being personal identifiers, mainly names, addresses, telephone numbers and email addresses. This data is kept securely and is only accessible by staff at Green and Tempest Ltd. All data is deleted from our systems immediately upon customer notification of termination of a subscription. |
| Who can access data? | Staff, Letter join staff for support |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Not shared |
| Legal basis for sharing | N/A |
| How is data shared? | N/A |

References

[Click to download Letter Join Privacy Policy](#)

System used: National Tutoring Programme (NTP)

| | |
|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | The National Tutoring Programme offers highly tailored tuition support for pupils, to help those whose education has been most impacted by the pandemic. |
| Personal Data Items | <p>Child</p> <ul style="list-style-type: none"> • Name • SEN Status • PP Funding Status • Attainment Level • Special Learning Needs • Safeguarding Info/Risk Assessments |

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

| | |
|------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Special Category Data Legal Basis | Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement. |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | https://nationaltutoring.org.uk/legal/privacy-notice/ |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To perform the services of the National Tutoring Programme |
| Legal Basis | Legitimate Interest Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.” |
| Evidence for legal basis | ICO lawful basis toolkit |
| Is Consent Required? | No |
| | |

| | |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| Data Source | School |
| Where is data stored? | https://nationaltutoring.org.uk/legal/privacy-notice/ |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://nationaltutoring.org.uk/legal/privacy-notice/ |
| How long is data kept? | 6+ years |
| Who is data shared with? | https://nationaltutoring.org.uk/legal/privacy-notice/ |
| Legal basis for sharing | Legitimate Interest |
| How is data shared? | https://nationaltutoring.org.uk/legal/privacy-notice/ |

System used: NFER

| | |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Assessment materials, reading test and pupil progress data |
| Personal Data Items | Staff <ul style="list-style-type: none">• Name• School• Contact details Pupil <ul style="list-style-type: none">• Name• Date of birth• School• Performance data |
| Why is it being processed? | To assess pupil attainment and help staff track progress and set targets. |
| Legal Basis | Public task Article 6(1)(e) gives you a lawful basis for processing where: “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 |
| Evidence for legal basis | ICO legal basis toolkit. |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | In school NFER secure servers (analysis and marking) |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff and NFER staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Not shared |
| Legal basis for sharing | N/A |
| How is data shared? | N/A |
| References | Click to download NFER |

System used: Northumberland School Readiness Passport

| | |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | The School Readiness Passport is primarily a transition document. It will be used to gather information about key events in a child's early life. |
| Personal Data Items | <p>Child</p> <ul style="list-style-type: none"> • Name • Gender • Date of Birth • Unique Identifier • PP Information • Entitlement of hours • Special Needs Information • Development Progress • |
| Why is it being processed? | This information will be gathered from the child's parents/carers and we do not access or use this data in any way other than as required to enable developmental progress tracking of young children and promote clear transitions between early years settings. |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "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"</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | Yes |
| Data Source | Parent |
| Where is data stored? | https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf |
| Is it secure and/or encrypted? | https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf |
| Who can access data? | https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf |
| Legal basis for sharing | Public Task |
| How is data shared? | https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf |

System used: Nuffield Early Language Intervention (NELI)

| | |
|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | The Nuffield Foundation is an independent charitable trust with a mission to advance educational opportunity and social well-being. We fund research that informs social policy, primarily in Education, Welfare and Justice. We also provide opportunities for young people to develop skills and confidence in science and research. |
|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

| | |
|------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Special Category Data Legal Basis | Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement. |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | n/a |
| Legal basis for sharing Special Category data | n/a |
| Why is it being processed? | To support schools with Language Intervention |
| Legal Basis | Public task Article 6(1)(e) gives you a lawful basis for processing where: “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 |
| Evidence for legal basis | ICO Legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Secure Nuffield server |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | Staff with login and nuffield for technical support |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | n/a |

| | |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|
| Legal basis for sharing | n/a |
| How is data shared? | https://www.nuffieldfoundation.org/about/governance/privacy-policy |

System used: Padlet

| | |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Padlet is a free online tool that is best described as an online notice board. Padlet can be used by students and teachers to post notes on a common page. The notes posted by teachers and students can contain links, videos, images and document files |
| Personal Data Items | Pupil <ul style="list-style-type: none">• Name• Teacher |
| Why is it being processed? | To facilitate learning |
| Legal Basis | Public task Article 6(1)(e) gives you a lawful basis for processing where: “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 |
| Evidence for legal basis | Use by school in learning tasks |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | In school secure & electronically on Padlet system |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Padlet & business providers |
| How long is data kept? | 1+ year |
| Who is data shared with? | Business providers e.g.billing |
| Legal basis for sharing | Contract |
| How is data shared? | Secure electronic |

System used: ParentPay

| | |
|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | ParentPay is an online payment service for schools and families. |
| Personal Data Items | staff <ul style="list-style-type: none">• Name• Gender Pupil <ul style="list-style-type: none">• Name• Date of birth• Gender• Groups• Dietary requirements• Postal address• UPN• Roll number• Meal selections and history• Emergency contact information• Medical details• EHIC• Doctors contact• Passport Parent/Carer <ul style="list-style-type: none">• Name• Gender• Address• Phone number• Email• Payment history & balance• Payment card details |

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

| | |
|------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Special Category Data Legal Basis | Obligation <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| Special Category Evidence for | Article 9 |

| | |
|------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| legal basis | |
| How is the Special Category data shared? | Via secure server |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To provide parents with an online payment system for meals, school trips and other activities/resources. |
| Legal Basis | Contract Article 6(1)(b) gives you a lawful basis for processing where: “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” |
| Evidence for legal basis | ICO lawful basis tool. |
| Is Consent Required? | No |
| Data Source | Parent |
| Where is data stored? | Parent pay secure servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Parent, Parent pay staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | School staff |
| Legal basis for sharing | Contract |
| How is data shared? | Via secure servers |

System used: Performance Management

| | |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Staff appraisals |
| Why is it being processed? | To assist SLT in reviewing performance |
| Legal Basis | <p>Contract</p> <p>Article 6(1)(b) gives you a lawful basis for processing where: “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”</p> |
| Evidence for legal basis | Legitimate interest and public task |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Online Paper |
| Is it secure and/or encrypted? | Yes encrypted on line Paper in a locked drawer |
| Who can access data? | SLT and line managers |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Staff member |
| Legal basis for sharing | Public task |
| How is data shared? | Verbally Paper copy Electronic copy |

System used: Photographs and videos of staff and pupils.

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| Description | Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • Photograph • Video <p>Pupil</p> <ul style="list-style-type: none"> • Photograph (unnamed) • Video (unnamed) <p>Governor</p> <ul style="list-style-type: none"> • Name • Photograph |
| Why is it being processed? | To celebrate the life and work of the school. |
| Legal Basis | <p>Consent</p> <p>Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | School website and social media sites |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Publicly available on the www |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | The public |
| Legal basis for sharing | ICO legal basis toolkit |
| How is data shared? | On www |
| References | Click to download Model photograph policy (including consent form) |

System used: Recruitment information

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| Description | Part of the job application process |
| Personal Data Items | <p>Name</p> <ul style="list-style-type: none"> • Name • DOB • Address • Educational establishments attended • Qualifications • Disciplinary Records • Appraisal Records • Salary information |

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

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| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Electronically via secure online servers |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | As part of the recruitment process |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | Safer recruitment process |

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| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | Business Manager's office HT/ DHT |
| Is it secure and/or encrypted? | Locked storage/ filing cabinet |
| Who can access data? | Business Manager/ HT/ DHT/ School Governors |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Governors/ shortlisting panel/ SIP/ HR |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | Within shortlisting process/ Local Authority/ relevant personnel |

System used: Registers

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| Description | Daily register, after school club registers, lunch register |
| Personal Data Items | <p>Child</p> <ul style="list-style-type: none"> • Name • Address • Date of Birth • Lunch Status • Attendance |
| Why is it being processed? | To monitor children's attendance - legal obligation. |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Paper registers kept in the school office Electronic registers online |
| Is it secure and/or encrypted? | Yes- secure |
| Who can access data? | School staff, after school club providers |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | School staff, after school club providers |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | Through the paper register at the time of completion. Electronically with office/Sims. |

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| Description | Records relating to safeguarding of children |
| Personal Data Items | <p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Child Protection Plan/Actions <p>Parent/Carers</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>Social Care Worker</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>External Support Workers</p> <ul style="list-style-type: none"> • Name • Organisation • Position • Address • Contact Details |

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- Criminal Records information - protected in Article 10

Special Category Data Legal Basis

Obligation

Processing is required for carrying out obligations under employment,

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| | social security or social protection law or a collective agreement. |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Secure Cloud Sharing - Google or Office 365 |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | Statutory obligations and to support educational entitlement |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis tool |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | school computer, laptop |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Head Teacher, Designated Admin staff, Class Teacher, LA Workers as appropriate |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Parent/Carer as appropriate, key workers as appropriate, LA workers as appropriate, Police |
| Legal basis for sharing | Statutory and Legitimate |
| How is data shared? | Secure Cloud Sharing, Google or Office 365 |

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| Description | Records relating to safeguarding of children |
| Personal Data Items | <p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Child Protection Plan/Actions <p>Parent/Carers</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>Social Care Worker</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>External Support Workers</p> <ul style="list-style-type: none"> • Name • Organisation • Position • Address • Contact Details |

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- Criminal Records information - protected in Article 10

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| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment,</p> |
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| | <p>social security or social protection law or a collective agreement.</p> <p>Significant Public Interest</p> <p>Processing is required for reasons of significant public interest on the basis of Union or Member State Law that is equivalent to the aim pursued and which contains suitable safeguards.</p> |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Secure Messenger, verbal |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | Statutory obligations and to support educational entitlement |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis tool |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Secure cabinet, |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Head Teacher, Designated admin staff, Class Teacher, LA workers as appropriate |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Parent/Carer as appropriate, key workers as appropriate, LA workers as appropriate, Police |
| Legal basis for sharing | Statutory and Legitimate interest |
| How is data shared? | Verbal or secure messenger |

System used: School360

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| Description | Learning platform for Northumberland schools with links to 3rd party educational resource providers. |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • School id • Class/Group • Year • UPN (Unique Pupil Number) • Gender • Attendance (If School360 used for registration) • Pupil concern reports • EYFS reflections <p>Staff</p> <ul style="list-style-type: none"> • Name • Staff Alternative e-mail address • Teacher pupil notes |

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- Religious or philosophical beliefs
- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

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| Special Category Data Legal Basis | Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement. |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Electronically, encrypted on transfer and storage. |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To facilitate setting up and access to the County learning platform - School360 |
| Legal Basis | Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: “processing |

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| | <p>is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | Guidance from ICO Tool |
| Is Consent Required? | No |
| Data Source | SIMS |
| Where is data stored? | Rackspace London |
| Is it secure and/or encrypted? | Yes - See Rackspace Privacy Policy |
| Who can access data? | School Administrator NCC ICT Team Seven360 development staff Users (own data) |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | SIMs Wonde Frog Learning Just2easy Interactive Resources |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | Electronically, encrypted on transfer and storage. |
| References | <p>Click to download School360 Privacy Policy</p> <p>Click to download School360 EYFS App Privacy Policy</p> <p>Click to download School360 Parent App Privacy Policy</p> |

System used: Schoolcomms

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|---------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | Communication app for parents |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Attendance data <p>Parent</p> <ul style="list-style-type: none"> • Name • Address • e-mail address • Mobile number |
| Why is it being processed? | To allow regular communication between the school and parent, plus attendance data and payment information if the school chooses these modules. |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal basis tool, app conditions of use, app privacy notice |
| Is Consent Required? | Yes |
| Data Source | SIMS |
| Where is data stored? | 'Schoolcomms do not transfer data to countries outside of the EEA. The cloud providers that we work with guarantee data is only processed in the EEA, or that they explicitly abide by the regulation.' |
| Is it secure and/or encrypted? | 'Security of data is essential. Schoolcomms uses best of class protection measures and carry out regular external audits to assess our security posture.' |
| Who can access data? | Schoolcomm staff - 'our own staff may see information in the course of providing technical support to the school but this will not be shared with anyone without permission of the Data Controller.' |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | 'We may pass your own details to another organisation to supply/deliver products or services you have purchased and/or to provide after-sales service. We share data with our Payments Processing Service Providers when you make a purchase using our Payments module. This information will be used to authenticate you as a cardholder when making credit or debit card transactions. This data includes name, mobile phone number, |

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| | email address.' |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | 'If you apply for a Merchant Account through Schoolcomms, we can set up your payments gateway on your behalf' |
| References | Click to download Schoolcomms Privacy Notice |

| System used: Scratch | |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | With Scratch, you can program your own interactive stories, games, and animations — and share your creations with others in the online community. Scratch helps young people learn to think creatively, reason systematically, and work collaboratively — essential skills for life in the 21st century. Scratch is a project of the Lifelong Kindergarten Group at the MIT Media Lab. It is provided free of charge. |
| Personal Data Items | <p>Teacher</p> <ul style="list-style-type: none"> • Name <p>Child</p> <ul style="list-style-type: none"> • Name • • Age <p>Parent</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | https://scratch.mit.edu/privacy_policy |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO - Legal basis tool |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://scratch.mit.edu/privacy_policy |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://scratch.mit.edu/privacy_policy |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://scratch.mit.edu/privacy_policy |
| Legal basis for sharing | Public Task |
| How is data shared? | https://scratch.mit.edu/privacy_policy |

| System used: Senso Cloud | |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Description | The Cloud Based Platform for Device Monitoring and Management. All-In-One Software for Network, Classroom, Safeguarding and Asset Management, and for managing and monitoring any Windows and Chrome device from a Centralised Web portal |
| Personal Data Items | User <ul style="list-style-type: none"> • Name • Marital status • Title • DOB • Gender • Address • Email Address • Telephone number |
| Why is it being processed? | For filtering and monitoring services across school devices, to carry out our obligations arising from the performance of the contract entered and to comply with a legal or regulatory obligation. |
| Legal Basis | Contract <p>Article 6(1)(b) gives you a lawful basis for processing where: “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”</p> Legal Obligation <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> Legitimate Interest <p>Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”</p> |
| Evidence for legal basis | ICO toolkit |
| Is Consent Required? | No but consent can be withdrawn at any time |
| Data Source | School |
| Where is data stored? | Secure cloud server |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | The authorised person(s) within school only - staff |
| How long is data kept? | 3 years after date closed |
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| Who is data shared with? | External third parties - details and lawful basis all set out on website privacy notice. |
| Legal basis for sharing | Contract, legitimate interest |
| How is data shared? | Via company server |

System used: Social media sites e.g. Twitter, Facebook

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| Description | Social Media tool used to inform parents about events in school and celebrate children's achievement. |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Photos (unnamed) • Videos (unnamed) • School name • Classes |
| Why is it being processed? | Unnamed photos of pupils and their work are used on the site |
| Legal Basis | <p>Consent</p> <p>Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | Twitter or Facebook servers and in school |
| Is it secure and/or encrypted? | Twitter account is password protected. Only parents who have been approved by the school can access or follow the school twitter account |
| Who can access data? | Parents of children in school who have requested to follow the school on twitter and who have been approved by the admin team. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Information shared with parents |
| Legal basis for sharing | Consent |
| How is data shared? | Online via secure servers |

System used: STEM

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| Description | Developing teachers and leaders Explore programmes and resources that support professional development and drive the impact of teaching across schools and colleges. o support parents and carers, our subject experts have put together a selection of activities and materials, which are free for everyone to access. |
| Personal Data Items | <p>Teacher</p> <ul style="list-style-type: none"> • Name <p>child</p> <ul style="list-style-type: none"> • Name <p>Age</p> <ul style="list-style-type: none"> • Name <p>Parent</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | https://www.stem.org.uk/privacy-policy |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO Legal Basis Tool |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://www.stem.org.uk/privacy-policy |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://www.stem.org.uk/privacy-policy |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.stem.org.uk/privacy-policy |
| Legal basis for sharing | Public Task |
| How is data shared? | https://www.stem.org.uk/privacy-policy |

System used: Y4 Multiplication Check

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| Description | What is the Multiplication Tables Check. The Multiplication Tables Check (MTC) is a key stage 2 assessment to be taken by pupils at the end of year 4 (in June). From the 2019 / 2020 academic year onwards. The purpose of the MTC is to make sure the times tables knowledge is at the expected level. |
| Personal Data Items | <p>child</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “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</p> |
| Evidence for legal basis | ICO legal framework tool kit |
| Is Consent Required? | yes |
| Data Source | School |
| Where is data stored? | https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance |
| Is it secure and/or encrypted? | secure |
| Who can access data? | https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance |
| Legal basis for sharing | Public task |
| How is data shared? | https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance |