



Richard Coates C of E Primary and Middle

GDPR Asset Register

Date: 20/06/2019

Data Protection Officer: Helen Pye

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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 | |
| Active Learn Pearsons - including Bug Club and Abacus Maths | Bug Club is a whole-school reading programme that combines an online reading world with print books, and assessment tools. Abacus Maths is a whole school maths programme that combines an online maths world with printed books and assessment tools. | |
| Assessment Records | Electronic and paper mark books | |
| Attendance file | Attendance information about pupils and classes | yes |
| CCTV | CCTV | |
| 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 a 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 |
| CRB Cunninghams | CRB Cunninghams Education Solutions provide schools with their own identity management, cashless catering, and online payment system. | yes |
| Data tracking spreadsheets | Spreadsheets (excel) to track progress of children over the course of their school career. | yes |
| Dietary requirements information sheets | Required documents for specific children with severe allergies / intolerances and religious observations (food) | yes |
| EVOLVE visits | An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities. | |
| Frog Learning | Online learning application linked to School360. Provides resources for a wide range of curricular areas. | |
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| Futures Cloud | Internet / Network monitoring and reporting tool | |
| GL-Assessment | GL assessments provide a range of tests for schools including reading, progress and cognitive tests | |
| Google drive for education | suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom. | |
| Governance | Details of all members of the Governing Body | |
| Health & Safety | Records pertaining to Health & Safety | |
| Interactive Resources | Pupil / teacher online learning resources for Numeracy. | |
| Just2easy | Suite of online tools for Desk Top Publishing, Blogging, Infant toolkit and Tables, spelling an arithmetic SATs testers. | |
| 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. | |
| Lexia | Students work independently to develop critical reading and language skills through individualized, motivating learning paths. All students, regardless of their skill level, can each work at their own pace and the teacher is notified (on web-based reports and via email) only when they require support. | |
| Lightspeed Internet Filtering | The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC. | |
| Local Authority moderation of work | The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County. | |
| Medical log | File of medical information for each child: asthma, medication administered, health care plans, risk assessments | yes |
| Micro Librarian | Micro Librarian Systems (MLS) , supplier of Library Management Systems to Education in the UK and the worlds first to use biometric identification data | yes |
| My Maths | MyMaths is an interactive online teaching and homework subscription website for schools that builds | |

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| | pupil engagement and consolidates maths knowledge. | |
| National Centre for Excellence in the Teaching of Mathematics (NCETM) | NCETM provides professional development for staff in the teaching of Mathematics Children's chances of succeeding in education and life will be maximised if they develop deep and lasting procedural and conceptual mathematical understanding. The NCETM's teaching for mastery section explains the rationale for this teaching approach, and presents case studies from schools, together with interviews with teachers involved in mastery projects through the Maths Hubs programme. | |
| Nessy - Literacy interventions | Nessy programs are designed to help students of all abilities learn to read, write, spell and type, especially those who learn differently, including: Mainstream EAL Homeschool Students with dyslexia | |
| NFER | Assessment materials, reading test and pupil progress data | |
| Nursery (Early Years) files | Early years registration information and funding information for Early Years entitlement, hours taken each week | yes |
| Parent mail | Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events | |
| ParentPay | ParentPay is an online payment service for schools and families. | yes |
| Parents Evening Booking System | Online booking system for parents evenings and other school events. | |
| Personnel files | Information relating to staff employment | |
| 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. | |
| PIVATS | An online assessment and target setting tool | yes |
| PS Financials | Accounting, purchasing, budgeting and reporting software. | |
| Recruitment information | Part of the job application process | yes |
| Registers | Daily register, after school club registers, lunch register | |
| School360 | Learning platform for Northumberland schools with links to 3rd party educational resource providers. | yes |
| Schoolcomms | Communication app for parents | |
| Send Paper Records | Records relating to individual pupil's SEND history | yes |
| SIMS | SIMS is a management information system used by maintained schools in the UK. It provides, teachers, | yes |

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| | senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools. | |
| Social media sites e.g. Twitter, Facebook | Social Media tool used to inform parents about events in school and celebrate children's achievement. | |
| Sports Leader UK | Awarding body for L3 award in Sport leadership | |
| Tapestry | An online journal recording all the learning and fun of children's early years education. | |
| Testbase | This is an online resource provided by Doublestruck which enables children to prepare for National SAT examinations. Doublestruck is an Educational Technology company that is part of the AQA family. It specialises in technology that addresses the needs of teachers in formative assessment and reporting. | yes |
| Thrive | Social and Emotional Screening Programme | yes |
| Visitor book | Log of all visitors into school / fire regulations | |
| Wonde | Manages transfer of data from Sims MIS to School360. | yes |
| Pupil Data Collection Sheets - Paper | Information in respect of individual pupils collected at the start of the time in the school and at the beginning of each school year - updated mid year as required/notified | yes |

System used: Accident book

| | |
|---------------------------------------|---|
| 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: Active Learn Pearsons - including Bug Club and Abacus Maths

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|---------------------------------------|---|
| Description | Bug Club is a whole-school reading programme that combines an online reading world with print books, and assessment tools. Abacus Maths is a whole school maths programme that combines an online maths world with printed books and assessment tools. |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Class <p>Staff</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | To provide online access to curriculum materials for staff and pupils |
| 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? | No |
| Data Source | SIMS |
| Where is data stored? | Pearsons secure servers |
| Is it secure and/or encrypted? | <p>Yes Your privacy is extremely important to us. We’re committed to protecting any personal information you’ve given us, and we comply with all relevant data protection laws. This means that:</p> <ul style="list-style-type: none"> • we take full responsibility for the information we hold about you • we will protect your privacy at all times • we will never sell your personal information <p>Whether you’ve supplied your personal details online, by phone or text, by email or in a letter, we will never use them without a lawful reason to do so. We’ll use them for the purposes for which they were initially requested and as fully explained in this Privacy Notice and Cookie Policy.</p> |
| Who can access data? | Staff, pupils own data, Pearsons 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 | <p>Click to download Pearson GDPR readiness</p> <p>Click to download Bug Club Pearson Privacy Notice</p> |

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: CCTV

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|---------------------------------------|---|
| Description | CCTV |
| Personal Data Items | Staff <ul style="list-style-type: none">• Images Child <ul style="list-style-type: none">• Images Visitor <ul style="list-style-type: none">• Images |
| Why is it being processed? | Safeguarding |
| 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? | School servers and recordings |
| 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? | Police in event of criminal investigations |
| Legal basis for sharing | ICO legal basis toolkit |
| How is data shared? | Hard Copy |

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

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

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: CRB Cunninghams

| | |
|----------------------------|--|
| Description | CRB Cunninghams Education Solutions provide schools with their own identity management, cashless catering, and online payment system. |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Registration group • Year • Date of birth • Gender • Free school meal eligibility • Admission number • Photograph • Biometric data (if used by school). <p>Staff</p> <ul style="list-style-type: none"> • Name • School • Address |

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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 | 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? | Not shared |
| Legal basis for sharing Special Category data | N/A |
| Why is it being processed? | To provide users with access to the cashless payment system for school meals. |
| 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 | ICO legal basis toolkit |
| Is Consent Required? | Yes for biometric data |
| Data Source | Parent |
| Where is data stored? | Cunninghams secure servers |
| 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? | Not shared |
| Legal basis for sharing | N/A |
| How is data shared? | N/A |
| References | Click to download CRB Cunninghams Privacy Policy |

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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- 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 |

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|---------------------------------------|--|
| 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: 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

Special category information is data which has the following characteristics:

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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? | 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: 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 |

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

System used: Frog Learning

| | |
|---------------------------------------|---|
| Description | Online learning application linked to School360. Provides resources for a wide range of curricular areas. |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Class / Year group <p>Teacher</p> <ul style="list-style-type: none"> • Name • Class / Year group |
| Why is it being processed? | To allow secure individual access access to the online learning materials. |
| 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? | Frog Learning secure servers |
| Is it secure and/or encrypted? | Yes - see Frog privacy notice. |
| Who can access data? | School staff, ICT team, Frog learning for support. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Shared with school with Staff. |
| Legal basis for sharing | Public task |
| How is data shared? | Online through secure access login by staff |
| References | Click to download Frog Learning GDPR |

System used: Futures Cloud

| | |
|---------------------------------------|--|
| Description | Internet / Network monitoring and reporting tool |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • I/P address • URL's visited <p>Teacher</p> <ul style="list-style-type: none"> • Name • I / P address • URL's visited |
| Why is it being processed? | Fulfills statutory requirement for the school to monitor, log and report inappropriate network activity. |
| 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? | Future Digital Secure Servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Designated teachers in school (normally online safety lead. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | NCC Online safety staff, Northumberland Safeguarding Children Board, Police if serious incident, Staff within school. |
| Legal basis for sharing | Public task & legal obligation. |
| How is data shared? | Electronically. through a secure connection. |
| References | Click to download Future Digital |

System used: GL-Assessment

| | |
|---------------------------------------|---|
| Description | GL assessments provide a range of tests for schools including reading, progress and cognitive tests |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • School • Email • Class <p>Pupil</p> <ul style="list-style-type: none"> • Name • Age • Gender • Class • Year • Performance data |
| Why is it being processed? | To provide? access to a range of testing and diagnostic tools for teaching staff. |
| 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? | GL assessment? secure servers and secure school servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff, GL staff 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? | Electronically via secure networks |
| References | Click to download GL-Assessment Privacy Policy |

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: 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: 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: Just2easy

| | |
|---------------------------------------|--|
| Description | Suite of online tools for Desk Top Publishing, Blogging, Infant toolkit and Tables, spelling an arithmetic SATs testers. |
| Personal Data Items | Child <ul style="list-style-type: none">• Name• Gender• Class / Year group• School Staff <ul style="list-style-type: none">• Name• Class / Year group• School |
| Why is it being processed? | To provide access for staff and pupils to a variety of learning resources through School360 |
| 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? | No |
| Data Source | School 360 |
| Where is data stored? | J2e secure servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | J2e and school360 staff to manage accounts |
| 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 Just2easy Privacy & Data 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: Lexia

Description

Students work independently to develop critical reading and language skills through individualized, motivating learning paths. All students, regardless of their skill level, can each work at their own pace and the teacher is notified (on web-based reports and via email) only when they require support.

Personal Data Items

Staff

- Name
- Job title
- School
- Address
- Telephone number
- e-mail address
- IP address
- Browser information
-

School

- Name
- Payment details
- Usage data

Pupil

- Name
- Age
- Class
- Group

Why is it being processed?

To provide access for staff and pupils to a comprehensive range of teaching resources

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?

Lexia secure servers

Is it secure and/or encrypted?

Lexia has appropriate measures in place to help ensure that our users' Data is protected against unauthorized access or use, alteration, unlawful or accidental destruction and accidental loss. Although we make reasonable efforts to protect your Personal Information from loss, misuse, or alteration by third parties, you should be aware that there is always some risk involved in transmitting information over the Internet. There is also some risk that thieves could find a way to thwart our security

| | |
|---------------------------------|--|
| | systems. If you have any questions about the security of your personal information, you can contact us at privacyofficer@lexialearning.com . |
| Who can access data? | Staff, pupil (own data), Lexia staff for technical support |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Staff |
| Legal basis for sharing | Public task |
| How is data shared? | Internal secure systems |
| References | Click to download LEXIA Privacy Policy |

System used: Lightspeed Internet Filtering

| | |
|---------------------------------------|--|
| Description | The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • Machine name • I/P address • URLs visited • School <p>Pupil</p> <ul style="list-style-type: none"> • Name • Name • Machine name • I/P address • URLs visited • School |
| Why is it being processed? | Statutory requirement to filter Internet services for school users |
| 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? | Lightspeed Rockets at County Hall Northumberland |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | NCC school support Staff, Curriculum ICT Team, Lightspeed staff for support |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | School leadership, LSCB and police if serious incident occurs |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | Secure electron communication |
| References | Click to download Lightspeed Privacy Notice |

System used: Local Authority moderation of work

| | |
|---------------------------------------|--|
| Description | The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County. |
| Personal Data Items | <p>School</p> <ul style="list-style-type: none"> • Name <p>Staff</p> <ul style="list-style-type: none"> • Initials <p>Pupil</p> <ul style="list-style-type: none"> • Initials • Gender • Unique pupil number (UPN) |
| Why is it being processed? | As part of the statutory? requires for assessment and moderation in schools |
| 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? | At County Hall in secure Filing systems and online, encrypted |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Local Authority school data team and assessment/moderation team. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Other NCC staff |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | Secure server and hard copies |

System used: Medical log

| | |
|----------------------------|---|
| Description | File of medical information for each child: asthma, medication administered, health care plans, risk assessments |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Inhaler / medication information (doseage) • DOB • Class • Medical condition • Signs and symptoms • Treatment • Parental consent • Name of medication and dose • Side effects • Storage requirements • Special equipment • Testing needed • Access to food drink • Dietary requirement • Staff support • Contingency arrangements • Family / emergency contacts • Hazard • Risk • Control measures / risk evaluation |

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 | <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? | Internally with school / medical staff |
| Legal basis for sharing Special Category data | Article 9 |

| | |
|---------------------------------------|--|
| Why is it being processed? | Health and safety of child |
| 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? | Medical log in secure storage held in the school 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? | Staff, NCC and NHS professionals |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | Verbally, written and electronically via secure servers. |

System used: Micro Librarian

| | |
|----------------------------|--|
| Description | Micro Librarian Systems (MLS) , supplier of Library Management Systems to Education in the UK and the worlds first to use biometric identification data |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • School • email • Biometric data (if used) <p>Pupil</p> <ul style="list-style-type: none"> • Name • Age • Year • Biometric data (if used) <p>Parent</p> <ul style="list-style-type: none"> • Name • email |

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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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 | Explicit Consent Explicit consent to the Data Subject, unless dependence on consent is prohibited by EU or member state law. |
| Special Category Evidence for legal basis | Consent required from Parent/Carer, or pupil (dependent on age) if biometric data element is used. |
| How is the Special Category data shared? | Not shared |
| Legal basis for sharing Special Category data | N/A |
| Why is it being processed? | To provide online access to a range of library and literacy 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 tool |
| Is Consent Required? | Yes for biometric data if this element of the service is used. |
| Data Source | School |
| Where is data stored? | Micro library secure servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff, ML 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? | N/A |
| References | Click to download Micro Librarian |

System used: My Maths

| | |
|---------------------------------------|--|
| Description | MyMaths is an interactive online teaching and homework subscription website for schools that builds pupil engagement and consolidates maths knowledge. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • School • Email <p>Pupil</p> <ul style="list-style-type: none"> • Name • Age • Gender • Year • Class • Performance data |
| Why is it being processed? | To provide pupils and staff with access to a wider range of mathematics online teaching and learning materials. |
| 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? | MyMaths secure servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff and pupils with login. Mymaths staff for technical support. |
| 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? | Electronically via secure servers. |
| References | Click to download MyMaths |

System used: National Centre for Excellence in the Teaching of Mathematics (NCETM)

| | |
|---------------------------------------|--|
| Description | NCETM provides professional development for staff in the teaching of Mathematics Children's chances of succeeding in education and life will be maximised if they develop deep and lasting procedural and conceptual mathematical understanding. The NCETM's teaching for mastery section explains the rationale for this teaching approach, and presents case studies from schools, together with interviews with teachers involved in mastery projects through the Maths Hubs programme. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • email address • School |
| Why is it being processed? | To provide access to the wide range of resources available online. |
| 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? | Tribal secure servers |
| Is it secure and/or encrypted? | Yes. |
| Who can access data? | Staff, Tribal staff for support. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Tribal and school staff. |
| Legal basis for sharing | Public task |
| How is data shared? | With user details removed. |
| References | Click to download National Centre for Excellence in the Teaching of Mathematics |

System used: Nessy - Literacy interventions

| | |
|---------------------------------------|--|
| Description | Nessy programs are designed to help students of all abilities learn to read, write, spell and type, especially those who learn differently, including: Mainstream EAL Homeschool Students with dyslexia |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Year group • Test results |
| Why is it being processed? | To create a secure log in for individual pupils to access Online Literacy intervention materials. |
| 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? | No |
| Data Source | SIMS |
| Where is data stored? | Securely on Nessy Servers |
| Is it secure and/or encrypted? | The security of personal information The secrecy of your personal information is important to Nessy. We do not store credit card details nor do we share customer details with any 3rd parties. Any information you provide will be held securely and in accordance with the Data Protection Act 1998. All of the data collected, including usernames, passwords and any test results achieved, is stored on secure servers. Nessy will not sell or rent any of your personal information. We ask you to provide your email and telephone number solely to assist in coordinating and confirming your access to your Nessy online adventure (called a “Nessy Subscription” for short). |
| Who can access data? | School staff, pupils, Nessy 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 Nessy Privacy Policy |

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: Nursery (Early Years) files

| | |
|----------------------------|---|
| Description | Early years registration information and funding information for Early Years entitlement, hours taken each week |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Gender • Address • Documents seen / recorded • Parents Nat. Insurance Number • Eligibility code • Religion • Email address • Telephone number • Parent work details • Emergency contact details • Former placements • Medical information • Ethnic origin • SEN information • EAL • Armed forces • Meal arrangements • Parental consent: medicine, photos, website, school publications, press, local excursions • Start dates • Desired sessions |

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 | <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? | Internally within school |
| Legal basis for sharing Special | Article 9 |

| | |
|---------------------------------------|---|
| Category data | |
| Why is it being processed? | To ensure registration of children into school and that children receive their entitlements |
| 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 | Accurate record of admission |
| Is Consent Required? | No |
| Data Source | Parent |
| Where is data stored? | In school office in secure storage |
| 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? | School staff, NCC, outside agencies as required |
| Legal basis for sharing | Safeguarding |
| How is data shared? | Verbally / Electronically via secure server. |

System used: Parent mail

| | |
|-----------------------------------|--|
| Description | Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events |
| Personal Data Items | School <ul style="list-style-type: none">• Name• School email address Staff <ul style="list-style-type: none">• Name• Class• Title• e-mail• Gender• Telephone number• DOB• School address Pupil <ul style="list-style-type: none">• Name• Year• Parent/carer name• Title• Class• Gender• DOB• Address• DOB Parent/carer <ul style="list-style-type: none">• Name• Telephone number• email address• Title• Gender• Address |
| Why is it being processed? | To provide access to a range of communication and payment 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 | Parent |
| | |

| | |
|---------------------------------------|--|
| Where is data stored? | Parent mail secure servers |
| Is it secure and/or encrypted? | GDPR requires ParentMail to adhere to a number of key principles with regards to your data and you can be assured that we take these responsibilities extremely seriously. As part of our commitment to GDPR we make the following promises to our customers and partners; • We will only manage data where we have an explicit agreement with the data controller • We will only retain data for as long as we have a processing agreement with the controller or need to do so with the data subject • All data used in our systems is encrypted when at rest (stored) and whilst in transit (when accessed using a browser or the ParentMail app) |
| Who can access data? | Staff, Parent mail staff for technical support. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | School staff |
| Legal basis for sharing | Public task |
| How is data shared? | Via secure login |
| References | Click to download Parentmail Privacy Policy |

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: Parents Evening Booking System

| | |
|---------------------------------------|---|
| Description | Online booking system for parents evenings and other school events. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • Email • Classes <p>Pupil</p> <ul style="list-style-type: none"> • Name • Classes • Year <p>Parent</p> <ul style="list-style-type: none"> • Name • Email |
| Why is it being processed? | To provide parents/carers with an online system for booking parents evening and other school events. |
| 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? | PEBS servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Staff, parents |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Shared with individual? parents and appropriate staff. |
| Legal basis for sharing | Public task |
| How is data shared? | Secure online servers |
| References | Click to download PEBS |

System used: Personnel files

| | |
|---------------------------------------|--|
| Description | Information relating to staff employment |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • Address • Telephone number • e-mail address • National Insurance Number • Qualifications • DOB • Contract • Payroll no. • Employment history • References • Leave of absence • DBS checked |
| Why is it being processed? | Necessary for employment |
| 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 filing cabinet & online secure servers. |
| Is it secure and/or encrypted? | Yes - secure storage |
| Who can access data? | Headteacher and office staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | NCC and/or HR provider and/or Payroll provider |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | Electronically or secure courier |

System used: Photographs and videos of staff and pupils.

| | |
|---------------------------------------|---|
| 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: PIVATS

| | |
|----------------------------|---|
| Description | An online assessment and target setting tool |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Year Group • UPN • Assessment information • LAC • FSM • Gender • Primary Need <p>Staff</p> <ul style="list-style-type: none"> • Name • e-mail |

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? | Secure online database |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | Attainment tracking |
| 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.” |

| | |
|---------------------------------------|--|
| | 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? | Online secure database |
| 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? | Local Authority, NHS Services (CYPS) |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | Online secure database |
| References | Click to download PIVATS Lancashire County Council |

System used: PS Financials

| | |
|---------------------------------------|---|
| Description | Accounting, purchasing, budgeting and reporting software. |
| Personal Data Items | Staff <ul style="list-style-type: none">• Name• School• MIS ID• Email address School <ul style="list-style-type: none">• Name• Purchase data• Accounting data• Sales data• Expense data• Payment data• VAT returns |
| Why is it being processed? | To provide the school with an online financial management system. |
| 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? | PS Financials servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff with login PS financial technical? staff for support |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | VAT returns shared with HMRC |
| Legal basis for sharing | Public task |
| How is data shared? | Electronically |
| References | Click to download PS Financials Privacy Click to download PS Financial Data Protection |

System used: Recruitment information

| | |
|----------------------------|---|
| 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 |

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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

| | |
|--|--|
| 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 |

| | |
|---------------------------------------|--|
| 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

| | |
|---------------------------------------|--|
| 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. |

System used: School360

| | |
|----------------------------|---|
| 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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- 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? | 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 |

| | |
|---------------------------------------|---|
| | <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

| | |
|---------------------------------------|--|
| 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, |

| | |
|--------------------------------|---|
| | 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: Send Paper Records

| | |
|----------------------------|--|
| Description | Records relating to individual pupil's SEND history |
| Personal Data Items | Pupil <ul style="list-style-type: none">• Name• Date Of Birth• Address• Medical Information• Health & Social Care• Specific Educational Needs• Interventions In Place Parents <ul style="list-style-type: none">• Name• Address• Contact Details Staff <ul style="list-style-type: none">• Name• Position External Support <ul style="list-style-type: none">• Name• Organisation• Position• Address• Contact Details |

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Special category information is data which has the following characteristics:

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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 <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 | Secure messenger |

| | |
|--|--|
| shared? | |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To support educational entitlement to meet statutory obligations |
| 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>Legitimate Interest</p> <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 Legal Basis Toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Secure Cabinet |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Headteacher, Key Worker, Class Teacher, SENDCO and Office Staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Case workers, Parents, local Authority and Receiving Schools |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | Secure Messenger |

System used: SIMS

Description

SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools.

Personal Data Items

Pupil

- Name
- Date of birth
- Address
- Title
- Gender
- Class
- Year
- Parent/carer name
- UPN
- Dietary Requirements
- Medical information
- Attendance/exclusion
- FSM
- SEN
- Assessment information
- Child Protection Plan
- School history
- Looked After Information

Parent/Carer

- Name
- Address
- Phone number
- email address
- Gender
- Title
- DOB
- Parental responsibility
- Language
- Occupation

Staff

- Name
- Address
- Phone number
- email address
- Title
- Gender
- DOB
- NI Number
- Ethnicity
- Bank Account Information
- Qualifications
- Disability & Medical Information

- Religion
- Marital status
- Language
- Passport Information
- Dietary requirements
- Absences
- Car information
- Next of Kin
- Payroll number
- DBS 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

| | |
|--|--|
| 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 via secure encrypted communication |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | Processing of this data is necessary for the completion of a public task and for the school to meet statutory requirements. |
| 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." 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 | SIMS |
| Where is data stored? | Capita SIMs secure servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Admin staff, teachers in school, NCC SIMs team and Capita SIMs staff for support. |
| How long is data kept? | 10+ years |
| Who is data shared with? | Parents |
| Legal basis for sharing | Necessary for completion of statutory tasks. |
| How is data shared? | Electronically via secure encrypted communication |
| References | Click to download Capita SIMS Privacy Statement |

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

| | |
|---------------------------------------|---|
| 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: Sports Leader UK

| | |
|---------------------------------------|---|
| Description | Awarding body for L3 award in Sport leadership |
| Personal Data Items | <p>Child</p> <ul style="list-style-type: none"> • Name • D.o.B • Contact details • Unique Learner Number • Assessment details |
| Why is it being processed? | To gain qualifications |
| 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? | Sport Leader gateway |
| Is it secure and/or encrypted? | Yes- password protected |
| Who can access data? | School staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Sport Leader UK |
| Legal basis for sharing | Public task |
| How is data shared? | Via secure gateway |

System used: Tapestry

| | |
|---------------------------------------|---|
| Description | An online journal recording all the learning and fun of children's early years education. |
| Personal Data Items | <p>School</p> <ul style="list-style-type: none"> • Name • Address • Email address and name of person who pays for service in school <p>Pupil</p> <ul style="list-style-type: none"> • Name • Date of birth • Notes on progress • Photographs • Videos • Address <p>Parent</p> <ul style="list-style-type: none"> • Name • email address <p>Staff</p> <ul style="list-style-type: none"> • Name • Email address |
| Why is it being processed? | To provide access to an online early years journal which records pupil activity and progress throughout the year. |
| 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 for parent access element |
| Data Source | School |
| Where is data stored? | Tapestry? secure servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Staff, parents (own child), other settings if child moves school and new school if it uses Tapestry. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | The child's? new school if it uses Tapestry. |
| Legal basis for sharing | Public task |
| How is data shared? | Electronically over secure link. |

References

[Click to download Tapestry Privacy Policy](#)

System used: Testbase

Description

This is an online resource provided by Doublestruck which enables children to prepare for National SAT examinations. Doublestruck is an Educational Technology company that is part of the AQA family. It specialises in technology that addresses the needs of teachers in formative assessment and reporting.

Personal Data Items

School

- Name
- Contact Address
- Contact Email
- Contact Telephone Number
- Billing Address

Staff

- Name

Pupil

- Name
- UPN
- Admission number
- Gender
- Year Group
- Registration group
- Class name
- Teacher name
- Ethnicity
- Eligibility for free school meals
- Pupil premium indicator
- SEN Status
- In LEA care

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
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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

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

Article 9

| | |
|--|--|
| legal basis | |
| How is the Special Category data shared? | AQA; Doublestruck Service Providers (including internet service platform providers; payment processing providers); Local authorities; Doublestruck advisors and auditors; other approved third parties necessary to provide the service. |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To provide a service and resources which enables schools to assess pupil attainment and track? progress? of individuals and groups. |
| 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 server |
| Is it secure and/or encrypted? | Account is password protected, Store on Doublestruck secure servers. |
| Who can access data? | School; Teastbase (Doublestruck LTD) for technical support. |
| How long is data kept? | 6 years after date closed |
| Who is data shared with? | AQA; Doublestruck Service Providers (including internet service platform providers; payment processing providers); Local authorities; Doublestruck advisors and auditors; other approved third parties necessary to provide the service. |
| Legal basis for sharing | Legal obligation and public task |
| How is data shared? | In a structure, commonly used, machine readable format. |
| References | Click to download Testbase privacy notice |

System used: Thrive

| | |
|----------------------------|--|
| Description | Social and Emotional Screening Programme |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Class • Year Group • UPN • Assessment information • LAC <p>Staff</p> <ul style="list-style-type: none"> • Name • Class |

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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? | Online secure server |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | Social & emotional development tracking |
| 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? | No |

| | |
|---------------------------------------|--|
| Data Source | School |
| Where is data stored? | Thrive secure servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Thrive employees for support, school staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | School staff |
| Legal basis for sharing | Public task |
| How is data shared? | Online secure server |

System used: Visitor book

| | |
|---------------------------------------|--|
| Description | Log of all visitors into school / fire regulations |
| Personal Data Items | <p>Visitor</p> <ul style="list-style-type: none"> • Name • Date and time • Car registration • Purpose of visit • Company • |
| Why is it being processed? | Safeguarding, health and safety, fire 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 |
| Where is data stored? | Visitor book (hard copy) |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff, visitors |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | School staff, visitors |
| Legal basis for sharing | Public task & legal obligation |
| How is data shared? | Hard copy or secure online server. |

System used: Wonde

| | |
|----------------------------|--|
| Description | Manages transfer of data from Sims MIS to School360. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name <p>Pupil</p> <ul style="list-style-type: none"> • Name • School id • Class/group • Year • UPN • Gender • Attendance |

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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? | School 360 secure servers |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To facilitate the exchange of data to allow the set up of school360 for a school. |
| 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 | ICO legal basis toolkit |

| | |
|---------------------------------------|---|
| Is Consent Required? | No |
| Data Source | SIMS |
| Where is data stored? | School360 servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School360 users |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | School360 users |
| Legal basis for sharing | Public task & legitimate interest |
| How is data shared? | Online secure servers |
| References | Click to download Wonde Privacy Policy Click to download Wonde data protection |

System used: Pupil Data Collection Sheets - Paper

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|----------------------------|--|
| Description | Information in respect of individual pupils collected at the start of the time in the school and at the beginning of each school year - updated mid year as required/notified |
| Personal Data Items | <p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Medical Information • Travel Arrangements • Dietary Requirements <p>Parents / Carers / Designated Contact</p> <ul style="list-style-type: none"> • Name • Address • Contact details <p>External Support</p> <ul style="list-style-type: none"> • Name • Organisation • Address • Contact details |

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| Special Category Data Legal Basis | <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 | ICO Legal basis tool |
| How is the Special Category data shared? | Not Shared - input into SIMS |
| Legal basis for sharing Special Category data | N/R |

| | |
|---------------------------------------|--|
| Why is it being processed? | In order to meet the specific needs of the pupils and ensure safe arrangements for transport / collection / school meals etc.. |
| 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? | No |
| Data Source | Parent |
| Where is data stored? | Secured filing cabinet |
| Is it secure and/or encrypted? | Yes - locked |
| Who can access data? | Head Heacher / Office Staff / Deputy Head |
| 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 |