



Ellington Primary School

GDPR Asset Register

Date: 20/03/2026

Data Protection Officer: Louise Gilmour

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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 |
|----------------------|--|------------------|
| Accelerated Reader | Accelerated Reader gives teachers the information they need to monitor students' reading practice and make informed decisions to guide their future learning. | |
| Accident book | Log of accidents / minor injuries in school | |
| Accident Report Form | ACC1 form for reporting accidents to NCC | |
| Assessment Records | Electronic and paper mark books | |
| Attendance file | Attendance information about pupils and classes | yes |
| BBC Bitesize | BBC Bitesize is a free online study support resource designed to help with learning, revision and homework! Bitesize provides support for learners aged 5 to 16+ across a wide range of school subjects. It also supports children and young people's wellbeing and career choices. Bitesize also has hundreds of published lessons to help students across the UK with home schooling. Bitesize guides are written by teachers and subject experts and are mapped to follow the curricula of the UK. Secondary Bitesize follows exam board specifications for the main exam boards in the UK, including for GCSE in England, Wales and Northern Ireland and National 4, National 5 & Highers in Scotland, ensuring students are preparing for the right exams | |
| Bikeability | The Bikeability Trust run on behalf of Department of Transport. Courses and resources for schools in England | |
| Bromcom | To provide the best MIS and finance solution for all schools to help improve student outcomes. Bromcom have over 10 years of experience of delivering using the Cloud, we are the most experienced MIS provider. We are constantly developing our system to reduce bolt ons. We present our software via up to date browser technology and an intuitive user friendly interface making everyday tasks simple to find and execute. | yes |
| Canva | Canva is an online design and publishing tool | |
| CCTV | CCTV | |
| Charanga | Charanga Music School, the best-selling, modern resource for primary music — online, easy to use and great value. Includes A complete scheme to teach the national curriculum for music A vast library of songs, topics, instrument courses and creative apps In-depth | |

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| | support for assessment, SEND and personalised teaching and learning | |
| Child Protection Records - Electronic | Records relating to child protection issues for individual pupils | yes |
| Class Dojo | Class Dojo is a classroom management and behaviour rewards system which includes a digital portfolio for pupils which can be accessed by staff, pupils and parents?/carers. | |
| Classroom Secrets | Classroom Secrets was founded by Claire and Ed Riley in 2013 after Claire took a supply role in a primary school. Being a trained secondary school teacher of performing arts, Claire was used to differentiating by outcome rather than by activity. When planning for her Year 4 class, she came across a problem – the activities and resources available did not allow all children in the same class to access them. Claire was used to providing the same activity for all children, with a choice of levels that would suit each child. And with that, the idea for Classroom Secrets was born... Based in Claire and Ed's hometown of Halifax, we have seen rapid growth since the spring of 2018. We now have over 50 employees working hard on a daily basis to bring you resources that help children learn and teachers reduce their workloads. | |
| Complete PE | Complete P.E. is an interactive Physical Education resource designed to support the implementation of a High Quality Physical Education Curriculum. | |
| Consent for educational visits | Consent information for all educational visits including day trips and residential visits | yes |
| CPOMS | CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral welfare for schools. CPOMS is software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Working alongside a school's existing safeguarding processes, CPOMS is an intuitive system to help with the management and recording of child protection, behavioural issues, bullying, special educational needs, domestic issues and much much more. Using CPOMS, schools can ensure that students are safe and fully supported, whilst school staff can focus on teaching and providing support, instead of administration. | yes |
| Data tracking spreadsheets | Spreadhseets (excel) to track progress of children over the course of their school career. | yes |
| DFE-Census and workforce Census | The school workforce census is a statutory data collection that takes place each autumn. You must complete statutory censuses by law unless there's a | |

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| | <p>good reason not to. The census collects data on all teaching and support staff in regular employment, including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data.</p> | |
| Dietary requirements information sheets | Required documents for specific children with severe allergies / intolerances and religious observations (food) | yes |
| Ed Shed | EdShed, or Education Shed Ltd. as our accountant calls us, is the umbrella for several educational products and brands. These include The Literacy Shed, Literacy Shed Plus, Spelling Shed and MathShed. We are a company run by teachers for teachers and we try to maintain particular values within all of our products: The best quality product we can create Making the most educational impact possible Transparent and affordable pricing The least hassle for teachers and schools | |
| Eschools Website Provider | On-line school website building tool | |
| EVOLVE visits | An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities. | |
| FFT Aspire | Performance analysis, target setting, pupil progress tracking, attendance tracking and reading assessment. | yes |
| Google Classroom | A free and easy tool helping educators efficiently manage and assess progress, while enhancing connections with learners from school, from home, or on the go. | |
| Google drive for education | suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom. | |
| Google Meet | Google Meet is a video-communication service developed by Google. It is one of two apps that constitute the replacement for Google Hangouts, the other being Google Chat | |
| Governance | Details of all members of the Governing Body | |
| HAF- HolidayActivities | The dedicated platform built to run and report on your local authority HAF programme. | yes |
| Health & Safety | Records pertaining to Health & Safety | |

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| Hugg | Purchase and send supermarket vouchers to those in need. Manage funds and give recipients choice all in one simple to use platform. | |
| Insight Tracking | An online data tracking system for teachers. The following data is collected: Pupil records include the following data: Unique Pupil Number (UPN) Legal first & last names Preferred first & last names Date of birth Gender Date pupil joined the school Date pupil left the school The following data can optionally be recorded as well: Address Ethnicity EAL status FSM history SEN history Service child status In-care status Attendance summaries Customer-defined groups Customer-defined notes and files | yes |
| Kapow | Engaging, knowledge-rich and progressive curriculums and lesson plans for foundation subjects. Includes teacher CPD videos and planning materials. | |
| Language Angels | Language Angels award-winning language teaching resources are designed so every primary school teacher - irrespective of their linguistic ability - can teach the foreign language of their choice. Our experienced team of foreign language teaching specialists have spent thousands of hours over a number of years creating, testing and refining our lessons and resources to bring them to where they are now. We won't rest on our laurels though. We continue to work, adding innovative and exciting new units and resources all the time. By providing a multitude of teaching units (each designed to run for 6 weeks) there are more than enough resources to enable you to teach the language of your choice throughout the whole of your primary school. | |
| 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. | |
| Lightspeed Internet Filtering | The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC. | |
| Live Kitchen | Live kitchen provides a number of online tools for parents, pupils and school staff to manage school meals. These include: Direct Debit cash collection option Replaces dinner register and manages cash and cheques Account histories and payment reminders by email Pre-order system for classroom | |

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| | whiteboards with branding Children get the meal of their choice Controls food costs - waste is minimised Parents can log in from home to view the menu, check their account and pre-order meals Uptake graphs and reports help you track progress Lunchtimes are faster and more organised Optional menu costing and nutritional analysis | |
| 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. | |
| Looked After Children Records - Electronic | Information relating to children who are in Looked After Care | yes |
| Medical Files - Electronic | Information in respect of specific medical needs of an individual student | yes |
| Medical Files - Paper | Information in respect of specific medical needs of an individual student | yes |
| Medical log | File of medical information for each child: asthma, medication administered, health care plans, risk assessments | yes |
| Microsoft Teams | Remote learning with Office 365 for students Microsoft Teams for Education Whether you're learning at home for long periods of time or just outside of class, access Office 365 for free, stay connected, and learn in a way that's right for you. Get started Tips for successful online learning Get set up Students at eligible institutions can sign up for Office 365 Education for free. That means access to apps like Word, PowerPoint, and Teams from any web browser. Plus, all the work you create will automatically be saved and backed up in the cloud. Get started with Office 365 for free Already have Office 365? Sign in. Tip: Click Install Office from Office.com to download Office apps to your desktop device. Work together as a class or group Microsoft Teams is a digital hub that brings conversations, content, and apps together in one place. If your classes are using Teams, you'll be able to connect with your classmates, ask your teacher questions, work on your homework, and track the work you've got coming up. Not part of any teams yet? No problem! You can create your own to work on group projects and keep in touch from your computer or phone. Join virtual meetings set up by your teacher and even blur your background | |
| My ON Renaissance Reading | A personalized digital library at every student's fingertips Renaissance myON® Reader is a student-centered, personalized literacy environment that gives students access to more than 6,000 enhanced digital books. Titles are dynamically matched to each | |

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| | individual student's interests, grade and Lexile® reading level. Combined with a suite of close reading tools and embedded supports, myON Reader fosters student engagement and achievement. | |
| National Tutoring Programme (NTP) | The National Tutoring Programme offers highly tailored tuition support for pupils, to help those whose education has been most impacted by the pandemic. | yes |
| Nereo (Matrix) | North East Regional Employers' Organisation is one of eleven regional bodies that support local authorities across England, Wales and Northern Ireland. NEREO's function is to support local authorities and partner organisations in the fields of Human Resources, Organisational Development and Employee Relations in all their complex and varied forms. NEREO is a small organisation with a big reputation. Our staff have over a hundred years experience of working in the public sector. Some have voluntary and private sector experience too. The Governance of NEREO is carried out by an Executive Committee made up of Elected Member representatives from each of the local authorities. | |
| NFER | Assessment materials, reading test and pupil progress data | |
| Northumberland School Readiness Passport | The School Readiness Passport is primarily a transition document. It will be used to gather information about key events in a child's early life. | |
| Nursery (Early Years) files | Early years registration information and funding information for Early Years entitlement, hours taken each week | yes |
| Oak Academy | Oak National Academy provides free video lessons, slides and worksheets to support teachers and pupils to keep learning. Created by teachers in response to coronavirus, the resources are freely available, to complement schools' own teaching. Lessons cover a broad range of subjects, from reception to year 11. There are no sign-ups or logins required. | |
| Oxford Owls | Oxford Owl for School Teaching resources and expert school improvement support Remote learning guidance and support Award-winning subscriptions and leadership support Free teaching resources and eBooks Advice and support for parents Educational activities and games Free eBook library for 3- to 11-year-olds | |
| Personnel files | Information relating to staff employment | |
| Phonics play | Interactive phonics games, phonics planning, assessment ideas and many teaching ideas and resources to help children to learn | |
| Photographs and videos of staff | Permission to display staff and pupil photographs | |

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| and pupils. | (unnamed) and video on the school website and social media platforms. | |
| PIVATS | An online assessment and target setting tool | yes |
| Places Leisure- School Swimming Management System | The SSMS is a digital assessment tool, assessing pupils using Swim England School Swimming and Water Safety Charter. It is matched against the National Curriculum programmes of study and provides schools with termly reports. Reports evidence statistics to unlock Sports Premium funding for further swimming lessons. The product gives Places Leisure an important opportunity to gather national data to report on school swimming and influence national networks. Data gathered will strengthen potential to 'close the gap' for the 30% not yet meeting the standard. The system requires a school pupil data upload containing basic details for pupils swimming each term. Data is automatically uploaded to the Places Leisure School Swim App where school swim instructors assess pupils against Swim England's School Swimming Awards. Schools receive a termly update on pupil attainment for all pupils we have the data for. | yes |
| Purple Mash | The all-in-one Edtech solution for your Primary School. Embed computing and digital skills across your whole curriculum with award-winning teaching and learning software for KS1 and KS2. | |
| Read Write Inc Website (www.ruthmiskin.com) | A website linked to the scheme Read Write Inc which includes a staff portal. | |
| Recruitment information | Part of the job application process | yes |
| Registers | Daily register, after school club registers, lunch register | |
| Safeguarding Records - Electronic | Records relating to safeguarding of children | yes |
| School Cloud | SchoolCloud started in a computing classroom — except, we weren't the teachers. Our company founders were aged 15 and challenged by their IT teacher to solve a school-wide issue of room double bookings. They spent a rainy, Scottish summer developing our very first product, Room Booking System. Not only did their school find it a winning solution, but they even gave them the grand sum of £100 for it! Equipped with our first income and some valuable guidance from entrepreneurial parents, we launched our business from the playground in 2006. And we've not looked back since. Today, by understanding our customers to ensure our technology is tailored to their needs, our software has come far beyond version one. We've organically grown our team to develop and launch multiple award-winning technology solutions that are used across the world to | |

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| | enhance school operations. | |
| School Gateway | School Gateway is your school's app available on Android, iOS and the web. It'll work on phones tablets, laptops and even smart watches. Your school can decide which services they'd like parents to access with it. When you log into the app, each of the services your school provides will appear in a list for you to choose from. Below are some examples of the services your school might provide on School Gateway. | |
| School Grid | School meal provider | |
| School360 | Learning platform for Northumberland schools with links to 3rd party educational resource providers. | yes |
| Schoolcomms | Communication app for parents | |
| Scratch | With Scratch, you can program your own interactive stories, games, and animations — and share your creations with others in the online community. Scratch helps young people learn to think creatively, reason systematically, and work collaboratively — essential skills for life in the 21st century. Scratch is a project of the Lifelong Kindergarten Group at the MIT Media Lab. It is provided free of charge. | |
| Seesaw | Seesaw - Student driven digital portfolios and simple parent communication. | |
| SEND electronic records | Records relating to Special Educational Needs and Disability for individual pupils | yes |
| Send Paper Records | Records relating to individual pupil's SEND history | yes |
| Senso Cloud | The Cloud Based Platform for Device Monitoring and Management. All-In-One Software for Network, Classroom, Safeguarding and Asset Management, and for managing and monitoring any Windows and Chrome device from a Centralised Web portal | |
| Sign-In App | Electronic sign-in software for the school / fire regulations / emergency evacuation | |
| Social media sites e.g. Twitter, Facebook | Social Media tool used to inform parents about events in school and celebrate children's achievement. | |
| Spelling Shed | The Spelling Shed - proudly powered by EdShed - is a spelling platform designed by a team of teachers. It is built with students, teachers and parents in mind and aims to make spelling fun for students as well as simple for adults to manage. | |
| StepLab | Targeted professional development system | yes |
| Tapestry | An online journal recording all the learning and fun of children's early years education. | |
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| The National College | A provider of online training for staff & governors | |
| Times Tables Rock Stars | Online times tables practice and testing. | |
| Twinkl | We're here to 'help those who teach'. It's what brings us to work every day. We're proud to create educational resources that can be used at each step of a child's learning journey. Our teacher-created resources provide entire schemes of work, lesson planning and assessments right through to online educational games, augmented reality and so much more. We have over 525,000 resources and new content gets added every day. You'll find we've normally got what you need before you even know you want it. | |
| Visitor book | Log of all visitors into school / fire regulations | |
| Vocabulary Ninja | THE HOME OF HIGH-QUALITY TEACHING AND LEARNING RESOURCES. WHICH TEACHING RESOURCES DO YOU NEED? At Vocabulary Ninja we provide a wide variety of high-quality products and systems that help to support pupils, teachers and schools. | |
| White Rose Maths and Science | Influenced, inspired and informed by the work of leading maths researchers and practitioners across the world, White Rose Maths brings together a team of highly experienced and passionate maths teaching experts to train, guide, help and support all those who want to make change happen in their schools. We're guessing that might include YOU! If so, we offer you in-depth training programmes, a vast bank of clear, practical resources (many of them available free of charge), and the bespoke support you want and need to keep raising the bar. We'll not only make your job a whole lot simpler, we'll help you change the future for every child. | yes |
| Widget | Communication Symbol Software | |
| Wonde | Manages transfer of data from Sims MIS to School360. | yes |
| Y4 Multiplication Check | What is the Multiplication Tables Check. The Multiplication Tables Check (MTC) is a key stage 2 assessment to be taken by pupils at the end of year 4 (in June). From the 2019 / 2020 academic year onwards. The purpose of the MTC is to make sure the times tables knowledge is at the expected level. | |
| Zoom | Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Our easy, reliable cloud platform for video, voice, content sharing, and chat runs across mobile devices, desktops, telephones, and room systems. | |

System used: Accelerated Reader

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| Description | Accelerated Reader gives teachers the information they need to monitor students' reading practice and make informed decisions to guide their future learning. |
| 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 generate information on the reading abilities of 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 | School |
| Where is data stored? | Renaissance Learning servers |
| Is it secure and/or encrypted? | We have taken certain physical, electronic, contractual and administrative steps to protect the confidentiality, security, and integrity of your personally identifiable information. However, no method of transmission over the Internet or method of electronic storage is completely secure, and we cannot guarantee its absolute security. It is your responsibility to maintain the confidentiality of your Website account information. |
| Who can access data? | Pupil (own data), staff, technical support 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 Accelerated Reader Privacy Policy |

System used: Accident book

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

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

System used: Assessment Records

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

System used: Attendance file

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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| | is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Attendance file and electronically |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | EWO and other agencies as required / parents |
| Legal basis for sharing | Legal obligation/ Public task |
| How is data shared? | Electronically |

System used: BBC Bitesize

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

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

Description

To provide the best MIS and finance solution for all schools to help improve student outcomes. Bromcom have over 10 years of experience of delivering using the Cloud, we are the most experienced MIS provider. We are constantly developing our system to reduce bolt ons. We present our software via up to date browser technology and an intuitive user friendly interface making everyday tasks simple to find and execute.

Personal Data Items

Pupil

- Name
- DOB
- Address
- Title
- Gender
- Class
- Year
- Parent/carer name and contact details
- UPN
- Dietary Requirements
- Medical Information
- Attendance/exclusion
- FSM
- SEN
- EAL & First Language
- Assessment Information
- Pupil Premium
- Child Protection Plan
- School history
- Looked After information
- Ethnicity
- Religion

Staff

- Name
- Address
- Phone number
- Email address
- Title
- Gender
- DOB
- NI Number
- Ethnicity
- Bank Account information
- Qualifications
- Disability and Medical Information
- Religion
- Martial 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. Public Processing relates to personal data manifestly made public by the Data Subject. |
| Special Category Evidence for legal basis | Public task, contract, consent, legal obligation |
| How is the Special Category data shared? | https://bromcom.com/privacy-policy/ |
| Legal basis for sharing Special Category data | Public interest and obligation |
| Why is it being processed? | https://bromcom.com/privacy-policy/ |
| Legal Basis | Consent 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” 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” 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 Toolkit |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://bromcom.com/privacy-policy/ |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://bromcom.com/privacy-policy/ |
| How long is data kept? | 6 years after date closed |
| Who is data shared with? | https://bromcom.com/privacy-policy/ |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | https://bromcom.com/privacy-policy/ |

System used: Canva

| | |
|---------------------------------------|--|
| Description | Canva is an online design and publishing tool |
| Personal Data Items | Teacher <ul style="list-style-type: none">• Name• date of birth• email• phone number• school• analytics data• usage data including device & location Student <ul style="list-style-type: none">• Name• class• school• email• analytics data• usage data including device & location |
| Why is it being processed? | To allow use of Canva resources and to improve Canva service to users |
| 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 toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | secured cloud |
| Is it secure and/or encrypted? | yes both encrypted and secure |
| Who can access data? | School and Canva employees as required to provide service |
| How long is data kept? | 1+ year |
| Who is data shared with? | Third party companies to provide service |
| Legal basis for sharing | contractual legitimate interest |
| How is data shared? | secure encrypted transfer |

| System used: CCTV | |
|---------------------------------------|---|
| Description | CCTV |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Images <p>Child</p> <ul style="list-style-type: none"> • Images <p>Visitor</p> <ul style="list-style-type: none"> • Images |
| Why is it being processed? | Safeguarding |
| 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? | 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: Charanga

| | |
|---------------------------------------|--|
| Description | Charanga Music School, the best-selling, modern resource for primary music — online, easy to use and great value. Includes A complete scheme to teach the national curriculum for music A vast library of songs, topics, instrument courses and creative apps In-depth support for assessment, SEND and personalised teaching and learning |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • School • email address • Mobile phone number • Pupils groups <p>Pupil</p> <ul style="list-style-type: none"> • Name • School • Assessment information |
| Why is it being processed? | To provide online access to teaching and learning materials. |
| 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 | Charanga privacy notice. |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Securely stored on servers in Ireland. |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Strictly controlled internally in Charanga, Teachers and pupils. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Shared with partner company Soundation AB |
| Legal basis for sharing | |
| How is data shared? | Electronically |
| References | Click to download Privacy Notice Click to download Soundation Privacy Policy |

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Class Dojo

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

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

System used: Classroom Secrets

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

System used: Complete PE

| | |
|---------------------------------------|---|
| Description | Complete P.E. is an interactive Physical Education resource designed to support the implementation of a High Quality Physical Education Curriculum. |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Year Group • UPN |
| Why is it being processed? | |
| Legal Basis | <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> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal framework |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://www.completepe.com/privacy-policy/ |
| Is it secure and/or encrypted? | secure |
| Who can access data? | https://www.completepe.com/privacy-policy/ |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.completepe.com/privacy-policy/ |
| Legal basis for sharing | Legitimate interest/public task |
| How is data shared? | https://www.completepe.com/privacy-policy/ |

System used: Consent for educational visits

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

This system has been identified as containing Special Category Information

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

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

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

System used: CPOMS

Description

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

Personal Data Items

Pupil

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

Main contact

- Name
- Telephone Number

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

Special Category Data Legal Basis

Obligation

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

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

System used: Data tracking spreadsheets

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

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- 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? | Secure google drive and paper copies |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | Processing this data is necessary for the completion of a public task and for the school to meet statutory requirements |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |

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

System used: DFE-Census and workforce Census

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

System used: Dietary requirements information sheets

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

This system has been identified as containing Special Category Information

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- 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? | 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: Ed Shed

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

System used: Eschools Website Provider

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

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

System used: EVOLVE visits

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

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

System used: FFT Aspire

| | |
|----------------------------|---|
| Description | Performance analysis, target setting, pupil progress tracking, attendance tracking and reading assessment. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • Username • Email Address • Job Title • Phone Number <p>Child</p> <ul style="list-style-type: none"> • Name • DoB • Gender • Language • Ethnicity • School • Attendance • Exam and assessment information • SEND 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 | Public Processing relates to personal data manifestly made public by the Data Subject. |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | https://fft.org.uk/viewer/?pdf=FFT-Privacy-Notice&d=FFT%20Privacy%20Notice&l=/privacy |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | https://fft.org.uk/viewer/?pdf=FFT-Privacy-Notice&d=FFT%20Privacy%20Notice&l=/privacy |
| | |

| | |
|---------------------------------------|--|
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>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> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO Toolkit |
| Is Consent Required? | https://fft.org.uk/viewer/?pdf=FFT-Privacy-Notice&d=FFT%20Privacy%20Notice&l=/privacy |
| Data Source | School |
| Where is data stored? | https://fft.org.uk/viewer/?pdf=FFT-Privacy-Notice&d=FFT%20Privacy%20Notice&l=/privacy |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | https://fft.org.uk/viewer/?pdf=FFT-Privacy-Notice&d=FFT%20Privacy%20Notice&l=/privacy |
| How long is data kept? | 3+ years |
| Who is data shared with? | https://fft.org.uk/viewer/?pdf=FFT-Privacy-Notice&d=FFT%20Privacy%20Notice&l=/privacy |
| Legal basis for sharing | legal obligation, legitimate interest and public task |
| How is data shared? | https://fft.org.uk/viewer/?pdf=FFT-Privacy-Notice&d=FFT%20Privacy%20Notice&l=/privacy |

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

System used: Google drive for education

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

System used: Google Meet

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

System used: Governance

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

System used: HAF- HolidayActivities

Description

The dedicated platform built to run and report on your local authority HAF programme.

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.

Public

Processing relates to personal data manifestly made public by the Data Subject.

Special Category Evidence for legal basis

Article 9

How is the Special Category data shared?

<https://www.holidayactivities.com/privacy-notice/>

Legal basis for sharing Special Category data

Article 9

Why is it being processed?

To run and report HAF programme for schools.

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."

Legitimate Interest

Article 6(1)(f) gives you a lawful basis for processing where: "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child."

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 Toolkit |
| Is Consent Required? | https://www.holidayactivities.com/privacy-notice/ |
| Data Source | School |
| Where is data stored? | https://www.holidayactivities.com/privacy-notice/ |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | https://www.holidayactivities.com/privacy-notice/ |
| How long is data kept? | 3+ years |
| Who is data shared with? | https://www.holidayactivities.com/privacy-notice/ |
| Legal basis for sharing | Legal obligation, public task and legitimate interest |
| How is data shared? | https://www.holidayactivities.com/privacy-notice/ |

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: Huggg

| | |
|---------------------------------------|--|
| Description | Purchase and send supermarket vouchers to those in need. Manage funds and give recipients choice all in one simple to use platform. |
| Personal Data Items | parent <ul style="list-style-type: none">• Name child <ul style="list-style-type: none">• Name• age |
| Why is it being processed? | https://www.huggg.me/privacy |
| Evidence for legal basis | ICO Legal Basis tool |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://www.huggg.me/privacy |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://www.huggg.me/privacy |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.huggg.me/privacy |
| Legal basis for sharing | Public duty |
| How is data shared? | https://www.huggg.me/privacy |

System used: Insight Tracking

| | |
|--------------------|--|
| Description | An online data tracking system for teachers. The following data is collected: Pupil records include the following data: Unique Pupil Number (UPN) Legal first & last names Preferred first & last names Date of birth Gender Date pupil joined the school Date pupil left the school The following data can optionally be recorded as well: Address Ethnicity EAL status FSM history SEN history Service child status In-care status Attendance summaries Customer-defined groups Customer-defined notes and files |
|--------------------|--|

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? | |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To track progress and attainment of children. |
| 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? | online- secure website |
| Is it secure and/or encrypted? | yes |
| Who can access data? | https://www.insighttracking.com/terms https://www.insighttracking.com/privacy/ |

| | |
|---------------------------------|---|
| How long is data kept? | 3+ years |
| Who is data shared with? | https://www.insighttracking.com/privacy/ |
| Legal basis for sharing | https://www.insighttracking.com/privacy/ |
| How is data shared? | https://www.insighttracking.com/privacy/ |

| System used: Kapow | |
|---------------------------------------|---|
| Description | Engaging, knowledge-rich and progressive curriculums and lesson plans for foundation subjects. Includes teacher CPD videos and planning materials. |
| Personal Data Items | <p>Staff Member/User</p> <ul style="list-style-type: none"> • Name • Title • Username / similar identifier |
| Why is it being processed? | From Kapow's privacy notice: We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances: Where we need to perform the contract we are about to enter into or have entered into with you. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Where we need to comply with a legal or regulatory obligation. |
| 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> <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 toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Kapow keeps personal subscription data (first name, last name, school email address) inside the UK; this data is stored on our own WordPress hosting provider, based in a Google cloud in London. |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Kapow, Staff User |
| How long is data kept? | 1+ year |
| | |

| | |
|---------------------------------|---|
| Who is data shared with? | From Kapow's privacy notice: 'We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above. Specific third parties including financial auditors, legal advisors, marketing agencies engaged to promote our business and products Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.' |
| Legal basis for sharing | ICO toolkit |
| How is data shared? | Transfer from parties |

System used: Language Angels

| | |
|---------------------------------------|--|
| Description | Language Angels award-winning language teaching resources are designed so every primary school teacher - irrespective of their linguistic ability - can teach the foreign language of their choice. Our experienced team of foreign language teaching specialists have spent thousands of hours over a number of years creating, testing and refining our lessons and resources to bring them to where they are now. We won't rest on our laurels though. We continue to work, adding innovative and exciting new units and resources all the time. By providing a multitude of teaching units (each designed to run for 6 weeks) there are more than enough resources to enable you to teach the language of your choice throughout the whole of your primary school. |
| Personal Data Items | <p>teacher</p> <ul style="list-style-type: none"> • Name <p>child</p> <ul style="list-style-type: none"> • Name • age |
| Why is it being processed? | Language_Angels_Home_School_Terms_&_Conditions.pdf |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p> |
| Evidence for legal basis | ICO Legal Basis Tool |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | Language_Angels_Home_School_Terms_&_Conditions.pdf |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | Language_Angels_Home_School_Terms_&_Conditions.pdf |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Language_Angels_Home_School_Terms_&_Conditions.pdf |
| Legal basis for sharing | Public Task |
| How is data shared? | Language_Angels_Home_School_Terms_&_Conditions.pdf |

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: 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: Live Kitchen

| | |
|---------------------------------------|--|
| Description | Live kitchen provides a number of online tools for parents, pupils and school staff to manage school meals. These include: Direct Debit cash collection option Replaces dinner register and manages cash and cheques Account histories and payment reminders by email Pre-order system for classroom whiteboards with branding Children get the meal of their choice Controls food costs - waste is minimised Parents can log in from home to view the menu, check their account and pre-order meals Uptake graphs and reports help you track progress Lunchtimes are faster and more organised Optional menu costing and nutritional analysis |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Age <p>Parent</p> <ul style="list-style-type: none"> • Name • email address • Payment details if using direct debit |
| Why is it being processed? | To provide additional functionality and a better service to pupils and parents at lunchtime. |
| 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 | Parent |
| Where is data stored? | Secure school server |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff, parents and NCC. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | School staff and NCC |
| Legal basis for sharing | Public task |
| How is data shared? | Electronically via secure servers. |
| References | Click to download Live Kitchen Privacy Policy v1.4 |

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 |

| | |
|---|--|
| Description | Information relating to children who are in Looked After Care |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Personal Education Plan • Health Needs • Social Care Needs • Educational Needs • Family Background <p>Parents & Carers</p> <ul style="list-style-type: none"> • Name • Contact Details • Address • <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>External Support</p> <ul style="list-style-type: none"> • Name • Organisation • Position • Address • Contact Details |
| <p>This system has been identified as containing Special Category Information</p> | |
| <p>Special category information is data which has the following characteristics:</p> | |
| <ul style="list-style-type: none"> • 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 |

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| How is the Special Category data shared? | Verbally or secure cloud sharing (Google or Office 365 etc) |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To support the education of children who are Looked After |
| 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? | School computer, laptop |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Head Teacher, Class Teacher, Designated Key Worker |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Social Workers, Local Authority, Carers, Receiving school |
| Legal basis for sharing | Legal Obligation, Public Task |
| How is data shared? | via secure electronic means, Google or Office 365 |

| | |
|----------------------------|--|
| Description | Information in respect of specific medical needs of an individual student |
| Personal Data Items | <p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Medical History • Medication Details <p>Parents/Carers</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>External Support Workers</p> <ul style="list-style-type: none"> • Name • Organisation • Position • Address • Contact Details |

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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| Special Category Data Legal Basis | Obligation 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 |
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| How is the Special Category data shared? | Secure encrypted laptops and pens, secure messenger |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To ensure access to education |
| 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? | Secure encrypted laptops/ school desktop computers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Head, SENDCO, Teachers, Key Workers |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Parents/Carers (as appropriate), Social Workers, Health Care Professionals, receiving schools, LA workers (as appropriate) |
| Legal basis for sharing | Public task |
| How is data shared? | Secure encrypted laptops |

System used: Medical Files - Paper

| | |
|----------------------------|--|
| Description | Information in respect of specific medical needs of an individual student |
| Personal Data Items | <p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Medical History • Medication Details <p>Parents/Carers</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>External Support Workers</p> <ul style="list-style-type: none"> • Name • Organisation • Position • address • Contact details |

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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| Special Category Data Legal Basis | Obligation 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 | ICO regs Article 9 |
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|--|---|
| How is the Special Category data shared? | Secure Messenger |
| Legal basis for sharing Special Category data | ICO regs Article 9 |
| Why is it being processed? | To ensure access to education |
| 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? | Secure cabinet |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Head, SENDCO, Teachers, Key workers |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Parents/Carers (as appropriate); Social Workers; Health Care Professionals, receiving schools, LA workers as appropriate |
| Legal basis for sharing | Public Task |
| How is data shared? | Secure Messenger |

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

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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? | 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: Microsoft Teams

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|--|--|
| <p>Description</p> | <p>Remote learning with Office 365 for students Microsoft Teams for Education Whether you're learning at home for long periods of time or just outside of class, access Office 365 for free, stay connected, and learn in a way that's right for you. Get started Tips for successful online learning Get set up Students at eligible institutions can sign up for Office 365 Education for free. That means access to apps like Word, PowerPoint, and Teams from any web browser. Plus, all the work you create will automatically be saved and backed up in the cloud. Get started with Office 365 for free Already have Office 365? Sign in. Tip: Click Install Office from Office.com to download Office apps to your desktop device. Work together as a class or group Microsoft Teams is a digital hub that brings conversations, content, and apps together in one place. If your classes are using Teams, you'll be able to connect with your classmates, ask your teacher questions, work on your homework, and track the work you've got coming up. Not part of any teams yet? No problem! You can create your own to work on group projects and keep in touch from your computer or phone. Join virtual meetings set up by your teacher and even blur your background</p> |
| <p>Personal Data Items</p> | <p>Teacher</p> <ul style="list-style-type: none"> • Name <p>Child</p> <ul style="list-style-type: none"> • Name |
| <p>Why is it being processed?</p> | <p>https://privacy.microsoft.com/en-us/privacystatement</p> |
| <p>Legal Basis</p> | <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> |
| <p>Evidence for legal basis</p> | <p>ICO legal basis toolkit</p> |
| <p>Is Consent Required?</p> | <p>Yes</p> |
| <p>Data Source</p> | <p>School</p> |
| <p>Where is data stored?</p> | <p>https://privacy.microsoft.com/en-us/privacystatement</p> |
| <p>Is it secure and/or encrypted?</p> | <p>Secure</p> |
| <p>Who can access data?</p> | <p>https://privacy.microsoft.com/en-us/privacystatement</p> |
| <p>How long is data kept?</p> | <p>3 years after date closed</p> |
| <p>Who is data shared with?</p> | <p>https://privacy.microsoft.com/en-us/privacystatement</p> |

| | |
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| Legal basis for sharing | Public Task/ |
| How is data shared? | https://privacy.microsoft.com/en-us/privacystatement |

System used: My ON Renaissance Reading

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| Description | A personalized digital library at every student's fingertips Renaissance myON® Reader is a student-centered, personalized literacy environment that gives students access to more than 6,000 enhanced digital books. Titles are dynamically matched to each individual student's interests, grade and Lexile® reading level. Combined with a suite of close reading tools and embedded supports, myON Reader fosters student engagement and achievement. |
| Personal Data Items | <p>Teacher</p> <ul style="list-style-type: none"> • Name <p>Child</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | http://www.renlearn.co.uk/privacy-hub/ |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p> |
| Evidence for legal basis | ICO - Legal Basis Tool |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | http://www.renlearn.co.uk/privacy-hub/ |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | http://www.renlearn.co.uk/privacy-hub/ |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | http://www.renlearn.co.uk/privacy-hub/ |
| Legal basis for sharing | Public Task |
| How is data shared? | http://www.renlearn.co.uk/privacy-hub/ |

System used: National Tutoring Programme (NTP)

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

| | |
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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? | https://nationaltutoring.org.uk/legal/privacy-notice/ |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To perform the services of the National Tutoring Programme |
| Legal Basis | <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 lawful basis toolkit |
| Is Consent Required? | No |
| | |

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

System used: Nereo (Matrix)

| | |
|---------------------------------------|--|
| Description | North East Regional Employers' Organisation is one of eleven regional bodies that support local authorities across England, Wales and Northern Ireland. NEREO's function is to support local authorities and partner organisations in the fields of Human Resources, Organisational Development and Employee Relations in all their complex and varied forms. NEREO is a small organisation with a big reputation. Our staff have over a hundred years experience of working in the public sector. Some have voluntary and private sector experience too. The Governance of NEREO is carried out by an Executive Committee made up of Elected Member representatives from each of the local authorities. |
| Personal Data Items | <p>All Staff</p> <ul style="list-style-type: none"> • Name • Date of birth |
| Why is it being processed? | https://www.nereo.gov.uk/privacy-notice/ |
| 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 | School |
| Where is data stored? | https://www.nereo.gov.uk/privacy-notice/ |
| Is it secure and/or encrypted? | secure |
| Who can access data? | https://www.nereo.gov.uk/privacy-notice/ |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.nereo.gov.uk/privacy-notice/ |
| Legal basis for sharing | Public task/legal obligation |
| How is data shared? | https://www.nereo.gov.uk/privacy-notice/ |

System used: NFER

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

System used: Northumberland School Readiness Passport

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

System used: 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: Oak Academy

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|---------------------------------------|---|
| Description | Oak National Academy provides free video lessons, slides and worksheets to support teachers and pupils to keep learning. Created by teachers in response to coronavirus, the resources are freely available, to complement schools' own teaching. Lessons cover a broad range of subjects, from reception to year 11. There are no sign-ups or logins required. |
| Personal Data Items | Teacher <ul style="list-style-type: none">• Name Pupil <ul style="list-style-type: none">• Name• Age |
| Why is it being processed? | https://privacy.thenational.academy/ |
| Legal Basis | Legal Obligation <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> Public task <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://privacy.thenational.academy/ |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://privacy.thenational.academy/ |
| How long is data kept? | 3+ years |
| Who is data shared with? | https://privacy.thenational.academy/ |
| Legal basis for sharing | Public Task/Legal Obligation |
| How is data shared? | https://privacy.thenational.academy/ |

System used: Oxford Owls

| | |
|---------------------------------------|---|
| Description | Oxford Owl for School Teaching resources and expert school improvement support Remote learning guidance and support Award-winning subscriptions and leadership support Free teaching resources and eBooks Advice and support for parents Educational activities and games Free eBook library for 3- to 11-year-olds |
| Personal Data Items | <p>Teacher</p> <ul style="list-style-type: none"> • Name <p>Parent</p> <ul style="list-style-type: none"> • Name <p>Child</p> <ul style="list-style-type: none"> • Name • Age |
| Why is it being processed? | https://global.oup.com/privacy?cc=us |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis Tool |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://global.oup.com/privacy?cc=us |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://global.oup.com/privacy?cc=us |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://global.oup.com/privacy?cc=us |
| Legal basis for sharing | Public Interest |
| How is data shared? | https://global.oup.com/privacy?cc=us |

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: Phonics play

| | |
|---------------------------------------|---|
| Description | Interactive phonics games, phonics planning, assessment ideas and many teaching ideas and resources to help children to learn |
| Personal Data Items | <p>School</p> <ul style="list-style-type: none"> • Name <p>Pupil</p> <ul style="list-style-type: none"> • Name <p>Staff</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | To provide access to online learning resources for pupils and 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? | Phonics play servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Staff, Phonics Play for 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? | Online secure server |
| References | Click to download Phonics Play Privacy Policy |

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

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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? | 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.” |

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| | <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? | 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: Places Leisure- School Swimming Management System

Description

The SSMS is a digital assessment tool, assessing pupils using Swim England School Swimming and Water Safety Charter. It is matched against the National Curriculum programmes of study and provides schools with termly reports. Reports evidence statistics to unlock Sports Premium funding for further swimming lessons. The product gives Places Leisure an important opportunity to gather national data to report on school swimming and influence national networks. Data gathered will strengthen potential to 'close the gap' for the 30% not yet meeting the standard. The system requires a school pupil data upload containing basic details for pupils swimming each term. Data is automatically uploaded to the Places Leisure School Swim App where school swim instructors assess pupils against Swim England's School Swimming Awards. Schools receive a termly update on pupil attainment for all pupils we have the data for.

- Personal Data Items**
- Child**
- Name
 - UPN
 - Year Group
 - DOB
 - Gender
 - SEN information
 - Medical Needs
 - EAL
 - Pupil Premium

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

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| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Inputted directly into the system by the school- Microsoft Azure |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To capture the progress of children in swimming |
| 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 tool |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Microsoft Dataverse |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Swim Instructors, Swim Coordinators, Managers, School |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | N/A |
| Legal basis for sharing | Public Task & Legitimate Interest |
| How is data shared? | Microsoft Dataverse |

System used: Purple Mash

| | |
|---------------------------------------|---|
| Description | The all-in-one Edtech solution for your Primary School. Embed computing and digital skills across your whole curriculum with award-winning teaching and learning software for KS1 and KS2. |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Year Group • School • Age <p>Staff</p> <ul style="list-style-type: none"> • Name • School |
| Why is it being processed? | To provide online access to a range of Edtech software. |
| 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? | Purple Mash secure online system |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Staff, Pupils both in school and home |
| 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 online purple mash servers |

System used: Read Write Inc Website (www.ruthmiskin.com)

| | |
|---------------------------------------|--|
| Description | A website linked to the scheme Read Write Inc which includes a staff portal. |
| Personal Data Items | Staff <ul style="list-style-type: none">• Name• Address• Email• Telephone Number• Role |
| Why is it being processed? | https://www.ruthmiskin.com/en/privacy-policy/ |
| Legal Basis | Public task Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller |
| Evidence for legal basis | ICO Legal Basis Tool |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | https://www.ruthmiskin.com/en/privacy-policy/ |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://www.ruthmiskin.com/en/privacy-policy/ |
| How long is data kept? | 3+ years |
| Who is data shared with? | https://www.ruthmiskin.com/en/privacy-policy/ |
| Legal basis for sharing | Public Task |
| How is data shared? | https://www.ruthmiskin.com/en/privacy-policy/ |

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

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

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

System used: Registers

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

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

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

System used: School Cloud

| | |
|---------------------------------------|---|
| Description | <p>SchoolCloud started in a computing classroom — except, we weren't the teachers. Our company founders were aged 15 and challenged by their IT teacher to solve a school-wide issue of room double bookings. They spent a rainy, Scottish summer developing our very first product, Room Booking System. Not only did their school find it a winning solution, but they even gave them the grand sum of £100 for it! Equipped with our first income and some valuable guidance from entrepreneurial parents, we launched our business from the playground in 2006. And we've not looked back since. Today, by understanding our customers to ensure our technology is tailored to their needs, our software has come far beyond version one. We've organically grown our team to develop and launch multiple award-winning technology solutions that are used across the world to enhance school operations.</p> |
| Personal Data Items | <p>Parents</p> <ul style="list-style-type: none"> • Name • Email address <p>Pupil</p> <ul style="list-style-type: none"> • Name <p>Teacher</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | https://www.schoolcloud.co.uk/privacy-notice.asp |
| 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 | <p>ICO legal basis tool kit</p> |
| Is Consent Required? | <p>Yes</p> |
| Data Source | <p>School</p> |
| Where is data stored? | <p>https://www.schoolcloud.co.uk/privacy-notice.asp</p> |
| Is it secure and/or encrypted? | <p>Secure</p> |
| Who can access data? | <p>https://www.schoolcloud.co.uk/privacy-notice.asp</p> |
| How long is data kept? | <p>3 years after date closed</p> |
| Who is data shared with? | <p>https://www.schoolcloud.co.uk/privacy-notice.asp</p> |
| Legal basis for sharing | <p>Public duty</p> |
| How is data shared? | <p>https://www.schoolcloud.co.uk/privacy-notice.asp</p> |

System used: School Gateway

| | |
|---------------------------------------|---|
| Description | School Gateway is your school's app available on Android, iOS and the web. It'll work on phones tablets, laptops and even smart watches. Your school can decide which services they'd like parents to access with it. When you log into the app, each of the services your school provides will appear in a list for you to choose from. Below are some examples of the services your school might provide on School Gateway. |
| Personal Data Items | <p>parent</p> <ul style="list-style-type: none"> • Name • email <p>child</p> <ul style="list-style-type: none"> • Name • Date of birth • medical condition |
| Why is it being processed? | https://schoolcomms.com/privacy-policy/ |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | yes |
| Data Source | School |
| Where is data stored? | https://schoolcomms.com/privacy-policy/ |
| Is it secure and/or encrypted? | secure |
| Who can access data? | https://schoolcomms.com/privacy-policy/ |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://schoolcomms.com/privacy-policy/ |
| Legal basis for sharing | public task |
| How is data shared? | https://schoolcomms.com/privacy-policy/ |

| System used: School Grid | |
|---------------------------------------|---|
| Description | School meal provider |
| Personal Data Items | <p>Parent</p> <ul style="list-style-type: none"> • Name • Date of Birth • Gender • Contact Information • Demographic information |
| Why is it being processed? | To provide school meals within schools |
| 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> <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 Toolkit |
| Is Consent Required? | https://app.schoolgrid.co.uk/termsfuse/Privacy-Policy.pdf |
| Data Source | School |
| Where is data stored? | https://app.schoolgrid.co.uk/termsfuse/Privacy-Policy.pdf |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | https://app.schoolgrid.co.uk/termsfuse/Privacy-Policy.pdf |
| How long is data kept? | 3+ years |
| Who is data shared with? | https://app.schoolgrid.co.uk/termsfuse/Privacy-Policy.pdf |
| Legal basis for sharing | Legal obligation |
| How is data shared? | https://app.schoolgrid.co.uk/termsfuse/Privacy-Policy.pdf |

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

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

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

System used: Schoolcomms

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

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

System used: Scratch

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

| System used: Seesaw | |
|---------------------------------------|--|
| Description | Seesaw - Student driven digital portfolios and simple parent communication. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • School • Classes <p>Pupil</p> <ul style="list-style-type: none"> • Name • School • Year • Classes |
| Why is it being processed? | To provide Staff and pupil accounts on Seesaw and to enable the production of pupil portfolios. |
| 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? | Seesaw servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff with logins and pupils (own account). |
| 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 Seesaw Privacy Policy |

System used: SEND electronic records

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|----------------------------|--|
| Description | Records relating to Special Educational Needs and Disability for individual pupils |
| Personal Data Items | Pupils <ul style="list-style-type: none">• Name• Date of Birth• Address• Health Needs• Social Care Status• Educational Needs• SEND History Parents / Carers <ul style="list-style-type: none">• Name• Address• Contact details Staff <ul style="list-style-type: none">• Name• Position External Support Workers <ul style="list-style-type: none">• Name• Organisation• Position• Address• Contact details |

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

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| Special Category Data Legal Basis | 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 |
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| How is the Special Category data shared? | Secure cloud share - Google or Office 365 |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To ensure appropriate levels of support for the student in relation SEND needs |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis tool |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Google Drive or Office 360 secure cloud storage |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Head, SENDCO, Teachers, Key Workers |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Parents/Carers as appropriate; Social Workers; Health Care Professionals; Receiving Schools; Youth Offending Teams (case dependent); LA Workers as appropriate |
| Legal basis for sharing | Public Task |
| How is data shared? | Secure cloud share or secure messenger if printed. |

System used: Send Paper Records

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

| | |
|--|--|
| 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 | 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: Senso Cloud | |
|---------------------------------------|---|
| Description | The Cloud Based Platform for Device Monitoring and Management. All-In-One Software for Network, Classroom, Safeguarding and Asset Management, and for managing and monitoring any Windows and Chrome device from a Centralised Web portal |
| Personal Data Items | <p>User</p> <ul style="list-style-type: none"> • Name • Marital status • Title • DOB • Gender • Address • Email Address • Telephone number |
| Why is it being processed? | For filtering and monitoring services across school devices, to carry out our obligations arising from the performance of the contract entered and to comply with a legal or regulatory obligation. |
| Legal Basis | <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> <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 toolkit |
| Is Consent Required? | No but consent can be withdrawn at any time |
| Data Source | School |
| Where is data stored? | Secure cloud server |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | The authorised person(s) within school only - staff |
| How long is data kept? | 3 years after date closed |
| | |

| | |
|---------------------------------|--|
| Who is data shared with? | External third parties - details and lawful basis all set out on website privacy notice. |
| Legal basis for sharing | Contract, legitimate interest |
| How is data shared? | Via company server |

System used: Sign-In App

Description

Electronic sign-in software for the school / fire regulations / emergency evacuation

Personal Data Items

Staff

- Name
- Job title
- Car registration
- Photo
- Email address
- IP addresses
- Usage data
- Cookies data
- Online navigation data
- Location data
- Browser data

Parent

- Name
- Car registration
- Photo
- Email address
- IP addresses
- Usage data
- Cookies data
- Online navigation data
- Location data
- Browser data
- Purpose of visit

Visitor

- Name
- Car registration
- Job title/company
- Photo
- Email address
- IP addresses
- Usage data
- Cookies data
- Online navigation data
- Location data
- Browser data
- Purpose of visit

Why is it being processed?

Safeguarding, health and safety, fire regulations, emergency evacuation

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? | School system, SIA software database |
| 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 and legal obligation |
| How is data shared? | Secure school server/SIA software |

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: Spelling Shed

| | |
|---------------------------------------|---|
| Description | The Spelling Shed - proudly powered by EdShed - is a spelling platform designed by a team of teachers. It is built with students, teachers and parents in mind and aims to make spelling fun for students as well as simple for adults to manage. |
| Personal Data Items | <p>Child</p> <ul style="list-style-type: none"> • Name • Age • <p>Parent</p> <ul style="list-style-type: none"> • Name • Contact Details |
| Why is it being processed? | https://www.edshed.com/en-gb/privacy |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal toolkit |
| Is Consent Required? | Yes as part of registration process |
| Data Source | School |
| Where is data stored? | https://www.edshed.com/en-gb/privacy |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | School, teachers and parents |
| How long is data kept? | 3+ years |
| Who is data shared with? | https://www.edshed.com/en-gb/privacy |
| Legal basis for sharing | Public Task |
| How is data shared? | https://www.edshed.com/en-gb/privacy |

System used: Steplab

| | |
|----------------------------|---|
| Description | Targeted professional development system |
| Personal Data Items | Staff <ul style="list-style-type: none">• Name• Gender• Race• DoB• Title• School Role• Subject Taught• URN• Coaching data• Email• Telephone Number |

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> Public <p>Processing relates to personal data manifestly made public by the Data Subject.</p> |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | https://steplab.co/support/policies/privacy |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To support professional development |
| Legal Basis | Legal Obligation <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller</p> |

| | |
|---------------------------------------|---|
| | <p>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> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO Toolkit |
| Is Consent Required? | https://steplab.co/support/policies/privacy |
| Data Source | School |
| Where is data stored? | https://steplab.co/support/policies/privacy |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | https://steplab.co/support/policies/privacy |
| How long is data kept? | 3+ years |
| Who is data shared with? | https://steplab.co/support/policies/privacy |
| Legal basis for sharing | Legal obligation, legitimate interest and public task |
| How is data shared? | https://steplab.co/support/policies/privacy |

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: The National College

| | |
|---------------------------------------|--|
| Description | A provider of online training for staff & governors |
| Personal Data Items | <p>Staff member</p> <ul style="list-style-type: none"> • Name • Job Title • Email • Phone number <p>Governor</p> <ul style="list-style-type: none"> • Name • Email • Phone number |
| Why is it being processed? | In order to provide access to online training and for billing purposes |
| 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> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO Toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | On Server of National Education Group in UK |
| Is it secure and/or encrypted? | Yes both secure and encrypted |
| Who can access data? | College staff or their contractors to provide service and school |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Contractors to provide service |
| Legal basis for sharing | Contract |
| How is data shared? | Via encrypted transfer |

System used: Times Tables Rock Stars

| | |
|---------------------------------------|--|
| Description | Online times tables practice and testing. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • Email address • School name • School address <p>Pupil</p> <ul style="list-style-type: none"> • Name • Year group • Maths group |
| Why is it being processed? | To provide access to online learning tool. |
| 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? | Maths circle EU servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Staff |
| 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? | Online secure servers |
| References | <p>Click to download Times Tables Rock Stars</p> <p>Click to download Times Tables Rock Stars GDPR</p> |

System used: Twinkl

| | |
|---------------------------------------|--|
| Description | We're here to 'help those who teach'. It's what brings us to work every day. We're proud to create educational resources that can be used at each step of a child's learning journey. Our teacher-created resources provide entire schemes of work, lesson planning and assessments right through to online educational games, augmented reality and so much more. We have over 525,000 resources and new content gets added every day. You'll find we've normally got what you need before you even know you want it. |
| Personal Data Items | Teacher <ul style="list-style-type: none">• Name child <ul style="list-style-type: none">• Name |
| Why is it being processed? | https://www.twinkl.co.uk/legal |
| Legal Basis | Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller" |
| Evidence for legal basis | ICO Legal Basis Tool |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://www.twinkl.co.uk/legal |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://www.twinkl.co.uk/legal |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.twinkl.co.uk/legal |
| Legal basis for sharing | Public Task |
| How is data shared? | https://www.twinkl.co.uk/legal |

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: Vocabulary Ninja

| | |
|---------------------------------------|---|
| Description | THE HOME OF HIGH-QUALITY TEACHING AND LEARNING RESOURCES. WHICH TEACHING RESOURCES DO YOU NEED? At Vocabulary Ninja we provide a wide variety of high-quality products and systems that help to support pupils, teachers and schools. |
| Personal Data Items | <p>Teacher</p> <ul style="list-style-type: none"> • Name <p>child</p> <ul style="list-style-type: none"> • Name • age |
| Why is it being processed? | https://vocabularyninja.co.uk/privacy-policy-vn/ |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO Legal Basis Tool |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://vocabularyninja.co.uk/privacy-policy-vn/ |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://vocabularyninja.co.uk/privacy-policy-vn/ |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://vocabularyninja.co.uk/privacy-policy-vn/ |
| Legal basis for sharing | Public Task |
| How is data shared? | https://vocabularyninja.co.uk/privacy-policy-vn/ |

System used: White Rose Maths and Science

Description

Influenced, inspired and informed by the work of leading maths researchers and practitioners across the world, White Rose Maths brings together a team of highly experienced and passionate maths teaching experts to train, guide, help and support all those who want to make change happen in their schools. We're guessing that might include YOU! If so, we offer you in-depth training programmes, a vast bank of clear, practical resources (many of them available free of charge), and the bespoke support you want and need to keep raising the bar. We'll not only make your job a whole lot simpler, we'll help you change the future for every child.

Personal Data Items

Teacher

- Name
- Date of Birth
- Gender
- Email address
- Payment details

Child

- Name
- Age
- Gender
- Email address

Parent

- Name
- Age
- Gender
- Email address
-

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

Article 9

| | |
|--|--|
| legal basis | |
| How is the Special Category data shared? | https://whiterosemaths.com/privacy/ |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | https://whiterosemaths.com/privacy/ |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO Legal Basis Tool |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://whiterosemaths.com/privacy/ |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://whiterosemaths.com/privacy/ |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://whiterosemaths.com/privacy/ |
| Legal basis for sharing | Legal Obligation/Public Task |
| How is data shared? | https://whiterosemaths.com/privacy/ |

| System used: Widget | |
|---------------------------------------|--|
| Description | Communication Symbol Software |
| Personal Data Items | Pupil <ul style="list-style-type: none"> • Name • Progress Level |
| Why is it being processed? | To check Progress |
| Legal Basis | Legal Obligation <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> Public task <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? | Online. Secure servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Staff only |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Staff |
| Legal basis for sharing | Legal obligation & Public task |
| How is data shared? | Online secure server |
| References | Click to download Widget Privacy Doc |

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 |

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? | 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: Y4 Multiplication Check

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

System used: Zoom

| | |
|---------------------------------------|--|
| Description | Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Our easy, reliable cloud platform for video, voice, content sharing, and chat runs across mobile devices, desktops, telephones, and room systems. |
| Personal Data Items | Teacher <ul style="list-style-type: none">• Name Parent <ul style="list-style-type: none">• Name |
| Why is it being processed? | https://zoom.us/trust |
| Legal Basis | Legal Obligation <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> Public task <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis tool |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://zoom.us/trust |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://zoom.us/trust |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://zoom.us/trust |
| Legal basis for sharing | Public task |
| How is data shared? | https://zoom.us/trust |