



Bedlington Station Primary

GDPR Asset Register

Date: 25/05/2026

Data Protection Officer: Linda Papaioannou

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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	
Ambition Portal	Registration for ECF and NPQ	
Assessment Records	Electronic and paper mark books	
Attendance file	Attendance information about pupils and classes	yes
Bikeability	The Bikeability Trust run on behalf of Department of Transport. Courses and resources for schools in England	
Black and Banton	Black and Banton is one of the North East of England's leading providers of occupational and physical health services. Established in 2001 we have experienced strong growth each year based on our successful focus on our client's needs, many of whom we've partnered for more than ten years. They include leading names across a wide range of sectors including oil & gas, manufacturing, chemical, pharmaceutical, transport, housing, construction and demolition industry. We also private clients with health services, including sports injury treatment, shoulder, back and joint pain programmes, vaccinations, massage and pilates. Our approach is simple. We provide the highest level of bespoke occupational and physical health services, cost effectively and efficiently both empathetically and at times and locations to suit our clients	yes
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
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 support for assessment, SEND and personalised teaching and learning	
Child Protection Records - Electronic	Records relating to child protection issues for individual pupils	yes
Child Protection Records - Paper	Records relating to child protection issues for individual pupils	yes
Clennel Education Solutions	Clennel Education Solutions conduct stringent checks on all our staff prior to their appointment with us, which include: Enhanced DBS disclosure including Children's Barred List Check, Identity checks, Proof of right to work in the UK, Qualifications, Health checks and relevant references. Clennel Education Solutions take full responsibility for all our staff whilst on school premises.	yes
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
Debbie Judd HR	Our aim is to provide outstanding HR advice and support to schools and academies, which will then able schools and academies to focus on providing high standards of education to their pupils and students. We are a based in the North East of England and we offer HR advice and support to education establishments local to us and remotely to those further field. Whatever the size of your organisation, we can offer flexible HR advice and support through our different packages. We are well aware of budget restraints across the education and other sectors and will always endeavour to keep our costs low and ensure that we provide value for money, supporting clients to manage their budgets efficiently. In our experience, we have found that the vast majority of HR	

	issues can be resolved informally when dealt with appropriately at the earliest opportunity and strive to work with our clients on this basis. Our aim is to support you through initial concerns, providing professional, appropriate, proactive support in order to avoid a lengthy, costly HR process. We pride ourselves on our caring, knowledgeable and professional approach and will deliver legislative and practical HR support, at the highest standard, whilst adopting a common sense approach.	
DfE (Gov.uk)	The Department for Education (DfE) is data controller for the personal data DfE and our executive agencies process. Our executive agencies are: Education and Skills Funding Agency (ESFA) Standards and Testing Agency (STA) Teaching Regulation Agency (TRA)	
DFE-Census and workforce Census	The school workforce census is a statutory data collection that takes place each autumn. You must complete statutory censuses by law unless there's a good reason not to. The census collects data on all teaching and support staff in regular employment, including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data.	
Dietary requirements information sheets	Required documents for specific children with severe allergies / intolerances and religious observations (food)	yes
ECT Manager	ECT Manager is an online system that makes it easy for Appropriate Bodies and schools to manage every part of the ECT induction process in one place.	
Education Mutual	Staff absence protection for schools	
EVOLVE visits	An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities.	
Futures Cloud	Internet / Network monitoring and reporting tool	
Google drive for education	suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.	
Governance	Details of all members of the Governing Body	
HAF- HolidayActivities	The dedicated platform built to run and report on your local authority HAF programme.	yes

Health & Safety	Records pertaining to Health & Safety	
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
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.	
Lexia	Students work independently to develop critical reading and language skills through individualized, motivating learning paths. All students, regardless of their skill level, can each work at their own pace and the teacher is notified (on web-based reports and via email) only when they require support.	
Lightspeed Internet Filtering	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.	
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 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
Looked After Children Records - Paper	Information relating to children who are Looked After	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	
MS Office Suite	Suite of online tools for staff and pupils, including OneDrive, Word, Powerpoint, Excel, Outlook, Video and Teams.	
National Centre for Excellence in the Teaching of Mathematics (NCETM)	NCETM provides professional development for staff in the teaching of Mathematics Children's chances of succeeding in education and life will be maximised if they develop deep and lasting procedural and conceptual mathematical understanding. The NCETM's teaching for mastery section explains the rationale for this teaching approach, and presents case studies from schools, together with interviews with teachers involved in mastery projects through the Maths Hubs programme.	
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.	
Nessy - Literacy interventions	Nessy programs are designed to help students of all abilities learn to read, write, spell and type, especially those who learn differently, including: Mainstream EAL Homeschool Students with dyslexia	
Newcastle United Foundation	Newcastle United Foundation is an independent registered charity using the power of football to connect, motivate and inspire people in our region. Through community, education, health and wellbeing, and sports programmes delivered across Newcastle, Northumberland, North Tyneside and Gateshead, we strive to improve physical and mental health, boost learning and career prospects and provide life-changing opportunities for everyone – no matter their goals in life.	
NFER	Assessment materials, reading test and pupil progress data	
Northumberland School	The School Readiness Passport is primarily a	

Readiness Passport	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
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	
Padlet	A digital canvas where users can add photos, videos, audio, text, drawings, graphs, charts, and more.	
ParentPay	ParentPay is an online payment service for schools and families.	yes
Performance Management	Staff appraisals	
Personnel files	Information relating to staff employment	
Photographs and videos of staff and pupils.	Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms.	
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
Safeguarding Records - Paper	Records relating to safeguarding of children	yes
School360	Learning platform for Northumberland schools with links to 3rd party educational resource providers.	yes
Schoolcomms	Communication app for parents	
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.	
Testbase	This is an online resource provided by Doublestruck which enables children to prepare for National SAT examinations. Doublestruck is an Educational Technology company that is part of the AQA family. It specialises in technology that addresses the needs of teachers in formative assessment and reporting.	yes
The National College	A provider of online training for staff & governors	
Times Tables Rock Stars	Online times tables practice and testing.	
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.

System used: Accelerated Reader

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

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

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

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: Ambition Portal	
Description	Registration for ECF and NPQ
Personal Data Items	Staff <ul style="list-style-type: none"> • Name • Contact Details • Job Title
Why is it being processed?	https://www.ambition.org.uk/cookies/
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 Toolkit
Is Consent Required?	https://www.ambition.org.uk/cookies/
Data Source	School
Where is data stored?	https://www.ambition.org.uk/cookies/
Is it secure and/or encrypted?	No
Who can access data?	https://www.ambition.org.uk/cookies/
How long is data kept?	3+ years
Who is data shared with?	https://www.ambition.org.uk/cookies/
Legal basis for sharing	legitimate interest, public task
How is data shared?	https://www.ambition.org.uk/cookies/

System used: Assessment Records

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

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

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>

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

System used: Black and Banton

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

Special Category Evidence for legal basis	ICO legal basis tool kit
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How is the Special Category data shared?	Securely with staff
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Legal basis for sharing Special Category data	Consent
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Why is it being processed?	Staff wellbeing and to allow investiagtion of any health problems for school HR processes
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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 tool kit
Is Consent Required?	yes
Data Source	School
Where is data stored?	Both
Is it secure and/or encrypted?	secure & encrypted on Black & Banton Server/Staff PC
Who can access data?	Staff member and Senior Leadership team
How long is data kept?	3 years after date closed
Who is data shared with?	Staff and those who staff may nominate e.g. professional association. HR provider
Legal basis for sharing	public task/legal obligation
How is data shared?	https://www.blackandbantton.co.uk/

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

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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	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: 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	Staff <ul style="list-style-type: none">• Name• School• email address• Mobile phone number• Pupils groups Pupil <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

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

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

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

System used: Clennel Education Solutions

Description	Clennell Education Solutions conduct stringent checks on all our staff prior to their appointment with us, which include: Enhanced DBS disclosure including Children's Barred List Check, Identity checks, Proof of right to work in the UK, Qualifications, Health checks and relevant references. Clennell Education Solutions take full responsibility for all our staff whilst on school premises.
Personal Data Items	Pupil <ul style="list-style-type: none">• Name• Date of birth• Address Staff <ul style="list-style-type: none">• Name• Position

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Special Category Evidence for legal basis	
How is the Special Category data shared?	
Legal basis for sharing Special Category data	
Why is it being processed?	https://clennellcorporatesolutions.org/privacy
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
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://clennellcorporatesolutions.org/privacy
Is it secure and/or encrypted?	Secure
Who can access data?	https://clennellcorporatesolutions.org/privacy
How long is data kept?	3 years after date closed
Who is data shared with?	https://clennellcorporatesolutions.org/privacy
Legal basis for sharing	Statutory & Legitimate interest
How is data shared?	https://clennellcorporatesolutions.org/privacy

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

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

Special Category Data Legal Basis	<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

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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- 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?	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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- 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: Debbie Judd HR

Description	Our aim is to provide outstanding HR advice and support to schools and academies, which will then able schools and academies to focus on providing high standards of education to their pupils and students. We are a based in the North East of England and we offer HR advice and support to education establishments local to us and remotely to those further field. Whatever the size of your organisation, we can offer flexible HR advice and support through our different packages. We are well aware of budget restraints across the education and other sectors and will always endeavour to keep our costs low and ensure that we provide value for money, supporting clients to manage their budgets efficiently. In our experience, we have found that the vast majority of HR issues can be resolved informally when dealt with appropriately at the earliest opportunity and strive to work with our clients on this basis. Our aim is to support you through initial concerns, providing professional, appropriate, proactive support in order to avoid a lengthy, costly HR process. We pride ourselves on our caring, knowledgeable and professional approach and will deliver legislative and practical HR support, at the highest standard, whilst adopting a common sense approach.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • All staff employment details
Why is it being processed?	https://debbiejuddhr.co.uk/about-us/
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 kit
Is Consent Required?	yes
Data Source	Police
Where is data stored?	https://debbiejuddhr.co.uk/about-us/
Is it secure and/or encrypted?	secure
Who can access data?	https://debbiejuddhr.co.uk/about-us/
How long is data kept?	3 years after date closed
Who is data shared with?	https://debbiejuddhr.co.uk/about-us/
Legal basis for sharing	Public task/legal obligation
How is data shared?	https://debbiejuddhr.co.uk/about-us/

System used: DfE (Gov.uk)

Description	The Department for Education (DfE) is data controller for the personal data DfE and our executive agencies process. Our executive agencies are: Education and Skills Funding Agency (ESFA) Standards and Testing Agency (STA) Teaching Regulation Agency (TRA)
Why is it being processed?	We receive your personal information indirectly from other organisations. For example, we collect information about: you, your learning and your achievements - we collect this information from educational settings like early years providers, schools, academies, independent schools, colleges and training providers and from your employer, if applicable children in need, children looked after and alternative provision - we collect this information from local authorities you to support research and to safeguard children - we collect this information from other government departments, early years providers, schools, academies, independent schools, colleges and training providers your exam results - we receive this from awarding organisations and exam boards teachers and employees in educational settings or local authorities - we collect this information from the educational setting or local authorities
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 Toolkit
Is Consent Required?	https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter#how-we-use-your-information
Data Source	School
Where is data stored?	https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter#how-we-use-your-information
Is it secure and/or encrypted?	Yes
Who can access data?	https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter#how-we-use-your-information
How long is data kept?	10+ years
Who is data shared with?	https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter#how-we-use-your-information
Legal basis for sharing	Legitimate interest, public task
How is data shared?	https://www.gov.uk/government/organisations/department-for-education/a

System used: DFE-Census and workforce Census

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

System used: Dietary requirements information sheets

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

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- 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: ECT Manager	
Description	ECT Manager is an online system that makes it easy for Appropriate Bodies and schools to manage every part of the ECT induction process in one place.
Personal Data Items	Staff <ul style="list-style-type: none"> • Name • Job Role • Contact Details
Why is it being processed?	To manage ECT induction
Legal Basis	Legitimate Interest <p>Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”</p> 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 Toolkit
Is Consent Required?	https://www.ectmanager.com/privacy-notice/
Data Source	School
Where is data stored?	https://www.ectmanager.com/privacy-notice/
Is it secure and/or encrypted?	Yes
Who can access data?	https://www.ectmanager.com/privacy-notice/
How long is data kept?	3+ years
Who is data shared with?	https://www.ectmanager.com/privacy-notice/
Legal basis for sharing	Legitimate Interest, Public Task
How is data shared?	https://www.ectmanager.com/privacy-notice/

System used: Education Mutual

Description	Staff absence protection for schools
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • DOB • Gender • Role • Salary Band • Contact name
Why is it being processed?	Used to provide school with contacts to manage membership (staff absence protection/insurance)
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>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>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?	Yes - notification is via school Data Controller
Data Source	School
Where is data stored?	Both electronically and physical format depending on information submission
Is it secure and/or encrypted?	Secure and encrypted
Who can access data?	Data Controller at school (HT) and authorised staff i.e. SBM
How long is data kept?	6 years after date closed
Who is data shared with?	School only - no third parties
Legal basis for sharing	Contract, legitimate task
How is data shared?	Via web portal

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: Futures Cloud

Description	Internet / Network monitoring and reporting tool
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • I/P address • URL's visited <p>Teacher</p> <ul style="list-style-type: none"> • Name • I / P address • URL's visited
Why is it being processed?	Fulfills statutory requirement for the school to monitor, log and report inappropriate network activity.
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School 360
Where is data stored?	Future Digital Secure Servers
Is it secure and/or encrypted?	Yes
Who can access data?	Designated teachers in school (normally online safety lead.
How long is data kept?	3 years after date closed
Who is data shared with?	NCC Online safety staff, Northumberland Safeguarding Children Board, Police if serious incident, Staff within school.
Legal basis for sharing	Public task & legal obligation.
How is data shared?	Electronically. through a secure connection.
References	Click to download Future Digital

System used: Google drive for education

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

System used: Governance

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

System used: 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
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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: 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: Lexia

Description

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

Personal Data Items

Staff

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

School

- Name
- Payment details
- Usage data

Pupil

- Name
- Age
- Class
- Group

Why is it being processed?

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

Legal Basis

Public task

Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"

Evidence for legal basis

ICO Legal Basis Toolkit

Is Consent Required?

No

Data Source

School

Where is data stored?

Lexia secure servers

Is it secure and/or encrypted?

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

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

System used: Lightspeed Internet Filtering

Description	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Machine name • I/P address • URLs visited • School <p>Pupil</p> <ul style="list-style-type: none"> • Name • Name • Machine name • I/P address • URLs visited • School
Why is it being processed?	Statutory requirement to filter Internet services for school users
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	Lightspeed Rockets at County Hall Northumberland
Is it secure and/or encrypted?	Yes
Who can access data?	NCC school support Staff, Curriculum ICT Team, Lightspeed staff for support
How long is data kept?	3 years after date closed
Who is data shared with?	School leadership, LSCB and police if serious incident occurs
Legal basis for sharing	Public task and legal obligation
How is data shared?	Secure electron communication
References	Click to download Lightspeed Privacy Notice

System used: 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

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 relating to children who are Looked After
Personal Data Items	<p>Pupils</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 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

Special Category Data Legal Basis	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> <p>Significant Public Interest</p>
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	Processing is required for reasons of significant public interest on the basis of Union or Member State Law that is equivalent to the aim pursued and which contains suitable safeguards.
Special Category Evidence for legal basis	ICO Regs - Article 9
How is the Special Category data shared?	Secure Messenger or Verbal
Legal basis for sharing Special Category data	ICO Regs - 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?	Secure Cabinet
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?	Verbally and by Secure Messenger

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

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 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	Pupils <ul style="list-style-type: none">• Name• Date of Birth• Address• Health Needs• Social Care Status• Educational Needs• Medical History• Medication Details 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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

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

<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>

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

System used: MS Office Suite

Description	Suite of online tools for staff and pupils, including OneDrive, Word, Powerpoint, Excel, Outlook, Video and Teams.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Classes <p>Pupil</p> <ul style="list-style-type: none"> • Name <p>Governor</p> <ul style="list-style-type: none"> • Name
Why is it being processed?	To provide OneDrive 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 tool.
Is Consent Required?	No
Data Source	School
Where is data stored?	Microsoft Servers based in the EU
Is it secure and/or encrypted?	Yes, secure and encrypted
Who can access data?	Individual users can access their own accounts. ICT Team can access management tool.
How long is data kept?	3 years after date closed
Who is data shared with?	N/A
Legal basis for sharing	N/A
How is data shared?	https://privacy.microsoft.com/en-gb/privacystatement

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

Description	NCETM provides professional development for staff in the teaching of Mathematics Children's chances of succeeding in education and life will be maximised if they develop deep and lasting procedural and conceptual mathematical understanding. The NCETM's teaching for mastery section explains the rationale for this teaching approach, and presents case studies from schools, together with interviews with teachers involved in mastery projects through the Maths Hubs programme.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • email address • School
Why is it being processed?	To provide access to the wide range of resources available online.
Legal Basis	<p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
Evidence for legal basis	ICO legal basis toolkit.
Is Consent Required?	No
Data Source	School
Where is data stored?	Tribal secure servers
Is it secure and/or encrypted?	Yes.
Who can access data?	Staff, Tribal staff for support.
How long is data kept?	3 years after date closed
Who is data shared with?	Tribal and school staff.
Legal basis for sharing	Public task
How is data shared?	With user details removed.
References	Click to download National Centre for Excellence in the Teaching of Mathematics

System used: National Tutoring Programme (NTP)

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

Special Category Data Legal Basis	<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: Nessy - Literacy interventions

Description	Nessy programs are designed to help students of all abilities learn to read, write, spell and type, especially those who learn differently, including: Mainstream EAL Homeschool Students with dyslexia
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • Year group • Test results
Why is it being processed?	To create a secure log in for individual pupils to access Online Literacy intervention materials.
Legal Basis	<p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO Legal basis tool
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	Securely on Nessy Servers
Is it secure and/or encrypted?	The security of personal information The secrecy of your personal information is important to Nessy. We do not store credit card details nor do we share customer details with any 3rd parties. Any information you provide will be held securely and in accordance with the Data Protection Act 1998. All of the data collected, including usernames, passwords and any test results achieved, is stored on secure servers. Nessy will not sell or rent any of your personal information. We ask you to provide your email and telephone number solely to assist in coordinating and confirming your access to your Nessy online adventure (called a “Nessy Subscription” for short).
Who can access data?	School staff, pupils, Nessy staff for support
How long is data kept?	3 years after date closed
Who is data shared with?	Not shared
Legal basis for sharing	N/A
How is data shared?	N/A
References	Click to download Nessy Privacy Policy

System used: Newcastle United Foundation

Description	Newcastle United Foundation is an independent registered charity using the power of football to connect, motivate and inspire people in our region. Through community, education, health and wellbeing, and sports programmes delivered across Newcastle, Northumberland, North Tyneside and Gateshead, we strive to improve physical and mental health, boost learning and career prospects and provide life-changing opportunities for everyone – no matter their goals in life.
Personal Data Items	<p>Child</p> <ul style="list-style-type: none"> • Forename • Surname • Gender • Ethnicity • Disability • School • Year Group • Class name
Why is it being processed?	to provide data to premier league on progress of children using NUFC Foundation
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.newcastlesupportdirectory.org.uk/node/41
Is it secure and/or encrypted?	Secure
Who can access data?	School/Newcastle Foundation
How long is data kept?	3 years after date closed
Who is data shared with?	School/Newcastle Foundation
Legal basis for sharing	Public Task/Legal Obligation
How is data shared?	Secure - https://www.newcastlesupportdirectory.org.uk/node/41

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

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

Special Category Data Legal Basis	<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: 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: Padlet	
Description	A digital canvas where users can add photos, videos, audio, text, drawings, graphs, charts, and more.
Personal Data Items	<p>Child</p> <ul style="list-style-type: none"> • Name <p>Staff</p> <ul style="list-style-type: none"> • Name
Why is it being processed?	https://padlet.com/
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://privacy.commonsense.org/evaluation/padlet
Is it secure and/or encrypted?	Secure
Who can access data?	https://privacy.commonsense.org/evaluation/padlet
How long is data kept?	3 years after date closed
Who is data shared with?	https://privacy.commonsense.org/evaluation/padlet
Legal basis for sharing	Public Task
How is data shared?	https://privacy.commonsense.org/evaluation/padlet

System used: ParentPay

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Performance Management

Description	Staff appraisals
Why is it being processed?	To assist SLT in reviewing performance
Legal Basis	Contract Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”
Evidence for legal basis	Legitimate interest and public task
Is Consent Required?	No
Data Source	School
Where is data stored?	Online Paper
Is it secure and/or encrypted?	Yes encrypted on line Paper in a locked drawer
Who can access data?	SLT and line managers
How long is data kept?	3 years after date closed
Who is data shared with?	Staff member
Legal basis for sharing	Public task
How is data shared?	Verbally Paper copy Electronic copy

System used: Personnel files

Description	Information relating to staff employment
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Address • Telephone number • e-mail address • National Insurance Number • Qualifications • DOB • Contract • Payroll no. • Employment history • References • Leave of absence • DBS checked
Why is it being processed?	Necessary for employment
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure filing cabinet & online secure servers.
Is it secure and/or encrypted?	Yes - secure storage
Who can access data?	Headteacher and office staff
How long is data kept?	3 years after date closed
Who is data shared with?	NCC and/or HR provider and/or Payroll provider
Legal basis for sharing	Public task and legal obligation
How is data shared?	Electronically or secure courier

System used: Photographs and videos of staff and pupils.

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

System used: 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

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

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

System used: Registers

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

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

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,</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

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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- 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,</p>
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	social security or social protection law or a collective agreement. Significant Public Interest Processing is required for reasons of significant public interest on the basis of Union or Member State Law that is equivalent to the aim pursued and which contains suitable safeguards.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Secure Messenger, verbal
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Statutory obligations and to support educational entitlement
Legal Basis	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 tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure cabinet,
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Designated admin staff, Class Teacher, LA workers as appropriate
How long is data kept?	3 years after date closed
Who is data shared with?	Parent/Carer as appropriate, key workers as appropriate, LA workers as appropriate, Police
Legal basis for sharing	Statutory and Legitimate interest
How is data shared?	Verbal or secure messenger

System used: School360

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

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

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

System used: Schoolcomms

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

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

System used: Seesaw

Description	Seesaw - Student driven digital portfolios and simple parent communication.
Personal Data Items	Staff <ul style="list-style-type: none">• Name• School• Classes Pupil <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	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?	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

Description	Records relating to Special Educational Needs and Disability 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 • SEND History <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

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

Special Category Data Legal Basis	Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9

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

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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	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

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

Special Category Data Legal Basis	Obligation <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: Testbase

Description

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

Personal Data Items

School

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

Staff

- Name

Pupil

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

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

Special Category Data Legal Basis

Obligation

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

Special Category Evidence for

Article 9

legal basis	
How is the Special Category data shared?	AQA; Doublestruck Service Providers (including internet service platform providers; payment processing providers); Local authorities; Doublestruck advisors and auditors; other approved third parties necessary to provide the service.
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To provide a service and resources which enables schools to assess pupil attainment and track? progress? of individuals and groups.
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO Legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure server
Is it secure and/or encrypted?	Account is password protected, Store on Doublestruck secure servers.
Who can access data?	School; Teastbase (Doublestruck LTD) for technical support.
How long is data kept?	6 years after date closed
Who is data shared with?	AQA; Doublestruck Service Providers (including internet service platform providers; payment processing providers); Local authorities; Doublestruck advisors and auditors; other approved third parties necessary to provide the service.
Legal basis for sharing	Legal obligation and public task
How is data shared?	In a structure, commonly used, machine readable format.
References	Click to download Testbase privacy notice

System used: 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: 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