



# **Berwick St Marys C of E First School**

## **GDPR Asset Register**

**Date: 12/04/2026**

Data Protection Officer: Vicki Evans

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## Introduction

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

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

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

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

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

## Systems included in this report

| System Name                           | Description  | Special Category |
|---------------------------------------|--|------------------|
| Accident book                         | Log of accidents / minor injuries in school  |                  |
| Accident Report Form                  | ACC1 form for reporting accidents to NCC   |                  |
| Assessment Records                    | Electronic and paper mark books  |                  |
| Attendance file                       | Attendance information about pupils and classes  | yes              |
| BBC Bitesize                          | BBC Bitesize is a free online study support resource designed to help with learning, revision and homework! Bitesize provides support for learners aged 5 to 16+ across a wide range of school subjects. It also supports children and young people's wellbeing and career choices. Bitesize also has hundreds of published lessons to help students across the UK with home schooling. Bitesize guides are written by teachers and subject experts and are mapped to follow the curricula of the UK. Secondary Bitesize follows exam board specifications for the main exam boards in the UK, including for GCSE in England, Wales and Northern Ireland and National 4, National 5 & Highers in Scotland, ensuring students are preparing for the right exams |                  |
| Behaviour Files - Paper (in class)    | Information relating to the behaviours of particular pupils  | yes              |
| Busy Things                           | Online games & activities for learning   |                  |
| 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              |
| Class Charts                          | Because Class Charts is designed by an ex-teacher, we understand the issues schools face and we make a big impact in schools by improving behaviour, attendance and teaching & learning. Schools that use Class Charts equip themselves with a BETT Award winning solution that is effective & easy to use for   |                  |

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|   | everyone involved. We streamline every aspect of classroom management, reducing teacher workload and empowering SLT with real time data for informed decision making.   |     |
| 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. |     |
| Dietary requirements information sheets | Required documents for specific children with severe allergies / intolerances and religious observations (food)   | yes |
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| Edenred                           | Edenred is all about motivating and engaging people and making life/work better. About helping organisations all over the world perform better. And here's a bit more about how we do it. We offer the widest range of incentives, rewards and benefits solutions, individually designed to fit your audience, your goals and your budget - a unique and unrivalled total reward & recognition solution. We help organisations and public institutions streamline and simplify payment processes, reduce administrative burdens, save money and make life easier for everyone. We do this through Vouchers, prepaid cards, online platforms and digital & SMS products to help engage and motivate your employees, customers and business partners. Over 20 different solutions last time we checked. |     |
| Eduspot                           | Teachers2parents; School Money; Behaviour Watch; School Pod; School Website Design; Parents Evening; Cashless Catering; School App  | yes |
| Eschools Website Provider         | On-line school website building tool  |     |
| EVOLVE visits                     | An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities.  |     |
| Examination Boards administration | Pearson/OCR/AQA/ASDAN/Edexcel and any other examination board   |     |
| Google Classroom                  | A free and easy tool helping educators efficiently manage and assess progress, while enhancing connections with learners from school, from home, or on the go.  |     |
| Google drive for education        | suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.   |     |
| Google Meet                       | Google Meet is a video-communication service developed by Google. It is one of two apps that constitute the replacement for Google Hangouts, the other being Google Chat  |     |
| Governance                        | Details of all members of the Governing Body  |     |
| HAF- HolidayActivities            | The dedicated platform built to run and report on your local authority HAF programme.   | yes |
| Health & Safety                   | Records pertaining to Health & Safety   |     |
| Huggg                             | Purchase and send supermarket vouchers to those in need. Manage funds and give recipients choice all in one simple to use platform.   |     |
| ICT North                         | IT services for schools   |     |
| Interactive Resources             | Pupil / teacher online learning resources for Numeracy.   |     |

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| 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.  |     |
| 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,  | yes |

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|   | medication administered, health care plans, risk assessments   |     |
| 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 Online Safety.com  | Member schools can access our 'Safe Remote Education Hub' created to support teachers and leaders in understanding how to maintain effective safeguarding arrangements whilst also providing high-quality remote education and supporting pupil wellbeing  |     |
| 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 |
| Natterhub   | Innovative Online Safety & Digital Literacy Tool Y1-6   Interactive lessons   Lesson plans Resources   Teacher notes   Assessment  |     |
| NFER  | Assessment materials, reading test and pupil progress data   |     |
| Northumberland School Readiness Passport                              | The School Readiness Passport is primarily a transition document. It will be used to gather information about key events in a child's early life.  |     |
| Nuffield Early Language Intervention (NELI)                           | The Nuffield Foundation is an independent charitable trust with a mission to advance educational opportunity and social well-being. We fund research that informs social policy, primarily in Education, Welfare and Justice. We also provide opportunities for young people to develop skills and confidence in science and research.   | yes |
| Nursery (Early Years) files   | Early years registration information and funding information for Early Years entitlement, hours taken each week  | yes |
| Padlet  | Padlet is a free online tool that is best described as an online notice board. Padlet can be used by students and teachers to post notes on a common page. The notes posted by teachers and students can contain links, videos, images and document files  |     |
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| Parent mail                                 | Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events   |     |
| 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.  |     |
| PIRA - Rising stars (Wordblaze)             | Reliably assess reading attainment and progress with termly standardised reading tests Progress in Reading Assessment (PiRA) termly tests produce standardised results and age related scores to enable schools to track pupil progress term by term, predict future progress and benchmark performance against national averages. | yes |
| PIVATS                                      | An online assessment and target setting tool   | yes |
| 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 |
| School meals identification                 | Identification of pupils for meals   | yes |
| School360                                   | Learning platform for Northumberland schools with links to 3rd party educational resource providers.   | yes |
| 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  |     |
| SIMS  | SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools.   | yes |
| Social media sites e.g. Twitter, Facebook   | Social Media tool used to inform parents about events in school and celebrate children's achievement.  |     |
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| 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.  |     |
| STEM                         | Developing teachers and leaders Explore programmes and resources that support professional development and drive the impact of teaching across schools and colleges. o support parents and carers, our subject experts have put together a selection of activities and materials, which are free for everyone to access.   |     |
| Tapestry                     | An online journal recording all the learning and fun of children's early years education.  |     |
| Teachers2Parent              | Parent/Staff/Other Text Messaging System   |     |
| 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.  |     |
| Twinkl                       | We're here to 'help those who teach'. It's what brings us to work every day. We're proud to create educational resources that can be used at each step of a child's learning journey. Our teacher-created resources provide entire schemes of work, lesson planning and assessments right through to online educational games, augmented reality and so much more. We have over 525,000 resources and new content gets added every day. You'll find we've normally got what you need before you even know you want it. |     |
| Vimeo                        | Upload and Host Videos. Collaborate and Share. Find the Vimeo Plan for You. HD playback. Powerful privacy controls. Privacy controls. Unlimited bandwidth. Embedding features. Video statistics. Ad-free videos. Password protection. 8K 360 uploads. Customizable player  |     |
| Visitor book                 | Log of all visitors into school / fire regulations   |     |
| Vocabulary Ninja             | THE HOME OF HIGH-QUALITY TEACHING AND LEARNING RESOURCES. WHICH TEACHING RESOURCES DO YOU NEED? At Vocabulary Ninja we provide a wide variety of high-quality products and systems that help to support pupils, teachers and schools.  |     |
| White Rose Maths and Science | Influenced, inspired and informed by the work of   | yes |

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|                                       | <p>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.</p> |     |
| Wonde                                 | Manages transfer of data from Sims MIS to School360.   | yes |
| Y4 Multiplication Check               | <p>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.</p>  |     |
| Zoom                                  | <p>Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Our easy, reliable cloud platform for video, voice, content sharing, and chat runs across mobile devices, desktops, telephones, and room systems.</p>  |     |
| Child Protection Records              | Records relating to child protection issues for individual pupils  |     |
| Educspot (school money)               | School meals, After and before school clubs, communication with parents regarding finance, swimming, trips and provide consent for school trips  |     |
| Looked After Children Records - Paper | Information relating children who are Looked After   |     |
| Performance Management                | Records relating to staff appraisal, teaching observation records and CPD  |     |
| Pupil Reports - Paper system          | Information relating to achievement & progress of individual pupils  |     |
| Scrutiny and Moderation Records       | Records of joint meetings of moderating and scrutiny of pupil progress   |     |
| SEND Paper Records                    | Records relating to individual pupil's SEND history  |     |

System used: Accident book

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|---------------------------------------|---|
| <b>Description</b>                    | Log of accidents / minor injuries in school   |
| <b>Personal Data Items</b>            | <b>Pupil</b> <ul style="list-style-type: none"><li>• Name</li><li>• class</li><li>• Injury</li><li>• first aid</li><li>•</li></ul>  |
| <b>Why is it being processed?</b>     | To record injuries in school  |
| <b>Legal Basis</b>                    | <b>Legal Obligation</b><br>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.” |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | File in office  |
| <b>Is it secure and/or encrypted?</b> | No  |
| <b>Who can access data?</b>           | School staff  |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | Parents   |
| <b>Legal basis for sharing</b>        | Legal obligation  |
| <b>How is data shared?</b>            | Verbally  |

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| <b>Description</b>                | ACC1 form for reporting accidents to NCC   |
| <b>Personal Data Items</b>        | <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Gender</li> <li>• Address</li> <li>• Telephone number</li> <li>• Date and time of accident</li> <li>• nature of injury</li> <li>• Place of accident</li> <li>• First aid</li> <li>• Circumstances</li> <li>• Action taken</li> <li>• Witness information</li> <li>•</li> </ul> <p><b>Staff member</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Occupation</li> <li>• DOB</li> <li>• Gender</li> <li>• Address</li> <li>• Telephone number</li> <li>• Date and time of injury</li> <li>• nature of injury</li> <li>• place of accident</li> <li>• First aid</li> <li>• Circumstances</li> <li>• Action taken</li> <li>• Witness information</li> <li>•</li> </ul> |
| <b>Why is it being processed?</b> | Statutory obligations to comply with Health and Safety regulations.  |
| <b>Legal Basis</b>                | <p><b>Legal Obligation</b></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><b>Public task</b></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>   |
| <b>Evidence for legal basis</b>   | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>       | No   |
| <b>Data Source</b>                | School   |
|                                   |  |

|                                       |                                  |
|---------------------------------------|----------------------------------|
| <b>Where is data stored?</b>          | Secure filing cabinet in office  |
| <b>Is it secure and/or encrypted?</b> | Yes                              |
| <b>Who can access data?</b>           | SLT                              |
| <b>How long is data kept?</b>         | 3 years after date closed        |
| <b>Who is data shared with?</b>       | NCC / parents                    |
| <b>Legal basis for sharing</b>        | Public task and legal obligation |
| <b>How is data shared?</b>            | Carbon copy                      |

System used: Assessment Records

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Electronic and paper mark books  |
| <b>Personal Data Items</b>            | <p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Disadvantaged cohort</li> <li>• SEND Code</li> <li>• Key Stage 2 Assessment data</li> <li>• Internal Assessment Data</li> </ul>   |
| <b>Why is it being processed?</b>     | To track student achievement and report to parents   |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></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><b>Public task</b></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>   |
| <b>Evidence for legal basis</b>       | ICO lawful basis toolkit   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | On-site Secure Network Google Drive On paper- Class Context Files  |
| <b>Is it secure and/or encrypted?</b> | 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 |
| <b>Who can access data?</b>           | Staff  |
| <b>How long is data kept?</b>         | 3+ years   |
| <b>Who is data shared with?</b>       | Parents  |
| <b>Legal basis for sharing</b>        | Legal obligation, Public task  |
| <b>How is data shared?</b>            | Parents evenings, reports  |

System used: Attendance file

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: BBC Bitesize

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

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

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

|  |  |
|--|--|
| <b>Special Category Data Legal Basis</b> | <p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> <p><b>Significant Public Interest</b></p> <p>Processing is required for reasons of significant public interest on the basis of Union or Member State Law that is equivalent to the aim pursued</p> |
|--|--|

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|  | and which contains suitable safeguards.  |
| <b>Special Category Evidence for legal basis</b>     | Article 9  |
| <b>How is the Special Category data shared?</b>      | Verbally & by Secure Messenger   |
| <b>Legal basis for sharing Special Category data</b> | Article 9  |
| <b>Why is it being processed?</b>                    | To ensure access to education appropriate to needs   |
| <b>Legal Basis</b>                                   | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>                      | ICO legal basis tool   |
| <b>Is Consent Required?</b>                          | No   |
| <b>Data Source</b>                                   | School   |
| <b>Where is data stored?</b>                         | Secure cabinet   |
| <b>Is it secure and/or encrypted?</b>                | Yes  |
| <b>Who can access data?</b>                          | Head Teacher, Class Teacher and key workers as appropriate   |
| <b>How long is data kept?</b>                        | 3 years after date closed  |
| <b>Who is data shared with?</b>                      | External support workers as applies  |
| <b>Legal basis for sharing</b>                       | Public Task & Legal Obligation   |
| <b>How is data shared?</b>                           | Verbal or secure messenger   |

System used: Busy Things

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Online games & activities for learning  |
| <b>Personal Data Items</b>            | <p><b>Taecher</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• email</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>  |
| <b>Why is it being processed?</b>     | To allow use of the system  |
| <b>Legal Basis</b>                    | <p><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO Toolkit   |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | All data collected and processed by Busy Things is stored in a secure data centre in the UK meeting industry standards for security (ISO270001).  |
| <b>Is it secure and/or encrypted?</b> | All data is transmitted to and from this location using SSL encryption technologies. All data is backed up on a regular basis and stored securely off-site  |
| <b>Who can access data?</b>           | School & busy things staff  |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | Not Shared  |
| <b>Legal basis for sharing</b>        | N/A   |
| <b>How is data shared?</b>            | N/A   |

System used: CCTV

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | CCTV   |
| <b>Personal Data Items</b>            | <b>Staff</b> <ul style="list-style-type: none"><li>• Images</li></ul> <b>Child</b> <ul style="list-style-type: none"><li>• Images</li></ul> <b>Visitor</b> <ul style="list-style-type: none"><li>• Images</li></ul>                              |
| <b>Why is it being processed?</b>     | Safeguarding   |
| <b>Legal Basis</b>                    | <b>Public task</b><br>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 |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | School servers and recordings  |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | School staff   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Police in event of criminal investigations   |
| <b>Legal basis for sharing</b>        | ICO legal basis toolkit  |
| <b>How is data shared?</b>            | Hard Copy  |

System used: Charanga

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | 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 |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School</li> <li>• email address</li> <li>• Mobile phone number</li> <li>• Pupils groups</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School</li> <li>• Assessment information</li> </ul>                           |
| <b>Why is it being processed?</b>     | To provide online access to teaching and learning materials.   |
| <b>Legal Basis</b>                    | <b>Public task</b><br><br>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   |
| <b>Evidence for legal basis</b>       | Charanga privacy notice.   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Securely stored on servers in Ireland.   |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Strictly controlled internally in Charanga, Teachers and pupils.   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Shared with partner company Soundation AB  |
| <b>Legal basis for sharing</b>        |  |
| <b>How is data shared?</b>            | Electronically   |
| <b>References</b>                     | <a href="#">Click to download Privacy Notice</a><br><a href="#">Click to download Soundation Privacy Policy</a>  |

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

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- Criminal Records information - protected in Article 10

|  |                   |
|--|-------------------|
| <b>Special Category Data Legal Basis</b> | <b>Obligation</b> |
|--|-------------------|

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

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

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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.  |
| <b>Special Category Evidence for legal basis</b>     | Article 9  |
| <b>How is the Special Category data shared?</b>      | Verbal or secure messenger   |
| <b>Legal basis for sharing Special Category data</b> | Article 9  |
| <b>Why is it being processed?</b>                    | Statutory obligations and to support educational entitlement   |
| <b>Legal Basis</b>                                   | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>                      | ICO legal basis tool   |
| <b>Is Consent Required?</b>                          | No   |
| <b>Data Source</b>                                   | School   |
| <b>Where is data stored?</b>                         | Secure cabinet   |
| <b>Is it secure and/or encrypted?</b>                | Yes  |
| <b>Who can access data?</b>                          | Designated Child Protection Lead & Deputy; Designation admin staff   |
| <b>How long is data kept?</b>                        | 3 years after date closed  |
| <b>Who is data shared with?</b>                      | Social Workers, Parent/Carer as appropriate, some information shared with key workers, health care professionals and Police, receiving school  |
| <b>Legal basis for sharing</b>                       | Statutory and Legitimate interest  |
| <b>How is data shared?</b>                           | Verbal or secure messenger   |

System used: Class Charts

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

System used: Consent for educational visits

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

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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

|  |  |
|--|--|
| <b>Special Category Data Legal Basis</b>             | <p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>  |
| <b>Special Category Evidence for legal basis</b>     | Article 9  |
| <b>How is the Special Category data shared?</b>      | Shared by phone  |
| <b>Legal basis for sharing Special Category data</b> | Article 9  |
| <b>Why is it being processed?</b>                    | To ensure school has up to date information when taking children off site  |
| <b>Legal Basis</b>                                   | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>                      | ICO legal basis toolkit  |

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

|  |   |
|--|---|
| <b>Special Category Evidence for legal basis</b>     | Article 9   |
| <b>How is the Special Category data shared?</b>      | Verbally, secure messenger, online secure servers.  |
| <b>Legal basis for sharing Special Category data</b> | Article 9   |
| <b>Why is it being processed?</b>                    | 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.  |
| <b>Legal Basis</b>                                   | <p><b>Legal Obligation</b></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><b>Public task</b></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>  |
| <b>Evidence for legal basis</b>                      | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>                          | No  |
| <b>Data Source</b>                                   | SIMS  |
| <b>Where is data stored?</b>                         | Meritec secure servers.   |
| <b>Is it secure and/or encrypted?</b>                | 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. |
| <b>Who can access data?</b>                          | School staff, subsequent school if using CPOMS, Meritec for support and outside agencies.   |
| <b>How long is data kept?</b>                        | 3 years after date closed   |
| <b>Who is data shared with?</b>                      | School staff, subsequent school if using CPOMS, Meritec for support, outside agencies, parents.   |
| <b>Legal basis for sharing</b>                       | Legal obligation & public task  |
| <b>How is data shared?</b>                           | Secure cloud based systems and secure servers.  |
| <b>References</b>                                    | <a href="#">Click to download CPOMS Cloud Services for Schools</a>  |

System used: Data tracking spreadsheets

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

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- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

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

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

System used: Debbie Judd HR

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | 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. |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• All staff employment details</li> </ul>  |
| <b>Why is it being processed?</b>     | <a href="https://debbiejuddhr.co.uk/about-us/">https://debbiejuddhr.co.uk/about-us/</a>   |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></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><b>Public task</b></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>  |
| <b>Evidence for legal basis</b>       | ICO legal basis tool kit  |
| <b>Is Consent Required?</b>           | yes   |
| <b>Data Source</b>                    | Police  |
| <b>Where is data stored?</b>          | <a href="https://debbiejuddhr.co.uk/about-us/">https://debbiejuddhr.co.uk/about-us/</a>   |
| <b>Is it secure and/or encrypted?</b> | secure  |
| <b>Who can access data?</b>           | <a href="https://debbiejuddhr.co.uk/about-us/">https://debbiejuddhr.co.uk/about-us/</a>   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | <a href="https://debbiejuddhr.co.uk/about-us/">https://debbiejuddhr.co.uk/about-us/</a>   |
| <b>Legal basis for sharing</b>        | Public task/legal obligation  |
| <b>How is data shared?</b>            | <a href="https://debbiejuddhr.co.uk/about-us/">https://debbiejuddhr.co.uk/about-us/</a>   |



System used: Dietary requirements information sheets

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

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

|  |   |
|--|---|
| <b>Special Category Data Legal Basis</b>             | <p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>   |
| <b>Special Category Evidence for legal basis</b>     | Article 9   |
| <b>How is the Special Category data shared?</b>      | Paper records   |
| <b>Legal basis for sharing Special Category data</b> | Article 9   |
| <b>Why is it being processed?</b>                    | Health and safety - to avoid children coming into contact with specific foods   |
| <b>Legal Basis</b>                                   | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>                      | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>                          | No  |

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

System used: Edenred

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Edenred is all about motivating and engaging people and making life/work better. About helping organisations all over the world perform better. And here's a bit more about how we do it. We offer the widest range of incentives, rewards and benefits solutions, individually designed to fit your audience, your goals and your budget - a unique and unrivalled total reward & recognition solution. We help organisations and public institutions streamline and simplify payment processes, reduce administrative burdens, save money and make life easier for everyone. We do this through Vouchers, prepaid cards, online platforms and digital & SMS products to help engage and motivate your employees, customers and business partners. Over 20 different solutions last time we checked. |
| <b>Personal Data Items</b>            | <b>parent</b> <ul style="list-style-type: none"><li>• Name</li></ul> <b>child</b> <ul style="list-style-type: none"><li>• Name</li><li>• age</li></ul>  |
| <b>Why is it being processed?</b>     | <a href="https://www.edenred.co.uk/legal/legal-entity/privacy-policy/">https://www.edenred.co.uk/legal/legal-entity/privacy-policy/</a>   |
| <b>Legal Basis</b>                    | <b>Public task</b><br>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"   |
| <b>Evidence for legal basis</b>       | ICO legal Basis tool  |
| <b>Is Consent Required?</b>           | Yes   |
| <b>Data Source</b>                    | Parent  |
| <b>Where is data stored?</b>          | <a href="https://www.edenred.co.uk/legal/legal-entity/privacy-policy/">https://www.edenred.co.uk/legal/legal-entity/privacy-policy/</a>   |
| <b>Is it secure and/or encrypted?</b> | Secure  |
| <b>Who can access data?</b>           | <a href="https://www.edenred.co.uk/legal/legal-entity/privacy-policy/">https://www.edenred.co.uk/legal/legal-entity/privacy-policy/</a>   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | <a href="https://www.edenred.co.uk/legal/legal-entity/privacy-policy/">https://www.edenred.co.uk/legal/legal-entity/privacy-policy/</a>   |
| <b>Legal basis for sharing</b>        | Public Task   |
| <b>How is data shared?</b>            | <a href="https://www.edenred.co.uk/legal/legal-entity/privacy-policy/">https://www.edenred.co.uk/legal/legal-entity/privacy-policy/</a>   |

System used: Eduspot

|                            |  |
|----------------------------|--|
| <b>Description</b>         | Teachers2parents; School Money; Behaviour Watch; School Pod; School Website Design; Parents Evening; Cashless Catering; School App   |
| <b>Personal Data Items</b> | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School</li> <li>• Classes</li> <li>• Email</li> </ul> <p><b>Pupils</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class</li> <li>• age</li> <li>• Performance Data</li> <li>• SEND</li> <li>• Gender</li> </ul> |

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

|  |  |
|--|--|
| <b>Special Category Data Legal Basis</b>             | <b>Obligation</b><br>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.   |
| <b>Special Category Evidence for legal basis</b>     | Article 9  |
| <b>How is the Special Category data shared?</b>      | n/a  |
| <b>Legal basis for sharing Special Category data</b> | n/a  |
| <b>Why is it being processed?</b>                    | To provide the school with a range of tools for recording reporting and communication with parents/carers  |
| <b>Legal Basis</b>                                   | <b>Public task</b><br>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 |

|                                       |  |
|---------------------------------------|--|
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Eduspot secure server  |
| <b>Is it secure and/or encrypted?</b> | secure   |
| <b>Who can access data?</b>           | School staff with logins, Eduspot staff for technical support  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | n/a  |
| <b>Legal basis for sharing</b>        | n/a  |
| <b>How is data shared?</b>            | n/a Link to privacy notice - <a href="https://eduspot.co.uk/privacy-policy/">https://eduspot.co.uk/privacy-policy/</a> |

System used: Eschools Website Provider

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

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

System used: EVOLVE visits

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities.   |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• e-mail address</li> <li>• IP address</li> <li>• Location data</li> <li>• Qualifications</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• UPN</li> </ul>   |
| <b>Why is it being processed?</b>     | 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.  |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | SIMS   |
| <b>Where is data stored?</b>          | '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.'   |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Evolve staff   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | '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.'  |
| <b>Legal basis for sharing</b>        | Public task & legal obligation   |
| <b>How is data shared?</b>            | See contract/agreement   |

|                   |   |
|-------------------|---|
|                   | <a href="http://edufocus.co.uk/assets/files/gdpr/Data%20Processing%20Details.pdf">http://edufocus.co.uk/assets/files/gdpr/Data%20Processing%20Details.pdf</a> |
| <b>References</b> | <a href="#">Click to download Evolve eduFOCUS Global Data Privacy</a>   |

System used: Examination Boards administration

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Pearson/OCR/AQA/ASDAN/Edexcel and any other examination board  |
| <b>Personal Data Items</b>            | <p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Gender</li> <li>• Unique Candidate identifier</li> <li>• Unique Learner Number</li> <li>• Legal Name</li> <li>• Coursework marks</li> <li>• Forecast grades</li> </ul>   |
| <b>Why is it being processed?</b>     | Exam entry and issuing of qualifications   |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO lawful basis tool  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | SIMS   |
| <b>Where is data stored?</b>          | Secure gateway   |
| <b>Is it secure and/or encrypted?</b> | Yes- password protected on secure gateway and sent via EDI   |
| <b>Who can access data?</b>           | Examination Board, teachers, exams officer   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Examination Board  |
| <b>Legal basis for sharing</b>        | Public Task & legal obligation   |
| <b>How is data shared?</b>            | Via secure gateway- Privacy Notices for each exam board can be found on the website for each board.  |

| System used: Google Classroom         |  |
|---------------------------------------|--|
| <b>Description</b>                    | A free and easy tool helping educators efficiently manage and assess progress, while enhancing connections with learners from school, from home, or on the go.   |
| <b>Personal Data Items</b>            | <p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>  |
| <b>Why is it being processed?</b>     | <a href="https://policies.google.com/privacy?hl=en-GB#infocollect">https://policies.google.com/privacy?hl=en-GB#infocollect</a>  |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO legal tool kit   |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://policies.google.com/privacy?hl=en-GB#infocollect">https://policies.google.com/privacy?hl=en-GB#infocollect</a>  |
| <b>Is it secure and/or encrypted?</b> | Secure   |
| <b>Who can access data?</b>           | <a href="https://policies.google.com/privacy?hl=en-GB#infocollect">https://policies.google.com/privacy?hl=en-GB#infocollect</a>  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | <a href="https://policies.google.com/privacy?hl=en-GB#infocollect">https://policies.google.com/privacy?hl=en-GB#infocollect</a>  |
| <b>Legal basis for sharing</b>        | Public Task/legal obligation   |
| <b>How is data shared?</b>            | <a href="https://policies.google.com/privacy?hl=en-GB#infocollect">https://policies.google.com/privacy?hl=en-GB#infocollect</a>  |

System used: Google drive for education

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

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

System used: Governance

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Details of all members of the Governing Body   |
| <b>Personal Data Items</b>            | <p><b>Name</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details</li> <li>• Photos</li> <li>• Attendance at Meetings</li> <li>• Pecuniary Interests</li> </ul>   |
| <b>Why is it being processed?</b>     | Statutory Requirement  |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Secure school systems  |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Admin staff/ SLT   |
| <b>How long is data kept?</b>         | 3+ years   |
| <b>Who is data shared with?</b>       | Local Authority and the general public   |
| <b>Legal basis for sharing</b>        | Public task and legal obligation   |
| <b>How is data shared?</b>            | 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 |
| <b>Evidence for legal basis</b>       | ICO Toolkit  |
| <b>Is Consent Required?</b>           | <a href="https://www.holidayactivities.com/privacy-notice/">https://www.holidayactivities.com/privacy-notice/</a>  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://www.holidayactivities.com/privacy-notice/">https://www.holidayactivities.com/privacy-notice/</a>  |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | <a href="https://www.holidayactivities.com/privacy-notice/">https://www.holidayactivities.com/privacy-notice/</a>  |
| <b>How long is data kept?</b>         | 3+ years   |
| <b>Who is data shared with?</b>       | <a href="https://www.holidayactivities.com/privacy-notice/">https://www.holidayactivities.com/privacy-notice/</a>  |
| <b>Legal basis for sharing</b>        | Legal obligation, public task and legitimate interest  |
| <b>How is data shared?</b>            | <a href="https://www.holidayactivities.com/privacy-notice/">https://www.holidayactivities.com/privacy-notice/</a>  |

System used: Health & Safety

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

System used: Huggg

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

System used: ICT North

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | IT services for schools  |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Username</li> <li>• Email address</li> <li>• Temporary passwords</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Username</li> <li>• Email address</li> <li>• Temporary passwords</li> </ul>  |
| <b>Why is it being processed?</b>     | ICT support to end users at site / access to school IT equipment.  |
| <b>Legal Basis</b>                    | <p><b>Consent</b></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><b>Contract</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO legal toolkit  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | School software/ICT North systems  |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Staff, pupils, ICT North administrators  |
| <b>How long is data kept?</b>         | 1+ year  |
| <b>Who is data shared with?</b>       | Staff, pupils, ICT North administrators  |
| <b>Legal basis for sharing</b>        | Contract, consent, pupil task  |
| <b>How is data shared?</b>            | School software/ICT North systems  |



System used: Interactive Resources

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Pupil / teacher online learning resources for Numeracy.  |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class / Year group</li> <li>• School</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class / Year group</li> <li>• School</li> </ul>  |
| <b>Why is it being processed?</b>     | Necessary to provide access to learning resources through School360  |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit.   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School 360   |
| <b>Where is data stored?</b>          | Interactive Resources secure servers   |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Individual users can access their own accounts. Interactive Resources staff to enable support.   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | N/A  |
| <b>Legal basis for sharing</b>        | N/A  |
| <b>How is data shared?</b>            | N/A  |
| <b>References</b>                     | <a href="#">Click to download Interactive Resources Privacy Notices</a>  |

System used: Language Angels

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | 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. |
| <b>Personal Data Items</b>            | <p><b>teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• age</li> </ul>   |
| <b>Why is it being processed?</b>     | Language_Angels_Home_School_Terms_&_Conditions.pdf   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></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>   |
| <b>Evidence for legal basis</b>       | ICO Legal Basis Tool   |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Language_Angels_Home_School_Terms_&_Conditions.pdf   |
| <b>Is it secure and/or encrypted?</b> | Secure   |
| <b>Who can access data?</b>           | Language_Angels_Home_School_Terms_&_Conditions.pdf   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Language_Angels_Home_School_Terms_&_Conditions.pdf   |
| <b>Legal basis for sharing</b>        | Public Task  |
| <b>How is data shared?</b>            | Language_Angels_Home_School_Terms_&_Conditions.pdf   |

System used: Letter join

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | 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. |
| <b>Personal Data Items</b>            | <p><b>School</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class</li> </ul>   |
| <b>Why is it being processed?</b>     | To provide online access to a range of teaching and learning materials for staff and pupils.  |
| <b>Legal Basis</b>                    | <b>Public task</b><br>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"   |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | Green and Tempest secure servers  |
| <b>Is it secure and/or encrypted?</b> | 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.  |
| <b>Who can access data?</b>           | Staff, Letter join staff for support  |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | Not shared  |
| <b>Legal basis for sharing</b>        | N/A   |
| <b>How is data shared?</b>            | 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 <a href="mailto:privacyofficer@lexialearning.com">privacyofficer@lexialearning.com</a> . |
| <b>Who can access data?</b>     | Staff, pupil (own data), Lexia staff for technical support   |
| <b>How long is data kept?</b>   | 3 years after date closed  |
| <b>Who is data shared with?</b> | Staff  |
| <b>Legal basis for sharing</b>  | Public task  |
| <b>How is data shared?</b>      | Internal secure systems  |
| <b>References</b>               | <a href="#">Click to download LEXIA Privacy Policy</a>   |

System used: Lightspeed Internet Filtering

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.  |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Machine name</li> <li>• I/P address</li> <li>• URLs visited</li> <li>• School</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Name</li> <li>• Machine name</li> <li>• I/P address</li> <li>• URLs visited</li> <li>• School</li> </ul>  |
| <b>Why is it being processed?</b>     | Statutory requirement to filter Internet services for school users   |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | SIMS   |
| <b>Where is data stored?</b>          | Lightspeed Rockets at County Hall Northumberland   |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | NCC school support Staff, Curriculum ICT Team, Lightspeed staff for support  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | School leadership, LSCB and police if serious incident occurs  |
| <b>Legal basis for sharing</b>        | Public task and legal obligation   |
| <b>How is data shared?</b>            | Secure electron communication  |
| <b>References</b>                     | <a href="#">Click to download Lightspeed Privacy Notice</a>  |



System used: Local Authority moderation of work

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | 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.   |
| <b>Personal Data Items</b>            | <p><b>School</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Initials</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Initials</li> <li>• Gender</li> <li>• Unique pupil number (UPN)</li> </ul>   |
| <b>Why is it being processed?</b>     | As part of the statutory? requires for assessment and moderation in schools  |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO Legal basis toolkit  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | At County Hall in secure Filing systems and online, encrypted  |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Local Authority school data team and assessment/moderation team.   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Other NCC staff  |
| <b>Legal basis for sharing</b>        | Public task and legal obligation   |
| <b>How is data shared?</b>            | Secure server and hard copies  |

|   |  |
|---|--|
| <b>Description</b>  | Information relating to children who are in Looked After Care  |
| <b>Personal Data Items</b>  | <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• Address</li> <li>• Personal Education Plan</li> <li>• Health Needs</li> <li>• Social Care Needs</li> <li>• Educational Needs</li> <li>• Family Background</li> </ul> <p><b>Parents &amp; Carers</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact Details</li> <li>• Address</li> <li>•</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> </ul> <p><b>External Support</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Organisation</li> <li>• Position</li> <li>• Address</li> <li>• Contact Details</li> </ul> |
| <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"> <li>• Racial or ethnic origin</li> <li>• Political opinions</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic data for the purpose of identifying a natural person</li> <li>• Sex life and or sexual orientation</li> <li>• Criminal Records information - protected in Article 10</li> </ul> |  |
| <b>Special Category Data Legal Basis</b>  | <p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>  |
| <b>Special Category Evidence for legal basis</b>  | Article 9  |

|  |  |
|--|--|
| <b>How is the Special Category data shared?</b>      | Verbally or secure cloud sharing (Google or Office 365 etc)  |
| <b>Legal basis for sharing Special Category data</b> | Article 9  |
| <b>Why is it being processed?</b>                    | To support the education of children who are Looked After  |
| <b>Legal Basis</b>                                   | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>                      | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>                          | No   |
| <b>Data Source</b>                                   | School   |
| <b>Where is data stored?</b>                         | School computer, laptop  |
| <b>Is it secure and/or encrypted?</b>                | Yes  |
| <b>Who can access data?</b>                          | Head Teacher, Class Teacher, Designated Key Worker   |
| <b>How long is data kept?</b>                        | 3 years after date closed  |
| <b>Who is data shared with?</b>                      | Social Workers, Local Authority, Carers, Receiving school  |
| <b>Legal basis for sharing</b>                       | Legal Obligation, Public Task  |
| <b>How is data shared?</b>                           | via secure electronic means, Google or Office 365  |

|                            |  |
|----------------------------|--|
| <b>Description</b>         | Information relating to children who are Looked After  |
| <b>Personal Data Items</b> | <p><b>Pupils</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• Address</li> <li>• Personal Education Plan</li> <li>• Health Needs</li> <li>• Social Care Needs</li> <li>• Educational Needs</li> <li>• Family Background</li> <li>•</li> </ul> <p><b>Parents &amp; Carers</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact Details</li> <li>• Address</li> <li>•</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> </ul> <p><b>External Support Workers</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Organisation</li> <li>• Position</li> <li>• Address</li> <li>• Contact Details</li> </ul> |

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

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

|  |  |
|--|--|
|  | Processing is required for reasons of significant public interest on the basis of Union or Member State Law that is equivalent to the aim pursued and which contains suitable safeguards.  |
| <b>Special Category Evidence for legal basis</b>     | ICO Regs - Article 9   |
| <b>How is the Special Category data shared?</b>      | Secure Messenger or Verbal   |
| <b>Legal basis for sharing Special Category data</b> | ICO Regs - Article 9   |
| <b>Why is it being processed?</b>                    | To support the education of children who are Looked After  |
| <b>Legal Basis</b>                                   | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>                      | ICO Legal basis toolkit  |
| <b>Is Consent Required?</b>                          | No   |
| <b>Data Source</b>                                   | School   |
| <b>Where is data stored?</b>                         | Secure Cabinet   |
| <b>Is it secure and/or encrypted?</b>                | Yes  |
| <b>Who can access data?</b>                          | Head Teacher, Class Teacher, Designated Key Worker   |
| <b>How long is data kept?</b>                        | 3 years after date closed  |
| <b>Who is data shared with?</b>                      | Social Workers, Local Authority, Carers, Receiving School  |
| <b>Legal basis for sharing</b>                       | Legal Obligation & Public Task   |
| <b>How is data shared?</b>                           | Verbally and by Secure Messenger   |

System used: Medical Files - Electronic

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

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

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

|  |   |
|--|---|
| <b>How is the Special Category data shared?</b>      | Secure encrypted laptops and pens, secure messenger   |
| <b>Legal basis for sharing Special Category data</b> | Article 9   |
| <b>Why is it being processed?</b>                    | To ensure access to education   |
| <b>Legal Basis</b>                                   | <b>Public task</b><br><br>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" |
| <b>Evidence for legal basis</b>                      | ICO Legal Basis tool  |
| <b>Is Consent Required?</b>                          | No  |
| <b>Data Source</b>                                   | School  |
| <b>Where is data stored?</b>                         | Secure encrypted laptops/ school desktop computers  |
| <b>Is it secure and/or encrypted?</b>                | Yes   |
| <b>Who can access data?</b>                          | Head, SENDCO, Teachers, Key Workers   |
| <b>How long is data kept?</b>                        | 3 years after date closed   |
| <b>Who is data shared with?</b>                      | Parents/Carers (as appropriate), Social Workers, Health Care Professionals, receiving schools, LA workers (as appropriate)  |
| <b>Legal basis for sharing</b>                       | Public task   |
| <b>How is data shared?</b>                           | Secure encrypted laptops  |

System used: Medical Files - Paper

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

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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

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

|  |   |
|--|---|
| <b>How is the Special Category data shared?</b>      | Secure Messenger  |
| <b>Legal basis for sharing Special Category data</b> | ICO regs Article 9  |
| <b>Why is it being processed?</b>                    | To ensure access to education   |
| <b>Legal Basis</b>                                   | <b>Public task</b><br><br>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" |
| <b>Evidence for legal basis</b>                      | ICO Legal Basis tool  |
| <b>Is Consent Required?</b>                          | No  |
| <b>Data Source</b>                                   | School  |
| <b>Where is data stored?</b>                         | Secure cabinet  |
| <b>Is it secure and/or encrypted?</b>                | Yes   |
| <b>Who can access data?</b>                          | Head, SENDCO, Teachers, Key workers   |
| <b>How long is data kept?</b>                        | 3 years after date closed   |
| <b>Who is data shared with?</b>                      | Parents/Carers (as appropriate); Social Workers; Health Care Professionals, receiving schools, LA workers as appropriate  |
| <b>Legal basis for sharing</b>                       | Public Task   |
| <b>How is data shared?</b>                           | Secure Messenger  |

System used: Medical log

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

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|  |   |
|--|---|
| <b>Special Category Data Legal Basis</b>             | <p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| <b>Special Category Evidence for legal basis</b>     | Article 9   |
| <b>How is the Special Category data shared?</b>      | Internally with school / medical staff  |
| <b>Legal basis for sharing Special Category data</b> | Article 9   |

|                                       |  |
|---------------------------------------|--|
| <b>Why is it being processed?</b>     | Health and safety of child   |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | Parent   |
| <b>Where is data stored?</b>          | Medical log in secure storage held in the school office  |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | School staff   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Staff, NCC and NHS professionals   |
| <b>Legal basis for sharing</b>        | Public task and legal obligation   |
| <b>How is data shared?</b>            | Verbally, written and electronically via secure servers.   |

System used: MS Office Suite

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

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

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | 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. |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• email address</li> <li>• School</li> </ul>  |
| <b>Why is it being processed?</b>     | To provide access to the wide range of resources available online.   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></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>   |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit.   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Tribal secure servers  |
| <b>Is it secure and/or encrypted?</b> | Yes.   |
| <b>Who can access data?</b>           | Staff, Tribal staff for support.   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Tribal and school staff.   |
| <b>Legal basis for sharing</b>        | Public task  |
| <b>How is data shared?</b>            | With user details removed.   |
| <b>References</b>                     | <a href="#">Click to download National Centre for Excellence in the Teaching of Mathematics</a>  |

System used: National Online Safety.com

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Member schools can access our 'Safe Remote Education Hub' created to support teachers and leaders in understanding how to maintain effective safeguarding arrangements whilst also providing high-quality remote education and supporting pupil wellbeing |
| <b>Personal Data Items</b>            | <b>Teacher</b> <ul style="list-style-type: none"><li>• Name</li><li>• Email</li></ul>   |
| <b>Why is it being processed?</b>     |   |
| <b>Legal Basis</b>                    | <b>Public task</b><br>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"         |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>           | Yes   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | <a href="https://nationalonlinesafety.com/privacy-notice">https://nationalonlinesafety.com/privacy-notice</a>   |
| <b>Is it secure and/or encrypted?</b> | Secure  |
| <b>Who can access data?</b>           | <a href="https://nationalonlinesafety.com/privacy-notice">https://nationalonlinesafety.com/privacy-notice</a>   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | <a href="https://nationalonlinesafety.com/privacy-notice">https://nationalonlinesafety.com/privacy-notice</a>   |
| <b>Legal basis for sharing</b>        | Public Task   |
| <b>How is data shared?</b>            | <a href="https://nationalonlinesafety.com/privacy-notice">https://nationalonlinesafety.com/privacy-notice</a>   |

System used: National Tutoring Programme (NTP)

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

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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

|  |   |
|--|---|
| <b>Special Category Data Legal Basis</b>             | <p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>   |
| <b>Special Category Evidence for legal basis</b>     | Article 9   |
| <b>How is the Special Category data shared?</b>      | <a href="https://nationaltutoring.org.uk/legal/privacy-notice/">https://nationaltutoring.org.uk/legal/privacy-notice/</a>   |
| <b>Legal basis for sharing Special Category data</b> | Article 9   |
| <b>Why is it being processed?</b>                    | To perform the services of the National Tutoring Programme  |
| <b>Legal Basis</b>                                   | <p><b>Legitimate Interest</b></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> |
| <b>Evidence for legal basis</b>                      | ICO lawful basis toolkit  |
| <b>Is Consent Required?</b>                          | No  |
|  |   |

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

| System used: Natterhub                |   |
|---------------------------------------|---|
| <b>Description</b>                    | Innovative Online Safety & Digital Literacy Tool Y1-6   Interactive lessons   Lesson plans Resources   Teacher notes   Assessment   |
| <b>Personal Data Items</b>            | <p><b>teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• age</li> </ul>  |
| <b>Why is it being processed?</b>     | <a href="https://natterhub.com/legal">https://natterhub.com/legal</a>   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO Legal Basis Tool  |
| <b>Is Consent Required?</b>           | Yes   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | <a href="https://natterhub.com/legal">https://natterhub.com/legal</a>   |
| <b>Is it secure and/or encrypted?</b> | Secure  |
| <b>Who can access data?</b>           | <a href="https://natterhub.com/legal">https://natterhub.com/legal</a>   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | <a href="https://natterhub.com/legal">https://natterhub.com/legal</a>   |
| <b>Legal basis for sharing</b>        | Public Task   |
| <b>How is data shared?</b>            | <a href="https://natterhub.com/legal">https://natterhub.com/legal</a>   |

System used: NFER

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

System used: Northumberland School Readiness Passport

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | 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.   |
| <b>Personal Data Items</b>            | <p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Date of Birth</li> <li>• Unique Identifier</li> <li>• PP Information</li> <li>• Entitlement of hours</li> <li>• Special Needs Information</li> <li>• Development Progress</li> <li>•</li> </ul>  |
| <b>Why is it being processed?</b>     | 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.   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></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>  |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>           | Yes   |
| <b>Data Source</b>                    | Parent  |
| <b>Where is data stored?</b>          | <a href="https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf">https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf</a> |
| <b>Is it secure and/or encrypted?</b> | <a href="https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf">https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf</a> |
| <b>Who can access data?</b>           | <a href="https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf">https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf</a> |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | <a href="https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf">https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf</a> |
| <b>Legal basis for sharing</b>        | Public Task   |
| <b>How is data shared?</b>            | <a href="https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf">https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf</a> |

System used: Nuffield Early Language Intervention (NELI)

**Description**

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

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

**Special Category Data Legal Basis**

**Obligation**

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

**Special Category Evidence for legal basis**

Article 9

**How is the Special Category data shared?**

n/a

**Legal basis for sharing Special Category data**

n/a

**Why is it being processed?**

To support schools with Language Intervention

**Legal Basis**

**Public task**

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

**Evidence for legal basis**

ICO Legal basis toolkit

**Is Consent Required?**

No

**Data Source**

School

**Where is data stored?**

Secure Nuffield server

**Is it secure and/or encrypted?**

Secure

**Who can access data?**

Staff with login and nuffield for technical support

**How long is data kept?**

3 years after date closed

**Who is data shared with?**

n/a

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

System used: Nursery (Early Years) files

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

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

|  |   |
|--|---|
| <b>Special Category Data Legal Basis</b>         | <p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| <b>Special Category Evidence for legal basis</b> | Article 9   |
| <b>How is the Special Category data shared?</b>  | Internally within school  |
| <b>Legal basis for sharing Special</b>           | Article 9   |

|                                       |   |
|---------------------------------------|---|
| <b>Category data</b>                  |   |
| <b>Why is it being processed?</b>     | To ensure registration of children into school and that children receive their entitlements   |
| <b>Legal Basis</b>                    | <b>Public task</b><br><br>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" |
| <b>Evidence for legal basis</b>       | Accurate record of admission  |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | Parent  |
| <b>Where is data stored?</b>          | In school office in secure storage  |
| <b>Is it secure and/or encrypted?</b> | Yes   |
| <b>Who can access data?</b>           | SLT   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | School staff, NCC, outside agencies as required   |
| <b>Legal basis for sharing</b>        | Safeguarding  |
| <b>How is data shared?</b>            | Verbally / Electronically via secure server.  |

System used: Padlet

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

System used: Parent mail

|                                   |  |
|-----------------------------------|--|
| <b>Description</b>                | Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events   |
| <b>Personal Data Items</b>        | <p><b>School</b></p> <ul style="list-style-type: none"><li>• Name</li><li>• School email address</li></ul> <p><b>Staff</b></p> <ul style="list-style-type: none"><li>• Name</li><li>• Class</li><li>• Title</li><li>• e-mail</li><li>• Gender</li><li>• Telephone number</li><li>• DOB</li><li>• School address</li></ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"><li>• Name</li><li>• Year</li><li>• Parent/carer name</li><li>• Title</li><li>• Class</li><li>• Gender</li><li>• DOB</li><li>• Address</li><li>• DOB</li></ul> <p><b>Parent/carer</b></p> <ul style="list-style-type: none"><li>• Name</li><li>• Telephone number</li><li>• email address</li><li>• Title</li><li>• Gender</li><li>• Address</li></ul> |
| <b>Why is it being processed?</b> | To provide access to a range of communication and payment tools  |
| <b>Legal Basis</b>                | <p><b>Public task</b></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>   |
| <b>Evidence for legal basis</b>   | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>       | No   |
| <b>Data Source</b>                | Parent   |
|                                   |  |

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

System used: Performance Management

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

System used: Personnel files

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

System used: Photographs and videos of staff and pupils.

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

System used: PIRA - Rising stars (Wordblaze)

|                            |  |
|----------------------------|--|
| <b>Description</b>         | Reliably assess reading attainment and progress with termly standardised reading tests Progress in Reading Assessment (PiRA) termly tests produce standardised results and age related scores to enable schools to track pupil progress term by term, predict future progress and benchmark performance against national averages.   |
| <b>Personal Data Items</b> | <p><b>School</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Job title</li> <li>• email address</li> <li>• Telephone number</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Age</li> <li>• Date of birth</li> <li>• Gender</li> <li>• Ethnic origin</li> <li>• First Language</li> <li>• Unique pupil number</li> <li>• Pupil premium information</li> <li>• Assessment results</li> </ul> |

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

|  |  |
|--|--|
| <b>Special Category Data Legal Basis</b>         | <b>Obligation</b><br>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement. |
| <b>Special Category Evidence for legal basis</b> | Article 9  |
| <b>How is the Special Category data shared?</b>  | Online Hodder secure servers   |
| <b>Legal basis for sharing Special</b>           | Article 9  |

|                                       |  |
|---------------------------------------|--|
| <b>Category data</b>                  |  |
| <b>Why is it being processed?</b>     | To provide access to a range of Rising stars resources including PIRA for standardised reading tests.  |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit.   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Stored on Hodder servers   |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Staff, Hodder for support  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Staff  |
| <b>Legal basis for sharing</b>        | Public task and legal obligation   |
| <b>How is data shared?</b>            | Electronically via secure servers.   |
| <b>References</b>                     | <a href="#">Click to download Rising Stars Privacy Notice</a>  |

System used: PIVATS

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

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

|  |   |
|--|---|
| <b>Special Category Data Legal Basis</b>             | <b>Obligation</b><br>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.                                |
| <b>Special Category Evidence for legal basis</b>     | Article 9   |
| <b>How is the Special Category data shared?</b>      | Secure online database  |
| <b>Legal basis for sharing Special Category data</b> | Article 9   |
| <b>Why is it being processed?</b>                    | Attainment tracking   |
| <b>Legal Basis</b>                                   | <b>Legal Obligation</b><br>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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | Online secure database  |
| <b>Is it secure and/or encrypted?</b> | Yes   |
| <b>Who can access data?</b>           | School staff  |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | Local Authority, NHS Services (CYPS)  |
| <b>Legal basis for sharing</b>        | Public task and legal obligation  |
| <b>How is data shared?</b>            | Online secure database  |
| <b>References</b>                     | <a href="#">Click to download PIVATS Lancashire County Council</a>  |

System used: Read Write Inc Website ([www.ruthmiskin.com](http://www.ruthmiskin.com))

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | A website linked to the scheme Read Write Inc which includes a staff portal.   |
| <b>Personal Data Items</b>            | <b>Staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• Email</li><li>• Telephone Number</li><li>• Role</li></ul>  |
| <b>Why is it being processed?</b>     | <a href="https://www.ruthmiskin.com/en/privacy-policy/">https://www.ruthmiskin.com/en/privacy-policy/</a>  |
| <b>Legal Basis</b>                    | <b>Public task</b><br>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 |
| <b>Evidence for legal basis</b>       | ICO Legal Basis Tool   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://www.ruthmiskin.com/en/privacy-policy/">https://www.ruthmiskin.com/en/privacy-policy/</a>  |
| <b>Is it secure and/or encrypted?</b> | Secure   |
| <b>Who can access data?</b>           | <a href="https://www.ruthmiskin.com/en/privacy-policy/">https://www.ruthmiskin.com/en/privacy-policy/</a>  |
| <b>How long is data kept?</b>         | 3+ years   |
| <b>Who is data shared with?</b>       | <a href="https://www.ruthmiskin.com/en/privacy-policy/">https://www.ruthmiskin.com/en/privacy-policy/</a>  |
| <b>Legal basis for sharing</b>        | Public Task  |
| <b>How is data shared?</b>            | <a href="https://www.ruthmiskin.com/en/privacy-policy/">https://www.ruthmiskin.com/en/privacy-policy/</a>  |

System used: Recruitment information

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

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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

|  |  |
|--|--|
| <b>Special Category Data Legal Basis</b>             | <p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>  |
| <b>Special Category Evidence for legal basis</b>     | Article 9  |
| <b>How is the Special Category data shared?</b>      | Electronically via secure online servers   |
| <b>Legal basis for sharing Special Category data</b> | Article 9  |
| <b>Why is it being processed?</b>                    | As part of the recruitment process   |
| <b>Legal Basis</b>                                   | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>                      | Safer recruitment process  |

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

System used: Registers

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

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

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

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| <b>Special Category Data Legal Basis</b> | <p><b>Obligation</b></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.  |
| <b>Special Category Evidence for legal basis</b>     | Article 9  |
| <b>How is the Special Category data shared?</b>      | Secure Cloud Sharing - Google or Office 365  |
| <b>Legal basis for sharing Special Category data</b> | Article 9  |
| <b>Why is it being processed?</b>                    | Statutory obligations and to support educational entitlement   |
| <b>Legal Basis</b>                                   | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>                      | ICO legal basis tool   |
| <b>Is Consent Required?</b>                          | No   |
| <b>Data Source</b>                                   | School   |
| <b>Where is data stored?</b>                         | school computer, laptop  |
| <b>Is it secure and/or encrypted?</b>                | Yes  |
| <b>Who can access data?</b>                          | Head Teacher, Designated Admin staff, Class Teacher, LA Workers as appropriate   |
| <b>How long is data kept?</b>                        | 3 years after date closed  |
| <b>Who is data shared with?</b>                      | Parent/Carer as appropriate, key workers as appropriate, LA workers as appropriate, Police   |
| <b>Legal basis for sharing</b>                       | Statutory and Legitimate   |
| <b>How is data shared?</b>                           | Secure Cloud Sharing, Google or Office 365   |

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

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- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

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

System used: School meals identification

|                            |   |
|----------------------------|---|
| <b>Description</b>         | Identification of pupils for meals  |
| <b>Personal Data Items</b> | <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Photograph</li> <li>• Dietary requirement</li> </ul> |

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- Sex life and or sexual orientation
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|  |   |
|--|---|
| <b>Special Category Data Legal Basis</b>             | <p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>   |
| <b>Special Category Evidence for legal basis</b>     | Article 9   |
| <b>How is the Special Category data shared?</b>      | n/a   |
| <b>Legal basis for sharing Special Category data</b> | Article 9   |
| <b>Why is it being processed?</b>                    | To ensure the pupils receive appropriate dietary requirements, particularly those with food allergies.  |
| <b>Legal Basis</b>                                   | <p><b>Public task</b></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> |
| <b>Evidence for legal basis</b>                      | ICO Legal Basis Tool  |
| <b>Is Consent Required?</b>                          | No  |
| <b>Data Source</b>                                   | School  |
| <b>Where is data stored?</b>                         | Paper file - held securely within school premises, accessed daily   |
| <b>Is it secure and/or encrypted?</b>                | Yes - secure storage  |
| <b>Who can access data?</b>                          | Kitchen and office staff  |
|  |   |

|                                 |                           |
|---------------------------------|---------------------------|
| <b>How long is data kept?</b>   | 3 years after date closed |
| <b>Who is data shared with?</b> | Not shared                |
| <b>Legal basis for sharing</b>  | N/A                       |
| <b>How is data shared?</b>      | N/A                       |

System used: School360

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

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- Sex life and or sexual orientation
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| <b>Special Category Data Legal Basis</b>             | <b>Obligation</b><br>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement. |
| <b>Special Category Evidence for legal basis</b>     | Article 9  |
| <b>How is the Special Category data shared?</b>      | Electronically, encrypted on transfer and storage.   |
| <b>Legal basis for sharing Special Category data</b> | Article 9  |
| <b>Why is it being processed?</b>                    | To facilitate setting up and access to the County learning platform - School360  |
| <b>Legal Basis</b>                                   | <b>Legal Obligation</b><br>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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | Guidance from ICO Tool  |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | SIMS  |
| <b>Where is data stored?</b>          | Rackspace London  |
| <b>Is it secure and/or encrypted?</b> | Yes - See Rackspace Privacy Policy  |
| <b>Who can access data?</b>           | School Administrator NCC ICT Team Seven360 development staff Users (own data)   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | SIMs Wonde Frog Learning Just2easy Interactive Resources  |
| <b>Legal basis for sharing</b>        | Public task and legal obligation  |
| <b>How is data shared?</b>            | Electronically, encrypted on transfer and storage.  |
| <b>References</b>                     | <p><a href="#">Click to download School360 Privacy Policy</a></p> <p><a href="#">Click to download School360 EYFS App Privacy Policy</a></p> <p><a href="#">Click to download School360 Parent App Privacy Policy</a></p>   |

System used: SEND electronic records

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

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

|  |  |
|--|--|
| <b>How is the Special Category data shared?</b>      | Secure cloud share - Google or Office 365  |
| <b>Legal basis for sharing Special Category data</b> | Article 9  |
| <b>Why is it being processed?</b>                    | To ensure appropriate levels of support for the student in relation SEND needs   |
| <b>Legal Basis</b>                                   | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>                      | ICO legal basis tool   |
| <b>Is Consent Required?</b>                          | No   |
| <b>Data Source</b>                                   | School   |
| <b>Where is data stored?</b>                         | Google Drive or Office 360 secure cloud storage  |
| <b>Is it secure and/or encrypted?</b>                | Yes  |
| <b>Who can access data?</b>                          | Head, SENDCO, Teachers, Key Workers  |
| <b>How long is data kept?</b>                        | 3 years after date closed  |
| <b>Who is data shared with?</b>                      | Parents/Carers as appropriate; Social Workers; Health Care Professionals; Receiving Schools; Youth Offending Teams (case dependent); LA Workers as appropriate   |
| <b>Legal basis for sharing</b>                       | Public Task  |
| <b>How is data shared?</b>                           | Secure cloud share or secure messenger if printed.   |

System used: Send Paper Records

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

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| <b>Special Category Data Legal Basis</b>         | <b>Obligation</b> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| <b>Special Category Evidence for legal basis</b> | Article 9  |
| <b>How is the Special Category data</b>          | Secure messenger   |

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

| System used: Senso Cloud              |   |
|---------------------------------------|---|
| <b>Description</b>                    | 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   |
| <b>Personal Data Items</b>            | <p><b>User</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Marital status</li> <li>• Title</li> <li>• DOB</li> <li>• Gender</li> <li>• Address</li> <li>• Email Address</li> <li>• Telephone number</li> </ul>   |
| <b>Why is it being processed?</b>     | 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.   |
| <b>Legal Basis</b>                    | <p><b>Contract</b></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><b>Legal Obligation</b></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><b>Legitimate Interest</b></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> |
| <b>Evidence for legal basis</b>       | ICO toolkit   |
| <b>Is Consent Required?</b>           | No but consent can be withdrawn at any time   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | Secure cloud server   |
| <b>Is it secure and/or encrypted?</b> | Yes   |
| <b>Who can access data?</b>           | The authorised person(s) within school only - staff   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
|                                       |   |

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

System used: SIMS

**Description**

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

**Personal Data Items**

**Pupil**

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

**Parent/Carer**

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

**Staff**

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

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

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|  |  |
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| <b>Special Category Data Legal Basis</b>             | <b>Obligation</b><br><br>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.   |
| <b>Special Category Evidence for legal basis</b>     | Article 9  |
| <b>How is the Special Category data shared?</b>      | Electronically via secure encrypted communication  |
| <b>Legal basis for sharing Special Category data</b> | Article 9  |
| <b>Why is it being processed?</b>                    | Processing of this data is necessary for the completion of a public task and for the school to meet statutory requirements.  |
| <b>Legal Basis</b>                                   | <b>Legal Obligation</b><br><br>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."<br><br><b>Public task</b><br><br>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" |
| <b>Evidence for legal basis</b>                      | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>                          | No   |
|  |  |

|                                       |   |
|---------------------------------------|---|
| <b>Data Source</b>                    | SIMS  |
| <b>Where is data stored?</b>          | Capita SIMs secure servers  |
| <b>Is it secure and/or encrypted?</b> | Yes   |
| <b>Who can access data?</b>           | Admin staff, teachers in school, NCC SIMs team and Capita SIMs staff for support. |
| <b>How long is data kept?</b>         | 10+ years   |
| <b>Who is data shared with?</b>       | Parents   |
| <b>Legal basis for sharing</b>        | Necessary for completion of statutory tasks.                                      |
| <b>How is data shared?</b>            | Electronically via secure encrypted communication                                 |
| <b>References</b>                     | <a href="#">Click to download Capita SIMS Privacy Statement</a>                   |

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

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

System used: Spelling Shed

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | 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.           |
| <b>Personal Data Items</b>            | <p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Age</li> <li>•</li> </ul> <p><b>Parent</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact Details</li> </ul>   |
| <b>Why is it being processed?</b>     | <a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO legal toolkit   |
| <b>Is Consent Required?</b>           | Yes as part of registration process   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | <a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>   |
| <b>Is it secure and/or encrypted?</b> | Secure  |
| <b>Who can access data?</b>           | School, teachers and parents  |
| <b>How long is data kept?</b>         | 3+ years  |
| <b>Who is data shared with?</b>       | <a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>   |
| <b>Legal basis for sharing</b>        | Public Task   |
| <b>How is data shared?</b>            | <a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>   |

System used: STEM

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

System used: Tapestry

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

**References**

[Click to download Tapestry Privacy Policy](#)

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Parent/Staff/Other Text Messaging System  |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Telephone number</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Registration group</li> <li>• Year group</li> </ul> <p><b>Parent/Carer</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Primary telephone number</li> <li>• Secondary telephone number</li> </ul> <p><b>Taxi driver</b></p> <ul style="list-style-type: none"> <li>• Taxi drivers name</li> <li>• Taxi drivers telephone number</li> </ul> <p><b>Taxi escort</b></p> <ul style="list-style-type: none"> <li>• taxi escort name</li> <li>• Taxi escort telephone number</li> </ul> |
| <b>Why is it being processed?</b>     | To provide access to Communication tool for contact between school and parent/carers/staff/other  |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></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><b>Public task</b></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>  |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | Parent  |
| <b>Where is data stored?</b>          | T2P secure servers  |
| <b>Is it secure and/or encrypted?</b> | This site has security measures in place to protect the loss, misuse, and alteration of the information under our control. All instances of unauthorised attempted access to our site are logged and investigated.  |

|                                 |  |
|---------------------------------|--|
|                                 | Where necessary Eduspot will inform law enforcement agencies or other relevant organisations regarding misconduct. |
| <b>Who can access data?</b>     | Admin staff, teachers to parents staff for support.  |
| <b>How long is data kept?</b>   | 3 years after date closed  |
| <b>Who is data shared with?</b> | School staff   |
| <b>Legal basis for sharing</b>  | Public task  |
| <b>How is data shared?</b>      | Secure server  |
| <b>References</b>               | <a href="#">Click to download T2P Privacy Policy</a>   |

System used: Testbase

**Description**

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

**Personal Data Items**

**School**

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

**Staff**

- Name

**Pupil**

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

- Racial or ethnic origin
- Political opinions
- 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

|  |  |
|--|--|
| <b>legal basis</b>                                   |  |
| <b>How is the Special Category data shared?</b>      | 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.   |
| <b>Legal basis for sharing Special Category data</b> | Article 9  |
| <b>Why is it being processed?</b>                    | To provide a service and resources which enables schools to assess pupil attainment and track? progress? of individuals and groups.  |
| <b>Legal Basis</b>                                   | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>                      | ICO Legal basis toolkit  |
| <b>Is Consent Required?</b>                          | No   |
| <b>Data Source</b>                                   | School   |
| <b>Where is data stored?</b>                         | Secure server  |
| <b>Is it secure and/or encrypted?</b>                | Account is password protected, Store on Doublestruck secure servers.   |
| <b>Who can access data?</b>                          | School; Teastbase (Doublestruck LTD) for technical support.  |
| <b>How long is data kept?</b>                        | 6 years after date closed  |
| <b>Who is data shared with?</b>                      | 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.   |
| <b>Legal basis for sharing</b>                       | Legal obligation and public task   |
| <b>How is data shared?</b>                           | In a structure, commonly used, machine readable format.  |
| <b>References</b>                                    | <a href="#">Click to download Testbase privacy notice</a>  |

System used: The National College

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | A provider of online training for staff & governors  |
| <b>Personal Data Items</b>            | <p><b>Staff member</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Job Title</li> <li>• Email</li> <li>• Phone number</li> </ul> <p><b>Governor</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email</li> <li>• Phone number</li> </ul>   |
| <b>Why is it being processed?</b>     | In order to provide access to online training and for billing purposes   |
| <b>Legal Basis</b>                    | <p><b>Contract</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO Toolkit  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | On Server of National Education Group in UK  |
| <b>Is it secure and/or encrypted?</b> | Yes both secure and encrypted  |
| <b>Who can access data?</b>           | College staff or their contractors to provide service and school   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Contractors to provide service   |
| <b>Legal basis for sharing</b>        | Contract   |
| <b>How is data shared?</b>            | Via encrypted transfer   |

System used: Times Tables Rock Stars

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Online times tables practice and testing.  |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• School name</li> <li>• School address</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Year group</li> <li>• Maths group</li> </ul> |
| <b>Why is it being processed?</b>     | To provide access to online learning tool.   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></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>                      |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Maths circle EU servers  |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Staff  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Staff  |
| <b>Legal basis for sharing</b>        | Public task  |
| <b>How is data shared?</b>            | Online secure servers  |
| <b>References</b>                     | <p><a href="#">Click to download Times Tables Rock Stars</a></p> <p><a href="#">Click to download Times Tables Rock Stars GDPR</a></p>   |

System used: Twinkl

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

| System used: Vimeo                    |   |
|---------------------------------------|---|
| <b>Description</b>                    | Upload and Host Videos. Collaborate and Share. Find the Vimeo Plan for You. HD playback. Powerful privacy controls. Privacy controls. Unlimited bandwidth. Embedding features. Video statistics. Ad-free videos. Password protection. 8K 360 uploads. Customizable player |
| <b>Personal Data Items</b>            | <b>Teacher</b> <ul style="list-style-type: none"> <li>• Name</li> </ul> <b>Child</b> <ul style="list-style-type: none"> <li>• Name</li> </ul>   |
| <b>Why is it being processed?</b>     | <a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a>   |
| <b>Legal Basis</b>                    | <b>Public task</b><br>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                          |
| <b>Evidence for legal basis</b>       | ICO legal Basis tool kit  |
| <b>Is Consent Required?</b>           | yes   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | <a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a>   |
| <b>Is it secure and/or encrypted?</b> | Secure  |
| <b>Who can access data?</b>           | <a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a>   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | <a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a>   |
| <b>Legal basis for sharing</b>        | Public Task   |
| <b>How is data shared?</b>            | <a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a>   |

System used: Visitor book

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Log of all visitors into school / fire regulations   |
| <b>Personal Data Items</b>            | <p><b>Visitor</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date and time</li> <li>• Car registration</li> <li>• Purpose of visit</li> <li>• Company</li> <li>•</li> </ul>  |
| <b>Why is it being processed?</b>     | Safeguarding, health and safety, fire regulations  |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Visitor book (hard copy)   |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | School staff, visitors   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | School staff, visitors   |
| <b>Legal basis for sharing</b>        | Public task & legal obligation   |
| <b>How is data shared?</b>            | Hard copy or secure online server.   |

System used: Vocabulary Ninja

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | 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.                       |
| <b>Personal Data Items</b>            | <p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• age</li> </ul>  |
| <b>Why is it being processed?</b>     | <a href="https://vocabularyninja.co.uk/privacy-policy-vn/">https://vocabularyninja.co.uk/privacy-policy-vn/</a>   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></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> |
| <b>Evidence for legal basis</b>       | ICO Legal Basis Tool  |
| <b>Is Consent Required?</b>           | Yes   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | <a href="https://vocabularyninja.co.uk/privacy-policy-vn/">https://vocabularyninja.co.uk/privacy-policy-vn/</a>   |
| <b>Is it secure and/or encrypted?</b> | Secure  |
| <b>Who can access data?</b>           | <a href="https://vocabularyninja.co.uk/privacy-policy-vn/">https://vocabularyninja.co.uk/privacy-policy-vn/</a>   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | <a href="https://vocabularyninja.co.uk/privacy-policy-vn/">https://vocabularyninja.co.uk/privacy-policy-vn/</a>   |
| <b>Legal basis for sharing</b>        | Public Task   |
| <b>How is data shared?</b>            | <a href="https://vocabularyninja.co.uk/privacy-policy-vn/">https://vocabularyninja.co.uk/privacy-policy-vn/</a>   |

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

|  |  |
|--|--|
| <b>legal basis</b>                                   |  |
| <b>How is the Special Category data shared?</b>      | <a href="https://whiterosemaths.com/privacy/">https://whiterosemaths.com/privacy/</a>  |
| <b>Legal basis for sharing Special Category data</b> | Article 9  |
| <b>Why is it being processed?</b>                    | <a href="https://whiterosemaths.com/privacy/">https://whiterosemaths.com/privacy/</a>  |
| <b>Legal Basis</b>                                   | <p><b>Legal Obligation</b></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><b>Public task</b></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> |
| <b>Evidence for legal basis</b>                      | ICO Legal Basis Tool   |
| <b>Is Consent Required?</b>                          | Yes  |
| <b>Data Source</b>                                   | School   |
| <b>Where is data stored?</b>                         | <a href="https://whiterosemaths.com/privacy/">https://whiterosemaths.com/privacy/</a>  |
| <b>Is it secure and/or encrypted?</b>                | Secure   |
| <b>Who can access data?</b>                          | <a href="https://whiterosemaths.com/privacy/">https://whiterosemaths.com/privacy/</a>  |
| <b>How long is data kept?</b>                        | 3 years after date closed  |
| <b>Who is data shared with?</b>                      | <a href="https://whiterosemaths.com/privacy/">https://whiterosemaths.com/privacy/</a>  |
| <b>Legal basis for sharing</b>                       | Legal Obligation/Public Task   |
| <b>How is data shared?</b>                           | <a href="https://whiterosemaths.com/privacy/">https://whiterosemaths.com/privacy/</a>  |

System used: Wonde

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

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

|  |  |
|--|--|
| <b>Special Category Data Legal Basis</b>             | <p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>  |
| <b>Special Category Evidence for legal basis</b>     | Article 9  |
| <b>How is the Special Category data shared?</b>      | School 360 secure servers  |
| <b>Legal basis for sharing Special Category data</b> | Article 9  |
| <b>Why is it being processed?</b>                    | To facilitate the exchange of data to allow the set up of school360 for a school.  |
| <b>Legal Basis</b>                                   | <p><b>Contract</b></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> |
| <b>Evidence for legal basis</b>                      | ICO legal basis toolkit  |

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

System used: Y4 Multiplication Check

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | 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. |
| <b>Personal Data Items</b>            | <p><b>child</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>   |
| <b>Why is it being processed?</b>     | <a href="https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance">https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance</a>  |
| <b>Legal Basis</b>                    | <p><b>Public task</b></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>  |
| <b>Evidence for legal basis</b>       | ICO legal framework tool kit   |
| <b>Is Consent Required?</b>           | yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance">https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance</a>  |
| <b>Is it secure and/or encrypted?</b> | secure   |
| <b>Who can access data?</b>           | <a href="https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance">https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance</a>  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | <a href="https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance">https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance</a>  |
| <b>Legal basis for sharing</b>        | Public task  |
| <b>How is data shared?</b>            | <a href="https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance">https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance</a>  |

System used: Zoom

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Our easy, reliable cloud platform for video, voice, content sharing, and chat runs across mobile devices, desktops, telephones, and room systems.   |
| <b>Personal Data Items</b>            | <b>Teacher</b> <ul style="list-style-type: none"><li>• Name</li></ul> <b>Parent</b> <ul style="list-style-type: none"><li>• Name</li></ul>   |
| <b>Why is it being processed?</b>     | <a href="https://zoom.us/trust">https://zoom.us/trust</a>  |
| <b>Legal Basis</b>                    | <b>Legal Obligation</b> <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> <b>Public task</b> <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> |
| <b>Evidence for legal basis</b>       | ICO legal basis tool   |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://zoom.us/trust">https://zoom.us/trust</a>  |
| <b>Is it secure and/or encrypted?</b> | Secure   |
| <b>Who can access data?</b>           | <a href="https://zoom.us/trust">https://zoom.us/trust</a>  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | <a href="https://zoom.us/trust">https://zoom.us/trust</a>  |
| <b>Legal basis for sharing</b>        | Public task  |
| <b>How is data shared?</b>            | <a href="https://zoom.us/trust">https://zoom.us/trust</a>  |

|                                   |  |
|-----------------------------------|--|
| <b>Description</b>                | Records relating to child protection issues for individual pupils  |
| <b>Personal Data Items</b>        | <p><b>Pupils</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• Address</li> <li>• Health Needs</li> <li>• Social Care Status</li> <li>• Educational Needs</li> <li>• Child Protection Plan/Actions</li> </ul> <p><b>Parents/Carers</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> </ul> <p><b>Social Care Worker</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details</li> </ul> <p><b>External Support Workers</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Organisation</li> <li>• Position</li> <li>• Address</li> <li>• Contact Details</li> </ul> |
| <b>Why is it being processed?</b> | Statutory obligations and to support educational entitlement   |
| <b>Legal Basis</b>                | <p><b>Legal Obligation</b></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><b>Legitimate Interest</b></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>   |

|                                       |   |
|---------------------------------------|---|
| <b>Evidence for legal basis</b>       | ICO legal basis tool  |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | Secure cabinet  |
| <b>Is it secure and/or encrypted?</b> | Yes   |
| <b>Who can access data?</b>           | Designated Child Protection Lead & Deputy; Designated admin staff   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | Social Workers, Parent/Carer as appropriate, some information shared with key workers, health care professionals and police, receiving school |
| <b>Legal basis for sharing</b>        | Statutory & Legitimate interest   |
| <b>How is data shared?</b>            | Verbal or secure messenger.   |

System used: Educspot (school money)

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | School meals, After and before school clubs, communication with parents regarding finance, swimming, trips and provide consent for school trips  |
| <b>Personal Data Items</b>            | <p><b>Pupils</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• UPN</li> <li>• Class</li> <li>• DOB</li> </ul> <p><b>Parents</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact Details</li> <li>• Bank Details</li> <li>• Payment history</li> </ul>  |
| <b>Why is it being processed?</b>     | To ensure the smooth delivery of effective finance   |
| <b>Legal Basis</b>                    | <p><b>Contract</b></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><b>Legitimate Interest</b></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> |
| <b>Evidence for legal basis</b>       | ICO Legal Basis Tool   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Educspot, encrypted cloud storer   |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Office staff, Parents and Educspot admin   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | NA   |
| <b>Legal basis for sharing</b>        | NA   |
| <b>How is data shared?</b>            | NA   |

|                                   |  |
|-----------------------------------|--|
| <b>Description</b>                | Information relating children who are Looked After   |
| <b>Personal Data Items</b>        | <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• Address</li> <li>• Personal Education Plan</li> <li>• Health Needs</li> <li>• Social Care Needs</li> <li>• Educational Needs</li> <li>• Family Background</li> <li>•</li> </ul> <p><b>Parents &amp; Carers</b></p> <ul style="list-style-type: none"> <li>• Contact Details</li> <li>• Address</li> <li>• Name</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> </ul> <p><b>External Support</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Organisation</li> <li>• Position</li> <li>• Address</li> <li>• Contact Details</li> </ul> |
| <b>Why is it being processed?</b> | To support the education of children who are looked after  |
| <b>Legal Basis</b>                | <p><b>Legal Obligation</b></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><b>Legitimate Interest</b></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>   |
| <b>Evidence for legal basis</b>   | ICO legal basis tool   |
| <b>Is Consent Required?</b>       | No   |
| <b>Data Source</b>                | School   |

|                                       |   |
|---------------------------------------|---|
| <b>Where is data stored?</b>          | Secure cabinet  |
| <b>Is it secure and/or encrypted?</b> | Yes   |
| <b>Who can access data?</b>           | Head Teacher, Class Teacher, Designated Key Worker        |
| <b>How long is data kept?</b>         | 3 years after date closed                                 |
| <b>Who is data shared with?</b>       | Social Workers, Local Authority, Carers, Receiving School |
| <b>Legal basis for sharing</b>        | Legal Obligation & Legitimate Interest                    |
| <b>How is data shared?</b>            | Verbally & by Secure Messenger                            |

System used: Performance Management

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Records relating to staff appraisal, teaching observation records and CPD  |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Observation Records</li> <li>• CPD Records</li> <li>• Objectives and Progress</li> <li>• Line Manager</li> <li>• Performance Records</li> <li>• Support Plans</li> </ul>  |
| <b>Why is it being processed?</b>     | To inform and improve staff performance  |
| <b>Legal Basis</b>                    | <p><b>Contract</b></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><b>Legitimate Interest</b></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> |
| <b>Evidence for legal basis</b>       | ICO Legal Basis Tool   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Secure cabinet   |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Individual Line managers and Headteacher   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Individual   |
| <b>Legal basis for sharing</b>        | Legitimate interest  |
| <b>How is data shared?</b>            | Verbally and paper copy by hand.   |

System used: Pupil Reports - Paper system

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Information relating to achievement & progress of individual pupils  |
| <b>Personal Data Items</b>            | <p><b>Pupils</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• Class</li> <li>• Achievement</li> <li>• Progress</li> <li>• Attendance</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> </ul>  |
| <b>Why is it being processed?</b>     | To meet statutory requirements and report on the education of the pupil by informing parents/carers of achievement & progress  |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></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><b>Legitimate Interest</b></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> |
| <b>Evidence for legal basis</b>       | ICO legal basis tool   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Schools 360 and printed off for parents/carers   |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Teachers & Office Staff  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Parents/Carers   |
| <b>Legal basis for sharing</b>        | Legal Obligation & Legitimate Interest   |
| <b>How is data shared?</b>            | By hand at Parents' Evening or by post   |

System used: Scrutiny and Moderation Records

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Records of joint meetings of moderating and scrutiny of pupil progress   |
| <b>Personal Data Items</b>            | <b>Staff</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> <li>• Record of Discussion</li> </ul>  |
| <b>Why is it being processed?</b>     | To evaluate and inform   |
| <b>Legal Basis</b>                    | <b>Legitimate Interest</b><br><br>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.” |
| <b>Evidence for legal basis</b>       | ICO Legal Basis Tool   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Secure cabinet.  |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Headteacher, Line Mangers and Teaching Staff   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | NA   |
| <b>Legal basis for sharing</b>        | NA   |
| <b>How is data shared?</b>            | NA.  |

|                                   |  |
|-----------------------------------|--|
| <b>Description</b>                | Records relating to individual pupil's SEND history  |
| <b>Personal Data Items</b>        | <p><b>Pupils</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• Address</li> <li>• Medical information</li> <li>• Health and Social Care</li> <li>• Specific Special Needs</li> <li>• Interventions In Place</li> </ul> <p><b>Parents</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> </ul> <p><b>External Support</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Organisation</li> <li>• Position</li> <li>• Address</li> <li>• Contact Details</li> </ul> |
| <b>Why is it being processed?</b> | To support educational entitlement to meet statutory obligations   |
| <b>Legal Basis</b>                | <p><b>Legal Obligation</b></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><b>Legitimate Interest</b></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>                           |
| <b>Evidence for legal basis</b>   | ICO legal basis tool   |
| <b>Is Consent Required?</b>       | No   |
| <b>Data Source</b>                | School   |
| <b>Where is data stored?</b>      | Secure cabinet   |

|                                       |  |
|---------------------------------------|--|
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Head teacher, SENDco, Class Teacher, Key worker and Office Staff |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Case workers, Parents, Local Authority and Receiving school      |
| <b>Legal basis for sharing</b>        | Statutory and Legitimate Interest                                |
| <b>How is data shared?</b>            | Secure messenger.  |