

St Aidans RC Primary GDPR Asset Register Date: 05/08/2025

Data Protection Officer:

01670 813308

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
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
ClassCharts - Edukey	Class Charts offers a solution for seating plans & improving and tracking behaviour in school. Seating plans for SIMS are available with this piece of Edukey software.	
Complete PE	Complete P.E. is an interactive Physical Education resource designed to support the implementation of a High Quality Physical Education Curriculum.	
Consent for educational visits	Consent information for all educational visits including	yes

	day trips and residential visits	
Covid-19 Lateral Flow Testing	About 1 in 3 people with coronavirus do not have symptoms but can still pass it on to others. Regular testing of people without symptoms is important to help stop the virus spreading and protect your loved ones. As lockdown restrictions gradually ease we all need to play our part to help protect each other. The following people in England will have access to regular rapid lateral flow testing made available to them as schools reopen: secondary school pupils primary and secondary school staff households, childcare and support bubbles of primary and secondary-age pupils households, childcare and support bubbles of primary and secondary staff	yes
CPOMS	CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral welfare for schoolls. 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
Diagnostic questions	Diagnostic Questions is a leading assessment tool that provides detailed insights into student understanding in a fraction of the time, simultaneously reducing workload and improving student results and confidence.	
Dietary requirements information sheets	Required documents for specific chidlren with severe allergies / intolerances and religious observations (food)	yes
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.	
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	
Futures Cloud	Internet / Network monitoring and reporting tool	
GL-Assessment	GL assessments provide a range of tests for schools including reading, progress and cognitive tests	
Google Classroom	A free and easy tool helping educators efficiently manage and assess progress, while enhancing connections with learners from school, from home, or on the go.	
Google drive for education	suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.	
Google Meet	Google Meet is a video-communication service developed by Google. It is one of two apps that constitute the replacement for Google Hangouts, the other being Google Chat	
Governance	Details of all members of the Governing Body	
Hamilton Trust	Hamilton Trust is a UK charity working to support inspirational teaching and learning through its website and projects. Mike O'Regan founded Hamilton in 1988 to support the education of children in the Blackbird Leys, Rose Hill and Barton estates in Oxford - children whose educational potential had long been underestimated. Hamilton aims to enable children from areas of socio-economic disadvantage to create for themselves the life opportunities they deserve through high-quality education and high expectations. Hamilton continues to work closely with primary schools in Oxford and to derive enormous amounts of inspiration for improving educational opportunities from doing so. Professor Ruth Merttens joined Hamilton in 1996 as Co-director. With Mike, she set up and directed the Hamilton Maths and Reading Projects to boost those subjects in Oxford schools located in areas of significant deprivation. As word leaked out about Hamilton's planning materials, demand for them spread, and Hamilton started providing them to teachers in other schools. These formed the basis of Hamilton's original 'Save teachers' Sundays!' website, which enabled a much wider audience to	

	access these plans. Hamilton's website continues to provide high quality, fully adaptable planning and resources to primary school teachers to help them teach robust and engaging lessons. Hamilton also supports and runs various education projects that provide support to its local community and across the country.	
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.	
Letter join	Letter-join is the teacher's companion for teaching cursive handwriting combining interactive animations and worksheets for real handwriting practice. Letter-join includes animations of all the letters of the alphabet with a spoken commentary on how to write each letter. Patterns, Letters and Words can all be watched and traced on-screen. Magic Words lets you trace over your own words on a number of exciting backgrounds and Custom Words lets you input your own words, replay the video and trace over the words for IWB practice.	
Lightspeed Internet Filtering	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.	
Live Kitchen	Live kitchen provides a number of online tools for parents, pupils and school staff to manage school meals. These include: Direct Debit cash collection option Replaces dinner register and manages cash and cheques Account histories and payment reminders by email Pre-order system for classroom whiteboards with branding Children get the meal of their choice Controls food costs - waste is minimised Parents can log in from home to view the menu, check their account and pre-order meals Uptake graphs and reports help you track progress Lunchtimes are faster and more organised Optional menu costing and nutritional analysis	
Local Authority moderation of work	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.	
Looked After Children Records - Electronic	Information relating to children who are in Looked After Care	yes
Looked After Children Records - Paper	Information relating to children who are Looked After	yes
Medical Files - Electronic	Information in respect of specific medical needs of an individual student	yes

Medical Files - Paper	Information in respect of specific medical needs of an individual student	yes
Medical log	File of medical information for each child: asthma, medication administered, heath care plans, risk assessments	yes
Microsoft Teams	Remote learning with Office 365 for students Microsoft Teams for Education Whether you're learning at home for long periods of time or just outside of class, access Office 365 for free, stay connected, and learn in a way that's right for you. Get startedTips for successful online learning Get set up Students at eligible institutions can sign up for Office 365 Education for free. That means access to apps like Word, PowerPoint, and Teams from any web browser. Plus, all the work you create will automatically be saved and backed up in the cloud. Get started with Office 365 for free Already have Office 365? Sign in. Tip: Click Install Office from Office.com to download Office apps to your desktop device. Work together as a class or group Microsoft Teams is a digital hub that brings conversations, content, and apps together in one place. If your classes are using Teams, you'll be able to connect with your classmates, ask your teacher questions, work on your homework, and track the work you've got coming up. Not part of any teams yet? No problem! You can create your own to work on group projects and keep in touch from your computer or phone. Join virtual meetings set up by your teacher and even blur your background	
MS Office Suite	Suite of online tools for staff and pupils, including OneDrive, Word, Powerpoint, Excel, Outlook, Video and Teams.	
My Maths	MyMaths is an interactive online teaching and homework subscription website for schools that builds pupil engagement and consolidates maths knowledge.	
Nursery (Early Years) files	Early years registration information and funding informaiton for Early Years entitlement, hours taken each week	yes
Parent mail	Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events	
ParentPay	ParentPay is an online payment service for schools and families.	yes
Parents Evening Booking System	Online booking system for parents evenings and other school events.	
Performance Management	Staff appraisals	
Personnel files	Information relating to staff employment	

Phonics play	Interactive phonics games, phonics planning, assessment ideas and many teaching ideas and resources to help children to learn	
Photographs and videos of staff 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
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
Seesaw	Seesaw - Student driven digital portfolios and simple parent communication.	
SEND electronic records	Records relating to Special Educational Needs and Disability for individual pupils	yes
Send Paper Records	Records relating to individual pupil's SEND history	yes
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.	
Tapestry	An online journal recording all the learning and fun of children's early years education.	
Twinkl	We're here to 'help those who teach'. It's what brings us to work every day. We're proud to create educational resources that can be used at each step of a child's learning journey. Our teacher-created resources provide entire schemes of work, lesson planning and assessments right through to online educational games, augmented reality and so much more. We have over 525,000 resources and new content gets added every day. You'll find we've	

	normally got what you need before you even know you want it.	
Visitor book	Log of all visitors into school / fire regulations	
White Rose Maths and Science	Influenced, inspired and informed by the work of leading maths researchers and practitioners across the world, White Rose Maths brings together a team of highly experienced and passionate maths teaching experts to train, guide, help and support all those who want to make change happen in their schools. We're guessing that might include YOU! If so, we offer you indepth training programmes, a vast bank of clear, practical resources (many of them available free of charge), and the bespoke support you want and need to keep raising the bar. We'll not only make your job a whole lot simpler, we'll help you change the future for every child.	yes
Wonde	Manages transfer of data from Sims MIS to School360.	yes
Y4 Multiplication Check	What is the Multiplication Tables Check. The Multiplication Tables Check (MTC) is a key stage 2 assessment to be taken by pupils at the end of year 4 (in June). From the 2019 / 2020 academic year onwards. The purpose of the MTC is to make sure the times tables knowledge is at the expected level.	
Zoom	Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Our easy, reliable cloud platform for video, voice, content sharing, and chat runs across mobile devices, desktops, telephones, and room systems.	

System used: Accident book	
Description	Log of accidents / minor injuries in school
Personal Data Items	Pupil Name class Injury first aid
Why is it being processed?	To record injuries in school
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	File in office
Is it secure and/or encrypted?	No
Who can access data?	School staff
How long is data kept?	3 years after date closed
Who is data shared with?	Parents
Legal basis for sharing	Legal obligation
How is data shared?	Verbally

System used: Accident Report Form	
Description	ACC1 form for reporting accidents to NCC
Personal Data Items	Pupil Name DOB Gender Address Telephone number Date and time of accident nature of injury Place of accident First aid Circumstances Action taken Witness information
	Name Occupation DOB Gender Address Telephone number Date and time of injury nature of injury place of accident First aid Circumstances Action taken Witness information
Why is it being processed?	Statutory obligations to comply with Health and Safety regulations.
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School

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

System used: Assessment Records	
Description	Electronic and paper mark books
Personal Data Items	 Name Gender Disadvantaged cohort SEND Code Key Stage 2 Assessment data Internal Assessment Data
Why is it being processed?	To track student achievement and report to parents
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO lawful basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	On-site Secure Network Google Drive On paper- Class Context Files
Is it secure and/or encrypted?	On-site Network- This solution has user authentication and access controls which determine the level of access to data that a user requires. The solution also utilises the Schools' Information Security policy which includes password, physical and network security controls. Google Drive-authentication and access controls which determine the level of access to data that a user requires. G-Suite complies with the Schools' Information Security policy which includes password security controls. Class Context Files- teachers follow privacy culture procedures
Who can access data?	Staff
How long is data kept?	3+ years
Who is data shared with?	Parents
Legal basis for sharing	Legal obligation, Public task
How is data shared?	Parents evenings, reports

System used: Attendance file	
Description	Attendance information about pupils and classes
Personal Data Items	Pupil Name DOB Class Gender UPN Address Telephone number Parental contact Ethnic origin Current attendance Past attendance

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

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

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

System used: BBC Bitesize			
Description	BBC Bitesize is a free online study support resource designed to help with learning, revision and homework! Bitesize provides support for learners aged 5 to 16+ across a wide range of school subjects. It also supports children and young people's wellbeing and career choices. Bitesize also has hundreds of published lessons to help students across the UK with home schooling. Bitesize guides are written by teachers and subject experts and are mapped to follow the curricula of the UK. Secondary Bitesize follows exam board specifications for the main exam boards in the UK, including for GCSE in England, Wales and Northern Ireland and National 4, National 5 & Highers in Scotland, ensuring students are preparing for the right exams		
Personal Data Items	teacher Name email address child Name Age Year group		
Why is it being processed?	https://www.bbc.co.uk/usingthebbc/privacy/		
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller		
Evidence for legal basis	ICO legal basis toolkit		
Is Consent Required?	Yes		
Data Source	School		
Where is data stored?	https://www.bbc.co.uk/usingthebbc/privacy/		
	Secure		
Is it secure and/or encrypted?	Secure		
Is it secure and/or encrypted? Who can access data?	Secure https://www.bbc.co.uk/usingthebbc/privacy/		
Who can access data?	https://www.bbc.co.uk/usingthebbc/privacy/		
Who can access data? How long is data kept?	https://www.bbc.co.uk/usingthebbc/privacy/ 3 years after date closed		

System used: Behaviour Files - Paper (in class)			
Description	Information relating to the behaviours of particular pupils		
Personal Data Items	Pupils Name Date of Birth Address Health Needs Educational Behavioural Needs Social Care Status Parents/Carers Name Address Contact Details Staff Name Position External Support Workers Name Organisation Position Address Contact Details		

- 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.			
	Significant Public Interest			
	Processing is required for reasons of significant public interest on the basis of Union or Member State Law that is equivalent to the aim pursued			

	and which contains suitable safeguards.		
Special Category Evidence for legal basis	Article 9		
How is the Special Category data shared?	Verbally & by Secure Messenger		
Legal basis for sharing Special Category data	Article 9		
Why is it being processed?	To ensure access to education appropriate to needs		
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller		
Evidence for legal basis	ICO legal basis tool		
Is Consent Required?	No		
Data Source	School		
Where is data stored?	Secure cabinet		
Is it secure and/or encrypted?	Yes		
Who can access data?	Head Teacher, Class Teacher and key workers as appropriate		
How long is data kept?	3 years after date closed		
Who is data shared with?	External support workers as applies		
Legal basis for sharing	Public Task & Legal Obligation		
How is data shared?	Verbal or secure messenger		

System used: Charanga			
Description	Charanga Music School, the best-selling, modern resource for primary music — online, easy to use and great value. Includes A complete scheme to teach the national curriculum for music A vast library of songs, topics, instrument courses and creative apps In-depth support for assessment, SEND and personalised teaching and learning		
Personal Data Items	Staff Name School email address Mobile phone umber Pupils groups Pupil Name School Assessment information		
Why is it being processed?	To provide online access to teaching and learning materials.		
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller		
Evidence for legal basis	Charanga privacy notice.		
Is Consent Required?	No		
Data Source	School		
Where is data stored?	Securely stored on servers in Ireland.		
Is it secure and/or encrypted?	Yes		
Who can access data?	Strictly controlled internally in Charanga, Teachers and pupils.		
How long is data kept?	3 years after date closed		
Who is data shared with?	Shared with partner company Soundation AB		
Legal basis for sharing			
How is data shared?	Electronically		
References	Click to download Privacy Notice Click to download Soundation Privacy Policy		

System used: Child Protection Records - Electronic			
Description	Records relating to child protection issues for individual pupils		
Personal Data Items	 Name Date of Birth Address Health Needs Social Care Status Educational Needs Child Protection Plan/Actions 		
	Parents Name Address Contact Details Staff Name Position		
	Social Care Worker Name Address Contact Details External Support Workers Name Organisation Position Address Contact Details		

Special category information is data which has the following characteristics:

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

Special	Category	Data	Legal
Basis			

Obligation

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

System used: Child Protection Records - Paper			
Description	Records relating to child protection issues for individual pupils		
Personal Data Items	Pupils Name Date of Birth Address Health Needs Social Care Status Educational needs Child Protection Plan/Actions Parents/Carers		
	 Name Address Contact Details Staff Name Position 		
	Social Care Worker • Name • Address • Contact Details		
	 Name Organisation Position Address Contact Details 		

Special category information is data which has the following characteristics:

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

Special	Category	Data	Legal
Basis			

Obligation

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

System used: ClassCharts - Edukey	
Description	Class Charts offers a solution for seating plans & improving and tracking behaviour in school. Seating plans for SIMS are available with this piece of Edukey software.
Personal Data Items	Staff Name Email address Phone number IP Address Pupil Name Photograph Year Class
Why is it being processed?	To provide access to the online tools in Classcharts
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?	Edukey secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	Schoool staff and pupils with accounts
How long is data kept?	3 years after date closed
Who is data shared with?	Shared securely with staff in school
Legal basis for sharing	Public task
How is data shared?	Online to users with login
References	Click to download Edukey DfE Cloud Services Project Click to download Edukey Software

System used: Complete PE	
Description	Complete P.E. is an interactive Physical Education resource designed to support the implementation of a High Quality Physical Education Curriculum.
Personal Data Items	Pupil Name Year Group UPN
Why is it being processed?	
Legal Basis	Legitimate Interest
	Article 6(1)(f) gives you a lawful basis for processing where: "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child." 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 framework
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.completepe.com/privacy-policy/
Is it secure and/or encrypted?	secure
Who can access data?	https://www.completepe.com/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.completepe.com/privacy-policy/
Legal basis for sharing	Legitimate interest/public task
How is data shared?	https://www.completepe.com/privacy-policy/

System used: Consent for educational visits	
Description	Consent information for all educational visits including day trips and residential visits
Personal Data Items	Pupil Name DOB Health conditions Medication Dietary requirements Contact information Family doctor

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

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

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

System used: Covid-19 Lateral Flow Testing	
Description	About 1 in 3 people with coronavirus do not have symptoms but can still pass it on to others. Regular testing of people without symptoms is important to help stop the virus spreading and protect your loved ones. As lockdown restrictions gradually ease we all need to play our part to help protect each other. The following people in England will have access to regular rapid lateral flow testing made available to them as schools reopen: secondary school pupils primary and secondary school staff households, childcare and support bubbles of primary and secondary-age pupils households, childcare and support bubbles of primary and secondary staff
Personal Data Items	 Name Date of Birth Postcode Test Result Parent Name Email address Telephone number

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

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

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

System used: CPOMS CPOMS - Safeguarding and Conline monitoring of child protest pastoral welfare for schoolls. Continuous continuou

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

Personal Data Items

Pupil

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

Main contact

- Name
- Telephone Number

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

Special Category Data Legal Basis

Obligation

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

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

System used: Data tracking spreadsheets	
Description	Spreadhseets (excel) to track progress of children over the course of their school career.
Personal Data Items	 Name date of birth gender class year FSM SEN Assessment info

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

Special Category Data Legal Basis	Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Secure google drive and paper copies
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Processing this data is necessary for the completion of a public task and for the school to meet statutory requirements
Legal Basis	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 Google Drive/cloud based storage.
Is it secure and/or encrypted?	Yes
Who can access data?	Teachers in school
How long is data kept?	3 years after date closed
Who is data shared with?	Different elemetns of data are shared with different parties including: other staff, Governors and parents
Legal basis for sharing	Public task
How is data shared?	Electronically by secure encrypted communication

Description Diagnostic Questions is a leading assessment tool that provides detailed insights into student understanding in a fraction of the time, simultaneously reducing workload and improving student results and confidence. Personal Data Items School	System used: Diagnostic questions	
* Name Staff * Name * E-mail address * Primary role * What you teach Pupils * Name * Unique classroom id (generated by teacher) Why is it being processed? To provide online access for teachers and pupils to a variety of teaching and learning materials. Legal Basis Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller Evidence for legal basis ICO legal basis toolkit Is Consent Required? No Data Source School Where is data stored? Is it secure and/or encrypted? Yes Diagnostic questions servers Is it secure and/or encrypted? Yes Diagnostic Questions have implemented a variety of security measures to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Who can access data? Staff, Diagnostic Questions staff for support. How long is data kept? 3 years after date closed Who is data shared with? Not Shared Legal basis for sharing N/A How is data shared? N/A	Description	insights into student understanding in a fraction of the time, simultaneously reducing workload and improving student results and
Staff Name E-mail address Primary role What you teach Pupils Name Unique classroom id (generated by teacher) Why is it being processed? To provide online access for teachers and pupils to a variety of teaching and learning materials. Legal Basis Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller Evidence for legal basis ICO legal basis toolkit Is Consent Required? No Data Source School Where is data stored? Diagnostic questions servers Is it secure and/or encrypted? Yes Diagnostic Questions have implemented a variety of security measures to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Who can access data? Staff, Diagnostic Questions staff for support. How long is data kept? 3 years after date closed Who is data shared with? Not Shared Legal basis for sharing N/A How is data shared? N/A	Personal Data Items	School
* Name		Name
E-mail address Primary role What you teach Pupils Name Unique classroom id (generated by teacher) To provide online access for teachers and pupils to a variety of teaching and learning materials. Legal Basis Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller Evidence for legal basis ICO legal basis toolkit Is Consent Required? No Data Source School Where is data stored? Diagnostic questions servers Is it secure and/or encrypted? Yes Diagnostic Questions have implemented a variety of security measures to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Who can access data? Staff, Diagnostic Questions staff for support. How long is data kept? 3 years after date closed Who is data shared with? Not Shared Legal basis for sharing N/A How is data shared? N/A		Staff
• Name • Unique classroom id (generated by teacher) Why is it being processed? To provide online access for teachers and pupils to a variety of teaching and learning materials. Legal Basis Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller Evidence for legal basis ICO legal basis toolkit Is Consent Required? No Data Source School Where is data stored? Is it secure and/or encrypted? Yes Diagnostic Questions have implemented a variety of security measures to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Who can access data? Staff, Diagnostic Questions staff for support. How long is data kept? 3 years after date closed Who is data shared with? Not Shared Legal basis for sharing N/A N/A		E-mail address Primary role
• Unique classroom id (generated by teacher) Why is it being processed? To provide online access for teachers and pupils to a variety of teaching and learning materials. Legal Basis Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller Evidence for legal basis ICO legal basis toolkit Is Consent Required? No Data Source School Where is data stored? Diagnostic questions servers Is it secure and/or encrypted? Yes Diagnostic Questions have implemented a variety of security measures to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Who can access data? Staff, Diagnostic Questions staff for support. How long is data kept? 3 years after date closed Who is data shared with? Not Shared Legal basis for sharing N/A How is data shared? N/A		Pupils
and learning materials. 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? Diagnostic questions servers Is it secure and/or encrypted? Yes Diagnostic Questions have implemented a variety of security measures to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Who can access data? Staff, Diagnostic Questions staff for support. How long is data kept? 3 years after date closed Who is data shared with? Not Shared Legal basis for sharing N/A How is data shared? N/A		
Article 6(1)(e) gives you a lawful basis for processing where: "processing is 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? Diagnostic questions servers Is it secure and/or encrypted? Yes Diagnostic Questions have implemented a variety of security measures to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Who can access data? Staff, Diagnostic Questions staff for support. How long is data kept? 3 years after date closed Who is data shared with? Not Shared Legal basis for sharing N/A How is data shared? N/A	Why is it being processed?	
is 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? Is it secure and/or encrypted? Yes Diagnostic Questions have implemented a variety of security measures to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Who can access data? Staff, Diagnostic Questions staff for support. How long is data kept? 3 years after date closed Who is data shared with? Not Shared Legal basis for sharing N/A How is data shared? N/A	Legal Basis	Public task
Is Consent Required? Data Source School Where is data stored? Diagnostic questions servers Yes Diagnostic Questions have implemented a variety of security measures to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Who can access data? Staff, Diagnostic Questions staff for support. How long is data kept? 3 years after date closed Who is data shared with? Not Shared N/A How is data shared? N/A		is necessary for the performance of a task carried out in the public
Data Source Where is data stored? Diagnostic questions servers Yes Diagnostic Questions have implemented a variety of security measures to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Who can access data? Staff, Diagnostic Questions staff for support. How long is data kept? 3 years after date closed Who is data shared with? Not Shared N/A How is data shared? N/A	Evidence for legal basis	ICO legal basis toolkit
Where is data stored? Is it secure and/or encrypted? Yes Diagnostic Questions have implemented a variety of security measures to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Who can access data? Staff, Diagnostic Questions staff for support. How long is data kept? 3 years after date closed Who is data shared with? Not Shared N/A How is data shared? N/A	Is Consent Required?	No
Is it secure and/or encrypted? Yes Diagnostic Questions have implemented a variety of security measures to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Who can access data? Staff, Diagnostic Questions staff for support. How long is data kept? 3 years after date closed Who is data shared with? Not Shared N/A How is data shared? N/A	Data Source	School
measures to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Who can access data? Staff, Diagnostic Questions staff for support. How long is data kept? 3 years after date closed Who is data shared with? Not Shared N/A How is data shared? N/A	Where is data stored?	Diagnostic questions servers
How long is data kept? 3 years after date closed Who is data shared with? Not Shared Legal basis for sharing N/A How is data shared? N/A	Is it secure and/or encrypted?	measures to protect the personal information we collect from loss,
Who is data shared with? Legal basis for sharing N/A How is data shared? N/A	Who can access data?	Staff, Diagnostic Questions staff for support.
Legal basis for sharing N/A How is data shared? N/A	How long is data kept?	3 years after date closed
How is data shared? N/A	Who is data shared with?	Not Shared
	Legal basis for sharing	N/A
References Click to download Diagnostic Questions Privacy Policy	How is data shared?	N/A
	References	Click to download Diagnostic Questions Privacy Policy

System used: Dietary requirements information sheets	
Description	Required documents for specific chidlren with severe allergies / intolerances and religious observations (food)
Personal Data Items	Pupil Name DOB Dietary information

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

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

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

0	
System used: Edenred	
Description	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.
Personal Data Items	parent
	Name
	child
	Nameage
Why is it being processed?	https://www.edenred.co.uk/legal/legal-entity/privacy-policy/
Legal Basis	Public task
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal Basis tool
Is Consent Required?	Yes
Data Source	Parent
Where is data stored?	https://www.edenred.co.uk/legal/legal-entity/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.edenred.co.uk/legal/legal-entity/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.edenred.co.uk/legal/legal-entity/privacy-policy/
Legal basis for sharing	Public Task
How is data shared?	https://www.edenred.co.uk/legal/legal-entity/privacy-policy/

System used: Eschools Website Provider	
Description	On-line school website building tool
Personal Data Items	School Information Name Address Contact information Class names Staff names Governor names Year group information (planning, homework) Newsletters Pupil Photographs Photographs
Why is it being processed?	To inform parents and the wider community about the life of the school
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." 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?	Consent not required to put on school information. Consent required to use pupil photographs
Data Source	School
Where is data stored?	On eschool secure server through school 360 platform 4. Transfer of School Data 4.1. The School hereby consents to eSchools accessing School Data held on the Management Information System through Wonde, for the purpose of extracting and transferring such School Data to eSchools. 4.2. Prior to leaving the School premises by electronic means (via HTTPS) the School Data will be encrypted by Wonde and eSchools.
Is it secure and/or encrypted?	Yes 4.2. Prior to leaving the School premises by electronic means (via HTTPS) the School Data will be encrypted by Wonde and eSchools. 5.1. The School Data shall always remain the property of the School. 5.2. eSchools shall have no responsibility to maintain the security of any School Data held or controlled by the School. 5.3. eSchools shall keep all Confidential Information and School Data confidential and shall not:-5.3.1.1. use any Confidential Information or School Data except for the purpose of performing the services it provides to the School; or 5.3.1.2.

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

System used: EVOLVE visits	
Description	An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities.
Personal Data Items	Staff Name e-mail address IP address Location data Qualifications Pupil Name Date of Birth UPN
Why is it being processed?	To reduce paperwork, simplify procedures, produce self-review and inspection preparation data, and improve staff confidence in that they automatically follow both employer, and National Guidelines.
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public
	interest or in the exercise of official authority vested in the controller
Evidence for legal basis	interest or in the exercise of official authority vested in the controller ICO legal basis toolkit
Evidence for legal basis Is Consent Required?	·
	ICO legal basis toolkit
Is Consent Required?	ICO legal basis toolkit Yes
Is Consent Required? Data Source	ICO legal basis toolkit Yes SIMS 'We store all of the Customer Data (including your personal data) on servers which are located in the United Kingdom. These servers are
Is Consent Required? Data Source Where is data stored?	ICO legal basis toolkit Yes SIMS 'We store all of the Customer Data (including your personal data) on servers which are located in the United Kingdom. These servers are protected by passwords and firewalls.'
Is Consent Required? Data Source Where is data stored? Is it secure and/or encrypted?	ICO legal basis toolkit Yes SIMS '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.' Yes
Is Consent Required? Data Source Where is data stored? Is it secure and/or encrypted? Who can access data?	ICO legal basis toolkit Yes SIMS '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.' Yes Evolve staff
Is Consent Required? Data Source Where is data stored? Is it secure and/or encrypted? Who can access data? How long is data kept?	ICO legal basis toolkit Yes SIMS '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.' Yes Evolve staff 3 years after date closed '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

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

System used: Examination Boards a	System used: Examination Boards administration	
Description	Pearson/OCR/AQA/ASDAN/Edexcel and any other examination board	
Personal Data Items	 Name Date of birth Gender Unique Candidiate identifier Unique Learner Number Legal Name Coursework marks Forecast grades 	
Why is it being processed?	Exam entry and issuing of qualifications	
Legal Basis	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
Evidence for legal basis	ICO lawful basis tool	
Is Consent Required?	No	
Data Source	SIMS	
Where is data stored?	Secure gateway	
Is it secure and/or encrypted?	Yes- password protected on secure gateway and sent via EDI	
Who can access data?	Examination Board, teachers, exams officer	
How long is data kept?	3 years after date closed	
Who is data shared with?	Examination Board	
Legal basis for sharing	Public Task & legal obligation	
How is data shared?	Via secure gateway- Privacy Notices for each exam board can be found on the website for each board.	

System used: Futures Cloud	
Description	Internet / Network monitoring and reporting tool
Personal Data Items	Pupil Name I/P address URL's visited Teacher Name I/P address URL's visited
Why is it being processed?	Fulfills statutory requirement for the school to monitor, log and report inappropriate network activity.
Legal Basis	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School 360
Where is data stored?	Future Digital Secure Servers
Is it secure and/or encrypted?	Yes
Who can access data?	Designated teachers in school (normally online safety lead.
How long is data kept?	3 years after date closed
Who is data shared with?	NCC Online safety staff, Northumberland Safeguarding Children Board, Police if serious incident, Staff within school.
Legal basis for sharing	Public task & legal obligation.
How is data shared?	Electronically. through a secure connection.
References	Click to download Future Digital

System used: GL-Assessment	
Description	GL assessments provide a range of tests for schools including reading, progress and cognitive tests
Personal Data Items	Staff Name School Email Class Pupil Name Age Gender Class Year Performance data
Why is it being processed?	To provide? access to a range of testing and diagnostic tools for teaching staff.
Legal Basis	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?	GL assessment? secure servers and secure school servers
Is it secure and/or encrypted?	Yes
Who can access data?	School staff, GL staff for technical support.
How long is data kept?	3 years after date closed
Who is data shared with?	Shared with school
Legal basis for sharing	Public task
How is data shared?	Electronically via secure networks
References	Click to download GL-Assessment Privacy Policy

System used: Google Classroom	
Description	A free and easy tool helping educators efficiently manage and assess progress, while enhancing connections with learners from school, from home, or on the go.
Personal Data Items	Teacher
	Name
	Child
	Name
Why is it being processed?	https://policies.google.com/privacy?hl=en-GB#infocollect
Legal Basis	Legal Obligation
Logui Dadio	Logar Obrigation
	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."
	Public task
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal tool kit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://policies.google.com/privacy?hl=en-GB#infocollect
Is it secure and/or encrypted?	Secure
Who can access data?	https://policies.google.com/privacy?hl=en-GB#infocollect
How long is data kept?	3 years after date closed
Who is data shared with?	https://policies.google.com/privacy?hl=en-GB#infocollect
Legal basis for sharing	Public Task/legal obligation
How is data shared?	https://policies.google.com/privacy?hl=en-GB#infocollect

System used: Google drive for educ	cation
Description	suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.
Personal Data Items	Name Classes / groups Gmail address Pupil Name Classes / groups Gmail address Governor Name Gmail address
Why is it being processed?	To provide Google drive for education to staff, pupils and governors.
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 360
Where is data stored?	Google secure servers in Europe
Is it secure and/or encrypted?	Yes secure and encrypted
Who can access data?	Individual users can access their own accounts. School360 and ICT Team can access management tool.
How long is data kept?	3 years after date closed
Who is data shared with?	Staff and Pupils
Legal basis for sharing	Public task
How is data shared?	Secure google cloud.
References	Click to download Google Drive Policy Notice Click to download Google GSuite Privacy Policy

Custom used. Coordo Most	
System used: Google Meet	
Description	Google Meet is a video-communication service developed by Google. It is one of two apps that constitute the replacement for Google Hangouts, the other being Google Chat
Personal Data Items	teacher Name thild Name
Why is it being processed?	https://policies.google.com/privacy?hl=en-GB
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 tool kit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://policies.google.com/privacy?hl=en-GB
Is it secure and/or encrypted?	Secsure
Who can access data?	https://policies.google.com/privacy?hl=en-GB
How long is data kept?	3 years after date closed
Who is data shared with?	https://policies.google.com/privacy?hl=en-GB
Legal basis for sharing	Public Task
How is data shared?	https://policies.google.com/privacy?hl=en-GB

System used: Governance	
Details of all members of the Governing Body	
Name Name Address Contact Details Photos Attendance at Meetings Pecuniary Interests	
Statutory Requirement	
Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
ICO legal basis toolkit	
No	
School	
Secure school systems	
Yes	
Admin staff/ SLT	
3+ years	
Local Authority and the general public	
Public task and legal obligation	
Electronically via a secure server.	

System used: Hamilton Trust	
Description	Hamilton Trust is a UK charity working to support inspirational teaching and learning through its website and projects. Mike O'Regan founded Hamilton in 1988 to support the education of children in the Blackbird Leys, Rose Hill and Barton estates in Oxford - children whose educational potential had long been underestimated. Hamilton aims to enable children from areas of socio-economic disadvantage to create for themselves the life opportunities they deserve through high-quality education and high expectations. Hamilton continues to work closely with primary schools in Oxford and to derive enormous amounts of inspiration for improving educational opportunities from doing so. Professor Ruth Merttens joined Hamilton in 1996 as Co-director. With Mike, she set up and directed the Hamilton Maths and Reading Projects to boost those subjects in Oxford schools located in areas of significant deprivation. As word leaked out about Hamilton's planning materials, demand for them spread, and Hamilton started providing them to teachers in other schools. These formed the basis of Hamilton's original 'Save teachers' Sundays!' website, which enabled a much wider audience to access these plans. Hamilton's website continues to provide high quality, fully adaptable planning and resources to primary school teachers to help them teach robust and engaging lessons. Hamilton also supports and runs various education projects that provide support to its local community and across the country.
Personal Data Items	Teacher Name Email name Name Age year group
Why is it being processed?	https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/
How long is data kept?	3 years after date closed

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

System used: Health & Safety	
Description	Records pertaining to Health & Safety
Personal Data Items	Staff Name Contact details D.o.B Record of Accident/Incident Child Name Contact details D.o.B Record of Accident/Incident Visitor Name Contact details Record of Accident/Incident
Why is it being processed?	To ensure Health and Safety Regulations are followed
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	School network Paper copies- secure private office
Is it secure and/or encrypted?	Yes
Who can access data?	School staff
How long is data kept?	3 years after date closed
Who is data shared with?	NCC, school staff and parents
Legal basis for sharing	Public task and legal obligation.
How is data shared?	Electronically via a secure server.

System used: Huggg	
Description	Purchase and send supermarket vouchers to those in need. Manage funds and give recipients choice all in one simple to use platform.
Personal Data Items	parent
	Name
	child
	Name age
Why is it being processed?	https://www.huggg.me/privacy
Evidence for legal basis	ICO Legal Basis tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.huggg.me/privacy
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.huggg.me/privacy
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.huggg.me/privacy
Legal basis for sharing	Public duty
How is data shared?	https://www.huggg.me/privacy

System used: Letter join	System used: Letter join	
Description	Letter-join is the teacher's companion for teaching cursive handwriting combining interactive animations and worksheets for real handwriting practice. Letter-join includes animations of all the letters of the alphabet with a spoken commentary on how to write each letter. Patterns, Letters and Words can all be watched and traced on-screen. Magic Words lets you trace over your own words on a number of exciting backgrounds and Custom Words lets you input your own words, replay the video and trace over the words for IWB practice.	
Personal Data Items	School	
	Name	
	Chaff	
	Staff	
	NameClass	
	Pupil	
	NameClass	
Why is it being processed?	To provide online access to a range of teaching and learning materials for staff and pupils.	
Legal Basis	Public task	
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
Evidence for legal basis	ICO legal basis toolkit	
Is Consent Required?	No	
Data Source	School	
Where is data stored?	Green and Tempest secure servers	
Is it secure and/or encrypted?	In line with the General Data Protection Regulation (GDPR) we understand our obligation to store securely the contact details of our customers; those being personal identifiers, mainly names, addresses, telephone numbers and email addresses. This data is kept securely and is only accessible by staff at Green and Tempest Ltd. All data is deleted from our systems immediately upon customer notification of termination of a subscription.	
Who can access data?	Staff, Letter join staff for support	
How long is data kept?	3 years after date closed	
Who is data shared with?	Not shared	
Legal basis for sharing	N/A	
How is data shared?	N/A	

References	Click to download Letter Join Privacy Policy

Description	The Lightenend Pockets provide DFE compliant Internet Filtering Convince
Description	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.
Personal Data Items	Staff
	Name
	Machine nameI/P address
	URLs visited
	School
	Pupil
	Name
	NameMachine name
	I/P address
	URLs visited
Why is it being processed?	School Statutory requirement to filter Internet services for school users
Legal Basis	Legal Obligation
Legai Dasis	Logar Obligation
	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller
	is subject."
	Public task
	Article 6(1)(e) gives you a lawful basis for processing where: "processing
	is necessary for the performance of a task carried out in the public
	interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	Lightspeed Rockets at County Hall Northumberland
Is it secure and/or encrypted?	Yes
Who can access data?	NCC school support Staff, Curriculum ICT Team, Lightspeed staff for support
How long is data kept?	3 years after date closed
Who is data shared with?	School leadership, LSCB and police if serious incident occurs
Legal basis for sharing	Public task and legal obligation
How is data shared?	Secure electron communication
References	Click to download Lightspeed Privacy Notice

System used: Live Kitchen	
Description	Live kitchen provides a number of online tools for parents, pupils and school staff to manage school meals. These include: Direct Debit cash collection option Replaces dinner register and manages cash and cheques Account histories and payment reminders by email Pre-order system for classroom whiteboards with branding Children get the meal of their choice Controls food costs - waste is minimised Parents can log in from home to view the menu, check their account and pre-order meals Uptake graphs and reports help you track progress Lunchtimes are faster and more organised Optional menu costing and nutritional analysis
Personal Data Items	Pupil Name Age Parent Name email address Payment detais if using direct debit
Why is it being processed?	To provide additional functionality and a better service to pupils and parents at lunchtime.
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal basis toolkit
Is Consent Required?	No
Data Source	Parent
Where is data stored?	Secure school server
Is it secure and/or encrypted?	Yes
Who can access data?	School staff, parents and NCC.
How long is data kept?	3 years after date closed
Who is data shared with?	School staff and NCC
Legal basis for sharing	Public task
How is data shared?	Electronically via secure servers.
References	Click to download Live Kitchen Privacy Policy v1.4

System used: Local Authority moderation of work	
Description	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.
Personal Data Items	School
	Name
	Staff
	Initials
	Pupil
	InitialsGender
	Unique pupil number (UPN)
Why is it being processed?	As part of the statutory? requires for assessment and moderation in 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."
	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?	At County Hall in secure Filing systems and online, encrypted
Is it secure and/or encrypted?	Yes
Who can access data?	Local Authority school data team and assessment/moderation team.
How long is data kept?	3 years after date closed
Who is data shared with?	Other NCC staff
Legal basis for sharing	Public task and legal obligation
How is data shared?	Secure server and hard copies

System used: Looked After Children Records - Electronic	
Description	Information relating to children who are in Looked After Care
Personal Data Items	Pupil Name Date of Birth Address Personal Education Plan Health Needs Social Care Needs Educational Needs Family Background Parents & Carers Name Contact Details Address Name Position
	External Support
	NameOrganisationPositionAddressContact Details

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

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

How is the Special Category data shared?	Verbally or secure cloud sharing (Google or Office 365 etc)
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To support the education of children who are Looked After
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	School computer, laptop
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Class Teacher, Designated Key Worker
How long is data kept?	3 years after date closed
Who is data shared with?	Social Workers, Local Authority, Carers, Receiving school
Legal basis for sharing	Legal Obligation, Public Task
How is data shared?	via secure electronic means, Google or Office 365

System used: Looked After Children Records - Paper	
Description	Information relating to children who are Looked After
Personal Data Items	Pupils Name Date of Birth Address Personal Education Plan Health Needs Social Care Needs Educational Needs Family Background Parents & Carers Name Contact Details Address
	 Name Position External Support Workers Name Organisation Position Address Contact Details

- 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.
	Significant Public Interest

	Processing is required for reasons of significant public interest on the basis of Union or Member State Law that is equivalent to the aim pursued and which contains suitable safeguards.
Special Category Evidence for legal basis	ICO Regs - Article 9
How is the Special Category data shared?	Secure Messenger or Verbal
Legal basis for sharing Special Category data	ICO Regs - Article 9
Why is it being processed?	To support the education of children who are Looked After
Legal Basis	Legal Obligation
	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."
	Public task
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure Cabinet
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Class Teacher, Designated Key Worker
How long is data kept?	3 years after date closed
Who is data shared with?	Social Workers, Local Authority, Carers, Receiving School
Legal basis for sharing	Legal Obligation & Public Task
How is data shared?	Verbally and by Secure Messenger

System used: Medical Files - Electronic	
Description	Information in respect of specific medical needs of an individual student
Personal Data Items	Pupils • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Medical History • Medication Details Parents/Carers • Name • Address • Contact Details Staff • Name • Position External Support Workers
	NameOrganisationPositionAddressContact Details

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

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

How is the Special Category data shared?	Secure encrypted laptops and pens, secure messenger
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To ensure access to education
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure encrypted laptops/ school desktop computers
Is it secure and/or encrypted?	Yes
Who can access data?	Head, SENDCO, Teachers, Key Workers
How long is data kept?	3 years after date closed
Who is data shared with?	Parents/Carers (as appropriate), Social Workers, Health Care Professionals, receiving schools, LA workers (as appropriate)
Legal basis for sharing	Public task
How is data shared?	Secure encrypted laptops

System used: Medical Files - Paper	
Description	Information in respect of specific medical needs of an individual student
Personal Data Items	Pupils Name Date of Birth Address Health Needs Social Care Status Educational Needs Medical History Medication Details Parents/Carers Name Address Contact Details
	Name Position External Support Workers Name Organisation Position address Contact details

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

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

How is the Special Category data shared?	Secure Messenger
Legal basis for sharing Special Category data	ICO regs Article 9
Why is it being processed?	To ensure access to education
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure cabinet
Is it secure and/or encrypted?	Yes
Who can access data?	Head, SENDCO, Teachers, Key workers
How long is data kept?	3 years after date closed
Who is data shared with?	Parents/Carers (as appropriate); Social Workers; Health Care Professionals, receiving schools, LA workers as appropriate
Legal basis for sharing	Public Task
How is data shared?	Secure Messenger

System used: Medical log	
Description	File of medical information for each child: asthma, medication administered, heath care plans, risk assessments
Personal Data Items	Pupil Name Inhaler / medication information (doseage) DOB Class Medical condition Signs and symptoms Treatment Parental consent Name of medication and dose Side effects Storage requirements Special equipment Testing needed Access to food drink Dietary requirement Staff support Contingency arrangements Family / emergency contacts Hazard Risk Control measures / risk evaluation

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

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

Why is it being processed?	Health and safety of child
Legal Basis	Legal Obligation
	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."
	Public task
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	Parent
Where is data stored?	Medical log in secure storage held in the school office
Is it secure and/or encrypted?	Yes
Who can access data?	School staff
How long is data kept?	3 years after date closed
Who is data shared with?	Staff, NCC and NHS professionals
Legal basis for sharing	Public task and legal obligation
How is data shared?	Verbally, written and electronically via secure servers.

System used: Microsoft Teams		
Description	Remote learning with Office 365 for students Microsoft Teams for Education Whether you're learning at home for long periods of time or just outside of class, access Office 365 for free, stay connected, and learn in a way that's right for you. Get startedTips for successful online learning Get set up Students at eligible institutions can sign up for Office 365 Education for free. That means access to apps like Word, PowerPoint, and Teams from any web browser. Plus, all the work you create will automatically be saved and backed up in the cloud. Get started with Office 365 for free Already have Office 365? Sign in. Tip: Click Install Office from Office.com to download Office apps to your desktop device. Work together as a class or group Microsoft Teams is a digital hub that brings conversations, content, and apps together in one place. If your classes are using Teams, you'll be able to connect with your classmates, ask your teacher questions, work on your homework, and track the work you've got coming up. Not part of any teams yet? No problem! You can create your own to work on group projects and keep in touch from your computer or phone. Join virtual meetings set up by your teacher and even blur your background	
Personal Data Items	Teacher	
	Name	
	Child	
	Name	
Why is it being processed?	https://privacy.microsoft.com/en-us/privacystatement	
Legal Basis	Legal Obligation	
	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task	
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
Evidence for legal basis	ICO legal basis toolkit	
Is Consent Required?	Yes	
Data Source	School	
Where is data stored?	https://privacy.microsoft.com/en-us/privacystatement	
Is it secure and/or encrypted?	Secure	
Who can access data?	https://privacy.microsoft.com/en-us/privacystatement	
How long is data kept?	3 years after date closed	
Who is data shared with?	https://privacy.microsoft.com/en-us/privacystatement	

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

System used: MS Office Suite		
Description	Suite of online tools for staff and pupils, including OneDrive, Word, Powerpoint, Excel, Outlook, Video and Teams.	
Personal Data Items	Staff Name Classes Pupil Name Rovernor Name	
Why is it being processed?	To provide OneDrive for education to staff, pupils and governors.	
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
Evidence for legal basis	ICO legal basis tool.	
Is Consent Required?	No	
Data Source	School	
Where is data stored?	Microsoft Servers based in the EU	
Is it secure and/or encrypted?	Yes, secure and encrypted	
Who can access data?	Individual users can access their own accounts. ICT Team can access management tool.	
How long is data kept?	3 years after date closed	
Who is data shared with?	N/A	
Legal basis for sharing	N/A	
How is data shared?	https://privacy.microsoft.com/en-gb/privacystatement	

System used: My Maths	
Description	MyMaths is an interactive online teaching and homework subscription website for schools that builds pupil engagement and consolidates maths knowledge.
Personal Data Items	Staff Name School Email Pupil Name Age Gender Year Class Performance data
Why is it being processed?	To provide pupils and staff with access to a wider range of mathematics online teaching and learning materials.
Legal Basis	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?	MyMaths secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	School staff and pupils with login. Mymaths staff for technical support.
How long is data kept?	3 years after date closed
Who is data shared with?	Shared within school.
Legal basis for sharing	Public task
How is data shared?	Electronically via secure servers.
References	Click to download MyMaths

System used: Nursery (Early Years) files	
Description	Early years registration information and funding information for Early Years entitlement, hours taken each week
Personal Data Items	Pupil Name DOB Gender Address Documents seen / recorded Parents Nat. Insurance Number Eligibility code Religion Email address Telephone number Parent work details Emergency contact details Former placements Medical information Ethnic origin SEN information EAL Armed forces Meal arrangements Parental consent: medicine, photos, website, school publications, press, local excursions Start dates Desired sessions

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

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

Category data	
Why is it being processed?	To ensure registration of chidlren into school and that children receive their entitlements
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	Accurate record of admission
Is Consent Required?	No
Data Source	Parent
Where is data stored?	In school office in secure storage
Is it secure and/or encrypted?	Yes
Who can access data?	SLT
How long is data kept?	3 years after date closed
Who is data shared with?	School staff, NCC, outside agencies as required
Legal basis for sharing	Safeguarding
How is data shared?	Verbally / Electronically via secure server.

System used: Parent mail	
Description	Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events
Personal Data Items	Evening Manager Online Form Collection Meetings & Events School Name School email address Staff Name Class Title e-mail Gender Telephone number DOB School address Pupil Name Year Parent/carer name Title Class Gender DOB Address
	 DOB Parent/carer Name Telephone number email address Title Gender Address
Why is it being processed?	To provide access to a range of communication and payment tools
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	Parent

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

System used: ParentPay	
Description	ParentPay is an online payment service for schools and families.
Personal Data Items	staff Name Gender Pupil Name Date of birth Gender Groups Dietary requirements Postal address UPN Roll number Meal selections and history Emergency contact information Medical details EHIC Doctors contact Passport Parent/Carer Name Gender Address Phone number Email Payment history & balance Payment card details

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

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

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

System used: Parents Evening Book	System used: Parents Evening Booking System	
Description	Online booking system for parents evenings and other school events.	
Personal Data Items	Staff Name Email Classes Pupil Name Classes Year Parent Name Email	
Why is it being processed?	To provide parents/carers with an online system for booking parents evening and other school events.	
Legal Basis	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?	PEBS servers	
Is it secure and/or encrypted?	Yes	
Who can access data?	Staff, parents	
How long is data kept?	3 years after date closed	
Who is data shared with?	Shared with individual? parents and appropriate staff.	
Legal basis for sharing	Public task	
How is data shared?	Secure online servers	
References	Click to download PEBS	

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

System used: Personnel files	
Description	Information relating to staff employment
Personal Data Items	 Name Address Telephone number e-mail address National Insurance Number Qualifications DOB Contract Payroll no. Employment history References Leave of absence DBS checked
Why is it being processed?	Necessary for employment
Legal Basis	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure filing cabinet & online secure servers.
Is it secure and/or encrypted?	Yes - secure storage
Who can access data?	Headteacher and office staff
How long is data kept?	3 years after date closed
Who is data shared with?	NCC and/or HR provider and/or Payroll provider
Legal basis for sharing	Public task and legal obligation
How is data shared?	Electronically or secure courier

System used: Phonics play	
Description	Interactive phonics games, phonics planning, assessment ideas and many teaching ideas and resources to help children to learn
Personal Data Items	School Name Pupil Name Staff Name
Why is it being processed?	To provide access to online learning resources for pupils and staff.
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?	Phonics play servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff, Phonics Play for support
How long is data kept?	3 years after date closed
Who is data shared with?	Staff
Legal basis for sharing	Public task
How is data shared?	Online secure server
References	Click to download Phonics Play Privacy Policy

System used: Photographs and videos of staff and pupils.	
Description	Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms.
Personal Data Items	on the school website and social media platforms. Staff Name Photograph Video Pupil Photograph (unnamed) Video (unnamed) Video (unnamed) Photograph Photograph
Why is it being processed?	To celebrate the life and work of the school.
Legal Basis	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" Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	School website and social media sites
Is it secure and/or encrypted?	Yes
Who can access data?	Publicly available on the www
How long is data kept?	3 years after date closed
Who is data shared with?	The public
Legal basis for sharing	ICO legal basis toolkit
How is data shared?	On www
References	Click to download Model photograph policy (including consent form)

System used: PIRA - Rising stars (Wordblaze)	
Description	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.
Personal Data Items	School Name Staff Name Job title email address Telephone number
	 Name Age Date of birth Gender Ethnic origin First Language Unique pupil number Pupil premium information Assessment results

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

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

Category data	
Why is it being processed?	To provide access to a range of Rising stars resources including PIRA for standardised reading tests.
Legal Basis	Legal Obligation
	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."
	Public task
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit.
Is Consent Required?	No
Data Source	School
Where is data stored?	Stored on Hodder servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff, Hodder for support
How long is data kept?	3 years after date closed
Who is data shared with?	Staff
Legal basis for sharing	Public task and legal obligation
How is data shared?	Electronically via secure servers.
References	Click to download Rising Stars Privacy Notice

System used: Recruitment information	
Description	Part of the job application process
Personal Data Items	Name Name DOB Address Educational establishments attended Qualifications Disciplinary Records Appraisal Records Salary information

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

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

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

System used: Registers Description Daily register, after school club registers, lunch register Personal Data Items Child		
Personal Data Items Child Name Address Date of Birth Lunch Status Attendance Why is it being processed? To monitor children's attendance - legal obligation. Legal Basis Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller Evidence for legal basis ICO legal basis toolkit Is Consent Required? No Data Source School Where is data stored? Paper registers kept in the school office Electronic registers online Is it secure and/or encrypted? Yes- secure Who can access data? School staff, after school club providers How long is data kept? 3 years after date closed Who is data shared with? School staff, after school club providers Legal basis for sharing Public task and legal obligation Through the paper register at the time of completion. Electronically with	System used: Registers	
• Name • Address • Date of Birth • Lunch Status • Attendance Why is it being processed? To monitor children's attendance - legal obligation. Legal Basis Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller Evidence for legal basis ICO legal basis toolkit Is Consent Required? No Data Source School Where is data stored? Paper registers kept in the school office Electronic registers online Is it secure and/or encrypted? Yes- secure Who can access data? How long is data kept? 3 years after date closed Who is data shared with? School staff, after school club providers Legal basis for sharing Public task and legal obligation Through the paper register at the time of completion. Electronically with	Description	Daily register, after school club registers, lunch register
Legal Basis Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller Evidence for legal basis ICO legal basis toolkit Is Consent Required? No Data Source School Where is data stored? Paper registers kept in the school office Electronic registers online Is it secure and/or encrypted? Yes- secure Who can access data? School staff, after school club providers How long is data kept? 3 years after date closed Who is data shared with? School staff, after school club providers Legal basis for sharing Public task and legal obligation Through the paper register at the time of completion. Electronically with	Personal Data Items	NameAddressDate of BirthLunch Status
Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller Evidence for legal basis ICO legal basis toolkit Is Consent Required? No Data Source Where is data stored? Paper registers kept in the school office Electronic registers online Is it secure and/or encrypted? Yes- secure Who can access data? School staff, after school club providers How long is data kept? 3 years after date closed Who is data shared with? School staff, after school club providers Legal basis for sharing Public task and legal obligation Through the paper register at the time of completion. Electronically with	Why is it being processed?	To monitor children's attendance - legal obligation.
Is Consent Required? Data Source School Where is data stored? Paper registers kept in the school office Electronic registers online Is it secure and/or encrypted? Yes- secure Who can access data? School staff, after school club providers How long is data kept? 3 years after date closed Who is data shared with? School staff, after school club providers Legal basis for sharing Public task and legal obligation Through the paper register at the time of completion. Electronically with	Legal Basis	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public
Data Source School Where is data stored? Paper registers kept in the school office Electronic registers online Is it secure and/or encrypted? Yes- secure Who can access data? School staff, after school club providers How long is data kept? 3 years after date closed Who is data shared with? School staff, after school club providers Legal basis for sharing Public task and legal obligation How is data shared? Through the paper register at the time of completion. Electronically with	Evidence for legal basis	ICO legal basis toolkit
Where is data stored? Is it secure and/or encrypted? Who can access data? School staff, after school club providers How long is data kept? School staff, after school club providers School staff, after school club providers Who is data shared with? School staff, after school club providers Legal basis for sharing Public task and legal obligation Through the paper register at the time of completion. Electronically with	Is Consent Required?	No
Is it secure and/or encrypted? Who can access data? School staff, after school club providers How long is data kept? 3 years after date closed Who is data shared with? School staff, after school club providers Legal basis for sharing Public task and legal obligation Through the paper register at the time of completion. Electronically with	Data Source	School
Who can access data? School staff, after school club providers 3 years after date closed Who is data shared with? School staff, after school club providers Legal basis for sharing Public task and legal obligation Through the paper register at the time of completion. Electronically with	Where is data stored?	Paper registers kept in the school office Electronic registers online
How long is data kept? 3 years after date closed Who is data shared with? School staff, after school club providers Legal basis for sharing Public task and legal obligation How is data shared? Through the paper register at the time of completion. Electronically with	Is it secure and/or encrypted?	Yes- secure
Who is data shared with? School staff, after school club providers Legal basis for sharing Public task and legal obligation How is data shared? Through the paper register at the time of completion. Electronically with	Who can access data?	School staff, after school club providers
Legal basis for sharing Public task and legal obligation How is data shared? Through the paper register at the time of completion. Electronically with	How long is data kept?	3 years after date closed
How is data shared? Through the paper register at the time of completion. Electronically with	Who is data shared with?	School staff, after school club providers
	Legal basis for sharing	Public task and legal obligation
	How is data shared?	

System used: Safeguarding Records - Electronic	
Description	Records relating to safeguarding of children
Personal Data Items	Pupils Name Date of Birth Address Health Needs Social Care Status Educational Needs Child Protection Plan/Actions
	Parent/Carers Name Address Contact Details Staff Name Position
	Social Care Worker Name Address Contact Details External Support Workers Name Organisation Position Address

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

Special Category Data Legal Basis	Obligation
	Processing is required for carrying out obligations under employment,

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

System used: Safeguarding Records - Paper	
Description	Records relating to safeguarding of children
Personal Data Items	Pupils Name Date of Birth Address Health Needs Social Care Status Educational Needs Child Protection Plan/Actions
	Parent/Carers Name Address Contact Details Staff Name Position
	Social Care Worker Name Address Contact Details External Support Workers
	 Name Organisation Position Address Contact Details

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

System used: School meals identification	
Description	Identification of pupils for meals
Personal Data Items	Pupil Name Photograph Dietary requirement

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

Special Category Data Legal Basis	Obligation
	Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	n/a
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To ensure the pupils receive appropriate dietary requirements, particularly those with food allergies.
Legal Basis	Public task
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Paper file - held securely within school premises, accessed daily
Is it secure and/or encrypted?	Yes - secure storage
Who can access data?	Kitchen and office staff

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

System used: School360	
Description	Learning platform for Northumberland schools with links to 3rd party educational resource providers.
Personal Data Items	Pupil Name School id Class/Group Year UPN (Unique Pupil Number) Gender Attendance (If School360 used for registration) Pupil concern reports EYFS reflections
	 Name Staff Alternative e-mail address Teacher pupil notes

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

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

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

System used: Seesaw	System used: Seesaw	
Description	Seesaw - Student driven digital portfolios and simple parent communication.	
Personal Data Items	Staff Name School Classes Pupil Name School Year Classes	
Why is it being processed?	To provide Staff and pupil accounts on Seesaw and to enable the production of pupil portfolios.	
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
Evidence for legal basis	ICO legal basis toolkit	
Is Consent Required?	No	
Data Source	School	
Where is data stored?	Seesaw servers	
Is it secure and/or encrypted?	Yes	
Who can access data?	School staff with logins and pupils (own account).	
How long is data kept?	3 years after date closed	
Who is data shared with?	Not shared	
Legal basis for sharing	N/A	
How is data shared?	N/A	
References	Click to download Seesaw Privacy Policy	

System used: SEND electronic records	
Description	Records relating to Special Educational Needs and Disability for individual pupils
Personal Data Items	Pupils Name Date of Birth Address Health Needs Social Care Status Educational Needs SEND History Parents / Carers Name Address Contact details Staff Name Position External Support Workers Name Organisation Position
	AddressContact details

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

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

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

System used: Send Paper Records	
Description	Records relating to individual pupil's SEND history
Personal Data Items	Pupil Name Date Of Birth Address Medical Information Health & Social Care Specific Educational Needs Interventions In Place Parents Name Address Contact Details Staff Name Position External Support Name Organisation Position Address Contact Details

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

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

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

System used: SIMS	
Description	SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools.
Personal Data Items	Pupil
	 Name Date of birth Address Title Gender Class Year Parent/carer name UPN Dietary Requirements Medical information Attendance/exclusion FSM SEN Assessment information Child Protection Plan School history Looked After Information Parent/Carer
	• Name
	AddressPhone numberemail addressGender
	 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

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

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

Special Category Data Legal Basis	Obligation
	Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Electronically via secure encrypted communication
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Processing of this data is necessary for the completion of a public task and for the school to meet statutory requirements.
Legal Basis	Legal Obligation
	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."
	Public task
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No

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

System used: Social media sites e.g	. Twitter, Facebook
Description	Social Media tool used to inform parents about events in school and celebrate children's achievement.
Personal Data Items	Pupil Photos (unnamed) Videos (unnamed) School name Classes
Why is it being processed?	Unnamed photos of pupils and their work are used on the site
Legal Basis	Consent Article 6(1)(a) gives you a lawful basis for processing where: "the data subject has given consent to the processing of their personal data for one or more specific purposes"
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	Twitter or Facebook servers and in school
Is it secure and/or encrypted?	Twitter account is password protected. Only parents who have been approved by the school can access or follow the school twitter account
Who can access data?	Parents of children in school who have requested to follow the school on twitter and who have been approved by the admin team.
How long is data kept?	3 years after date closed
Who is data shared with?	Information shared with parents
Legal basis for sharing	Consent
How is data shared?	Online via secure servers

System used: Tapestry	
Description	An online journal recording all the learning and fun of children's early years education.
Personal Data Items	School Name Address Email address and name of person who pays for service in school Pupil Name Date of birth Notes on progress Photographs Videos Address Parent Name email address Staff Name Email address
Why is it being processed?	To provide access to an online early years journal which records pupil activity and progress throughout the year.
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes for parent access element
Data Source	School
Where is data stored?	Tapestry? secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff, parents (own child), other settings if child moves school and new school if it uses Tapestry.
How long is data kept?	3 years after date closed
Who is data shared with?	The child's? new school if it uses Tapestry.
Legal basis for sharing	Public task
How is data shared?	Electronically over secure link.

References	Click to download Tapestry Privacy Policy

System used: Twinkl	
Description	We're here to 'help those who teach'. It's what brings us to work every day. We're proud to create educational resources that can be used at each step of a child's learning journey. Our teacher-created resources provide entire schemes of work, lesson planning and assessments right through to online educational games, augmented reality and so much more. We have over 525,000 resources and new content gets added every day. You'll find we've normally got what you need before you even know you want it.
Personal Data Items	Teacher • Name child • Name
Why is it being processed?	https://www.twinkl.co.uk/legal
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.twinkl.co.uk/legal
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.twinkl.co.uk/legal
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.twinkl.co.uk/legal
Legal basis for sharing	Public Task
How is data shared?	https://www.twinkl.co.uk/legal

System used: Visitor book	
Description	Log of all visitors into school / fire regulations
Personal Data Items	Visitor • Name • Date and time • Car registration • Purpose of visit • Company •
Why is it being processed?	Safeguarding, health and safety, fire regulations
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Visitor book (hard copy)
Is it secure and/or encrypted?	Yes
Who can access data?	School staff, visitors
How long is data kept?	3 years after date closed
Who is data shared with?	School staff, visitors
Legal basis for sharing	Public task & legal obligation
How is data shared?	Hard copy or secure online server.

System used: 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

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This system has been identified as containing Special Category Information

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

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

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

System used: Wonde	
Description	Manages transfer of data from Sims MIS to School360.
Personal Data Items	Staff Name Name Name School id Class/group Year UPN Gender Attendance

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

Special Category Data Legal Basis	Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	School 360 secure servers
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To facilitate the exchange of data to allow the set up of school360 for a school.
Legal Basis	Contract Article 6(1)(b) gives you a lawful basis for processing where: "processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract"
Evidence for legal basis	ICO legal basis toolkit

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

System used: Y4 Multiplication Chec	k
Description	What is the Multiplication Tables Check. The Multiplication Tables Check (MTC) is a key stage 2 assessment to be taken by pupils at the end of year 4 (in June). From the 2019 / 2020 academic year onwards. The purpose of the MTC is to make sure the times tables knowledge is at the expected level.
Personal Data Items	child Name
Why is it being processed?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
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 framework tool kit
Is Consent Required?	yes
Data Source	School
Where is data stored?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
Is it secure and/or encrypted?	secure
Who can access data?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
Legal basis for sharing	Public task
How is data shared?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance

System used: Zoom	
Description	Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Our easy, reliable cloud platform for video, voice, content sharing, and chat runs across mobile devices, desktops, telephones, and room systems.
Personal Data Items	Teacher
	Name
	Parent
	Name
Why is it being processed?	https://zoom.us/trust
Legal Basis	Legal Obligation
	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://zoom.us/trust
Is it secure and/or encrypted?	Secure
Who can access data?	https://zoom.us/trust
How long is data kept?	3 years after date closed
Who is data shared with?	https://zoom.us/trust
Legal basis for sharing	Public task
How is data shared?	https://zoom.us/trust