

Amble Links Primary School

GDPR Asset Register

Date: 10/11/2026

Data Protection Officer: Wallis Bath

01665 710667

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	
Arbor	School information management system	yes
Assessment Records	Electronic and paper mark books	
Attendance file	Attendance information about pupils and classes	yes
Bandlab	Music education for everyone Our award-winning music creation features let students embark on a music-learning journey that unleashes their creativity and foster collaboration with peers	
BBC Bitesize	BBC Bitesize is a free online study support resource designed to help with learning, revision and homework! Bitesize provides support for learners aged 5 to 16+ across a wide range of school subjects. It also supports children and young people's wellbeing and career choices. Bitesize also has hundreds of published lessons to help students across the UK with home schooling. Bitesize guides are written by teachers and subject experts and are mapped to follow the curricula of the UK. Secondary Bitesize follows exam board specifications for the main exam boards in the UK, including for GCSE in England, Wales and Northern Ireland and National 4, National 5 & Highers in Scotland, ensuring students are preparing for the right exams	
Bikeability	The Bikeability Trust run on behalf of Department of Transport. Courses and resources for schools in England	
Blooket	Welcome to the World of Blooket: a new take on trivia and review games! The way it works is that a teacher/host picks a question set and a unique game mode. Then, we generate a code that players can use to join the game on their own devices. After the game starts, players will answer questions to help them win. That's where the fun starts, because we offer a variety of games to keep students engaged and excited!	
Busy Things	Online games & activities for learning	
Canva	Canva is an online design and publishing tool	
Charanga	Charanga Music School, the best-selling, modern resource for primary music — online, easy to use and great value. Includes A complete scheme to teach the	

	national curriculum for music A vast library of songs, topics, instrument courses and creative apps In-depth support for assessment, SEND and personalised teaching and learning	
Child Protection Records - Electronic	Records relating to child protection issues for individual pupils	yes
Child Protection Records - Paper	Records relating to child protection issues for individual pupils	yes
Class Dojo	Class Dojo is a classroom management and behaviour rewards system which includes a digital portfolio for pupils which can be accessed by staff, pupils and parents?/carers.	
CLPE	Welcome to The Centre for Literacy in Primary Education The Centre for Literacy in Primary Education is a UK based children's literacy charity working with primary schools. Our work raises the achievement of children's reading and writing by helping schools to teach literacy creatively and effectively, putting quality children’s books at the heart of all learning. We offer courses at our literacy library in central London and deliver training in various regional locations as well as provide a wide range of free resources for Primary teachers.	
Complete PE	Complete P.E. is an interactive Physical Education resource designed to support the implementation of a High Quality Physical Education Curriculum.	
Consent for educational visits	Consent information for all educational visits including day trips and residential visits	yes
CPOMS	CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral welfare for 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
DFE-Census and workforce Census	The school workforce census is a statutory data collection that takes place each autumn. You must complete statutory censuses by law unless there’s a good reason not to. The census collects data on all	

	teaching and support staff in regular employment, including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data.	
Dietary requirements information sheets	Required documents for specific chidlren with severe allergies / intolerances and religious observations (food)	yes
Doodle Maths	Personalised maths tuition – anywhere, anytime Curriculum-aligned Ages 4 to 14	
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.	
Futures Cloud	Internet / Network monitoring and reporting tool	
Google Classroom	A free and easy tool helping educators efficiently manage and assess progress, while enhancing connections with learners from school, from home, or on the go.	
Google drive for education	suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.	
Google Meet	Google Meet is a video-communication service developed by Google. It is one of two apps that constitute the replacement for Google Hangouts, the other being Google Chat	
Governance	Details of all members of the Governing Body	
HAF- HolidayActivities	The dedicated platform built to run and report on your local authority HAF programme.	yes
Health & Safety	Records pertaining to Health & Safety	
Huggg	Purchase and send supermarket vouchers to those in need. Manage funds and give recipients choice all in one simple to use platform.	
Insight Tracking	An online data tracking system for teachers. The following data is collected: Pupil records include the following data: Unique Pupil Number (UPN) Legal first & last names Preferred first & last names Date of birth Gender Date pupil joined the school Date pupil left the school The following data can optionally be recorded	yes

	as well: Address Ethnicity EAL status FSM history SEN history Service child status In-care status Attendance summaries Customer-defined groups Customer-defined notes and files	
Interactive Resources	Pupil / teacher online learning resources for Numeracy.	
Just2easy	Suite of online tools for Desk Top Publishing, Blogging, Infant toolkit and Tables, spelling an arithmetic SATs testers.	
Kapow	Engaging, knowledge-rich and progressive curriculums and lesson plans for foundation subjects. Includes teacher CPD videos and planning materials.	
Language Angels	Language Angels award-winning language teaching resources are designed so every primary school teacher - irrespective of their linguistic ability - can teach the foreign language of their choice. Our experienced team of foreign language teaching specialists have spent thousands of hours over a number of years creating, testing and refining our lessons and resources to bring them to where they are now. We won’t rest on our laurels though. We continue to work, adding innovative and exciting new units and resources all the time. By providing a multitude of teaching units (each designed to run for 6 weeks) there are more than enough resources to enable you to teach the language of your choice throughout the whole of your primary school.	
Learning by Questions	me in the classroom is precious LbQ is the teaching tool to help squeeze the most out of your lesson. Enjoy more lightbulb moments with our award-winning resources. Respond and adapt quickly with our Live Results Matrix. Transform learning with immediate targeted feedback.	
Letter join	Letter-join is the teacher's companion for teaching cursive handwriting combining interactive animations and worksheets for real handwriting practice. Letter-join includes animations of all the letters of the alphabet with a spoken commentary on how to write each letter. Patterns, Letters and Words can all be watched and traced on-screen. Magic Words lets you trace over your own words on a number of exciting backgrounds and Custom Words lets you input your own words, replay the video and trace over the words for IWB practice.	
Lexia	Students work independently to develop critical reading and language skills through individualized, motivating learning paths. All students, regardless of their skill level, can each work at their own pace and the teacher is notified (on web-based reports and via email) only when they require support.	

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
Micro Librarian	Micro Librarian Systems (MLS) , supplier of Library Management Systems to Education in the UK and the worlds first to use biometric identification data	yes
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	
Monster Phonics	Phonics is the foundation that all other education is built upon and having the right phonics programme in place can make all the difference to your schools' performance	
Nereo (Matrix)	North East Regional Employers' Organisation is one of eleven regional bodies that support local authorities across England, Wales and Northern Ireland. NEREO's function is to support local authorities and partner organisations in the fields of Human Resources, Organisational Development and Employee Relations in all their complex and varied forms. NEREO is a small organisation with a big reputation. Our staff have over a hundred years experience of working in the public sector. Some have voluntary and private sector experience too. The Governance of NEREO is carried out by an Executive Committee made up of Elected Member	

	representatives from each of the local authorities.	
Nursery (Early Years) files	Early years registration information and funding informaiton for Early Years entitlement, hours taken each week	yes
Oak Acadamy	Oak National Academy provides free video lessons, slides and worksheets to support teachers and pupils to keep learning. Created by teachers in response to coronavirus, the resources are freely available, to complement schools' own teaching. Lessons cover a broad range of subjects, from reception to year 11. There are no sign-ups or logins required.	
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	
Purple Mash	The all-in-one Edtech solution for your Primary School. Embed computing and digital skills across your whole curriculum with award-winning teaching and learning software for KS1 and KS2.	
Reading Plus	Personalized intervention and instruction to develop silent reading proficiency and confident, lifelong readers.	
Recruitment information	Part of the job application process	yes
Registers	Daily register, after school club registers, lunch register	
Safeguarding Records - Electronic	Records relating to safeguarding of children	yes
Safeguarding Records - Paper	Records relating to safeguarding of children	yes
School360	Learning platform for Northumberland schools with links to 3rd party educational resource providers.	yes
SEND electronic records	Records relating to Special Educational Needs and Disability for individual pupils	yes
Send Paper Records	Records relating to individual pupil's SEND history	yes
Senso Cloud	The Cloud Based Platform for Device Monitoring and Management. All-In-One Software for Network, Classroom, Safeguarding and Asset Management, and for managing and monitoring any Windows and Chrome device from a Centralised Web portal	
SIMS	SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools.	yes

Social media sites e.g. Twitter, Facebook	Social Media tool used to inform parents about events in school and celebrate children's achievement.	
Spelling Shed	The Spelling Shed - proudly powered by EdShed - is a spelling platform designed by a team of teachers. It is built with students, teachers and parents in mind and aims to make spelling fun for students as well as simple for adults to manage.	
Tapestry	An online journal recording all the learning and fun of children's early years education.	
Testbase	This is an online resource provided by Doublestruck which enables children to prepare for National SAT examinations. Doublestruck is an Educational Technology company that is part of the AQA family. It specialises in technology that addresses the needs of teachers in formative assessment and reporting.	yes
Touch Type Read Spell	multi-sensory course that teaches typing, reading and spelling	
Visitor book	Log of all visitors into school / fire regulations	
Wonde	Manages transfer of data from Sims MIS to School360.	yes
Y4 Multiplication Check	What is the Multiplication Tables Check. The Multiplication Tables Check (MTC) is a key stage 2 assessment to be taken by pupils at the end of year 4 (in June). From the 2019 / 2020 academic year onwards. The purpose of the MTC is to make sure the times tables knowledge is at the expected level.	

System used: 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 • **Staff member** • 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: Arbor	
Description	School information management system
Personal Data Items	**Admin** • Name • Phone contact • email contact • Organisiation • **Pupil** • Name • Date of birth • Address • Gender • Parent/carer name and contact details • UPN • Dietary Requirements • Ethnicity • Religion • Attainment & behaviour data **Staff** • Name • Date of Birth • Gender • Employment records **Parent/carer** • Name • Contact details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.

	Public Processing relates to personal data manifestly made public by the Data Subject.
Special Category Evidence for legal basis	ICO toolkit
How is the Special Category data shared?	Secure transfer
Legal basis for sharing Special Category data	ICO toolkit
Why is it being processed?	To fulfil school's legal obligations in respect of pupil education
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 Toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure Cloud Server
Is it secure and/or encrypted?	Both secure & encrypted https://support.arbor-education.com/hc/en-us/articles/360013442894-Arbor-s-Data-Protection-Policy-to-comply-with-GDPR#our-certifications-0-3
Who can access data?	School staff
How long is data kept?	3 years after date closed
Who is data shared with?	Other schools Local Authority & public agencies as required
Legal basis for sharing	ICO toolkit
How is data shared?	Secure transfer

System used: Assessment Records	
Description	Electronic and paper mark books
Personal Data Items	**Child** • 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
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 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: Bandlab	
Description	Music education for everyone Our award-winning music creation features let students embark on a music-learning journey that unleashes their creativity and foster collaboration with peers
Personal Data Items	**Teacher** • Name **Child** • Name
Why is it being processed?	https://blog.bandlab.com/edu-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://blog.bandlab.com/edu-privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://blog.bandlab.com/edu-privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://blog.bandlab.com/edu-privacy-policy/
Legal basis for sharing	Public Task/Legal Obligation
How is data shared?	https://blog.bandlab.com/edu-privacy-policy/

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/
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.bbc.co.uk/usingthebbc/privacy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.bbc.co.uk/usingthebbc/privacy/
Legal basis for sharing	Public Task
How is data shared?	https://www.bbc.co.uk/usingthebbc/privacy/

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

System used: Blooket	
Description	Welcome to the World of Blooket: a new take on trivia and review games! The way it works is that a teacher/host picks a question set and a unique game mode. Then, we generate a code that players can use to join the game on their own devices. After the game starts, players will answer questions to help them win. That's where the fun starts, because we offer a variety of games to keep students engaged and excited!
Personal Data Items	**Student** • Name • Username • Password • Email **Teacher** • Name • Username • Password • Email
Why is it being processed?	https://www.blooket.com/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 Tool
Is Consent Required?	Yes- Please note that Blooket provides its Service upon explicit consent given by you when signing up.
Data Source	School
Where is data stored?	https://www.blooket.com/privacy
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.blooket.com/privacy
How long is data kept?	3+ years
Who is data shared with?	https://www.blooket.com/privacy
Legal basis for sharing	Public Task
How is data shared?	https://www.blooket.com/privacy

System used: Busy Things	
Description	Online games & activities for learning
Personal Data Items	**Taecher** • Name • email **Pupil** • Name
Why is it being processed?	To allow use of the system
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	All data collected and processed by Busy Things is stored in a secure data centre in the UK meeting industry standards for security (ISO270001).
Is it secure and/or encrypted?	All data is transmitted to and from this location using SSL encryption technologies. All data is backed up on a regular basis and stored securely off-site
Who can access data?	School & busy things 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: Canva	
Description	Canva is an online design and publishing tool
Personal Data Items	**Teacher** • Name • date of birth • email • phone number • school • analytics data • usage data including device & location **Student** • Name • class • school • email • analytics data • usage data including device & location
Why is it being processed?	To allow use of Canva resources and to improve Canva service to users
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	secured cloud
Is it secure and/or encrypted?	yes both encrypted and secure
Who can access data?	School and Canva employees as required to provide service
How long is data kept?	1+ year
Who is data shared with?	Third party companies to provide service
Legal basis for sharing	contractual legitimate interest
How is data shared?	secure encrypted transfer

System used: 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	**Pupils** • 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
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation**

	Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbally or secure cloud sharing (Google or Office 365 etc)
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Statutory obligations and to support educational entitlement
Legal Basis	**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 **External Support Workers** • Name • Organisation • Position • Address • Contact Details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation**

	Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	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: Class Dojo	
Description	Class Dojo is a classroom management and behaviour rewards system which includes a digital portfolio for pupils which can be accessed by staff, pupils and parents?/carers.
Personal Data Items	**Staff** • Name • Phone number • email • Password • Device id • Gender • School • School address • Geo Location • Photos, Videos, Docs and audio • IP address **Pupil** • Name • Password • Age • School • IP Address **Parent/carer** • Name • Phone number • Email address • Password • Device id • Gender • School • Geo location • IP Address
Why is it being processed?	To provide access to the online curriculum and classroom management? 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	School
Where is data stored?	Secure Class Dojo servers

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

System used: CLPE	
Description	Welcome to The Centre for Literacy in Primary Education The Centre for Literacy in Primary Education is a UK based children's literacy charity working with primary schools. Our work raises the achievement of children's reading and writing by helping schools to teach literacy creatively and effectively, putting quality children's books at the heart of all learning. We offer courses at our literacy library in central London and deliver training in various regional locations as well as provide a wide range of free resources for Primary teachers.
Personal Data Items	**Teacher** • Name
Why is it being processed?	https://clpe.org.uk/content/privacy-cookies
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://clpe.org.uk/content/privacy-cookies
Is it secure and/or encrypted?	Secure
Who can access data?	https://clpe.org.uk/content/privacy-cookies
How long is data kept?	3 years after date closed
Who is data shared with?	https://clpe.org.uk/content/privacy-cookies
Legal basis for sharing	Public Task
How is data shared?	https://clpe.org.uk/content/privacy-cookies

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
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?	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: CPOMS	
Description	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	**pupil** • Name • date of birth • gender • class • year • FSM • SEN • Assessment info
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Secure 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

System used: DFE-Census and workforce Census	
Description	The school workforce census is a statutory data collection that takes place each autumn. You must complete statutory censuses by law unless there's a good reason not to. The census collects data on all teaching and support staff in regular employment, including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data.
Personal Data Items	**Staff** • Name
Why is it being processed?	https://www.gov.uk/help/privacy-notice
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://www.gov.uk/help/privacy-notice
Is it secure and/or encrypted?	secure
Who can access data?	https://www.gov.uk/help/privacy-notice
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.gov.uk/help/privacy-notice
Legal basis for sharing	public task/legal obligation
How is data shared?	https://www.gov.uk/help/privacy-notice

System used: Dietary requirements information sheets	
Description	Required documents for specific chidlren with severe allergies / intolerances and religious observations (food)
Personal Data Items	**Pupil** • Name • DOB • Dietary information
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	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

System used: Doodle Maths	
Description	Personalised maths tuition – anywhere, anytime Curriculum-aligned Ages 4 to 14
Personal Data Items	**Teacher** • Name **Child** • Name • **Parent** • Name
Why is it being processed?	https://www.doodlemaths.com/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	School
Where is data stored?	https://www.doodlemaths.com/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	Teacher, Parent, Child https://www.doodlemaths.com/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.doodlemaths.com/privacy-policy/
Legal basis for sharing	Public Task
How is data shared?	https://www.doodlemaths.com/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 • •
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	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	SIMS
Where is data stored?	'We store all of the Customer Data (including your personal data) on servers which are located in the United Kingdom. These servers are protected by passwords and firewalls.'
Is it secure and/or encrypted?	Yes
Who can access data?	Evolve staff
How long is data kept?	3 years after date closed
Who is data shared with?	'The only time that any information will be shared by us outside of our services is where our Customer has asked us to configure the service so that it shares certain data with specified third party programs including calendars.'
Legal basis for sharing	Public task & legal obligation
How is data shared?	See contract/agreement

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

System used: Futures Cloud	
Description	Internet / Network monitoring and reporting tool
Personal Data Items	**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	**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 360
Where is data stored?	Future Digital Secure Servers
Is it secure and/or encrypted?	Yes
Who can access data?	Designated teachers in school (normally online safety lead.
How long is data kept?	3 years after date closed
Who is data shared with?	NCC Online safety staff, Northumberland Safeguarding Children Board, Police if serious incident, Staff within school.
Legal basis for sharing	Public task & legal obligation.
How is data shared?	Electronically. through a secure connection.
References	Click to download Future Digital

System used: Google 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** 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 education	
Description	suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.
Personal Data Items	**Staff** • 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

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 • • **child** • 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	
Description	Details of all members of the Governing Body
Personal Data Items	**Name** • Name • Address • Contact Details • Photos • Attendance at Meetings • Pecuniary Interests
Why is it being processed?	Statutory Requirement
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 school systems
Is it secure and/or encrypted?	Yes
Who can access data?	Admin staff/ SLT
How long is data kept?	3+ years
Who is data shared with?	Local Authority and the general public
Legal basis for sharing	Public task and legal obligation
How is data shared?	Electronically via a secure server.

System used: HAF- HolidayActivities	
Description	The dedicated platform built to run and report on your local authority HAF programme.
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement. **Public** Processing relates to personal data manifestly made public by the Data Subject.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	https://www.holidayactivities.com/privacy-notice/
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To run and report HAF programme for schools.
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Legitimate Interest** Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.” **Public task**

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

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

System used: Huggg	
Description	Purchase and send supermarket vouchers to those in need. Manage funds and give recipients choice all in one simple to use platform.
Personal Data Items	**parent** • 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: Insight Tracking	
Description	An online data tracking system for teachers. The following data is collected: Pupil records include the following data: Unique Pupil Number (UPN) Legal first & last names Preferred first & last names Date of birth Gender Date pupil joined the school Date pupil left the school The following data can optionally be recorded as well: Address Ethnicity EAL status FSM history SEN history Service child status In-care status Attendance summaries Customer-defined groups Customer-defined notes and files
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To track progress and attainment of children.
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	online- secure website
Is it secure and/or encrypted?	yes
Who can access data?	https://www.insighttracking.com/terms https://www.insighttracking.com/privacy/

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

System used: Interactive Resources	
Description	Pupil / teacher online learning resources for Numeracy.
Personal Data Items	**Staff** • Name • Class / Year group • School **Pupil** • Name • Class / Year group • School
Why is it being processed?	Necessary to provide access to learning resources through 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	ICO legal basis toolkit.
Is Consent Required?	No
Data Source	School 360
Where is data stored?	Interactive Resources secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	Individual users can access their own accounts. Interactive Resources staff to enable support.
How long is data kept?	3 years after date closed
Who is data shared with?	N/A
Legal basis for sharing	N/A
How is data shared?	N/A
References	Click to download Interactive Resources Privacy Notices

System used: Just2easy	
Description	Suite of online tools for Desk Top Publishing, Blogging, Infant toolkit and Tables, spelling an arithmetic SATs testers.
Personal Data Items	**Child** • Name • Gender • Class / Year group • School **Staff** • Name • Class / Year group • School
Why is it being processed?	To provide access for staff and pupils to a variety of learning resources through School360
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School 360
Where is data stored?	J2e secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	J2e and school360 staff to manage accounts
How long is data kept?	3 years after date closed
Who is data shared with?	N/A
Legal basis for sharing	N/A
How is data shared?	N/A
References	Click to download Just2easy Privacy & Data Policy

System used: Kapow	
Description	Engaging, knowledge-rich and progressive curriculums and lesson plans for foundation subjects. Includes teacher CPD videos and planning materials.
Personal Data Items	**Staff Member/User** • Name • Title • Username / similar identifier
Why is it being processed?	From Kapow's privacy notice: We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances: Where we need to perform the contract we are about to enter into or have entered into with you. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Where we need to comply with a legal or regulatory obligation.
Legal Basis	**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” **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 toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Kapow keeps personal subscription data (first name, last name, school email address) inside the UK; this data is stored on our own WordPress hosting provider, based in a Google cloud in London.
Is it secure and/or encrypted?	Yes
Who can access data?	Kapow, Staff User
How long is data kept?	1+ year

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

System used: Language Angels	
Description	Language Angels award-winning language teaching resources are designed so every primary school teacher - irrespective of their linguistic ability - can teach the foreign language of their choice. Our experienced team of foreign language teaching specialists have spent thousands of hours over a number of years creating, testing and refining our lessons and resources to bring them to where they are now. We won't rest on our laurels though. We continue to work, adding innovative and exciting new units and resources all the time. By providing a multitude of teaching units (each designed to run for 6 weeks) there are more than enough resources to enable you to teach the language of your choice throughout the whole of your primary school.
Personal Data Items	**teacher** • Name **child** • Name • age
Why is it being processed?	Language_Angels_Home_School_Terms_&_Conditions.pdf
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?	Language_Angels_Home_School_Terms_&_Conditions.pdf
Is it secure and/or encrypted?	Secure
Who can access data?	Language_Angels_Home_School_Terms_&_Conditions.pdf
How long is data kept?	3 years after date closed
Who is data shared with?	Language_Angels_Home_School_Terms_&_Conditions.pdf
Legal basis for sharing	Public Task
How is data shared?	Language_Angels_Home_School_Terms_&_Conditions.pdf

System used: Learning by Questions	
Description	me in the classroom is precious LbQ is the teaching tool to help squeeze the most out of your lesson. Enjoy more lightbulb moments with our award-winning resources. Respond and adapt quickly with our Live Results Matrix. Transform learning with immediate targeted feedback.
Personal Data Items	**Teacher** • Name **Pupil** • Name
Why is it being processed?	https://www.lbq.org/Privacy-and-Data-Protection
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 kit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.lbq.org/Privacy-and-Data-Protection
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.lbq.org/Privacy-and-Data-Protection
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.lbq.org/Privacy-and-Data-Protection
Legal basis for sharing	Public Task
How is data shared?	https://www.lbq.org/Privacy-and-Data-Protection

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 **Staff** • Name • Class **Pupil** • Name • Class
Why is it being processed?	To provide online access to a range of teaching and learning materials for staff and pupils.
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Green and Tempest secure servers
Is it secure and/or encrypted?	In line with the General Data Protection Regulation (GDPR) we understand our obligation to store securely the contact details of our customers; those being personal identifiers, mainly names, addresses, telephone numbers and email addresses. This data is kept securely and is only accessible by staff at Green and Tempest Ltd. All data is deleted from our systems immediately upon customer notification of termination of a subscription.
Who can access data?	Staff, Letter join staff for support
How long is data kept?	3 years after date closed
Who is data shared with?	Not shared
Legal basis for sharing	N/A
How is data shared?	N/A

References	Click to download Letter Join Privacy Policy

System used: Lexia	
Description	Students work independently to develop critical reading and language skills through individualized, motivating learning paths. All students, regardless of their skill level, can each work at their own pace and the teacher is notified (on web-based reports and via email) only when they require support.
Personal Data Items	**Staff** • Name • Job title • School • Address • Telephone number • e-mail address • IP address • Browser information • **School** • Name • Payment details • Usage data **Pupil** • Name • Age • Class • Group
Why is it being processed?	To provide access for staff and pupils to a comprehensive range of teaching resources
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis Toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Lexia secure servers
Is it secure and/or encrypted?	Lexia has appropriate measures in place to help ensure that our users’ Data is protected against unauthorized access or use, alteration, unlawful or accidental destruction and accidental loss. Although we make reasonable efforts to protect your Personal Information from loss, misuse, or alteration by third parties, you should be aware that there is always some risk involved in transmitting information over the Internet. There is also some risk that thieves could find a way to thwart our security

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

System used: 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** • Name • Organisation • Position • Address • Contact Details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9

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

System used: Medical Files - Paper	
Description	Information in respect of specific medical needs of an individual student
Personal Data Items	**Pupils** • 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** • Name • Organisation • Position • address • Contact details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	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
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?	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: Micro Librarian	
Description	Micro Librarian Systems (MLS) , supplier of Library Management Systems to Education in the UK and the worlds first to use biometric identification data
Personal Data Items	**Staff** • Name • School • email • Biometric data (if used) **Pupil** • Name • Age • Year • Biometric data (if used) **Parent** • Name • email
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	**Explicit Consent** Explicit consent to the Data Subject, unless dependence on consent is prohibited by EU or member state law.
Special Category Evidence for legal basis	Consent required from Parent/Carer, or pupil (dependent on age) if biometric data element is used.
How is the Special Category data shared?	Not shared
Legal basis for sharing Special Category data	N/A
Why is it being processed?	To provide online access to a range of library and literacy tools.
Legal Basis	**Public task**

	Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	Yes for biometric data if this element of the service is used.
Data Source	School
Where is data stored?	Micro library secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	School staff, ML for technical support.
How long is data kept?	3 years after date closed
Who is data shared with?	N/A
Legal basis for sharing	N/A
How is data shared?	N/A
References	Click to download Micro Librarian

System used: 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: Monster Phonics	
Description	Phonics is the foundation that all other education is built upon and having the right phonics programme in place can make all the difference to your schools' performance
Personal Data Items	**Teacher** • Name **Pupil** • Name
Why is it being processed?	https://monsterphonics.com/privacy-policy/
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 360
Where is data stored?	https://monsterphonics.com/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://monsterphonics.com/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://monsterphonics.com/privacy-policy/
Legal basis for sharing	Legal Obligation/Public Task
How is data shared?	https://monsterphonics.com/privacy-policy/

System used: Nereo (Matrix)	
Description	North East Regional Employers' Organisation is one of eleven regional bodies that support local authorities across England, Wales and Northern Ireland. NEREO's function is to support local authorities and partner organisations in the fields of Human Resources, Organisational Development and Employee Relations in all their complex and varied forms. NEREO is a small organisation with a big reputation. Our staff have over a hundred years experience of working in the public sector. Some have voluntary and private sector experience too. The Governance of NEREO is carried out by an Executive Committee made up of Elected Member representatives from each of the local authorities.
Personal Data Items	**All Staff** • Name • Date of birth
Why is it being processed?	https://www.nereo.gov.uk/privacy-notice/
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://www.nereo.gov.uk/privacy-notice/
Is it secure and/or encrypted?	secure
Who can access data?	https://www.nereo.gov.uk/privacy-notice/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.nereo.gov.uk/privacy-notice/
Legal basis for sharing	Public task/legal obligation
How is data shared?	https://www.nereo.gov.uk/privacy-notice/

System used: Nursery (Early Years) files	
Description	Early years registration information and funding informaiton 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
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?	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: Oak Acadamy	
Description	Oak National Academy provides free video lessons, slides and worksheets to support teachers and pupils to keep learning. Created by teachers in response to coronavirus, the resources are freely available, to complement schools' own teaching. Lessons cover a broad range of subjects, from reception to year 11. There are no sign-ups or logins required.
Personal Data Items	**Teacher** • Name **Pupil** • Name • Age
Why is it being processed?	https://privacy.thenational.academy/
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.thenational.academy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://privacy.thenational.academy/
How long is data kept?	3+ years
Who is data shared with?	https://privacy.thenational.academy/
Legal basis for sharing	Public Task/Legal Obligation
How is data shared?	https://privacy.thenational.academy/

System used: 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	**Staff** • 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	**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 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: Purple Mash	
Description	The all-in-one Edtech solution for your Primary School. Embed computing and digital skills across your whole curriculum with award-winning teaching and learning software for KS1 and KS2.
Personal Data Items	**Pupil** • Name • Year Group • School • Age **Staff** • Name • School
Why is it being processed?	To provide online access to a range of Edtech software.
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?	Purple Mash secure online system
Is it secure and/or encrypted?	Yes
Who can access data?	Staff, Pupils both in school and home
How long is data kept?	3 years after date closed
Who is data shared with?	School staff
Legal basis for sharing	Public task
How is data shared?	Via online purple mash servers

System used: Reading Plus	
Description	Personalized intervention and instruction to develop silent reading proficiency and confident, lifelong readers.
Personal Data Items	**Teacher** • Name **Child** • Name • Age
Why is it being processed?	https://www.readingplus.com/privacy-policy/
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://www.readingplus.com/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.readingplus.com/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.readingplus.com/privacy-policy/
Legal basis for sharing	Public task/Legal Obligation
How is data shared?	https://www.readingplus.com/privacy-policy/

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
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Electronically via secure 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** • 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
How is data shared?	Through the paper register at the time of completion. Electronically with office/Sims.

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 • Contact Details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment,

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

System used: School360	
Description	Learning platform for Northumberland schools with links to 3rd party educational resource providers.
Personal Data Items	**Pupil** • Name • School id • Class/Group • Year • UPN (Unique Pupil Number) • Gender • Attendance (If School360 used for registration) • Pupil concern reports • EYFS reflections **Staff** • Name • Staff Alternative e-mail address • Teacher pupil notes
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Electronically, 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: 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 • Address • Contact details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9

How is the Special Category data shared?	Secure 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
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data	Secure messenger

shared?	
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To support educational entitlement to meet statutory obligations
Legal Basis	**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: Senso Cloud	
Description	The Cloud Based Platform for Device Monitoring and Management. All-In-One Software for Network, Classroom, Safeguarding and Asset Management, and for managing and monitoring any Windows and Chrome device from a Centralised Web portal
Personal Data Items	**User** • Name • Marital status • Title • DOB • Gender • Address • Email Address • Telephone number
Why is it being processed?	For filtering and monitoring services across school devices, to carry out our obligations arising from the performance of the contract entered and to comply with a legal or regulatory obligation.
Legal Basis	**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” **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 toolkit
Is Consent Required?	No but consent can be withdrawn at any time
Data Source	School
Where is data stored?	Secure cloud server
Is it secure and/or encrypted?	Yes
Who can access data?	The authorised person(s) within school only - staff
How long is data kept?	3 years after date closed

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

System used: SIMS	
Description	SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools.
Personal Data Items	**Pupil** • Name • Date of birth • Address • Title • Gender • Class • Year • Parent/carer name • UPN • Dietary Requirements • Medical information • Attendance/exclusion • FSM • SEN • Assessment information • Child Protection Plan • School history • Looked After Information **Parent/Carer** • Name • Address • Phone number • email address • Gender • Title • DOB • Parental responsibility • Language • Occupation **Staff** • Name • Address • Phone number • email address • Title • Gender • DOB • NI Number • Ethnicity • Bank Account Information • Qualifications • Disability & Medical Information

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Social media sites e.g. Twitter, Facebook	
Description	Social Media tool used to inform parents about events in school and celebrate children's achievement.
Personal Data Items	**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: Spelling Shed	
Description	The Spelling Shed - proudly powered by EdShed - is a spelling platform designed by a team of teachers. It is built with students, teachers and parents in mind and aims to make spelling fun for students as well as simple for adults to manage.
Personal Data Items	**Child** • Name • Age • **Parent** • Name • Contact Details
Why is it being processed?	https://www.edshed.com/en-gb/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 toolkit
Is Consent Required?	Yes as part of registration process
Data Source	School
Where is data stored?	https://www.edshed.com/en-gb/privacy
Is it secure and/or encrypted?	Secure
Who can access data?	School, teachers and parents
How long is data kept?	3+ years
Who is data shared with?	https://www.edshed.com/en-gb/privacy
Legal basis for sharing	Public Task
How is data shared?	https://www.edshed.com/en-gb/privacy

System used: 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: Testbase	
Description	This is an online resource provided by Doublestruck which enables children to prepare for National SAT examinations. Doublestruck is an Educational Technology company that is part of the AQA family. It specialises in technology that addresses the needs of teachers in formative assessment and reporting.
Personal Data Items	**School** • Name • Contact Address • Contact Email • Contact Telephone Number • Billing Address **Staff** • Name **Pupil** • Name • UPN • Admission number • Gender • Year Group • Registration group • Class name • Teacher name • Ethnicity • Eligibilty for free school meals • Pupil premium indicator • SEN Status • In LEA care
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for	Article 9

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

System used: Touch Type Read Spell	
Description	multi-sensory course that teaches typing, reading and spelling
Personal Data Items	**User** • Name • Username
Why is it being processed?	Where we need to perform the contract we are about to enter into or have entered into with you. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Where we need to comply with a legal or regulatory obligation
Legal Basis	**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” **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 toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	databases stored on servers operated by Microsoft Azure located in the Netherlands in the EU.
Is it secure and/or encrypted?	Yes
Who can access data?	School, user
How long is data kept?	3 years after date closed
Who is data shared with?	We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased goods or services from us [or if you provided us

	with your details when you entered a competition or registered for a promotion] and, in each case, you have not opted out of receiving that marketing. We will get your express opt-in consent before we share your personal data with any company outside the TTRS group of companies for marketing purposes.
Legal basis for sharing	Legitimate interest
How is data shared?	Through communications, servers.

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: Wonde	
Description	Manages transfer of data from Sims MIS to School360.
Personal Data Items	**Staff** • Name **Pupil** • Name • School id • Class/group • Year • UPN • Gender • Attendance
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**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 Check	
Description	What is the Multiplication Tables Check. The Multiplication Tables Check (MTC) is a key stage 2 assessment to be taken by pupils at the end of year 4 (in June). From the 2019 / 2020 academic year onwards. The purpose of the MTC is to make sure the times tables knowledge is at the expected level.
Personal Data Items	**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