

Whitley Memorial C of E Primary School

GDPR Asset Register

Date: 22/11/2026

Data Protection Officer: Louise Gilmour

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Introduction

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

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

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

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

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

Systems included in this report

System Name	Description	Special Category
Accident book	Log of accidents / minor injuries in school	
Accident Report Form	ACC1 form for reporting accidents to NCC	
Assessment Records	Electronic and paper mark books	
Attendance file	Attendance information about pupils and classes	yes
Behaviour Files - Paper (in class)	Information relating to the behaviours of particular pupils	yes
CCTV	CCTV	
Charanga	Charanga Music School, the best-selling, modern resource for primary music — online, easy to use and great value. Includes A complete scheme to teach the national curriculum for music A vast library of songs, topics, instrument courses and creative apps In-depth support for assessment, SEND and personalised teaching and learning	
Child Protection Records - Electronic	Records relating to child protection issues for individual pupils	yes
Child Protection Records - Paper	Records relating to child protection issues for individual pupils	yes
Consent for educational visits	Consent information for all educational visits including day trips and residential visits	yes
Covid-19 Lateral Flow Testing	About 1 in 3 people with coronavirus do not have symptoms but can still pass it on to others. Regular testing of people without symptoms is important to help stop the virus spreading and protect your loved ones. As lockdown restrictions gradually ease we all need to play our part to help protect each other. The following people in England will have access to regular rapid lateral flow testing made available to them as schools reopen: secondary school pupils primary and secondary school staff households, childcare and support bubbles of primary and secondary-age pupils households, childcare and support bubbles of primary and secondary staff	yes
CPOMS	CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral welfare for schoolls. CPOMS is software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Working alongside a school’s existing safeguarding processes,	yes

	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.	
Dietary requirements information sheets	Required documents for specific chidlren with severe allergies / intolerances and religious observations (food)	yes
Education City	EducationCity offers a flexible range of teaching resources, linked to teaching, planning and assessment.	
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.	
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
Local Authority moderation of work	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.	
Looked After Children Records - Electronic	Information relating to children who are in Looked After Care	yes
Looked After Children Records - Paper	Information relating to children who are Looked After	yes
Medical Files - Electronic	Information in respect of specific medical needs of an individual student	yes
Medical Files - Paper	Information in respect of specific medical needs of an individual student	yes
National Centre for Excellence in the Teaching of Mathematics	NCETM provides professional development for staff in the teaching of Mathematics Children’s chances of	

(NCETM)	succeeding in education and life will be maximised if they develop deep and lasting procedural and conceptual mathematical understanding. The NCETM's teaching for mastery section explains the rationale for this teaching approach, and presents case studies from schools, together with interviews with teachers involved in mastery projects through the Maths Hubs programme.	
Nursery (Early Years) files	Early years registration information and funding informaiton for Early Years entitlement, hours taken each week	yes
Parent mail	Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events	
Personnel files	Information relating to staff employment	
Photographs and videos of staff and pupils.	Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms.	
Places Leisure- School Swimming Management System	The SSMS is a digital assessment tool, assessing pupils using Swim England School Swimming and Water Safety Charter. It is matched against the National Curriculum programmes of study and provides schools with termly reports. Reports evidence statistics to unlock Sports Premium funding for further swimming lessons. The product gives Places Leisure an important opportunity to gather national data to report on school swimming and influence national networks. Data gathered will strengthen potential to 'close the gap' for the 30% not yet meeting the standard. The system requires a school pupil data upload containing basic details for pupils swimming each term. Data is automatically uploaded to the Places Leisure School Swim App where school swim instructors assess pupils against Swim England's School Swimming Awards. Schools receive a termly update on pupil attainment for all pupils we have the data for.	yes
Reading Eggs	The multi-award winning early learning resource supports your child's learn to read journey with carefully designed online reading games and activities that are easy to follow, self-paced, and highly engaging for young children.	
Recruitment information	Part of the job application process	yes
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	yes

	links to 3rd party educational resource providers.	
Schoolcomms	Communication app for parents	
SchoolGrid	SchoolGrid provides kitchen management software to schools and caterers across the public sector.	
Seesaw	Seesaw - Student driven digital portfolios and simple parent communication.	
SEND electronic records	Records relating to Special Educational Needs and Disability for individual pupils	yes
Send Paper Records	Records relating to individual pupil's SEND history	yes
SIMS	SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools.	yes
Social media sites e.g. Twitter, Facebook	Social Media tool used to inform parents about events in school and celebrate children's achievement.	
Tapestry	An online journal recording all the learning and fun of children's early years education.	
Target Tracker	Pupil assessment and tracking software?.	yes
Thrive	Social and Emotional Screening Programme	yes
Times Tables Rock Stars	Online times tables practice and testing.	
Visitor book	Log of all visitors into school / fire regulations	
Wonde	Manages transfer of data from Sims MIS to School360.	yes
Tyne Photos	School photographer - takes class, family and individual pupil photos	

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: 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: Behaviour Files - Paper (in class)	
Description	Information relating to the behaviours of particular pupils
Personal Data Items	**Pupils** • Name • Date of Birth • Address • Health Needs • Educational Behavioural Needs • Social Care Status • **Parents/Carers** • Name • Address • Contact Details **Staff** • Name • Position **External Support Workers** • Name • Organisation • Position • Address • Contact Details
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?	Verbally & by Secure Messenger
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To ensure access to education appropriate to needs
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure cabinet
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Class Teacher and key workers as appropriate
How long is data kept?	3 years after date closed
Who is data shared with?	External support workers as applies
Legal basis for sharing	Public Task & Legal Obligation
How is data shared?	Verbal or secure messenger

System used: CCTV	
Description	CCTV
Personal Data Items	**Staff** • Images **Child** • Images **Visitor** • Images
Why is it being processed?	Safeguarding
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?	School servers and recordings
Is it secure and/or encrypted?	Yes
Who can access data?	School staff
How long is data kept?	See school's CCTV policy for their specific retention period - typically 30/40 days.
Who is data shared with?	Police in event of criminal investigations
Legal basis for sharing	ICO legal basis toolkit
How is data shared?	Hard Copy

System used: Charanga	
Description	Charanga Music School, the best-selling, modern resource for primary music — online, easy to use and great value. Includes A complete scheme to teach the national curriculum for music A vast library of songs, topics, instrument courses and creative apps In-depth support for assessment, SEND and personalised teaching and learning
Personal Data Items	**Staff** • 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: 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: Covid-19 Lateral Flow Testing	
Description	About 1 in 3 people with coronavirus do not have symptoms but can still pass it on to others. Regular testing of people without symptoms is important to help stop the virus spreading and protect your loved ones. As lockdown restrictions gradually ease we all need to play our part to help protect each other. The following people in England will have access to regular rapid lateral flow testing made available to them as schools reopen: secondary school pupils primary and secondary school staff households, childcare and support bubbles of primary and secondary-age pupils households, childcare and support bubbles of primary and secondary staff
Personal Data Items	**Child** • Name • Date of Birth • Postcode • Test Result **Parent** • Name • Email address • 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	**Public Interest / Public Health** Processing necessary for reasons of public interest in the area of public health such as protecting against serious cross-border threats to health or guaranteeing high standards of healthcare and of medical products or medical devices.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Electronically/verbally with PHE
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To support the national effort in the fight against Covid-19. Under

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

System used: CPOMS	
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: 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: Education City	
Description	EducationCity offers a flexible range of teaching resources, linked to teaching, planning and assessment.
Personal Data Items	**Staff** • Name • Email • School **Pupil** • Name • Gender • Age • Class
Why is it being processed?	To provide access for teachers and pupils to a range of online teaching and learning 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?	Education City secure servers in the U.K>
Is it secure and/or encrypted?	Yes
Who can access data?	School users with login, Education city for technical? support
How long is data kept?	3 years after date closed
Who is data shared with?	Shared with school
Legal basis for sharing	Public task
How is data shared?	Secure online server
References	Click to download Education City

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: 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: Local Authority moderation of work	
Description	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.
Personal Data Items	**School** • Name **Staff** • Initials **Pupil** • Initials • Gender • Unique pupil number (UPN)
Why is it being processed?	As part of the statutory? requires for assessment and moderation in schools
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	At County Hall in secure Filing systems and online, encrypted
Is it secure and/or encrypted?	Yes
Who can access data?	Local Authority school data team and assessment/moderation team.
How long is data kept?	3 years after date closed
Who is data shared with?	Other NCC staff
Legal basis for sharing	Public task and legal obligation
How is data shared?	Secure server and hard copies

System used: Looked After Children Records - Electronic	
Description	Information relating to children who are in Looked After Care
Personal Data Items	**Pupil** • Name • Date of Birth • Address • Personal Education Plan • Health Needs • Social Care Needs • Educational Needs • Family Background **Parents & Carers** • Name • Contact Details • Address • **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 shared?	Verbally or secure cloud sharing (Google or Office 365 etc)
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To support the education of children who are Looked After
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	School computer, laptop
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Class Teacher, Designated Key Worker
How long is data kept?	3 years after date closed
Who is data shared with?	Social Workers, Local Authority, Carers, Receiving school
Legal basis for sharing	Legal Obligation, Public Task
How is data shared?	via secure electronic means, Google or Office 365

System used: Looked After Children Records - Paper	
Description	Information relating to children who are Looked After
Personal Data Items	**Pupils** • Name • Date of Birth • Address • Personal Education Plan • Health Needs • Social Care Needs • Educational Needs • Family Background • **Parents & Carers** • Name • Contact Details • Address • **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. **Significant Public Interest**

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

System used: Medical Files - Electronic	
Description	Information in respect of specific medical needs of an individual student
Personal Data Items	**Pupils** • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Medical History • Medication Details **Parents/Carers** • Name • Address • Contact Details **Staff** • Name • Position **External Support Workers** • 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: National Centre for Excellence in the Teaching of Mathematics (NCETM)	
Description	NCETM provides professional development for staff in the teaching of Mathematics Children's chances of succeeding in education and life will be maximised if they develop deep and lasting procedural and conceptual mathematical understanding. The NCETM's teaching for mastery section explains the rationale for this teaching approach, and presents case studies from schools, together with interviews with teachers involved in mastery projects through the Maths Hubs programme.
Personal Data Items	**Staff** • Name • email address • School
Why is it being processed?	To provide access to the wide range of resources available online.
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?	Tribal secure servers
Is it secure and/or encrypted?	Yes.
Who can access data?	Staff, Tribal staff for support.
How long is data kept?	3 years after date closed
Who is data shared with?	Tribal and school staff.
Legal basis for sharing	Public task
How is data shared?	With user details removed.
References	Click to download National Centre for Excellence in the Teaching of Mathematics

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

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

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

System used: Places Leisure- School Swimming Management System	
Description	The SSMS is a digital assessment tool, assessing pupils using Swim England School Swimming and Water Safety Charter. It is matched against the National Curriculum programmes of study and provides schools with termly reports. Reports evidence statistics to unlock Sports Premium funding for further swimming lessons. The product gives Places Leisure an important opportunity to gather national data to report on school swimming and influence national networks. Data gathered will strengthen potential to 'close the gap' for the 30% not yet meeting the standard. The system requires a school pupil data upload containing basic details for pupils swimming each term. Data is automatically uploaded to the Places Leisure School Swim App where school swim instructors assess pupils against Swim England's School Swimming Awards. Schools receive a termly update on pupil attainment for all pupils we have the data for.
Personal Data Items	**Child** • Name • UPN • Year Group • DOB • Gender • SEN information • Medical Needs • EAL • Pupil Premium
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 Evidence for legal basis	Article 9
How is the Special Category data shared?	Inputted directly into the system by the school- Microsoft Azure
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To capture the progress of children in swimming
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: "processing

	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?	Microsoft Dataverse
Is it secure and/or encrypted?	Yes
Who can access data?	Swim Instructors, Swim Coordinators, Managers, School
How long is data kept?	3 years after date closed
Who is data shared with?	N/A
Legal basis for sharing	Public Task & Legitimate Interest
How is data shared?	Microsoft Dataverse

System used: Reading Eggs	
Description	The multi-award winning early learning resource supports your child's learn to read journey with carefully designed online reading games and activities that are easy to follow, self-paced, and highly engaging for young children.
Personal Data Items	**Staff** • Name • School • Email **Pupil** • Name • Age • Class
Why is it being processed?	
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?	Reading Eggs secure servers
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?	School staff
Legal basis for sharing	Public task
How is data shared?	Reading eggs secure servers

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: 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: Schoolcomms	
Description	Communication app for parents
Personal Data Items	**Pupil** • Name • Attendance data **Parent** • Name • Address • e-mail address • Mobile number
Why is it being processed?	To allow regular communication between the school and parent, plus attendance data and payment information if the school chooses these modules.
Legal Basis	**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, app conditions of use, app privacy notice
Is Consent Required?	Yes
Data Source	SIMS
Where is data stored?	'Schoolcomms do not transfer data to countries outside of the EEA. The cloud providers that we work with guarantee data is only processed in the EEA, or that they explicitly abide by the regulation.'
Is it secure and/or encrypted?	'Security of data is essential. Schoolcomms uses best of class protection measures and carry out regular external audits to assess our security posture.'
Who can access data?	Schoolcomm staff - 'our own staff may see information in the course of providing technical support to the school but this will not be shared with anyone without permission of the Data Controller.'
How long is data kept?	3 years after date closed
Who is data shared with?	'We may pass your own details to another organisation to supply/deliver products or services you have purchased and/or to provide after-sales service. We share data with our Payments Processing Service Providers when you make a purchase using our Payments module. This information will be used to authenticate you as a cardholder when making credit or debit card transactions. This data includes name, mobile phone number,

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

System used: SchoolGrid	
Description	SchoolGrid provides kitchen management software to schools and caterers across the public sector.
Personal Data Items	**Pupil/parent/guardian account** • Name • DOB • Gender • Email • Telephone Number
Why is it being processed?	? Allowing parents and guardians to control their child's school meal service ? Providing (often critical) nutrition and allergy information to parents and guardians ? Contacting parents and guardians, possibly in case of emergency ? Providing parents and guardians with cashless payment options ? Providing parents and guardians with a means to submit feedback regarding the school meals service
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." **Vital Interest** Article 6(1)(d) provides a lawful basis for processing where: "processing is necessary in order to protect the vital interests of the data subject or of another natural person".
Evidence for legal basis	ICO toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure server in UK
Is it secure and/or encrypted?	Yes

Who can access data?	School, pupil/parent/guardian account
How long is data kept?	6 years after date closed
Who is data shared with?	1. In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority. 2. We may sometimes contract with third parties to supply services to you on Our behalf, such as card payment processing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law. 3. We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We do this to ensure that our site performs well and to identify any software issues. 4. We may from time to time share such data as described above with third parties such as prospective investors, school caterers (where they are contracted to provide food services at your child's school, and partners. Data will only be shared and used within the bounds of the law.
Legal basis for sharing	As above
How is data shared?	As above

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

System used: SEND electronic records	
Description	Records relating to Special Educational Needs and Disability for individual pupils
Personal Data Items	**Pupils** • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • SEND History **Parents / Carers** • Name • Address • Contact details **Staff** • Name • Position **External Support Workers** • Name • Organisation • Position • 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: 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: 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: Target Tracker	
Description	Pupil assessment and tracking software?.
Personal Data Items	**Staff** • Name • Email address **Pupils** • Name • Date of birth • Age • Classes • Ethnicity • SEN data • Pupil premium eligibility • Performance data • Attendance data
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 internally with staff.
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To help track progress and set targets for pupils.
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?	Target Tracker servers
Is it secure and/or encrypted?	Yes
Who can access data?	School staff
How long is data kept?	3+ years
Who is data shared with?	School Staff
Legal basis for sharing	Public task & legal obligation
How is data shared?	Target tracker servers
References	Click to download Target Tracker Privacy Notice

System used: Thrive	
Description	Social and Emotional Screening Programme
Personal Data Items	**Pupil** • Name • DOB • Class • Year Group • UPN • Assessment information • LAC **Staff** • Name • Class
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?	Online secure server
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Social & emotional development tracking
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?	Thrive secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	Thrive employees for support, school staff
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?	Online secure server

System used: Times Tables Rock Stars	
Description	Online times tables practice and testing.
Personal Data Items	**Staff** • Name • Email address • School name • School address **Pupil** • Name • Year group • Maths group
Why is it being processed?	To provide access to online learning tool.
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?	Maths circle EU servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff
How long is data kept?	3 years after date closed
Who is data shared with?	Staff
Legal basis for sharing	Public task
How is data shared?	Online secure servers
References	Click to download Times Tables Rock Stars Click to download Times Tables Rock Stars GDPR

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: Tyne Photos	
Description	School photographer - takes class, family and individual pupil photos
Personal Data Items	**class** • Name
Why is it being processed?	To return photograph to parents for purchase
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	
Is Consent Required?	Yes
Data Source	Parent
Where is data stored?	Tyne photos
Is it secure and/or encrypted?	Yes
Who can access data?	Tyne photos
How long is data kept?	1+ year
Who is data shared with?	N/A
Legal basis for sharing	
How is data shared?	