



# **Grange View C of E Vol Controlled First School**

## **GDPR Asset Register**

**Date: 23/03/2019**

Data Protection Officer: Paula Brown

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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
Child Protection Records - Electronic	Records relating to child protection issues for individual pupils	yes
Child Protection Records - Paper	Records relating to child protection issues for individual pupils	yes
Class Dojo	Class Dojo is a classroom management and behaviour rewards system which includes a digital portfolio for pupils which can be accessed by staff, pupils and parents?/carers.	
CPOMS	CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral welfare for schools. CPOMS is software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Working alongside a school's existing safeguarding processes, CPOMS is an intuitive system to help with the management and recording of child protection, behavioural issues, bullying, special educational needs, domestic issues and much much more. Using CPOMS, schools can ensure that students are safe and fully supported, whilst school staff can focus on teaching and providing support, instead of administration.	yes
Data tracking spreadsheets	Spreadhseets (excel) to track progress of children over the course of their school career.	yes
Education City	EducationCity offers a flexible range of teaching resources, linked to teaching, planning and assessment.	
EVOLVE visits	An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities.	
Governance	Details of all members of the Governing Body	
Health & Safety	Records pertaining to Health & Safety	
Interactive Resources	Pupil / teacher online learning resources for Numeracy.	

Just2easy	Suite of online tools for Desk Top Publishing, Blogging, Infant toolkit and Tables, spelling an arithmetic SATs testers.	
Lightspeed Internet Filtering	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.	
Local Authority moderation of work	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.	
Mathletics _ online numeracy activities	Mathletics is a captivating online learning space providing students with all the tools they need to be successful learners, both in the classroom and beyond. Powerful courses aligned to the various National Curricula of the UK & Ireland, from Foundation Stage to Key Stage 5, matched with dynamic tools and reporting for teachers. Mathletics supports and caters to each teacher's unique blend of student-driven learning and teacher-led instruction.	
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)	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.	
Personnel files	Information relating to staff employment	
Phonics play	Interactive phonics games, phonics planning, assessment ideas and many teaching ideas and resources to help children to learn	
Photographs and videos of staff and pupils.	Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms.	
Registers	Daily register, after school club registers, lunch register	
School360	Learning platform for Northumberland schools with links to 3rd party educational resource providers.	yes
Schoolcomms	Communication app for parents	
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.	
Teachers2Parent	Parent/Staff/Other Text Messaging System	
Thrive	Social and Emotional Screening Programme	yes
Times Tables Rock Stars	Online times tables practice and testing.	
Wonde	Manages transfer of data from Sims MIS to School360.	yes

System used: Accident book

<b>Description</b>	Log of accidents / minor injuries in school
<b>Personal Data Items</b>	<b>Pupil</b> <ul style="list-style-type: none"><li>• Name</li><li>• class</li><li>• Injury</li><li>• first aid</li><li>•</li></ul>
<b>Why is it being processed?</b>	To record injuries in school
<b>Legal Basis</b>	<b>Legal Obligation</b> Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	File in office
<b>Is it secure and/or encrypted?</b>	No
<b>Who can access data?</b>	School staff
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Parents
<b>Legal basis for sharing</b>	Legal obligation
<b>How is data shared?</b>	Verbally

<b>Description</b>	ACC1 form for reporting accidents to NCC
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Gender</li> <li>• Address</li> <li>• Telephone number</li> <li>• Date and time of accident</li> <li>• nature of injury</li> <li>• Place of accident</li> <li>• First aid</li> <li>• Circumstances</li> <li>• Action taken</li> <li>• Witness information</li> <li>•</li> </ul> <p><b>Staff member</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Occupation</li> <li>• DOB</li> <li>• Gender</li> <li>• Address</li> <li>• Telephone number</li> <li>• Date and time of injury</li> <li>• nature of injury</li> <li>• place of accident</li> <li>• First aid</li> <li>• Circumstances</li> <li>• Action taken</li> <li>• Witness information</li> <li>•</li> </ul>
<b>Why is it being processed?</b>	Statutory obligations to comply with Health and Safety regulations.
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School

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



System used: Assessment Records

<b>Description</b>	Electronic and paper mark books
<b>Personal Data Items</b>	<p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Disadvantaged cohort</li> <li>• SEND Code</li> <li>• Key Stage 2 Assessment data</li> <li>• Internal Assessment Data</li> </ul>
<b>Why is it being processed?</b>	To track student achievement and report to parents
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO lawful basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	On-site Secure Network Google Drive On paper- Class Context Files
<b>Is it secure and/or encrypted?</b>	On-site Network- This solution has user authentication and access controls which determine the level of access to data that a user requires. The solution also utilises the Schools' Information Security policy which includes password, physical and network security controls. Google Drive- authentication and access controls which determine the level of access to data that a user requires. G-Suite complies with the Schools' Information Security policy which includes password security controls. Class Context Files- teachers follow privacy culture procedures
<b>Who can access data?</b>	Staff
<b>How long is data kept?</b>	3+ years
<b>Who is data shared with?</b>	Parents
<b>Legal basis for sharing</b>	Legal obligation, Public task
<b>How is data shared?</b>	Parents evenings, reports

System used: Attendance file

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

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

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

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

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- Criminal Records information - protected in Article 10

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

System used: Class Dojo

<b>Description</b>	Class Dojo is a classroom management and behaviour rewards system which includes a digital portfolio for pupils which can be accessed by staff, pupils and parents?/carers.
<b>Personal Data Items</b>	<b>Staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• Phone number</li><li>• email</li><li>• Password</li><li>• Device id</li><li>• Gender</li><li>• School</li><li>• School address</li><li>• Geo Location</li><li>• Photos, Videos, Docs and audio</li><li>• IP address</li></ul> <b>Pupil</b> <ul style="list-style-type: none"><li>• Name</li><li>• Password</li><li>• Age</li><li>• School</li><li>• IP Address</li></ul> <b>Parent/carer</b> <ul style="list-style-type: none"><li>• Name</li><li>• Phone number</li><li>• Email address</li><li>• Password</li><li>• Device id</li><li>• Gender</li><li>• School</li><li>• Geo location</li><li>• IP Address</li></ul>
<b>Why is it being processed?</b>	To provide access to the online curriculum and classroom management? tools
<b>Legal Basis</b>	<b>Public task</b> Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Secure Class Dojo servers



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

System used: CPOMS

**Description**

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

**Personal Data Items**

**Pupil**

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

**Main contact**

- Name
- Telephone Number

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**Special Category Data Legal Basis**

**Obligation**

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

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

System used: Data tracking spreadsheets

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

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<b>Special Category Data Legal Basis</b>	<p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	Secure google drive and paper copies
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	Processing this data is necessary for the completion of a public task and for the school to meet statutory requirements
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School

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

System used: Education City

<b>Description</b>	EducationCity offers a flexible range of teaching resources, linked to teaching, planning and assessment.
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email</li> <li>• School</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Age</li> <li>• Class</li> </ul>
<b>Why is it being processed?</b>	To provide access for teachers and pupils to a range of online teaching and learning tools.
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Education City secure servers in the U.K>
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	School users with login, Education city for technical? support
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Shared with school
<b>Legal basis for sharing</b>	Public task
<b>How is data shared?</b>	Secure online server
<b>References</b>	<a href="#">Click to download Education City</a>

System used: EVOLVE visits

<b>Description</b>	An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities.
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• e-mail address</li> <li>• IP address</li> <li>• Location data</li> <li>• Qualifications</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• UPN</li> </ul>
<b>Why is it being processed?</b>	To reduce paperwork, simplify procedures, produce self-review and inspection preparation data, and improve staff confidence in that they automatically follow both employer, and National Guidelines.
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	Yes
<b>Data Source</b>	SIMS
<b>Where is data stored?</b>	'We store all of the Customer Data (including your personal data) on servers which are located in the United Kingdom. These servers are protected by passwords and firewalls.'
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Evolve staff
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	'The only time that any information will be shared by us outside of our services is where our Customer has asked us to configure the service so that it shares certain data with specified third party programs including calendars.'
<b>Legal basis for sharing</b>	Public task & legal obligation
<b>How is data shared?</b>	See contract/agreement

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



System used: Governance

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

System used: Health & Safety

<b>Description</b>	Records pertaining to Health & Safety
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact details</li> <li>• D.o.B</li> <li>• Record of Accident/Incident</li> </ul> <p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact details</li> <li>• D.o.B</li> <li>• Record of Accident/Incident</li> </ul> <p><b>Visitor</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact details</li> <li>• D.o.B</li> <li>• Record of Accident/Incident</li> </ul>
<b>Why is it being processed?</b>	To ensure Health and Safety Regulations are followed
<b>Legal Basis</b>	<b>Legal Obligation</b>  Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	School network Paper copies- secure private office
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	School staff
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	NCC, school staff and parents
<b>Legal basis for sharing</b>	Public task and legal obligation.
<b>How is data shared?</b>	Electronically via a secure server.

System used: Interactive Resources

<b>Description</b>	Pupil / teacher online learning resources for Numeracy.
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class / Year group</li> <li>• School</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class / Year group</li> <li>• School</li> </ul>
<b>Why is it being processed?</b>	Necessary to provide access to learning resources through School360
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit.
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School 360
<b>Where is data stored?</b>	Interactive Resources secure servers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Individual users can access their own accounts. Interactive Resources staff to enable support.
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	N/A
<b>Legal basis for sharing</b>	N/A
<b>How is data shared?</b>	N/A
<b>References</b>	<a href="#">Click to download Interactive Resources Privacy Notices</a>

System used: Just2easy

<b>Description</b>	Suite of online tools for Desk Top Publishing, Blogging, Infant toolkit and Tables, spelling an arithmetic SATs testers.
<b>Personal Data Items</b>	<b>Child</b> <ul style="list-style-type: none"><li>• Name</li><li>• Gender</li><li>• Class / Year group</li><li>• School</li></ul> <b>Staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• Class / Year group</li><li>• School</li></ul>
<b>Why is it being processed?</b>	To provide access for staff and pupils to a variety of learning resources through School360
<b>Legal Basis</b>	<b>Public task</b> Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
<b>Evidence for legal basis</b>	ICO legal basis tool
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School 360
<b>Where is data stored?</b>	J2e secure servers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	J2e and school360 staff to manage accounts
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	N/A
<b>Legal basis for sharing</b>	N/A
<b>How is data shared?</b>	N/A
<b>References</b>	<a href="#">Click to download Just2easy Privacy &amp; Data Policy</a>

System used: Lightspeed Internet Filtering

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



System used: Local Authority moderation of work

<b>Description</b>	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.
<b>Personal Data Items</b>	<p><b>School</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Initials</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Initials</li> <li>• Gender</li> <li>• Unique pupil number (UPN)</li> </ul>
<b>Why is it being processed?</b>	As part of the statutory? requires for assessment and moderation in schools
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO Legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	At County Hall in secure Filing systems and online, encrypted
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Local Authority school data team and assessment/moderation team.
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Other NCC staff
<b>Legal basis for sharing</b>	Public task and legal obligation
<b>How is data shared?</b>	Secure server and hard copies

System used: Mathletics \_ online numeracy activities

<b>Description</b>	Mathletics is a captivating online learning space providing students with all the tools they need to be successful learners, both in the classroom and beyond. Powerful courses aligned to the various National Curricula of the UK & Ireland, from Foundation Stage to Key Stage 5, matched with dynamic tools and reporting for teachers. Mathletics supports and caters to each teacher's unique blend of student-driven learning and teacher-led instruction.
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School</li> <li>• Year group</li> <li>• Test results</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School</li> </ul>
<b>Why is it being processed?</b>	To Provide secure individual access to the online learning materials
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	SIMS
<b>Where is data stored?</b>	3P - providers of Mathletics secure servers.
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	School Staff, individual pupils their own data, 3P staff for support.
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	School staff
<b>Legal basis for sharing</b>	Public task
<b>How is data shared?</b>	Secure online servers.
<b>References</b>	<a href="#">Click to download Privacy Policy for Mathletics</a>



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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

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

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

System used: Personnel files

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

System used: Phonics play

<b>Description</b>	Interactive phonics games, phonics planning, assessment ideas and many teaching ideas and resources to help children to learn
<b>Personal Data Items</b>	<b>School</b> <ul style="list-style-type: none"><li>• Name</li></ul> <b>Pupil</b> <ul style="list-style-type: none"><li>• Name</li></ul> <b>Staff</b> <ul style="list-style-type: none"><li>• Name</li></ul>
<b>Why is it being processed?</b>	To provide access to online learning resources for pupils and staff.
<b>Legal Basis</b>	<b>Public task</b> Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Phonics play servers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Staff, Phonics Play for support
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Staff
<b>Legal basis for sharing</b>	Public task
<b>How is data shared?</b>	Online secure server
<b>References</b>	<a href="#">Click to download Phonics Play Privacy Policy</a>

System used: Photographs and videos of staff and pupils.

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

System used: Registers

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

System used: School360

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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



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

System used: Schoolcomms

<b>Description</b>	Communication app for parents
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Attendance data</li> </ul> <p><b>Parent</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• e-mail address</li> <li>• Mobile number</li> </ul>
<b>Why is it being processed?</b>	To allow regular communication between the school and parent, plus attendance data and payment information if the school chooses these modules.
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis tool, app conditions of use, app privacy notice
<b>Is Consent Required?</b>	Yes
<b>Data Source</b>	SIMS
<b>Where is data stored?</b>	'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.'
<b>Is it secure and/or encrypted?</b>	'Security of data is essential. Schoolcomms uses best of class protection measures and carry out regular external audits to assess our security posture.'
<b>Who can access data?</b>	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.'
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	'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.'
<b>Legal basis for sharing</b>	Public task and legal obligation
<b>How is data shared?</b>	'If you apply for a Merchant Account through Schoolcomms, we can set up your payments gateway on your behalf'
<b>References</b>	<a href="#">Click to download Schoolcomms Privacy Notice</a>

System used: SEND electronic records

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Send Paper Records

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

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

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

shared?	
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	To support educational entitlement to meet statutory obligations
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Legitimate Interest</b></p> <p>Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”</p>
<b>Evidence for legal basis</b>	ICO Legal Basis Toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Secure Cabinet
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Headteacher, Key Worker, Class Teacher, SENDCO and Office Staff
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Case workers, Parents, local Authority and Receiving Schools
<b>Legal basis for sharing</b>	Public task and legal obligation
<b>How is data shared?</b>	Secure Messenger

System used: SIMS

**Description**

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

**Personal Data Items**

**Pupil**

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

**Parent/Carer**

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

**Staff**

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



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

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

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

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

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

<b>Description</b>	Social Media tool used to inform parents about events in school and celebrate children's achievement.
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Photos (unnamed)</li> <li>• Videos (unnamed)</li> <li>• School name</li> <li>• Classes</li> </ul>
<b>Why is it being processed?</b>	Unnamed photos of pupils and their work are used on the site
<b>Legal Basis</b>	<p><b>Consent</b></p> <p>Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	Yes
<b>Data Source</b>	School
<b>Where is data stored?</b>	Twitter or Facebook servers and in school
<b>Is it secure and/or encrypted?</b>	Twitter account is password protected. Only parents who have been approved by the school can access or follow the school twitter account
<b>Who can access data?</b>	Parents of children in school who have requested to follow the school on twitter and who have been approved by the admin team.
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Information shared with parents
<b>Legal basis for sharing</b>	Consent
<b>How is data shared?</b>	Online via secure servers

System used: Tapestry

<b>Description</b>	An online journal recording all the learning and fun of children's early years education.
<b>Personal Data Items</b>	<p><b>School</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Email address and name of person who pays for service in school</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Notes on progress</li> <li>• Photographs</li> <li>• Videos</li> <li>• Address</li> </ul> <p><b>Parent</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• email address</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> </ul>
<b>Why is it being processed?</b>	To provide access to an online early years journal which records pupil activity and progress throughout the year.
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	Yes for parent access element
<b>Data Source</b>	School
<b>Where is data stored?</b>	Tapestry? secure servers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Staff, parents (own child), other settings if child moves school and new school if it uses Tapestry.
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	The child's? new school if it uses Tapestry.
<b>Legal basis for sharing</b>	Public task
<b>How is data shared?</b>	Electronically over secure link.

**References**

[Click to download Tapestry Privacy Policy](#)

<b>Description</b>	Parent/Staff/Other Text Messaging System
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Telephone number</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Registration group</li> <li>• Year group</li> </ul> <p><b>Parent/Carer</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Primary telephone number</li> <li>• Secondary telephone number</li> </ul> <p><b>Taxi driver</b></p> <ul style="list-style-type: none"> <li>• Taxi drivers name</li> <li>• Taxi drivers telephone number</li> </ul> <p><b>Taxi escort</b></p> <ul style="list-style-type: none"> <li>• taxi escort name</li> <li>• Taxi escort telephone number</li> </ul>
<b>Why is it being processed?</b>	To provide access to Communication tool for contact between school and parent/carers/staff/other
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	Parent
<b>Where is data stored?</b>	T2P secure servers
<b>Is it secure and/or encrypted?</b>	This site has security measures in place to protect the loss, misuse, and alteration of the information under our control. All instances of unauthorised attempted access to our site are logged and investigated.

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

System used: Thrive

<b>Description</b>	Social and Emotional Screening Programme
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Class</li> <li>• Year Group</li> <li>• UPN</li> <li>• Assessment information</li> <li>• LAC</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class</li> </ul>

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

<b>Special Category Data Legal Basis</b>	<b>Obligation</b> Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	Online secure server
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	Social & emotional development tracking
<b>Legal Basis</b>	<b>Public task</b> Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
<b>Evidence for legal basis</b>	ICO Legal basis tool
<b>Is Consent Required?</b>	No



<b>Data Source</b>	School
<b>Where is data stored?</b>	Thrive secure servers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Thrive employees for support, school staff
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	School staff
<b>Legal basis for sharing</b>	Public task
<b>How is data shared?</b>	Online secure server

System used: Times Tables Rock Stars

<b>Description</b>	Online times tables practice and testing.
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• School name</li> <li>• School address</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Year group</li> <li>• Maths group</li> </ul>
<b>Why is it being processed?</b>	To provide access to online learning tool.
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Maths circle EU servers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Staff
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Staff
<b>Legal basis for sharing</b>	Public task
<b>How is data shared?</b>	Online secure servers
<b>References</b>	<p><a href="#">Click to download Times Tables Rock Stars</a></p> <p><a href="#">Click to download Times Tables Rock Stars GDPR</a></p>

System used: Wonde

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

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

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

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