



**Mickley First School**

**GDPR Asset Register**

**Date: 09/05/2025**

Data Protection Officer: Helen Pye

## Introduction

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

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

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

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

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

## Systems included in this report

| System Name                           | Description  | Special Category |
|---------------------------------------|--|------------------|
| Accident book                         | Log of accidents / minor injuries in school  |                  |
| Accident Report Form                  | ACC1 form for reporting accidents to NCC   |                  |
| Assessment Records                    | Electronic and paper mark books  |                  |
| Attendance file                       | Attendance information about pupils and classes  | yes              |
| BBC Bitesize                          | BBC Bitesize is a free online study support resource designed to help with learning, revision and homework! Bitesize provides support for learners aged 5 to 16+ across a wide range of school subjects. It also supports children and young people's wellbeing and career choices. Bitesize also has hundreds of published lessons to help students across the UK with home schooling. Bitesize guides are written by teachers and subject experts and are mapped to follow the curricula of the UK. Secondary Bitesize follows exam board specifications for the main exam boards in the UK, including for GCSE in England, Wales and Northern Ireland and National 4, National 5 & Highers in Scotland, ensuring students are preparing for the right exams |                  |
| Book Creator                          | Allows pupils to write books and store them in an online library   |                  |
| Bromcom                               | To provide the best MIS and finance solution for all schools to help improve student outcomes. Bromcom have over 10 years of experience of delivering using the Cloud, we are the most experienced MIS provider. We are constantly developing our system to reduce bolt ons. We present our software via up to date browser technology and an intuitive user friendly interface making everyday tasks simple to find and execute.  | yes              |
| Canva                                 | Canva is an online design and publishing tool  |                  |
| Charanga                              | Charanga Music School, the best-selling, modern resource for primary music — online, easy to use and great value. Includes A complete scheme to teach the national curriculum for music A vast library of songs, topics, instrument courses and creative apps In-depth support for assessment, SEND and personalised teaching and learning   |                  |
| Child Protection Records - Electronic | Records relating to child protection issues for individual pupils  | yes              |
| Child Protection Records -            | Records relating to child protection issues for  | yes              |

|                                 |   |     |
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| Paper                           | individual pupils   |     |
| 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 |
| Debbie Judd HR                  | Our aim is to provide outstanding HR advice and support to schools and academies, which will then able schools and academies to focus on providing high standards of education to their pupils and students. We are a based in the North East of England and we offer HR advice and support to education establishments local to us and remotely to those further field. Whatever the size of your organisation, we can offer flexible HR advice and support through our different packages. We are well aware of budget restraints across the education and other sectors and will always endeavour to keep our costs low and ensure that we provide value for money, supporting clients to manage their budgets efficiently. In our experience, we have found that the vast majority of HR issues can be resolved informally when dealt with appropriately at the earliest opportunity and strive to work with our clients on this basis. Our aim is to support you through initial concerns, providing professional, appropriate, proactive support in order to avoid a lengthy, costly HR process. We pride ourselves on our caring, knowledgeable and professional approach and will deliver legislative and practical HR support, at the highest standard, whilst adopting a common sense approach. |     |
| DFE-Census and workforce Census | The school workforce census is a statutory data collection that takes place each autumn. You must complete statutory censuses by law unless there's a good reason not to. The census collects data on all teaching and support staff in regular employment,   |     |

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|   | including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data. |     |
| Dietary requirements information sheets | Required documents for specific children with severe allergies / intolerances and religious observations (food)  | yes |
| Ed Shed                                 | EdShed, or Education Shed Ltd. as our accountant calls us, is the umbrella for several educational products and brands. These include The Literacy Shed, Literacy Shed Plus, Spelling Shed and MathShed. We are a company run by teachers for teachers and we try to maintain particular values within all of our products: The best quality product we can create Making the most educational impact possible Transparent and affordable pricing The least hassle for teachers and schools  |     |
| Education Mutual                        | Staff absence protection for schools   |     |
| EVOLVE visits                           | An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities.   |     |
| GL-Assessment                           | GL assessments provide a range of tests for schools including reading, progress and cognitive tests  |     |
| Google Classroom                        | A free and easy tool helping educators efficiently manage and assess progress, while enhancing connections with learners from school, from home, or on the go.   |     |
| Google drive for education              | suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.  |     |
| Google Meet                             | Google Meet is a video-communication service developed by Google. It is one of two apps that constitute the replacement for Google Hangouts, the other being Google Chat   |     |
| Governance                              | Details of all members of the Governing Body   |     |
| Hamilton Trust                          | Hamilton Trust is a UK charity working to support inspirational teaching and learning through its website and projects. Mike O'Regan founded Hamilton in 1988 to support the education of children in the Blackbird Leys, Rose Hill and Barton estates in Oxford - children whose educational potential had long been  |     |

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|                 | <p>underestimated. Hamilton aims to enable children from areas of socio-economic disadvantage to create for themselves the life opportunities they deserve through high-quality education and high expectations. Hamilton continues to work closely with primary schools in Oxford and to derive enormous amounts of inspiration for improving educational opportunities from doing so. Professor Ruth Merttens joined Hamilton in 1996 as Co-director. With Mike, she set up and directed the Hamilton Maths and Reading Projects to boost those subjects in Oxford schools located in areas of significant deprivation. As word leaked out about Hamilton's planning materials, demand for them spread, and Hamilton started providing them to teachers in other schools. These formed the basis of Hamilton's original 'Save teachers' Sundays!' website, which enabled a much wider audience to access these plans. Hamilton's website continues to provide high quality, fully adaptable planning and resources to primary school teachers to help them teach robust and engaging lessons. Hamilton also supports and runs various education projects that provide support to its local community and across the country.</p> |  |
| Health & Safety | Records pertaining to Health & Safety  |  |
| Huggg           | Purchase and send supermarket vouchers to those in need. Manage funds and give recipients choice all in one simple to use platform.  |  |
| Language Angels | <p>Language Angels award-winning language teaching resources are designed so every primary school teacher - irrespective of their linguistic ability - can teach the foreign language of their choice. Our experienced team of foreign language teaching specialists have spent thousands of hours over a number of years creating, testing and refining our lessons and resources to bring them to where they are now. We won't rest on our laurels though. We continue to work, adding innovative and exciting new units and resources all the time. By providing a multitude of teaching units (each designed to run for 6 weeks) there are more than enough resources to enable you to teach the language of your choice throughout the whole of your primary school.</p>  |  |
| Letter join     | <p>Letter-join is the teacher's companion for teaching cursive handwriting combining interactive animations and worksheets for real handwriting practice. Letter-join includes animations of all the letters of the alphabet with a spoken commentary on how to write each letter. Patterns, Letters and Words can all be watched and traced on-screen. Magic Words lets you trace over your own words on a number of exciting backgrounds and Custom Words lets you input your</p>  |  |

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|   | own words, replay the video and trace over the words for IWB practice.  |     |
| Lightspeed Internet Filtering   | The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.   |     |
| Little Wandle   | Phonics programme. Little Wandle Letters and Sounds Revised has been developed by Wandle and Little Sutton English Hubs and taken forward by Little Sutton Primary School and Wandle Learning Trust in partnership with other phonics and early reading experts.  |     |
| Looked After Children Records - Paper                                 | Information relating to children who are Looked After   | yes |
| Loom  | Show it, say it, send it Record video messages of your screen, cam, or both. Faster than typing an email or meeting live.   |     |
| Medical Files - Paper   | Information in respect of specific medical needs of an individual student   | yes |
| Microsoft Teams   | Remote learning with Office 365 for students Microsoft Teams for Education Whether you're learning at home for long periods of time or just outside of class, access Office 365 for free, stay connected, and learn in a way that's right for you. Get started Tips for successful online learning Get set up Students at eligible institutions can sign up for Office 365 Education for free. That means access to apps like Word, PowerPoint, and Teams from any web browser. Plus, all the work you create will automatically be saved and backed up in the cloud. Get started with Office 365 for free Already have Office 365? Sign in. Tip: Click Install Office from Office.com to download Office apps to your desktop device. Work together as a class or group Microsoft Teams is a digital hub that brings conversations, content, and apps together in one place. If your classes are using Teams, you'll be able to connect with your classmates, ask your teacher questions, work on your homework, and track the work you've got coming up. Not part of any teams yet? No problem! You can create your own to work on group projects and keep in touch from your computer or phone. Join virtual meetings set up by your teacher and even blur your background |     |
| MS Office Suite   | Suite of online tools for staff and pupils, including OneDrive, Word, Powerpoint, Excel, Outlook, Video and Teams.  |     |
| 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   |     |

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|  | conceptual mathematical understanding. The NCETM's teaching for mastery section explains the rationale for this teaching approach, and presents case studies from schools, together with interviews with teachers involved in mastery projects through the Maths Hubs programme.   |     |
| National Tutoring Programme (NTP)        | The National Tutoring Programme offers highly tailored tuition support for pupils, to help those whose education has been most impacted by the pandemic.   | yes |
| Nereo (Matrix)                           | North East Regional Employers' Organisation is one of eleven regional bodies that support local authorities across England, Wales and Northern Ireland. NEREO's function is to support local authorities and partner organisations in the fields of Human Resources, Organisational Development and Employee Relations in all their complex and varied forms. NEREO is a small organisation with a big reputation. Our staff have over a hundred years experience of working in the public sector. Some have voluntary and private sector experience too. The Governance of NEREO is carried out by an Executive Committee made up of Elected Member representatives from each of the local authorities. |     |
| Nessy                                    | Nessy has been making fun, educational software for children since 1999 and has developed a reputation for exceptional quality. Nessy offers the complete dyslexia aware solution with a suite of multisensory products aimed at making learning to read, write and spell fun. Nessy is used globally by hundreds of thousands of teachers and students and is a 3 time winner at the prestigious Educational Resources Awards.  |     |
| Nessy - Literacy interventions           | Nessy programs are designed to help students of all abilities learn to read, write, spell and type, especially those who learn differently, including: Mainstream EAL Homeschool Students with dyslexia  |     |
| Newcastle United Foundation              | Newcastle United Foundation is an independent registered charity using the power of football to connect, motivate and inspire people in our region. Through community, education, health and wellbeing, and sports programmes delivered across Newcastle, Northumberland, North Tyneside and Gateshead, we strive to improve physical and mental health, boost learning and career prospects and provide life-changing opportunities for everyone – no matter their goals in life.   |     |
| Northumberland School Readiness Passport | The School Readiness Passport is primarily a transition document. It will be used to gather information about key events in a child's early life.  |     |
| Nursery (Early Years) files              | Early years registration information and funding information for Early Years entitlement, hours taken  | yes |

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|   | each week   |     |
| Oak Academy                                 | Oak National Academy provides free video lessons, slides and worksheets to support teachers and pupils to keep learning. Created by teachers in response to coronavirus, the resources are freely available, to complement schools' own teaching. Lessons cover a broad range of subjects, from reception to year 11. There are no sign-ups or logins required.   |     |
| Personnel files                             | Information relating to staff employment  |     |
| Photographs and videos of staff and pupils. | Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms.   |     |
| PIRA - Rising stars (Wordblaze)             | Reliably assess reading attainment and progress with termly standardised reading tests Progress in Reading Assessment (PiRA) termly tests produce standardised results and age related scores to enable schools to track pupil progress term by term, predict future progress and benchmark performance against national averages.  | yes |
| PS Financials                               | Accounting, purchasing, budgeting and reporting software.   |     |
| Recruitment information                     | Part of the job application process   | yes |
| Registers                                   | Daily register, after school club registers, lunch register   |     |
| Safeguarding Records - Electronic           | Records relating to safeguarding of children  | yes |
| Safeguarding Records - Paper                | Records relating to safeguarding of children  | yes |
| School Gateway                              | School Gateway is your school's app available on Android, iOS and the web. It'll work on phones tablets, laptops and even smart watches. Your school can decide which services they'd like parents to access with it. When you log into the app, each of the services your school provides will appear in a list for you to choose from. Below are some examples of the services your school might provide on School Gateway. |     |
| 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 |
| Social media sites e.g. Twitter, Facebook   | Social Media tool used to inform parents about events in school and celebrate children's achievement.   |     |
| Spelling Shed                               | The Spelling Shed - proudly powered by EdShed - is a  |     |

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|                              | spelling platform designed by a team of teachers. It is built with students, teachers and parents in mind and aims to make spelling fun for students as well as simple for adults to manage.   |     |
| STEM                         | Developing teachers and leaders Explore programmes and resources that support professional development and drive the impact of teaching across schools and colleges. o support parents and carers, our subject experts have put together a selection of activities and materials, which are free for everyone to access.   |     |
| Tapestry                     | An online journal recording all the learning and fun of children's early years education.  |     |
| The National College         | A provider of online training for staff & governors  |     |
| Times Tables Rock Stars      | Online times tables practice and testing.  |     |
| Twinkl                       | We're here to 'help those who teach'. It's what brings us to work every day. We're proud to create educational resources that can be used at each step of a child's learning journey. Our teacher-created resources provide entire schemes of work, lesson planning and assessments right through to online educational games, augmented reality and so much more. We have over 525,000 resources and new content gets added every day. You'll find we've normally got what you need before you even know you want it.   |     |
| Vimeo                        | Upload and Host Videos. Collaborate and Share. Find the Vimeo Plan for You. HD playback. Powerful privacy controls. Privacy controls. Unlimited bandwidth. Embedding features. Video statistics. Ad-free videos. Password protection. 8K 360 uploads. Customizable player  |     |
| Visitor book                 | Log of all visitors into school / fire regulations   |     |
| White Rose Maths and Science | Influenced, inspired and informed by the work of leading maths researchers and practitioners across the world, White Rose Maths brings together a team of highly experienced and passionate maths teaching experts to train, guide, help and support all those who want to make change happen in their schools. We're guessing that might include YOU! If so, we offer you in-depth training programmes, a vast bank of clear, practical resources (many of them available free of charge), and the bespoke support you want and need to keep raising the bar. We'll not only make your job a whole lot simpler, we'll help you change the future for every child. | yes |
| Wonde                        | Manages transfer of data from Sims MIS to School360.   | yes |
| Y4 Multiplication Check      | What is the Multiplication Tables Check. The Multiplication Tables Check (MTC) is a key stage 2  |     |

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|                                   | assessment to be taken by pupils at the end of year 4 (in June). From the 2019 / 2020 academic year onwards. The purpose of the MTC is to make sure the times tables knowledge is at the expected level.   |  |
| Zoom                              | Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Our easy, reliable cloud platform for video, voice, content sharing, and chat runs across mobile devices, desktops, telephones, and room systems. |  |
| National Tutoring Programme (NTP) | The National Tutoring Programme offers highly tailored tuition support for pupils, to help those whose education has been most impacted by the pandemic.   |  |

| 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><br><br>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | 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  |

| System used: Accident Report Form |  |
|-----------------------------------|--|
| <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>            | <b>Child</b> <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>                    | <b>Legal Obligation</b><br><br>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”<br><br><b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”   |
| <b>Evidence for legal basis</b>       | ICO 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  |

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| 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>           |
| <p>This system has been identified as containing Special Category Information</p> <p>Special category information is data which has the following characteristics:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Political opinions</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic data for the purpose of identifying a natural person</li> <li>• Sex life and or sexual orientation</li> <li>• Criminal Records information - protected in Article 10</li> </ul> |  |
| <b>Special Category Data Legal Basis</b>   | <p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>  |
| <b>Special Category Evidence for legal basis</b>   | Article 9  |
| <b>How is the Special Category data shared?</b>  | Verbally, Secure cloud,  |
| <b>Legal basis for sharing Special Category data</b>   | Article 9  |
| <b>Why is it being processed?</b>  | To regularly check pupil's attendance towards a desired goal   |
| <b>Legal Basis</b>   | <p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing</p> |

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

| System used: BBC Bitesize             |  |
|---------------------------------------|--|
| <b>Description</b>                    | BBC Bitesize is a free online study support resource designed to help with learning, revision and homework! Bitesize provides support for learners aged 5 to 16+ across a wide range of school subjects. It also supports children and young people's wellbeing and career choices. Bitesize also has hundreds of published lessons to help students across the UK with home schooling. Bitesize guides are written by teachers and subject experts and are mapped to follow the curricula of the UK. Secondary Bitesize follows exam board specifications for the main exam boards in the UK, including for GCSE in England, Wales and Northern Ireland and National 4, National 5 & Highers in Scotland, ensuring students are preparing for the right exams |
| <b>Personal Data Items</b>            | <b>teacher</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• email address</li> </ul> <b>child</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• Age</li> <li>• Year group</li> </ul>  |
| <b>Why is it being processed?</b>     | <a href="https://www.bbc.co.uk/usingthebbc/privacy/">https://www.bbc.co.uk/usingthebbc/privacy/</a>  |
| <b>Legal Basis</b>                    | <b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller   |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://www.bbc.co.uk/usingthebbc/privacy/">https://www.bbc.co.uk/usingthebbc/privacy/</a>  |
| <b>Is it secure and/or encrypted?</b> | Secure   |
| <b>Who can access data?</b>           | <a href="https://www.bbc.co.uk/usingthebbc/privacy/">https://www.bbc.co.uk/usingthebbc/privacy/</a>  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | <a href="https://www.bbc.co.uk/usingthebbc/privacy/">https://www.bbc.co.uk/usingthebbc/privacy/</a>  |
| <b>Legal basis for sharing</b>        | Public Task  |
| <b>How is data shared?</b>            | <a href="https://www.bbc.co.uk/usingthebbc/privacy/">https://www.bbc.co.uk/usingthebbc/privacy/</a>  |

| System used: Book Creator             |   |
|---------------------------------------|---|
| <b>Description</b>                    | Allows pupils to write books and store them in an online library  |
| <b>Personal Data Items</b>            | <p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• email</li> <li>• profile picture from schools 360 [used to sign in]</li> <li>• Technical data -Type of device IP</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Pupil's [school] email</li> </ul>           |
| <b>Why is it being processed?</b>     | To allow use of the system  |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>  |
| <b>Evidence for legal basis</b>       | ICO Toolkit   |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | Stored in Google Cloud using Google's security model  |
| <b>Is it secure and/or encrypted?</b> | Yes and encrypted by Google Cloud   |
| <b>Who can access data?</b>           | School & Book Creator staff   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | With third party service providers, such as hosting providers or an email service, so that they can provide services to us. In cases where we share student personal data with these third parties they will be obligated to comply with the commitments in this policy. We maintain a list of these third party service providers; |
| <b>Legal basis for sharing</b>        | ICO Toolkit -contract & public task   |
| <b>How is data shared?</b>            | Data is transmitted securely over SSL   |

**Description**

To provide the best MIS and finance solution for all schools to help improve student outcomes. Bromcom have over 10 years of experience of delivering using the Cloud, we are the most experienced MIS provider. We are constantly developing our system to reduce bolt ons. We present our software via up to date browser technology and an intuitive user friendly interface making everyday tasks simple to find and execute.

**Personal Data Items**

**Pupil**

- Name
- DOB
- Address
- Title
- Gender
- Class
- Year
- Parent/carer name and contact details
- UPN
- Dietary Requirements
- Medical Information
- Attendance/exclusion
- FSM
- SEN
- EAL & First Language
- Assessment Information
- Pupil Premium
- Child Protection Plan
- School history
- Looked After information
- Ethnicity
- Religion

**Staff**

- Name
- Address
- Phone number
- Email address
- Title
- Gender
- DOB
- NI Number
- Ethnicity
- Bank Account information
- Qualifications
- Disability and Medical Information
- Religion
- Martial 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

|  |  |
|--|--|
| <b>Special Category Data Legal Basis</b>             | <p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> <p><b>Public</b></p> <p>Processing relates to personal data manifestly made public by the Data Subject.</p>  |
| <b>Special Category Evidence for legal basis</b>     | Public task, contract, consent, legal obligation   |
| <b>How is the Special Category data shared?</b>      | <a href="https://bromcom.com/privacy-policy/">https://bromcom.com/privacy-policy/</a>  |
| <b>Legal basis for sharing Special Category data</b> | Public interest and obligation   |
| <b>Why is it being processed?</b>                    | <a href="https://bromcom.com/privacy-policy/">https://bromcom.com/privacy-policy/</a>  |
| <b>Legal Basis</b>                                   | <p><b>Consent</b></p> <p>Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”</p> <p><b>Contract</b></p> <p>Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |

|                                       |   |
|---------------------------------------|---|
| <b>Evidence for legal basis</b>       | ICO Toolkit   |
| <b>Is Consent Required?</b>           | Yes   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | <a href="https://bromcom.com/privacy-policy/">https://bromcom.com/privacy-policy/</a> |
| <b>Is it secure and/or encrypted?</b> | Secure  |
| <b>Who can access data?</b>           | <a href="https://bromcom.com/privacy-policy/">https://bromcom.com/privacy-policy/</a> |
| <b>How long is data kept?</b>         | 6 years after date closed   |
| <b>Who is data shared with?</b>       | <a href="https://bromcom.com/privacy-policy/">https://bromcom.com/privacy-policy/</a> |
| <b>Legal basis for sharing</b>        | Public task and legal obligation  |
| <b>How is data shared?</b>            | <a href="https://bromcom.com/privacy-policy/">https://bromcom.com/privacy-policy/</a> |

| System used: Canva                    |   |
|---------------------------------------|---|
| <b>Description</b>                    | Canva is an online design and publishing tool   |
| <b>Personal Data Items</b>            | <p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• date of birth</li> <li>• email</li> <li>• phone number</li> <li>• school</li> <li>• analytics data</li> <li>• usage data including device &amp; location</li> </ul> <p><b>Student</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• class</li> <li>• school</li> <li>• email</li> <li>• analytics data</li> <li>• usage data including device &amp; location</li> </ul> |
| <b>Why is it being processed?</b>     | To allow use of Canva resources and to improve Canva service to users   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>   |
| <b>Evidence for legal basis</b>       | ICO toolkit   |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | secured cloud   |
| <b>Is it secure and/or encrypted?</b> | yes both encrypted and secure   |
| <b>Who can access data?</b>           | School and Canva employees as required to provide service   |
| <b>How long is data kept?</b>         | 1+ year   |
| <b>Who is data shared with?</b>       | Third party companies to provide service  |
| <b>Legal basis for sharing</b>        | contractual legitimate interest   |
| <b>How is data shared?</b>            | secure encrypted transfer   |

| System used: Charanga                 |  |
|---------------------------------------|--|
| <b>Description</b>                    | Charanga Music School, the best-selling, modern resource for primary music — online, easy to use and great value. Includes A complete scheme to teach the national curriculum for music A vast library of songs, topics, instrument courses and creative apps In-depth support for assessment, SEND and personalised teaching and learning |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School</li> <li>• email address</li> <li>• Mobile phone number</li> <li>• Pupils groups</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School</li> <li>• Assessment information</li> </ul>                           |
| <b>Why is it being processed?</b>     | To provide online access to teaching and learning materials.   |
| <b>Legal Basis</b>                    | <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>       | Charanga privacy notice.   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Securely stored on servers in Ireland.   |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Strictly controlled internally in Charanga, Teachers and pupils.   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Shared with partner company Soundation AB  |
| <b>Legal basis for sharing</b>        |  |
| <b>How is data shared?</b>            | Electronically   |
| <b>References</b>                     | <a href="#">Click to download Privacy Notice</a><br><a href="#">Click to download Soundation Privacy Policy</a>  |

System used: Child Protection Records - Electronic

|                    |   |
|--------------------|---|
| <b>Description</b> | 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

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

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

|  |  |
|--|--|
|  | 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)  |

System used: Child Protection Records - Paper

| Description         | Records relating to child protection issues for individual pupils  |
|---------------------|--|
| Personal Data Items | <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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- 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.  |
| <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>        | <p><b>Staff</b></p> <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> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Password</li> <li>• Age</li> <li>• School</li> <li>• IP Address</li> </ul> <p><b>Parent/carers</b></p> <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>                | <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 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><br><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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- 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.

|  |   |
|--|---|
| <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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- 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>      | 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   |

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Our aim is to provide outstanding HR advice and support to schools and academies, which will then able schools and academies to focus on providing high standards of education to their pupils and students. We are a based in the North East of England and we offer HR advice and support to education establishments local to us and remotely to those further field. Whatever the size of your organisation, we can offer flexible HR advice and support through our different packages. We are well aware of budget restraints across the education and other sectors and will always endeavour to keep our costs low and ensure that we provide value for money, supporting clients to manage their budgets efficiently. In our experience, we have found that the vast majority of HR issues can be resolved informally when dealt with appropriately at the earliest opportunity and strive to work with our clients on this basis. Our aim is to support you through initial concerns, providing professional, appropriate, proactive support in order to avoid a lengthy, costly HR process. We pride ourselves on our caring, knowledgeable and professional approach and will deliver legislative and practical HR support, at the highest standard, whilst adopting a common sense approach. |
| <b>Personal Data Items</b>            | <b>Staff</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• All staff employment details</li> </ul>   |
| <b>Why is it being processed?</b>     | <a href="https://debbiejuddhr.co.uk/about-us/">https://debbiejuddhr.co.uk/about-us/</a>   |
| <b>Legal Basis</b>                    | <b>Legal Obligation</b><br><br>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."<br><br><b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller   |
| <b>Evidence for legal basis</b>       | ICO legal basis tool kit  |
| <b>Is Consent Required?</b>           | yes   |
| <b>Data Source</b>                    | Police  |
| <b>Where is data stored?</b>          | <a href="https://debbiejuddhr.co.uk/about-us/">https://debbiejuddhr.co.uk/about-us/</a>   |
| <b>Is it secure and/or encrypted?</b> | secure  |
| <b>Who can access data?</b>           | <a href="https://debbiejuddhr.co.uk/about-us/">https://debbiejuddhr.co.uk/about-us/</a>   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | <a href="https://debbiejuddhr.co.uk/about-us/">https://debbiejuddhr.co.uk/about-us/</a>   |
| <b>Legal basis for sharing</b>        | Public task/legal obligation  |
| <b>How is data shared?</b>            | <a href="https://debbiejuddhr.co.uk/about-us/">https://debbiejuddhr.co.uk/about-us/</a>   |



System used: DFE-Census and workforce Census

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | The school workforce census is a statutory data collection that takes place each autumn. You must complete statutory censuses by law unless there's a good reason not to. The census collects data on all teaching and support staff in regular employment, including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data. |
| <b>Personal Data Items</b>            | <b>Staff</b> <ul style="list-style-type: none"> <li>• Name</li> </ul>  |
| <b>Why is it being processed?</b>     | <a href="https://www.gov.uk/help/privacy-notice">https://www.gov.uk/help/privacy-notice</a>  |
| <b>Legal Basis</b>                    | <b>Legal Obligation</b> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <b>Public task</b> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>  |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>           | yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://www.gov.uk/help/privacy-notice">https://www.gov.uk/help/privacy-notice</a>  |
| <b>Is it secure and/or encrypted?</b> | secure   |
| <b>Who can access data?</b>           | <a href="https://www.gov.uk/help/privacy-notice">https://www.gov.uk/help/privacy-notice</a>  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | <a href="https://www.gov.uk/help/privacy-notice">https://www.gov.uk/help/privacy-notice</a>  |
| <b>Legal basis for sharing</b>        | public task/legal obligation   |
| <b>How is data shared?</b>            | <a href="https://www.gov.uk/help/privacy-notice">https://www.gov.uk/help/privacy-notice</a>  |

| System used: Dietary requirements information sheets   |   |
|--|---|
| <b>Description</b>   | Required documents for specific children with severe allergies / intolerances and religious observations (food)   |
| <b>Personal Data Items</b>   | <b>Pupil</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Dietary information</li> </ul>   |
| <p>This system has been identified as containing Special Category Information</p> <p>Special category information is data which has the following characteristics:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Political opinions</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic data for the purpose of identifying a natural person</li> <li>• Sex life and or sexual orientation</li> <li>• Criminal Records information - protected in Article 10</li> </ul> |   |
| <b>Special Category Data Legal Basis</b>   | <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>  | Paper records   |
| <b>Legal basis for sharing Special Category data</b>   | Article 9   |
| <b>Why is it being processed?</b>  | Health and safety - to avoid children coming into contact with specific foods   |
| <b>Legal Basis</b>   | <b>Legal Obligation</b> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <b>Public task</b> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p> |
| <b>Evidence for legal basis</b>  | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>  | No  |
|  |   |

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

|                                       |   |
|---------------------------------------|---|
| System used: Ed Shed                  |   |
| <b>Description</b>                    | EdShed, or Education Shed Ltd. as our accountant calls us, is the umbrella for several educational products and brands. These include The Literacy Shed, Literacy Shed Plus, Spelling Shed and MathShed. We are a company run by teachers for teachers and we try to maintain particular values within all of our products: The best quality product we can create Making the most educational impact possible Transparent and affordable pricing The least hassle for teachers and schools |
| <b>Personal Data Items</b>            | <b>Teacher</b> <ul style="list-style-type: none"> <li>• Name</li> </ul> <b>Child</b> <ul style="list-style-type: none"> <li>• Name</li> </ul>   |
| <b>Why is it being processed?</b>     | <a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>   |
| <b>Legal Basis</b>                    | <b>Legal Obligation</b><br>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”<br><br><b>Public task</b><br>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”                                      |
| <b>Evidence for legal basis</b>       | ICO Legal Basis tool  |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School 360  |
| <b>Where is data stored?</b>          | <a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>   |
| <b>Is it secure and/or encrypted?</b> | Secure  |
| <b>Who can access data?</b>           | <a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | <a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>   |
| <b>Legal basis for sharing</b>        | Legal Obligation/public Task  |
| <b>How is data shared?</b>            | <a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>   |

| System used: Education Mutual         |   |
|---------------------------------------|---|
| <b>Description</b>                    | Staff absence protection for schools  |
| <b>Personal Data Items</b>            | <b>Staff</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Gender</li> <li>• Role</li> <li>• Salary Band</li> <li>• Contact name</li> </ul>   |
| <b>Why is it being processed?</b>     | Used to provide school with contacts to manage membership (staff absence protection/insurance)  |
| <b>Legal Basis</b>                    | <b>Consent</b><br><br>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"<br><br><b>Contract</b><br><br>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"<br><br><b>Legitimate Interest</b><br><br>Article 6(1)(f) gives you a lawful basis for processing where: "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child." |
| <b>Evidence for legal basis</b>       | ICO Toolkit   |
| <b>Is Consent Required?</b>           | Yes - notification is via school Data Controller  |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | Both electronically and physical format depending on information submission   |
| <b>Is it secure and/or encrypted?</b> | Secure and encrypted  |
| <b>Who can access data?</b>           | Data Controller at school (HT) and authorised staff i.e. SBM  |
| <b>How long is data kept?</b>         | 6 years after date closed   |
| <b>Who is data shared with?</b>       | School only - no third parties  |
| <b>Legal basis for sharing</b>        | Contract, legitimate task   |
| <b>How is data shared?</b>            | Via web portal  |



| 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: GL-Assessment            |   |
|---------------------------------------|---|
| <b>Description</b>                    | GL assessments provide a range of tests for schools including reading, progress and cognitive tests   |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School</li> <li>• Email</li> <li>• Class</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Age</li> <li>• Gender</li> <li>• Class</li> <li>• Year</li> <li>• Performance data</li> </ul> |
| <b>Why is it being processed?</b>     | To provide? access to a range of testing and diagnostic tools for teaching staff.   |
| <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>          | GL assessment? secure servers and secure school servers   |
| <b>Is it secure and/or encrypted?</b> | Yes   |
| <b>Who can access data?</b>           | School staff, GL staff 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>            | Electronically via secure networks  |
| <b>References</b>                     | <a href="#">Click to download GL-Assessment Privacy Policy</a>  |

| System used: Google Classroom         |  |
|---------------------------------------|--|
| <b>Description</b>                    | A free and easy tool helping educators efficiently manage and assess progress, while enhancing connections with learners from school, from home, or on the go.   |
| <b>Personal Data Items</b>            | <p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>  |
| <b>Why is it being processed?</b>     | <a href="https://policies.google.com/privacy?hl=en-GB#infocollect">https://policies.google.com/privacy?hl=en-GB#infocollect</a>  |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| <b>Evidence for legal basis</b>       | ICO legal tool kit   |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://policies.google.com/privacy?hl=en-GB#infocollect">https://policies.google.com/privacy?hl=en-GB#infocollect</a>  |
| <b>Is it secure and/or encrypted?</b> | Secure   |
| <b>Who can access data?</b>           | <a href="https://policies.google.com/privacy?hl=en-GB#infocollect">https://policies.google.com/privacy?hl=en-GB#infocollect</a>  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | <a href="https://policies.google.com/privacy?hl=en-GB#infocollect">https://policies.google.com/privacy?hl=en-GB#infocollect</a>  |
| <b>Legal basis for sharing</b>        | Public Task/legal obligation   |
| <b>How is data shared?</b>            | <a href="https://policies.google.com/privacy?hl=en-GB#infocollect">https://policies.google.com/privacy?hl=en-GB#infocollect</a>  |

| System used: Google drive for education |  |
|---|--|
| <b>Description</b>                      | suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.  |
| <b>Personal Data Items</b>              | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Classes / groups</li> <li>• Gmail address</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Classes / groups</li> <li>• Gmail address</li> </ul> <p><b>Governor</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Gmail address</li> </ul> |
| <b>Why is it being processed?</b>       | To provide Google drive for education to staff, pupils and governors.  |
| <b>Legal Basis</b>                      | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>  |
| <b>Evidence for legal basis</b>         | ICO legal basis toolkit.   |
| <b>Is Consent Required?</b>             | No   |
| <b>Data Source</b>                      | School 360   |
| <b>Where is data stored?</b>            | Google secure servers in Europe  |
| <b>Is it secure and/or encrypted?</b>   | Yes secure and encrypted   |
| <b>Who can access data?</b>             | Individual users can access their own accounts. School360 and ICT Team can access management tool.   |
| <b>How long is data kept?</b>           | 3 years after date closed  |
| <b>Who is data shared with?</b>         | Staff and Pupils   |
| <b>Legal basis for sharing</b>          | Public task  |
| <b>How is data shared?</b>              | Secure google cloud.   |
| <b>References</b>                       | <a href="#">Click to download Google Drive Policy Notice</a><br><a href="#">Click to download Google GSuite Privacy Policy</a>   |

| System used: Google Meet              |   |
|---------------------------------------|---|
| <b>Description</b>                    | Google Meet is a video-communication service developed by Google. It is one of two apps that constitute the replacement for Google Hangouts, the other being Google Chat  |
| <b>Personal Data Items</b>            | <p><b>teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>•</li> <li>•</li> </ul> <p><b>child</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>   |
| <b>Why is it being processed?</b>     | <a href="https://policies.google.com/privacy?hl=en-GB">https://policies.google.com/privacy?hl=en-GB</a>   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| <b>Evidence for legal basis</b>       | ICO legal tool kit  |
| <b>Is Consent Required?</b>           | Yes   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | <a href="https://policies.google.com/privacy?hl=en-GB">https://policies.google.com/privacy?hl=en-GB</a>   |
| <b>Is it secure and/or encrypted?</b> | Secure  |
| <b>Who can access data?</b>           | <a href="https://policies.google.com/privacy?hl=en-GB">https://policies.google.com/privacy?hl=en-GB</a>   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | <a href="https://policies.google.com/privacy?hl=en-GB">https://policies.google.com/privacy?hl=en-GB</a>   |
| <b>Legal basis for sharing</b>        | Public Task   |
| <b>How is data shared?</b>            | <a href="https://policies.google.com/privacy?hl=en-GB">https://policies.google.com/privacy?hl=en-GB</a>   |

| System used: Governance               |   |
|---------------------------------------|---|
| <b>Description</b>                    | Details of all members of the Governing Body  |
| <b>Personal Data Items</b>            | <b>Name</b> <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>                    | <b>Legal Obligation</b><br><br>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”<br><br><b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | 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: Hamilton Trust           |  |
|---------------------------------------|--|
| <b>Description</b>                    | <p>Hamilton Trust is a UK charity working to support inspirational teaching and learning through its website and projects. Mike O'Regan founded Hamilton in 1988 to support the education of children in the Blackbird Leys, Rose Hill and Barton estates in Oxford - children whose educational potential had long been underestimated. Hamilton aims to enable children from areas of socio-economic disadvantage to create for themselves the life opportunities they deserve through high-quality education and high expectations. Hamilton continues to work closely with primary schools in Oxford and to derive enormous amounts of inspiration for improving educational opportunities from doing so. Professor Ruth Merttens joined Hamilton in 1996 as Co-director. With Mike, she set up and directed the Hamilton Maths and Reading Projects to boost those subjects in Oxford schools located in areas of significant deprivation. As word leaked out about Hamilton's planning materials, demand for them spread, and Hamilton started providing them to teachers in other schools. These formed the basis of Hamilton's original 'Save teachers' Sundays!' website, which enabled a much wider audience to access these plans. Hamilton's website continues to provide high quality, fully adaptable planning and resources to primary school teachers to help them teach robust and engaging lessons. Hamilton also supports and runs various education projects that provide support to its local community and across the country.</p> |
| <b>Personal Data Items</b>            | <p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email</li> </ul> <p><b>name</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Age</li> <li>• year group</li> </ul>   |
| <b>Why is it being processed?</b>     | <a href="https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/">https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/</a>  |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>   |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/">https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/</a>  |
| <b>Is it secure and/or encrypted?</b> | Secure   |
| <b>Who can access data?</b>           | <a href="https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/">https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/</a>  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
|                                       |  |

|                                 |   |
|---------------------------------|---|
| <b>Who is data shared with?</b> | <a href="https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/">https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/</a> |
| <b>Legal basis for sharing</b>  | Public Task   |
| <b>How is data shared?</b>      | <a href="https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/">https://www.hamilton-trust.org.uk/terms-and-conditions/privacy-policy/</a> |

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

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

| System used: Language Angels          |  |
|---------------------------------------|--|
| <b>Description</b>                    | Language Angels award-winning language teaching resources are designed so every primary school teacher - irrespective of their linguistic ability - can teach the foreign language of their choice. Our experienced team of foreign language teaching specialists have spent thousands of hours over a number of years creating, testing and refining our lessons and resources to bring them to where they are now. We won't rest on our laurels though. We continue to work, adding innovative and exciting new units and resources all the time. By providing a multitude of teaching units (each designed to run for 6 weeks) there are more than enough resources to enable you to teach the language of your choice throughout the whole of your primary school. |
| <b>Personal Data Items</b>            | <b>teacher</b> <ul style="list-style-type: none"> <li>• Name</li> </ul> <b>child</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• age</li> </ul>   |
| <b>Why is it being processed?</b>     | Language_Angels_Home_School_Terms_&_Conditions.pdf   |
| <b>Legal Basis</b>                    | <b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"  |
| <b>Evidence for legal basis</b>       | ICO Legal Basis Tool   |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Language_Angels_Home_School_Terms_&_Conditions.pdf   |
| <b>Is it secure and/or encrypted?</b> | Secure   |
| <b>Who can access data?</b>           | Language_Angels_Home_School_Terms_&_Conditions.pdf   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Language_Angels_Home_School_Terms_&_Conditions.pdf   |
| <b>Legal basis for sharing</b>        | Public Task  |
| <b>How is data shared?</b>            | Language_Angels_Home_School_Terms_&_Conditions.pdf   |

| System used: Letter join              |   |
|---------------------------------------|---|
| <b>Description</b>                    | Letter-join is the teacher's companion for teaching cursive handwriting combining interactive animations and worksheets for real handwriting practice. Letter-join includes animations of all the letters of the alphabet with a spoken commentary on how to write each letter. Patterns, Letters and Words can all be watched and traced on-screen. Magic Words lets you trace over your own words on a number of exciting backgrounds and Custom Words lets you input your own words, replay the video and trace over the words for IWB practice. |
| <b>Personal Data Items</b>            | <b>School</b> <ul style="list-style-type: none"> <li>• Name</li> </ul> <b>Staff</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class</li> </ul> <b>Pupil</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class</li> </ul>  |
| <b>Why is it being processed?</b>     | To provide online access to a range of teaching and learning materials for staff and pupils.  |
| <b>Legal Basis</b>                    | <b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller  |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | Green and Tempest secure servers  |
| <b>Is it secure and/or encrypted?</b> | In line with the General Data Protection Regulation (GDPR) we understand our obligation to store securely the contact details of our customers; those being personal identifiers, mainly names, addresses, telephone numbers and email addresses. This data is kept securely and is only accessible by staff at Green and Tempest Ltd. All data is deleted from our systems immediately upon customer notification of termination of a subscription.  |
| <b>Who can access data?</b>           | Staff, Letter join staff for support  |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | Not shared  |
| <b>Legal basis for sharing</b>        | N/A   |
| <b>How is data shared?</b>            | N/A   |

## References

[Click to download Letter Join Privacy Policy](#)

| System used: 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: Little Wandle            |  |
|---------------------------------------|--|
| <b>Description</b>                    | Phonics programme. Little Wandle Letters and Sounds Revised has been developed by Wandle and Little Sutton English Hubs and taken forward by Little Sutton Primary School and Wandle Learning Trust in partnership with other phonics and early reading experts.   |
| <b>Personal Data Items</b>            | <p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name, email address, telephone number</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name, unique pupil numbers, assessment data</li> </ul> <p><b>Parent</b></p> <ul style="list-style-type: none"> <li>• Name, email address, telephone number</li> </ul> |
| <b>Why is it being processed?</b>     | <a href="https://www.littlewandlelettersandsounds.org.uk/privacy-policy/">https://www.littlewandlelettersandsounds.org.uk/privacy-policy/</a>  |
| <b>Evidence for legal basis</b>       | ICO Toolkit  |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://www.littlewandlelettersandsounds.org.uk/privacy-policy/">https://www.littlewandlelettersandsounds.org.uk/privacy-policy/</a>  |
| <b>Is it secure and/or encrypted?</b> | Secure   |
| <b>Who can access data?</b>           | <a href="https://www.littlewandlelettersandsounds.org.uk/privacy-policy/">https://www.littlewandlelettersandsounds.org.uk/privacy-policy/</a>  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | <a href="https://www.littlewandlelettersandsounds.org.uk/privacy-policy/">https://www.littlewandlelettersandsounds.org.uk/privacy-policy/</a>  |
| <b>Legal basis for sharing</b>        | Public task and legal obligation   |
| <b>How is data shared?</b>            | <a href="https://www.littlewandlelettersandsounds.org.uk/privacy-policy/">https://www.littlewandlelettersandsounds.org.uk/privacy-policy/</a>  |

System used: Looked After Children Records - Paper

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

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

| System used: Loom                     |  |
|---------------------------------------|--|
| <b>Description</b>                    | Show it, say it, send it Record video messages of your screen, cam, or both. Faster than typing an email or meeting live.  |
| <b>Personal Data Items</b>            | <b>Teacher</b> <ul style="list-style-type: none"> <li>• Name</li> </ul> <b>Child</b> <ul style="list-style-type: none"> <li>• Name</li> </ul>  |
| <b>Why is it being processed?</b>     | <a href="https://www.loom.com/privacy-policy">https://www.loom.com/privacy-policy</a>  |
| <b>Legal Basis</b>                    | <b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller |
| <b>Evidence for legal basis</b>       | ICO legal basis tool   |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://www.loom.com/privacy-policy">https://www.loom.com/privacy-policy</a>  |
| <b>Is it secure and/or encrypted?</b> | Secure   |
| <b>Who can access data?</b>           | <a href="https://www.loom.com/privacy-policy">https://www.loom.com/privacy-policy</a>  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | <a href="https://www.loom.com/privacy-policy">https://www.loom.com/privacy-policy</a>  |
| <b>Legal basis for sharing</b>        | Public Task  |
| <b>How is data shared?</b>            | <a href="https://www.loom.com/privacy-policy">https://www.loom.com/privacy-policy</a>  |

System used: Medical Files - Paper

|                            |  |
|----------------------------|--|
| <b>Description</b>         | Information in respect of specific medical needs of an individual student  |
| <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>• Medical History</li><li>• Medication Details</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> | ICO regs Article 9   |
|  |  |

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

| System used: Microsoft Teams          |   |
|---------------------------------------|---|
| <b>Description</b>                    | <p>Remote learning with Office 365 for students Microsoft Teams for Education Whether you're learning at home for long periods of time or just outside of class, access Office 365 for free, stay connected, and learn in a way that's right for you. Get startedTips for successful online learning Get set up Students at eligible institutions can sign up for Office 365 Education for free. That means access to apps like Word, PowerPoint, and Teams from any web browser. Plus, all the work you create will automatically be saved and backed up in the cloud. Get started with Office 365 for free Already have Office 365? Sign in. Tip: Click Install Office from Office.com to download Office apps to your desktop device. Work together as a class or group Microsoft Teams is a digital hub that brings conversations, content, and apps together in one place. If your classes are using Teams, you'll be able to connect with your classmates, ask your teacher questions, work on your homework, and track the work you've got coming up. Not part of any teams yet? No problem! You can create your own to work on group projects and keep in touch from your computer or phone. Join virtual meetings set up by your teacher and even blur your background</p> |
| <b>Personal Data Items</b>            | <p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>   |
| <b>Why is it being processed?</b>     | <a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a>   |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>   |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>           | Yes   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | <a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a>   |
| <b>Is it secure and/or encrypted?</b> | Secure  |
| <b>Who can access data?</b>           | <a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a>   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | <a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a>   |

|                                |   |
|--------------------------------|---|
| <b>Legal basis for sharing</b> | Public Task/  |
| <b>How is data shared?</b>     | <a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a> |

| System used: MS Office Suite          |  |
|---------------------------------------|--|
| <b>Description</b>                    | Suite of online tools for staff and pupils, including OneDrive, Word, Powerpoint, Excel, Outlook, Video and Teams.   |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Classes</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Governor</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> |
| <b>Why is it being processed?</b>     | To provide OneDrive for education to staff, pupils and governors.  |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>  |
| <b>Evidence for legal basis</b>       | ICO legal basis tool.  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Microsoft Servers based in the EU  |
| <b>Is it secure and/or encrypted?</b> | Yes, secure and encrypted  |
| <b>Who can access data?</b>           | Individual users can access their own accounts. ICT Team can access management tool.   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | N/A  |
| <b>Legal basis for sharing</b>        | N/A  |
| <b>How is data shared?</b>            | <a href="https://privacy.microsoft.com/en-gb/privacystatement">https://privacy.microsoft.com/en-gb/privacystatement</a>  |

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

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | NCETM provides professional development for staff in the teaching of Mathematics Children's chances of succeeding in education and life will be maximised if they develop deep and lasting procedural and conceptual mathematical understanding. The NCETM's teaching for mastery section explains the rationale for this teaching approach, and presents case studies from schools, together with interviews with teachers involved in mastery projects through the Maths Hubs programme. |
| <b>Personal Data Items</b>            | <b>Staff</b> <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>                    | <b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller   |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit.   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Tribal secure servers  |
| <b>Is it secure and/or encrypted?</b> | Yes.   |
| <b>Who can access data?</b>           | Staff, Tribal staff for support.   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Tribal and school staff.   |
| <b>Legal basis for sharing</b>        | Public task  |
| <b>How is data shared?</b>            | With user details removed.   |
| <b>References</b>                     | <a href="#">Click to download National Centre for Excellence in the Teaching of Mathematics</a>  |

|  |  |
|--|--|
| System used: National Tutoring Programme (NTP)   |  |
| <b>Description</b>   | The National Tutoring Programme offers highly tailored tuition support for pupils, to help those whose education has been most impacted by the pandemic.   |
| <b>Personal Data Items</b>   | <b>Child</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• SEN Status</li> <li>• PP Funding Status</li> <li>• Attainment Level</li> <li>• Special Learning Needs</li> <li>• Safeguarding Info/Risk Assessments</li> </ul>   |
| <p>This system has been identified as containing Special Category Information</p> <p>Special category information is data which has the following characteristics:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Political opinions</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic data for the purpose of identifying a natural person</li> <li>• Sex life and or sexual orientation</li> <li>• Criminal Records information - protected in Article 10</li> </ul> |  |
| <b>Special Category Data Legal Basis</b>   | <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>  | <a href="https://nationaltutoring.org.uk/legal/privacy-notice/">https://nationaltutoring.org.uk/legal/privacy-notice/</a>  |
| <b>Legal basis for sharing Special Category data</b>   | Article 9  |
| <b>Why is it being processed?</b>  | To perform the services of the National Tutoring Programme   |
| <b>Legal Basis</b>   | <b>Legitimate Interest</b> <p>Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”</p> |
| <b>Evidence for legal basis</b>  | ICO lawful basis toolkit   |
| <b>Is Consent Required?</b>  | No   |
|  |  |

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

| System used: Nereo (Matrix)           |  |
|---------------------------------------|--|
| <b>Description</b>                    | North East Regional Employers' Organisation is one of eleven regional bodies that support local authorities across England, Wales and Northern Ireland. NEREO's function is to support local authorities and partner organisations in the fields of Human Resources, Organisational Development and Employee Relations in all their complex and varied forms. NEREO is a small organisation with a big reputation. Our staff have over a hundred years experience of working in the public sector. Some have voluntary and private sector experience too. The Governance of NEREO is carried out by an Executive Committee made up of Elected Member representatives from each of the local authorities. |
| <b>Personal Data Items</b>            | <b>All Staff</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> </ul>   |
| <b>Why is it being processed?</b>     | <a href="https://www.nereo.gov.uk/privacy-notice/">https://www.nereo.gov.uk/privacy-notice/</a>  |
| <b>Legal Basis</b>                    | <b>Legal Obligation</b><br><br>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."<br><br><b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"   |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>           | yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://www.nereo.gov.uk/privacy-notice/">https://www.nereo.gov.uk/privacy-notice/</a>  |
| <b>Is it secure and/or encrypted?</b> | secure   |
| <b>Who can access data?</b>           | <a href="https://www.nereo.gov.uk/privacy-notice/">https://www.nereo.gov.uk/privacy-notice/</a>  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | <a href="https://www.nereo.gov.uk/privacy-notice/">https://www.nereo.gov.uk/privacy-notice/</a>  |
| <b>Legal basis for sharing</b>        | Public task/legal obligation   |
| <b>How is data shared?</b>            | <a href="https://www.nereo.gov.uk/privacy-notice/">https://www.nereo.gov.uk/privacy-notice/</a>  |

| System used: Nessy                    |   |
|---------------------------------------|---|
| <b>Description</b>                    | Nessy has been making fun, educational software for children since 1999 and has developed a reputation for exceptional quality. Nessy offers the complete dyslexia aware solution with a suite of multisensory products aimed at making learning to read, write and spell fun. Nessy is used globally by hundreds of thousands of teachers and students and is a 3 time winner at the prestigious Educational Resources Awards. |
| <b>Personal Data Items</b>            | <b>Teacher</b> <ul style="list-style-type: none"> <li>• Name</li> </ul> <b>Parent</b> <ul style="list-style-type: none"> <li>• Name</li> </ul> <b>child</b> <ul style="list-style-type: none"> <li>• Name</li> </ul>  |
| <b>Why is it being processed?</b>     | <a href="https://www.nessy.com/uk/privacy-policy/">https://www.nessy.com/uk/privacy-policy/</a>   |
| <b>Legal Basis</b>                    | <b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller  |
| <b>Evidence for legal basis</b>       | ICO Legal Basis tool  |
| <b>Is Consent Required?</b>           | Yes   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | <a href="https://www.nessy.com/uk/privacy-policy/">https://www.nessy.com/uk/privacy-policy/</a>   |
| <b>Is it secure and/or encrypted?</b> | Secure  |
| <b>Who can access data?</b>           | <a href="https://www.nessy.com/uk/privacy-policy/">https://www.nessy.com/uk/privacy-policy/</a>   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | <a href="https://www.nessy.com/uk/privacy-policy/">https://www.nessy.com/uk/privacy-policy/</a>   |
| <b>Legal basis for sharing</b>        | Public Task   |
| <b>How is data shared?</b>            | <a href="https://www.nessy.com/uk/privacy-policy/">https://www.nessy.com/uk/privacy-policy/</a>   |

| System used: Nessay - Literacy interventions |  |
|--|--|
| <b>Description</b>                           | Nessay programs are designed to help students of all abilities learn to read, write, spell and type, especially those who learn differently, including: Mainstream EAL Homeschool Students with dyslexia   |
| <b>Personal Data Items</b>                   | <b>Pupil</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• Year group</li> <li>• Test results</li> </ul>  |
| <b>Why is it being processed?</b>            | To create a secure log in for individual pupils to access Online Literacy intervention materials.  |
| <b>Legal Basis</b>                           | <b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller   |
| <b>Evidence for legal basis</b>              | ICO Legal basis tool   |
| <b>Is Consent Required?</b>                  | No   |
| <b>Data Source</b>                           | SIMS   |
| <b>Where is data stored?</b>                 | Securely on Nessay Servers   |
| <b>Is it secure and/or encrypted?</b>        | The security of personal information The secrecy of your personal information is important to Nessay. We do not store credit card details nor do we share customer details with any 3rd parties. Any information you provide will be held securely and in accordance with the Data Protection Act 1998. All of the data collected, including usernames, passwords and any test results achieved, is stored on secure servers. Nessay will not sell or rent any of your personal information. We ask you to provide your email and telephone number solely to assist in coordinating and confirming your access to your Nessay online adventure (called a “Nessay Subscription” for short). |
| <b>Who can access data?</b>                  | School staff, pupils, Nessay staff for support   |
| <b>How long is data kept?</b>                | 3 years after date closed  |
| <b>Who is data shared with?</b>              | Not shared   |
| <b>Legal basis for sharing</b>               | N/A  |
| <b>How is data shared?</b>                   | N/A  |
| <b>References</b>                            | <a href="#">Click to download Nessay Privacy Policy</a>  |

System used: Newcastle United Foundation

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Newcastle United Foundation is an independent registered charity using the power of football to connect, motivate and inspire people in our region. Through community, education, health and wellbeing, and sports programmes delivered across Newcastle, Northumberland, North Tyneside and Gateshead, we strive to improve physical and mental health, boost learning and career prospects and provide life-changing opportunities for everyone – no matter their goals in life. |
| <b>Personal Data Items</b>            | <b>Child</b> <ul style="list-style-type: none"> <li>• Forename</li> <li>• Surname</li> <li>• Gender</li> <li>• Ethnicity</li> <li>• Disability</li> <li>• School</li> <li>• Year Group</li> <li>• Class name</li> </ul>  |
| <b>Why is it being processed?</b>     | to provide data to premier league on progress of children using NUFC Foundation  |
| <b>Legal Basis</b>                    | <b>Legal Obligation</b><br><br>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”<br><br><b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”                     |
| <b>Evidence for legal basis</b>       | ICO Legal basis toolkit  |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://www.newcastlesupportdirectory.org.uk/node/41">https://www.newcastlesupportdirectory.org.uk/node/41</a>  |
| <b>Is it secure and/or encrypted?</b> | Secure   |
| <b>Who can access data?</b>           | School/Newcastle Foundation  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | School/Newcastle Foundation  |
| <b>Legal basis for sharing</b>        | Public Task/Legal Obligation   |
| <b>How is data shared?</b>            | Secure - <a href="https://www.newcastlesupportdirectory.org.uk/node/41">https://www.newcastlesupportdirectory.org.uk/node/41</a>   |

| System used: Northumberland School Readiness Passport |   |
|---|---|
| <b>Description</b>                                    | The School Readiness Passport is primarily a transition document. It will be used to gather information about key events in a child's early life.   |
| <b>Personal Data Items</b>                            | <b>Child</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Date of Birth</li> <li>• Unique Identifier</li> <li>• PP Information</li> <li>• Entitlement of hours</li> <li>• Special Needs Information</li> <li>• Development Progress</li> <li>• </li> </ul>  |
| <b>Why is it being processed?</b>                     | This information will be gathered from the child's parents/carers and we do not access or use this data in any way other than as required to enable developmental progress tracking of young children and promote clear transitions between early years settings.   |
| <b>Legal Basis</b>                                    | <b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"   |
| <b>Evidence for legal basis</b>                       | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>                           | Yes   |
| <b>Data Source</b>                                    | Parent  |
| <b>Where is data stored?</b>                          | <a href="https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf">https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf</a> |
| <b>Is it secure and/or encrypted?</b>                 | <a href="https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf">https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf</a> |
| <b>Who can access data?</b>                           | <a href="https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf">https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf</a> |
| <b>How long is data kept?</b>                         | 3 years after date closed   |
| <b>Who is data shared with?</b>                       | <a href="https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf">https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf</a> |
| <b>Legal basis for sharing</b>                        | Public Task   |
| <b>How is data shared?</b>                            | <a href="https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf">https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf</a> |

System used: Nursery (Early Years) files

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

| System used: Oak Academy              |   |
|---------------------------------------|---|
| <b>Description</b>                    | Oak National Academy provides free video lessons, slides and worksheets to support teachers and pupils to keep learning. Created by teachers in response to coronavirus, the resources are freely available, to complement schools' own teaching. Lessons cover a broad range of subjects, from reception to year 11. There are no sign-ups or logins required.   |
| <b>Personal Data Items</b>            | <p><b>Teacher</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>• Age</li> </ul>  |
| <b>Why is it being processed?</b>     | <a href="https://privacy.thenational.academy/">https://privacy.thenational.academy/</a>   |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p> |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>           | Yes   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | <a href="https://privacy.thenational.academy/">https://privacy.thenational.academy/</a>   |
| <b>Is it secure and/or encrypted?</b> | Secure  |
| <b>Who can access data?</b>           | <a href="https://privacy.thenational.academy/">https://privacy.thenational.academy/</a>   |
| <b>How long is data kept?</b>         | 3+ years  |
| <b>Who is data shared with?</b>       | <a href="https://privacy.thenational.academy/">https://privacy.thenational.academy/</a>   |
| <b>Legal basis for sharing</b>        | Public Task/Legal Obligation  |
| <b>How is data shared?</b>            | <a href="https://privacy.thenational.academy/">https://privacy.thenational.academy/</a>   |

| System used: Personnel files          |  |
|---------------------------------------|--|
| <b>Description</b>                    | Information relating to staff employment   |
| <b>Personal Data Items</b>            | <b>Staff</b> <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>                    | <b>Legal Obligation</b><br><br>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”<br><br><b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller” |
| <b>Evidence for legal basis</b>       | ICO Legal Basis Tool   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Secure filing cabinet & online secure servers.   |
| <b>Is it secure and/or encrypted?</b> | Yes - secure storage   |
| <b>Who can access data?</b>           | Headteacher and office staff   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | NCC and/or HR provider and/or Payroll provider   |
| <b>Legal basis for sharing</b>        | Public task and legal obligation   |
| <b>How is data shared?</b>            | Electronically or secure courier   |

System used: Photographs and videos of staff and pupils.

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

System used: PIRA - Rising stars (Wordblaze)

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

| System used: PS Financials            |  |
|---------------------------------------|--|
| <b>Description</b>                    | Accounting, purchasing, budgeting and reporting software.  |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School</li> <li>• MIS ID</li> <li>• Email address</li> </ul> <p><b>School</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Purchase data</li> <li>• Accounting data</li> <li>• Sales data</li> <li>• Expense data</li> <li>• Payment data</li> <li>• VAT returns</li> </ul> |
| <b>Why is it being processed?</b>     | To provide the school with an online financial management system.  |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>  |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit.   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | PS Financials servers  |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | School staff with login PS financial technical? staff for support  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | VAT returns shared with HMRC   |
| <b>Legal basis for sharing</b>        | Public task  |
| <b>How is data shared?</b>            | Electronically   |
| <b>References</b>                     | <a href="#">Click to download PS Financials Privacy</a><br><a href="#">Click to download PS Financial Data Protection</a>  |

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| System used: Recruitment information   |  |
| <b>Description</b>   | Part of the job application process  |
| <b>Personal Data Items</b>   | <b>Name</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Address</li> <li>• Educational establishments attended</li> <li>• Qualifications</li> <li>• Disciplinary Records</li> <li>• Appraisal Records</li> <li>• Salary information</li> </ul>   |
| <p>This system has been identified as containing Special Category Information</p> <p>Special category information is data which has the following characteristics:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Political opinions</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic data for the purpose of identifying a natural person</li> <li>• Sex life and or sexual orientation</li> <li>• Criminal Records information - protected in Article 10</li> </ul> |  |
| <b>Special Category Data Legal Basis</b>   | <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>  | Electronically via secure online servers   |
| <b>Legal basis for sharing Special Category data</b>   | Article 9  |
| <b>Why is it being processed?</b>  | As part of the recruitment process   |
| <b>Legal Basis</b>   | <b>Legal Obligation</b> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <b>Public task</b> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| <b>Evidence for legal basis</b>  | Safer recruitment process  |

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

| System used: Registers                |  |
|---------------------------------------|--|
| <b>Description</b>                    | Daily register, after school club registers, lunch register  |
| <b>Personal Data Items</b>            | <b>Child</b> <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>                    | <b>Legal Obligation</b><br><br>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."<br><br><b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller" |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | 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: 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,

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

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,

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

| System used: School Gateway           |   |
|---------------------------------------|---|
| <b>Description</b>                    | School Gateway is your school's app available on Android, iOS and the web. It'll work on phones tablets, laptops and even smart watches. Your school can decide which services they'd like parents to access with it. When you log into the app, each of the services your school provides will appear in a list for you to choose from. Below are some examples of the services your school might provide on School Gateway. |
| <b>Personal Data Items</b>            | <p><b>parent</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• email</li> </ul> <p><b>child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• medical condition</li> </ul>   |
| <b>Why is it being processed?</b>     | <a href="https://schoolcomms.com/privacy-policy/">https://schoolcomms.com/privacy-policy/</a>   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>  |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit   |
| <b>Is Consent Required?</b>           | yes   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | <a href="https://schoolcomms.com/privacy-policy/">https://schoolcomms.com/privacy-policy/</a>   |
| <b>Is it secure and/or encrypted?</b> | secure  |
| <b>Who can access data?</b>           | <a href="https://schoolcomms.com/privacy-policy/">https://schoolcomms.com/privacy-policy/</a>   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | <a href="https://schoolcomms.com/privacy-policy/">https://schoolcomms.com/privacy-policy/</a>   |
| <b>Legal basis for sharing</b>        | public task   |
| <b>How is data shared?</b>            | <a href="https://schoolcomms.com/privacy-policy/">https://schoolcomms.com/privacy-policy/</a>   |

|  |   |
|--|---|
| System used: School360   |   |
| <b>Description</b>   | Learning platform for Northumberland schools with links to 3rd party educational resource providers.  |
| <b>Personal Data Items</b>   | <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School id</li> <li>• Class/Group</li> <li>• Year</li> <li>• UPN (Unique Pupil Number)</li> <li>• Gender</li> <li>• Attendance (If School360 used for registration)</li> <li>• Pupil concern reports</li> <li>• EYFS reflections</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Staff Alternative e-mail address</li> <li>• Teacher pupil notes</li> </ul> |
| <p>This system has been identified as containing Special Category Information</p> <p>Special category information is data which has the following characteristics:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Political opinions</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic data for the purpose of identifying a natural person</li> <li>• Sex life and or sexual orientation</li> <li>• Criminal Records information - protected in Article 10</li> </ul> |   |
| <b>Special Category Data Legal Basis</b>   | <p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>   |
| <b>Special Category Evidence for legal basis</b>   | Article 9   |
| <b>How is the Special Category data shared?</b>  | 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>   | <p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing</p>   |

|                                       |   |
|---------------------------------------|---|
|                                       | <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>                     | <a href="#">Click to download School360 Privacy Policy</a><br><a href="#">Click to download School360 EYFS App Privacy Policy</a><br><a href="#">Click to download School360 Parent App Privacy Policy</a>  |

| 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

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

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</b>          | 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                                   | <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> |
| 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: 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>            | <b>Pupil</b> <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>                    | <b>Consent</b><br><br>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" |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Twitter or Facebook servers and in school  |
| <b>Is it secure and/or encrypted?</b> | Twitter account is password protected. Only parents who have been approved by the school can access or follow the school twitter account   |
| <b>Who can access data?</b>           | Parents of children in school who have requested to follow the school on twitter and who have been approved by the admin team.   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Information shared with parents  |
| <b>Legal basis for sharing</b>        | Consent  |
| <b>How is data shared?</b>            | Online via secure servers  |

| System used: Spelling Shed            |   |
|---------------------------------------|---|
| <b>Description</b>                    | The Spelling Shed - proudly powered by EdShed - is a spelling platform designed by a team of teachers. It is built with students, teachers and parents in mind and aims to make spelling fun for students as well as simple for adults to manage.           |
| <b>Personal Data Items</b>            | <p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Age</li> <li>•</li> </ul> <p><b>Parent</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact Details</li> </ul>   |
| <b>Why is it being processed?</b>     | <a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| <b>Evidence for legal basis</b>       | ICO legal toolkit   |
| <b>Is Consent Required?</b>           | Yes as part of registration process   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | <a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>   |
| <b>Is it secure and/or encrypted?</b> | Secure  |
| <b>Who can access data?</b>           | School, teachers and parents  |
| <b>How long is data kept?</b>         | 3+ years  |
| <b>Who is data shared with?</b>       | <a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>   |
| <b>Legal basis for sharing</b>        | Public Task   |
| <b>How is data shared?</b>            | <a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>   |

| System used: STEM                     |  |
|---------------------------------------|--|
| <b>Description</b>                    | Developing teachers and leaders Explore programmes and resources that support professional development and drive the impact of teaching across schools and colleges. o support parents and carers, our subject experts have put together a selection of activities and materials, which are free for everyone to access. |
| <b>Personal Data Items</b>            | <b>Teacher</b> <ul style="list-style-type: none"> <li>• Name</li> </ul> <b>child</b> <ul style="list-style-type: none"> <li>• Name</li> </ul> <b>Age</b> <ul style="list-style-type: none"> <li>• Name</li> </ul> <b>Parent</b> <ul style="list-style-type: none"> <li>• Name</li> </ul>                                 |
| <b>Why is it being processed?</b>     | <a href="https://www.stem.org.uk/privacy-policy">https://www.stem.org.uk/privacy-policy</a>  |
| <b>Legal Basis</b>                    | <b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller   |
| <b>Evidence for legal basis</b>       | ICO Legal Basis Tool   |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://www.stem.org.uk/privacy-policy">https://www.stem.org.uk/privacy-policy</a>  |
| <b>Is it secure and/or encrypted?</b> | Secure   |
| <b>Who can access data?</b>           | <a href="https://www.stem.org.uk/privacy-policy">https://www.stem.org.uk/privacy-policy</a>  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | <a href="https://www.stem.org.uk/privacy-policy">https://www.stem.org.uk/privacy-policy</a>  |
| <b>Legal basis for sharing</b>        | Public Task  |
| <b>How is data shared?</b>            | <a href="https://www.stem.org.uk/privacy-policy">https://www.stem.org.uk/privacy-policy</a>  |

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

## References

[Click to download Tapestry Privacy Policy](#)

|                                       |  |
|---------------------------------------|--|
| System used: The National College     |  |
| <b>Description</b>                    | A provider of online training for staff & governors  |
| <b>Personal Data Items</b>            | <p><b>Staff member</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Job Title</li> <li>• Email</li> <li>• Phone number</li> </ul> <p><b>Governor</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email</li> <li>• Phone number</li> </ul>   |
| <b>Why is it being processed?</b>     | In order to provide access to online training and for billing purposes   |
| <b>Legal Basis</b>                    | <p><b>Contract</b></p> <p>Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| <b>Evidence for legal basis</b>       | ICO Toolkit  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | On Server of National Education Group in UK  |
| <b>Is it secure and/or encrypted?</b> | Yes both secure and encrypted  |
| <b>Who can access data?</b>           | College staff or their contractors to provide service and school   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Contractors to provide service   |
| <b>Legal basis for sharing</b>        | Contract   |
| <b>How is data shared?</b>            | Via encrypted transfer   |

System used: Times Tables Rock Stars

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

System used: Twinkl

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | We're here to 'help those who teach'. It's what brings us to work every day. We're proud to create educational resources that can be used at each step of a child's learning journey. Our teacher-created resources provide entire schemes of work, lesson planning and assessments right through to online educational games, augmented reality and so much more. We have over 525,000 resources and new content gets added every day. You'll find we've normally got what you need before you even know you want it. |
| <b>Personal Data Items</b>            | <b>Teacher</b> <ul style="list-style-type: none"><li>• Name</li></ul> <b>child</b> <ul style="list-style-type: none"><li>• Name</li></ul>  |
| <b>Why is it being processed?</b>     | <a href="https://www.twinkl.co.uk/legal">https://www.twinkl.co.uk/legal</a>  |
| <b>Legal Basis</b>                    | <b>Public task</b> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>  |
| <b>Evidence for legal basis</b>       | ICO Legal Basis Tool   |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://www.twinkl.co.uk/legal">https://www.twinkl.co.uk/legal</a>  |
| <b>Is it secure and/or encrypted?</b> | Secure   |
| <b>Who can access data?</b>           | <a href="https://www.twinkl.co.uk/legal">https://www.twinkl.co.uk/legal</a>  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | <a href="https://www.twinkl.co.uk/legal">https://www.twinkl.co.uk/legal</a>  |
| <b>Legal basis for sharing</b>        | Public Task  |
| <b>How is data shared?</b>            | <a href="https://www.twinkl.co.uk/legal">https://www.twinkl.co.uk/legal</a>  |

| System used: Vimeo                    |   |
|---------------------------------------|---|
| <b>Description</b>                    | Upload and Host Videos. Collaborate and Share. Find the Vimeo Plan for You. HD playback. Powerful privacy controls. Privacy controls. Unlimited bandwidth. Embedding features. Video statistics. Ad-free videos. Password protection. 8K 360 uploads. Customizable player |
| <b>Personal Data Items</b>            | <b>Teacher</b> <ul style="list-style-type: none"> <li>• Name</li> </ul> <b>Child</b> <ul style="list-style-type: none"> <li>• Name</li> </ul>   |
| <b>Why is it being processed?</b>     | <a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a>   |
| <b>Legal Basis</b>                    | <b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller                      |
| <b>Evidence for legal basis</b>       | ICO legal Basis tool kit  |
| <b>Is Consent Required?</b>           | yes   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | <a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a>   |
| <b>Is it secure and/or encrypted?</b> | Secure  |
| <b>Who can access data?</b>           | <a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a>   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | <a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a>   |
| <b>Legal basis for sharing</b>        | Public Task   |
| <b>How is data shared?</b>            | <a href="https://vimeo.com/privacy">https://vimeo.com/privacy</a>   |

| System used: Visitor book             |  |
|---------------------------------------|--|
| <b>Description</b>                    | Log of all visitors into school / fire regulations   |
| <b>Personal Data Items</b>            | <b>Visitor</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date and time</li> <li>• Car registration</li> <li>• Purpose of visit</li> <li>• Company</li> <li>•</li> </ul>   |
| <b>Why is it being processed?</b>     | Safeguarding, health and safety, fire regulations  |
| <b>Legal Basis</b>                    | <b>Legal Obligation</b><br><br>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”<br><br><b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller” |
| <b>Evidence for legal basis</b>       | ICO legal basis toolkit  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Visitor book (hard copy)   |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | School staff, visitors   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | School staff, visitors   |
| <b>Legal basis for sharing</b>        | Public task & legal obligation   |
| <b>How is data shared?</b>            | Hard copy or secure online server.   |

System used: White Rose Maths and Science

**Description**

Influenced, inspired and informed by the work of leading maths researchers and practitioners across the world, White Rose Maths brings together a team of highly experienced and passionate maths teaching experts to train, guide, help and support all those who want to make change happen in their schools. We're guessing that might include YOU! If so, we offer you in-depth training programmes, a vast bank of clear, practical resources (many of them available free of charge), and the bespoke support you want and need to keep raising the bar. We'll not only make your job a whole lot simpler, we'll help you change the future for every child.

**Personal Data Items**

**Teacher**

- Name
- Date of Birth
- Gender
- Email address
- Payment details

**Child**

- Name
- Age
- Gender
- Email address

**Parent**

- Name
- Age
- Gender
- Email address
- 

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

**Special Category Data Legal Basis**

**Obligation**

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

**Special Category Evidence for**

Article 9

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

|  |  |
|--|--|
| System used: Wonde   |  |
| <b>Description</b>   | Manages transfer of data from Sims MIS to School360.   |
| <b>Personal Data Items</b>   | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School id</li> <li>• Class/group</li> <li>• Year</li> <li>• UPN</li> <li>• Gender</li> <li>• Attendance</li> </ul>               |
| <p>This system has been identified as containing Special Category Information</p> <p>Special category information is data which has the following characteristics:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Political opinions</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic data for the purpose of identifying a natural person</li> <li>• Sex life and or sexual orientation</li> <li>• Criminal Records information - protected in Article 10</li> </ul> |  |
| <b>Special Category Data Legal Basis</b>   | <p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>  |
| <b>Special Category Evidence for legal basis</b>   | Article 9  |
| <b>How is the Special Category data shared?</b>  | School 360 secure servers  |
| <b>Legal basis for sharing Special Category data</b>   | Article 9  |
| <b>Why is it being processed?</b>  | To facilitate the exchange of data to allow the set up of school360 for a school.  |
| <b>Legal Basis</b>   | <p><b>Contract</b></p> <p>Article 6(1)(b) gives you a lawful basis for processing where: "processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract"</p> |
| <b>Evidence for legal basis</b>  | ICO legal basis toolkit  |
|  |  |

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

System used: Y4 Multiplication Check

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | What is the Multiplication Tables Check. The Multiplication Tables Check (MTC) is a key stage 2 assessment to be taken by pupils at the end of year 4 (in June). From the 2019 / 2020 academic year onwards. The purpose of the MTC is to make sure the times tables knowledge is at the expected level. |
| <b>Personal Data Items</b>            | <p><b>child</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>   |
| <b>Why is it being processed?</b>     | <a href="https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance">https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance</a>  |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>  |
| <b>Evidence for legal basis</b>       | ICO legal framework tool kit   |
| <b>Is Consent Required?</b>           | yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance">https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance</a>  |
| <b>Is it secure and/or encrypted?</b> | secure   |
| <b>Who can access data?</b>           | <a href="https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance">https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance</a>  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | <a href="https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance">https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance</a>  |
| <b>Legal basis for sharing</b>        | Public task  |
| <b>How is data shared?</b>            | <a href="https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance">https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance</a>  |

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| System used: Zoom                     |  |
| <b>Description</b>                    | Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Our easy, reliable cloud platform for video, voice, content sharing, and chat runs across mobile devices, desktops, telephones, and room systems.   |
| <b>Personal Data Items</b>            | <p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Parent</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>   |
| <b>Why is it being processed?</b>     | <a href="https://zoom.us/trust">https://zoom.us/trust</a>  |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| <b>Evidence for legal basis</b>       | ICO legal basis tool   |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | <a href="https://zoom.us/trust">https://zoom.us/trust</a>  |
| <b>Is it secure and/or encrypted?</b> | Secure   |
| <b>Who can access data?</b>           | <a href="https://zoom.us/trust">https://zoom.us/trust</a>  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | <a href="https://zoom.us/trust">https://zoom.us/trust</a>  |
| <b>Legal basis for sharing</b>        | Public task  |
| <b>How is data shared?</b>            | <a href="https://zoom.us/trust">https://zoom.us/trust</a>  |

| System used: National Tutoring Programme (NTP) |  |
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| <b>Description</b>                             | The National Tutoring Programme offers highly tailored tuition support for pupils, to help those whose education has been most impacted by the pandemic.   |
| <b>Personal Data Items</b>                     | <b>Child</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• SEN Status</li> <li>• PP Funding Status</li> <li>• Attainment Level</li> <li>• Special Learning Needs</li> <li>• Safeguarding Info/Risk Assessments</li> </ul>   |
| <b>Why is it being processed?</b>              | To perform the services of the National Tutoring Programme   |
| <b>Legal Basis</b>                             | <b>Legitimate Interest</b> <p>Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”</p> |
| <b>Evidence for legal basis</b>                | ICO lawful basis toolkit   |
| <b>Is Consent Required?</b>                    | No   |
| <b>Data Source</b>                             | School   |
| <b>Where is data stored?</b>                   | <a href="https://nationaltutoring.org.uk/legal/privacy-notice/">https://nationaltutoring.org.uk/legal/privacy-notice/</a>  |
| <b>Is it secure and/or encrypted?</b>          | Secure   |
| <b>Who can access data?</b>                    | <a href="https://nationaltutoring.org.uk/legal/privacy-notice/">https://nationaltutoring.org.uk/legal/privacy-notice/</a>  |
| <b>How long is data kept?</b>                  | 6+ years   |
| <b>Who is data shared with?</b>                | <a href="https://nationaltutoring.org.uk/legal/privacy-notice/">https://nationaltutoring.org.uk/legal/privacy-notice/</a>  |
| <b>Legal basis for sharing</b>                 | Legitimate Interest  |
| <b>How is data shared?</b>                     | <a href="https://nationaltutoring.org.uk/legal/privacy-notice/">https://nationaltutoring.org.uk/legal/privacy-notice/</a>  |