



Dr Thomlinson C of E Middle School

GDPR Asset Register

Date: 01/02/2026

Data Protection Officer: Wallis Bath

01669 620287

info@dtms.cheviottt.co.uk

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
Accelerated Reader	Accelerated Reader gives teachers the information they need to monitor students' reading practice and make informed decisions to guide their future learning.	
Accident Report Form	ACC1 form for reporting accidents to NCC	
Assessment Records	Electronic and paper mark books	
Attendance file	Attendance information about pupils and classes	yes
BBC Bitesize	BBC Bitesize is a free online study support resource designed to help with learning, revision and homework! Bitesize provides support for learners aged 5 to 16+ across a wide range of school subjects. It also supports children and young people's wellbeing and career choices. Bitesize also has hundreds of published lessons to help students across the UK with home schooling. Bitesize guides are written by teachers and subject experts and are mapped to follow the curricula of the UK. Secondary Bitesize follows exam board specifications for the main exam boards in the UK, including for GCSE in England, Wales and Northern Ireland and National 4, National 5 & Highers in Scotland, ensuring students are preparing for the right exams	
Behaviour Files - Paper (in class)	Information relating to the behaviours of particular pupils	yes
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	
CCTV	CCTV	
Child Protection Records - Electronic	Records relating to child protection issues for individual pupils	yes
Child Protection Records - Paper	Records relating to child protection issues for individual pupils	yes
Consent for educational visits	Consent information for all educational visits including day trips and residential visits	yes

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, including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data.	
Dietary requirements information sheets	Required documents for specific chidlren with severe allergies / intolerances and religious observations (food)	yes
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.	
Google Classroom	A free and easy tool helping educators efficiently	

	manage and assess progress, while enhancing connections with learners from school, from home, or on the go.	
Google drive for education	suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.	
Google Meet	Google Meet is a video-communication service developed by Google. It is one of two apps that constitute the replacement for Google Hangouts, the other being Google Chat	
Governance	Details of all members of the Governing Body	
HAF- HolidayActivities	The dedicated platform built to run and report on your local authority HAF programme.	yes
Health & Safety	Records pertaining to Health & Safety	
Huggg	Purchase and send supermarket vouchers to those in need. Manage funds and give recipients choice all in one simple to use platform.	
ICT North	IT services for schools	
Jump- Website Provider	User research, web design, brand strategy, brand identity, graphic design, illustration, print design, animation, motion graphics and brand communication	
Kerboodle	Kerboodle works alongside your course textbooks to seamlessly integrate quality digital resources into all of your lessons – both in school and at home. Packed with customisable learning content, assessment materials and reporting tools, Kerboodle allows you to seamlessly integrate quality digital resources into your classroom. Over 3 million students and teachers currently use Kerboodle across 60 courses and a wide range of subjects including Modern Languages, Science, Mathematics, English and Geography	
Lightspeed Internet Filtering	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.	
Local Authority moderation of work	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.	
Looked After Children Records - Electronic	Information relating to children who are in Looked After Care	yes
Looked After Children Records - Paper	Information relating to children who are Looked After	yes
Medical Files - Electronic	Information in respect of specific medical needs of an individual student	yes

Medical Files - Paper	Information in respect of specific medical needs of an individual student	yes
Medical log	File of medical information for each child: asthma, medication administered, health care plans, risk assessments	yes
Microsoft Teams	Remote learning with Office 365 for students Microsoft Teams for Education Whether you're learning at home for long periods of time or just outside of class, access Office 365 for free, stay connected, and learn in a way that's right for you. Get 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	
My Maths	MyMaths is an interactive online teaching and homework subscription website for schools that builds pupil engagement and consolidates maths knowledge.	
My ON Renaissance Reading	A personalized digital library at every student's fingertips Renaissance myON® Reader is a student-centered, personalized literacy environment that gives students access to more than 6,000 enhanced digital books. Titles are dynamically matched to each individual student's interests, grade and Lexile® reading level. Combined with a suite of close reading tools and embedded supports, myON Reader fosters student engagement and achievement.	
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.	
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.	
PaperCut Hive- Cloud Printing Software	Simple for users, and powerful for admins. Meet the cloud print, copy, and scan management software that just works with the devices you already have.	
Parents Evening Booking System	Online booking system for parents evenings and other school events.	
Performance Management	Staff appraisals	
Personnel files	Information relating to staff employment	
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
Place Leisure- School Swimming Management System	The SSMS is a digital assessment tool, assessing pupils using Swim England School Swimming and Water Safety Charter. It is matched against the National Curriculum programmes of study and provides schools with termly reports. Reports evidence statistics to unlock Sports Premium funding for further swimming lessons. The product gives Places Leisure an important opportunity to gather national data to report on school swimming and influence national networks. Data gathered will strengthen potential to 'close the gap' for the 30% not yet meeting the standard. The system requires a school pupil data upload containing basic details for pupils swimming each term. Data is automatically uploaded to the Places Leisure School Swim App where school swim instructors assess pupils against Swim England's School Swimming Awards. Schools receive a termly update on pupil attainment for all pupils we have the data for.	yes
PS Financials	Accounting, purchasing, budgeting and reporting software.	

Read Write Inc Website (www.ruthmiskin.com)	A website linked to the scheme Read Write Inc which includes a staff portal.	
RealSmart	Realsmart provides a website that improves communication and makes collaboration easy! Google Apps for Education and your online learning and tracking tools wrapped into one school website bringing your whole school online!	
Recruitment information	Part of the job application process	yes
Registers	Daily register, after school club registers, lunch register	
Safeguarding Records - Electronic	Records relating to safeguarding of children	yes
Safeguarding Records - Paper	Records relating to safeguarding of children	yes
School360	Learning platform for Northumberland schools with links to 3rd party educational resource providers.	yes
SEND electronic records	Records relating to Special Educational Needs and Disability for individual pupils	yes
Send Paper Records	Records relating to individual pupil's SEND history	yes
Senso Cloud	The Cloud Based Platform for Device Monitoring and Management. All-In-One Software for Network, Classroom, Safeguarding and Asset Management, and for managing and monitoring any Windows and Chrome device from a Centralised Web portal	
Sign-In App	Electronic sign-in software for the school / fire regulations / emergency evacuation	
SIMS	SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools.	yes
Social media sites e.g. Twitter, Facebook	Social Media tool used to inform parents about events in school and celebrate children's achievement.	
SPAG	Online SPaG tests for instant gap analysis SPaG.com provides KS1 and KS2 practice punctuation & grammar tests. Plus 80 additional tests covering grammar objectives for every year group	
Sports Leader UK	Awarding body for L3 award in Sport leadership	
SumDog	Personalised maths & spelling practice that pupils love Engage your pupils with adaptive learning games aligned to the National Curriculum, for children aged 5 to 14. Proven to accelerate progress.	
Testbase	This is an online resource provided by Doublestruck which enables children to prepare for National SAT examinations. Doublestruck is an Educational Technology company that is part of the AQA family. It	yes

	specialises in technology that addresses the needs of teachers in formative assessment and reporting.	
The National College	A provider of online training for staff & governors	
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.	
UCAS	University Applications	
WardHadaway	As a full service law firm, we offer a huge variety of services to a wide cross section of client groups. Those working in the public and third sectors operate in an often sensitive environment. They can be under significant scrutiny, as they use limited resources to try to achieve maximum impact and benefit. So whether working with educational establishments, local authorities or blue light services, with charities or social enterprises, our teams are highly experienced in providing a robust, efficient and effective service.	yes
Wonde	Manages transfer of data from Sims MIS to School360.	yes
Zoom	Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Our easy, reliable cloud platform for video, voice, content sharing, and chat runs across mobile devices, desktops, telephones, and room systems.	

System used: Accelerated Reader	
Description	Accelerated Reader gives teachers the information they need to monitor students' reading practice and make informed decisions to guide their future learning.
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • Class <p>Staff</p> <ul style="list-style-type: none"> • Name
Why is it being processed?	To generate information on the reading abilities of pupils
Legal Basis	<p>Public task</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>
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Renaissance Learning servers
Is it secure and/or encrypted?	We have taken certain physical, electronic, contractual and administrative steps to protect the confidentiality, security, and integrity of your personally identifiable information. However, no method of transmission over the Internet or method of electronic storage is completely secure, and we cannot guarantee its absolute security. It is your responsibility to maintain the confidentiality of your Website account information.
Who can access data?	Pupil (own data), staff, technical support staff
How long is data kept?	3 years after date closed
Who is data shared with?	Not shared
Legal basis for sharing	N/A
How is data shared?	N/A
References	Click to download Accelerated Reader Privacy Policy

System used: Accident Report Form	
Description	ACC1 form for reporting accidents to NCC
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Gender • Address • Telephone number • Date and time of accident • nature of injury • Place of accident • First aid • Circumstances • Action taken • Witness information • <p>Staff member</p> <ul style="list-style-type: none"> • Name • Occupation • DOB • Gender • Address • Telephone number • Date and time of injury • nature of injury • place of accident • First aid • Circumstances • Action taken • Witness information •
Why is it being processed?	Statutory obligations to comply with Health and Safety regulations.
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School

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

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

System used: Attendance file	
Description	Attendance information about pupils and classes
Personal Data Items	Pupil <ul style="list-style-type: none"> • Name • DOB • Class • Gender • UPN • Address • Telephone number • Parental contact • Ethnic origin • Current attendance • Past attendance
<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"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10 	
Special Category Data Legal Basis	Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbally, Secure cloud,
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To regularly check pupil's attendance towards a desired goal
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing

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

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

Description	Information relating to the behaviours of particular pupils
Personal Data Items	<p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Health Needs • Educational Behavioural Needs • Social Care Status • <p>Parents/Carers</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>External Support Workers</p> <ul style="list-style-type: none"> • 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	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> <p>Significant Public Interest</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</p>
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	and which contains suitable safeguards.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbally & by Secure Messenger
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To ensure access to education appropriate to needs
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure cabinet
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Class Teacher and key workers as appropriate
How long is data kept?	3 years after date closed
Who is data shared with?	External support workers as applies
Legal basis for sharing	Public Task & Legal Obligation
How is data shared?	Verbal or secure messenger

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

Special Category Data Legal Basis	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> <p>Public</p> <p>Processing relates to personal data manifestly made public by the Data Subject.</p>
Special Category Evidence for legal basis	Public task, contract, consent, legal obligation
How is the Special Category data shared?	https://bromcom.com/privacy-policy/
Legal basis for sharing Special Category data	Public interest and obligation
Why is it being processed?	https://bromcom.com/privacy-policy/
Legal Basis	<p>Consent</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>Contract</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>Public task</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>

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

System used: Canva	
Description	Canva is an online design and publishing tool
Personal Data Items	<p>Teacher</p> <ul style="list-style-type: none"> • Name • date of birth • email • phone number • school • analytics data • usage data including device & location <p>Student</p> <ul style="list-style-type: none"> • Name • class • school • email • analytics data • usage data including device & location
Why is it being processed?	To allow use of Canva resources and to improve Canva service to users
Legal Basis	<p>Public task</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>
Evidence for legal basis	ICO toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	secured cloud
Is it secure and/or encrypted?	yes both encrypted and secure
Who can access data?	School and Canva employees as required to provide service
How long is data kept?	1+ year
Who is data shared with?	Third party companies to provide service
Legal basis for sharing	contractual legitimate interest
How is data shared?	secure encrypted transfer

System used: CCTV	
Description	CCTV
Personal Data Items	Staff <ul style="list-style-type: none"> • Images Child <ul style="list-style-type: none"> • Images Visitor <ul style="list-style-type: none"> • Images
Why is it being processed?	Safeguarding
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	School servers and recordings
Is it secure and/or encrypted?	Yes
Who can access data?	School staff
How long is data kept?	3 years after date closed
Who is data shared with?	Police in event of criminal investigations
Legal basis for sharing	ICO legal basis toolkit
How is data shared?	Hard Copy

System used: Child Protection Records - Electronic

Description	Records relating to child protection issues for individual pupils
Personal Data Items	<p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Child Protection Plan/Actions • <p>Parents</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>Social Care Worker</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>External Support Workers</p> <ul style="list-style-type: none"> • 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
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	Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbally or secure cloud sharing (Google or Office 365 etc)
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Statutory obligations and to support educational entitlement
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	School computer, laptop
Is it secure and/or encrypted?	Yes
Who can access data?	Designated Child Protection Lead & Deputy, Designated Admin Staff
How long is data kept?	3 years after date closed
Who is data shared with?	Social Workers, Parent/Carers as appropriate, some information shared with key workers, health care professionals and Police, receiving school
Legal basis for sharing	Statutory & Legitimate interest
How is data shared?	Verbally or secure cloud sharing (Google or Office 365 etc)

System used: Child Protection Records - Paper

Description	Records relating to child protection issues for individual pupils
Personal Data Items	<p>Pupils</p> <ul style="list-style-type: none"> • Name • • Date of Birth • Address • Health Needs • Social Care Status • Educational needs • Child Protection Plan/Actions <p>Parents/Carers</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>Social Care Worker</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>External Support Workers</p> <ul style="list-style-type: none"> • 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
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	Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbal or secure messenger
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Statutory obligations and to support educational entitlement
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure cabinet
Is it secure and/or encrypted?	Yes
Who can access data?	Designated Child Protection Lead & Deputy; Designation admin staff
How long is data kept?	3 years after date closed
Who is data shared with?	Social Workers, Parent/Carer as appropriate, some information shared with key workers, health care professionals and Police, receiving school
Legal basis for sharing	Statutory and Legitimate interest
How is data shared?	Verbal or secure messenger

System used: Consent for educational visits	
Description	Consent information for all educational visits including day trips and residential visits
Personal Data Items	Pupil <ul style="list-style-type: none"> • Name • DOB • Health conditions • Medication • Dietary requirements • Contact information • Family doctor
<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"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10 	
Special Category Data Legal Basis	Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Shared by phone
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To ensure school has up to date information when taking children off site
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” Public task Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit

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

System used: Data tracking spreadsheets

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

Special Category Data Legal Basis	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Secure google drive and paper copies
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Processing this data is necessary for the completion of a public task and for the school to meet statutory requirements
Legal Basis	<p>Public task</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>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School

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

Description	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.
Personal Data Items	Staff <ul style="list-style-type: none"> • Name • All staff employment details
Why is it being processed?	https://debbiejuddhr.co.uk/about-us/
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis tool kit
Is Consent Required?	yes
Data Source	Police
Where is data stored?	https://debbiejuddhr.co.uk/about-us/
Is it secure and/or encrypted?	secure
Who can access data?	https://debbiejuddhr.co.uk/about-us/
How long is data kept?	3 years after date closed
Who is data shared with?	https://debbiejuddhr.co.uk/about-us/
Legal basis for sharing	Public task/legal obligation
How is data shared?	https://debbiejuddhr.co.uk/about-us/

System used: DFE-Census and workforce Census

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

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

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

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

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

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

System used: Google Classroom	
Description	A free and easy tool helping educators efficiently manage and assess progress, while enhancing connections with learners from school, from home, or on the go.
Personal Data Items	Teacher <ul style="list-style-type: none"> • Name Child <ul style="list-style-type: none"> • Name
Why is it being processed?	https://policies.google.com/privacy?hl=en-GB#infocollect
Legal Basis	Legal Obligation <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> Public task <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>
Evidence for legal basis	ICO legal tool kit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://policies.google.com/privacy?hl=en-GB#infocollect
Is it secure and/or encrypted?	Secure
Who can access data?	https://policies.google.com/privacy?hl=en-GB#infocollect
How long is data kept?	3 years after date closed
Who is data shared with?	https://policies.google.com/privacy?hl=en-GB#infocollect
Legal basis for sharing	Public Task/legal obligation
How is data shared?	https://policies.google.com/privacy?hl=en-GB#infocollect

System used: Google drive for education	
Description	suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Classes / groups • Gmail address <p>Pupil</p> <ul style="list-style-type: none"> • Name • Classes / groups • Gmail address <p>Governor</p> <ul style="list-style-type: none"> • Name • Gmail address
Why is it being processed?	To provide Google drive for education to staff, pupils and governors.
Legal Basis	<p>Public task</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>
Evidence for legal basis	ICO legal basis toolkit.
Is Consent Required?	No
Data Source	School 360
Where is data stored?	Google secure servers in Europe
Is it secure and/or encrypted?	Yes secure and encrypted
Who can access data?	Individual users can access their own accounts. School360 and ICT Team can access management tool.
How long is data kept?	3 years after date closed
Who is data shared with?	Staff and Pupils
Legal basis for sharing	Public task
How is data shared?	Secure google cloud.
References	Click to download Google Drive Policy Notice Click to download Google GSuite Privacy Policy

System used: Google Meet	
Description	Google Meet is a video-communication service developed by Google. It is one of two apps that constitute the replacement for Google Hangouts, the other being Google Chat
Personal Data Items	<p>teacher</p> <ul style="list-style-type: none"> • Name • • <p>child</p> <ul style="list-style-type: none"> • Name
Why is it being processed?	https://policies.google.com/privacy?hl=en-GB
Legal Basis	<p>Public task</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>
Evidence for legal basis	ICO legal tool kit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://policies.google.com/privacy?hl=en-GB
Is it secure and/or encrypted?	Secure
Who can access data?	https://policies.google.com/privacy?hl=en-GB
How long is data kept?	3 years after date closed
Who is data shared with?	https://policies.google.com/privacy?hl=en-GB
Legal basis for sharing	Public Task
How is data shared?	https://policies.google.com/privacy?hl=en-GB

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

System used: HAF- HolidayActivities	
Description	The dedicated platform built to run and report on your local authority HAF programme.
<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"> • 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	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> <p>Public</p> <p>Processing relates to personal data manifestly made public by the Data Subject.</p>
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	https://www.holidayactivities.com/privacy-notice/
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To run and report HAF programme for schools.
Legal Basis	<p>Legal Obligation</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>Legitimate Interest</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> <p>Public task</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
Evidence for legal basis	ICO Toolkit
Is Consent Required?	https://www.holidayactivities.com/privacy-notice/
Data Source	School
Where is data stored?	https://www.holidayactivities.com/privacy-notice/
Is it secure and/or encrypted?	Yes
Who can access data?	https://www.holidayactivities.com/privacy-notice/
How long is data kept?	3+ years
Who is data shared with?	https://www.holidayactivities.com/privacy-notice/
Legal basis for sharing	Legal obligation, public task and legitimate interest
How is data shared?	https://www.holidayactivities.com/privacy-notice/

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

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

System used: ICT North	
Description	IT services for schools
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Username • Email address • Temporary passwords <p>Pupil</p> <ul style="list-style-type: none"> • Name • Username • Email address • Temporary passwords
Why is it being processed?	ICT support to end users at site / access to school IT equipment.
Legal Basis	<p>Consent</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>Contract</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>Public task</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>
Evidence for legal basis	ICO legal toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	School software/ICT North systems
Is it secure and/or encrypted?	Yes
Who can access data?	Staff, pupils, ICT North administrators
How long is data kept?	1+ year
Who is data shared with?	Staff, pupils, ICT North administrators
Legal basis for sharing	Contract, consent, pupil task
How is data shared?	School software/ICT North systems

System used: Jump- Website Provider

Description	User research, web design, brand strategy, brand identity, graphic design, illustration, print design, animation, motion graphics and brand communication
Personal Data Items	Staff, Governor and Parents <ul style="list-style-type: none"> • Name • Email Address
Why is it being processed?	To inform parents and the wider community about the life of the school
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	Yes
Data Source	Parent
Where is data stored?	https://www.wesayhowhigh.com/privacy-policy
Is it secure and/or encrypted?	Yes
Who can access data?	https://www.wesayhowhigh.com/privacy-policy
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.wesayhowhigh.com/privacy-policy
Legal basis for sharing	Public interest & legal obligation
How is data shared?	https://www.wesayhowhigh.com/privacy-policy

System used: Kerboodle	
Description	Kerboodle works alongside your course textbooks to seamlessly integrate quality digital resources into all of your lessons – both in school and at home. Packed with customisable learning content, assessment materials and reporting tools, Kerboodle allows you to seamlessly integrate quality digital resources into your classroom. Over 3 million students and teachers currently use Kerboodle across 60 courses and a wide range of subjects including Modern Languages, Science, Mathematics, English and Geography
Personal Data Items	Teacher <ul style="list-style-type: none"> • Name Child <ul style="list-style-type: none"> • Name
Why is it being processed?	https://global.oup.com/privacy?cc=us
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO- Legal basis tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://global.oup.com/privacy?cc=us
Is it secure and/or encrypted?	Secure
Who can access data?	https://global.oup.com/privacy?cc=us
How long is data kept?	3 years after date closed
Who is data shared with?	https://global.oup.com/privacy?cc=us
Legal basis for sharing	Public Task
How is data shared?	https://global.oup.com/privacy?cc=us

System used: Lightspeed Internet Filtering	
Description	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Machine name • I/P address • URLs visited • School <p>Pupil</p> <ul style="list-style-type: none"> • Name • Name • Machine name • I/P address • URLs visited • School
Why is it being processed?	Statutory requirement to filter Internet services for school users
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	Lightspeed Rockets at County Hall Northumberland
Is it secure and/or encrypted?	Yes
Who can access data?	NCC school support Staff, Curriculum ICT Team, Lightspeed staff for support
How long is data kept?	3 years after date closed
Who is data shared with?	School leadership, LSCB and police if serious incident occurs
Legal basis for sharing	Public task and legal obligation
How is data shared?	Secure electron communication
References	Click to download Lightspeed Privacy Notice

System used: Local Authority moderation of work

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

System used: Looked After Children Records - Electronic

Description	Information relating to children who are in Looked After Care
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Personal Education Plan • Health Needs • Social Care Needs • Educational Needs • Family Background <p>Parents & Carers</p> <ul style="list-style-type: none"> • Name • Contact Details • Address • <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>External Support</p> <ul style="list-style-type: none"> • Name • Organisation • Position • Address • Contact Details
<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"> • 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	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
Special Category Evidence for legal basis	Article 9

How is the Special Category data shared?	Verbally or secure cloud sharing (Google or Office 365 etc)
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To support the education of children who are Looked After
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	School computer, laptop
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Class Teacher, Designated Key Worker
How long is data kept?	3 years after date closed
Who is data shared with?	Social Workers, Local Authority, Carers, Receiving school
Legal basis for sharing	Legal Obligation, Public Task
How is data shared?	via secure electronic means, Google or Office 365

System used: Looked After Children Records - Paper

Description	Information relating to children who are Looked After
Personal Data Items	<p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Personal Education Plan • Health Needs • Social Care Needs • Educational Needs • Family Background • <p>Parents & Carers</p> <ul style="list-style-type: none"> • Name • Contact Details • Address • <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>External Support Workers</p> <ul style="list-style-type: none"> • 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	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> <p>Significant Public Interest</p>
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	Processing is required for reasons of significant public interest on the basis of Union or Member State Law that is equivalent to the aim pursued and which contains suitable safeguards.
Special Category Evidence for legal basis	ICO Regs - Article 9
How is the Special Category data shared?	Secure Messenger or Verbal
Legal basis for sharing Special Category data	ICO Regs - Article 9
Why is it being processed?	To support the education of children who are Looked After
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO Legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure Cabinet
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Class Teacher, Designated Key Worker
How long is data kept?	3 years after date closed
Who is data shared with?	Social Workers, Local Authority, Carers, Receiving School
Legal basis for sharing	Legal Obligation & Public Task
How is data shared?	Verbally and by Secure Messenger

System used: Medical Files - Electronic

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Medical Files - Paper

Description	Information in respect of specific medical needs of an individual student
Personal Data Items	Pupils <ul style="list-style-type: none">• Name• Date of Birth• Address• Health Needs• Social Care Status• Educational Needs• Medical History• Medication Details Parents/Carers <ul style="list-style-type: none">• Name• Address• Contact Details Staff <ul style="list-style-type: none">• Name• Position External Support Workers <ul style="list-style-type: none">• 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 <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
Special Category Evidence for legal basis	ICO regs Article 9

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

System used: Medical log	
Description	File of medical information for each child: asthma, medication administered, health care plans, risk assessments
Personal Data Items	Pupil <ul style="list-style-type: none"> • Name • Inhaler / medication information (doseage) • DOB • Class • Medical condition • Signs and symptoms • Treatment • Parental consent • Name of medication and dose • Side effects • Storage requirements • Special equipment • Testing needed • Access to food drink • Dietary requirement • Staff support • Contingency arrangements • Family / emergency contacts • Hazard • Risk • Control measures / risk evaluation
<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"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10 	
Special Category Data Legal Basis	Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Internally with school / medical staff
Legal basis for sharing Special Category data	Article 9

Why is it being processed?	Health and safety of child
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	Parent
Where is data stored?	Medical log in secure storage held in the school office
Is it secure and/or encrypted?	Yes
Who can access data?	School staff
How long is data kept?	3 years after date closed
Who is data shared with?	Staff, NCC and NHS professionals
Legal basis for sharing	Public task and legal obligation
How is data shared?	Verbally, written and electronically via secure servers.

System used: Microsoft Teams	
Description	<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>
Personal Data Items	<p>Teacher</p> <ul style="list-style-type: none"> • Name <p>Child</p> <ul style="list-style-type: none"> • Name
Why is it being processed?	https://privacy.microsoft.com/en-us/privacystatement
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://privacy.microsoft.com/en-us/privacystatement
Is it secure and/or encrypted?	Secure
Who can access data?	https://privacy.microsoft.com/en-us/privacystatement
How long is data kept?	3 years after date closed
Who is data shared with?	https://privacy.microsoft.com/en-us/privacystatement

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

System used: My Maths	
Description	MyMaths is an interactive online teaching and homework subscription website for schools that builds pupil engagement and consolidates maths knowledge.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • School • Email <p>Pupil</p> <ul style="list-style-type: none"> • Name • Age • Gender • Year • Class • Performance data
Why is it being processed?	To provide pupils and staff with access to a wider range of mathematics online teaching and learning materials.
Legal Basis	<p>Public task</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>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	MyMaths secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	School staff and pupils with login. Mymaths staff for technical support.
How long is data kept?	3 years after date closed
Who is data shared with?	Shared within school.
Legal basis for sharing	Public task
How is data shared?	Electronically via secure servers.
References	Click to download MyMaths

System used: My ON Renaissance Reading

Description	A personalized digital library at every student's fingertips Renaissance myON® Reader is a student-centered, personalized literacy environment that gives students access to more than 6,000 enhanced digital books. Titles are dynamically matched to each individual student's interests, grade and Lexile® reading level. Combined with a suite of close reading tools and embedded supports, myON Reader fosters student engagement and achievement.
Personal Data Items	Teacher <ul style="list-style-type: none"> • Name Child <ul style="list-style-type: none"> • Name
Why is it being processed?	http://www.renlearn.co.uk/privacy-hub/
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO - Legal Basis Tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	http://www.renlearn.co.uk/privacy-hub/
Is it secure and/or encrypted?	Secure
Who can access data?	http://www.renlearn.co.uk/privacy-hub/
How long is data kept?	3 years after date closed
Who is data shared with?	http://www.renlearn.co.uk/privacy-hub/
Legal basis for sharing	Public Task
How is data shared?	http://www.renlearn.co.uk/privacy-hub/

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

System used: Oak Academy	
Description	Oak National Academy provides free video lessons, slides and worksheets to support teachers and pupils to keep learning. Created by teachers in response to coronavirus, the resources are freely available, to complement schools' own teaching. Lessons cover a broad range of subjects, from reception to year 11. There are no sign-ups or logins required.
Personal Data Items	<p>Teacher</p> <ul style="list-style-type: none"> • Name <p>Pupil</p> <ul style="list-style-type: none"> • Name • Age
Why is it being processed?	https://privacy.thenational.academy/
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://privacy.thenational.academy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://privacy.thenational.academy/
How long is data kept?	3+ years
Who is data shared with?	https://privacy.thenational.academy/
Legal basis for sharing	Public Task/Legal Obligation
How is data shared?	https://privacy.thenational.academy/

System used: PaperCut Hive- Cloud Printing Software

Description	Simple for users, and powerful for admins. Meet the cloud print, copy, and scan management software that just works with the devices you already have.
Why is it being processed?	
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO- legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	https://www.papercut.com/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.papercut.com/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.papercut.com/privacy-policy/
Legal basis for sharing	Legal Obligation/Public Task
How is data shared?	https://www.papercut.com/privacy-policy/

System used: Parents Evening Booking System	
Description	Online booking system for parents evenings and other school events.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Email • Classes <p>Pupil</p> <ul style="list-style-type: none"> • Name • Classes • Year <p>Parent</p> <ul style="list-style-type: none"> • Name • Email
Why is it being processed?	To provide parents/carers with an online system for booking parents evening and other school events.
Legal Basis	<p>Public task</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>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	PEBS servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff, parents
How long is data kept?	3 years after date closed
Who is data shared with?	Shared with individual? parents and appropriate staff.
Legal basis for sharing	Public task
How is data shared?	Secure online servers
References	Click to download PEBS

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

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

System used: Photographs and videos of staff and pupils.

Description	Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Photograph • Video <p>Pupil</p> <ul style="list-style-type: none"> • Photograph (unnamed) • Video (unnamed) <p>Governor</p> <ul style="list-style-type: none"> • Name • Photograph
Why is it being processed?	To celebrate the life and work of the school.
Legal Basis	<p>Consent</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>Public task</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>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	School website and social media sites
Is it secure and/or encrypted?	Yes
Who can access data?	Publicly available on the www
How long is data kept?	3 years after date closed
Who is data shared with?	The public
Legal basis for sharing	ICO legal basis toolkit
How is data shared?	On www
References	Click to download Model photograph policy (including consent form)

System used: PIRA - Rising stars (Wordblaze)

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

Category data	
Why is it being processed?	To provide access to a range of Rising stars resources including PIRA for standardised reading tests.
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis toolkit.
Is Consent Required?	No
Data Source	School
Where is data stored?	Stored on Hodder servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff, Hodder for support
How long is data kept?	3 years after date closed
Who is data shared with?	Staff
Legal basis for sharing	Public task and legal obligation
How is data shared?	Electronically via secure servers.
References	Click to download Rising Stars Privacy Notice

System used: Place Leisure- School Swimming Management System

Description	The SSMS is a digital assessment tool, assessing pupils using Swim England School Swimming and Water Safety Charter. It is matched against the National Curriculum programmes of study and provides schools with termly reports. Reports evidence statistics to unlock Sports Premium funding for further swimming lessons. The product gives Places Leisure an important opportunity to gather national data to report on school swimming and influence national networks. Data gathered will strengthen potential to 'close the gap' for the 30% not yet meeting the standard. The system requires a school pupil data upload containing basic details for pupils swimming each term. Data is automatically uploaded to the Places Leisure School Swim App where school swim instructors assess pupils against Swim England's School Swimming Awards. Schools receive a termly update on pupil attainment for all pupils we have the data for.
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- | | |
|----------------------------|--|
| Personal Data Items | <p>Child</p> <ul style="list-style-type: none"> • Name • UPN • Year Group • DOB • Gender • SEN information • Medical Needs • EAL • Pupil Premium |
|----------------------------|--|

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Inputted directly into the system by the school- Microsoft Azure
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To capture the progress of children in swimming
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Microsoft Dataverse
Is it secure and/or encrypted?	Yes
Who can access data?	Swim Instructors, Swim Coordinators, Managers, School
How long is data kept?	3 years after date closed
Who is data shared with?	N/A
Legal basis for sharing	Public Task & Legitimate Interest
How is data shared?	Microsoft Dataverse

System used: PS Financials	
Description	Accounting, purchasing, budgeting and reporting software.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • School • MIS ID • Email address <p>School</p> <ul style="list-style-type: none"> • Name • Purchase data • Accounting data • Sales data • Expense data • Payment data • VAT returns
Why is it being processed?	To provide the school with an online financial management system.
Legal Basis	<p>Public task</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>
Evidence for legal basis	ICO legal basis toolkit.
Is Consent Required?	No
Data Source	School
Where is data stored?	PS Financials servers
Is it secure and/or encrypted?	Yes
Who can access data?	School staff with login PS financial technical? staff for support
How long is data kept?	3 years after date closed
Who is data shared with?	VAT returns shared with HMRC
Legal basis for sharing	Public task
How is data shared?	Electronically
References	Click to download PS Financials Privacy Click to download PS Financial Data Protection

System used: Read Write Inc Website (www.ruthmiskin.com)

Description	A website linked to the scheme Read Write Inc which includes a staff portal.
Personal Data Items	Staff <ul style="list-style-type: none"> • Name • Address • Email • Telephone Number • Role
Why is it being processed?	https://www.ruthmiskin.com/en/privacy-policy/
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	No
Data Source	School
Where is data stored?	https://www.ruthmiskin.com/en/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.ruthmiskin.com/en/privacy-policy/
How long is data kept?	3+ years
Who is data shared with?	https://www.ruthmiskin.com/en/privacy-policy/
Legal basis for sharing	Public Task
How is data shared?	https://www.ruthmiskin.com/en/privacy-policy/

System used: RealSmart	
Description	Realsmart provides a website that improves communication and makes collaboration easy! Google Apps for Education and your online learning and tracking tools wrapped into one school website bringing your whole school online!
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • School • MIS id • Classes <p>Pupil</p> <ul style="list-style-type: none"> • Name • UPN • Classes • Attendance • Achievement and behaviour
Why is it being processed?	To provide staff and pupils with access to an online learning environment with a range of tools including Google drive for education.
Legal Basis	<p>Public task</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>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	Realsmart servers and Google Drive for education servers (in Europe).
Is it secure and/or encrypted?	Yes
Who can access data?	Staff with the school, Pupils own resources.
How long is data kept?	3 years after date closed
Who is data shared with?	Staff & Pupils
Legal basis for sharing	Public task
How is data shared?	Secure online servers
References	Click to download RealSmart

System used: Recruitment information	
Description	Part of the job application process
Personal Data Items	Name <ul style="list-style-type: none"> • Name • DOB • Address • Educational establishments attended • Qualifications • Disciplinary Records • Appraisal Records • Salary information
<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"> • 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 <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Electronically via secure online servers
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	As part of the recruitment process
Legal Basis	Legal Obligation <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> Public task <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>
Evidence for legal basis	Safer recruitment process

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

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

Description	Records relating to safeguarding of children
Personal Data Items	<p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Child Protection Plan/Actions <p>Parent/Carers</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>Social Care Worker</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>External Support Workers</p> <ul style="list-style-type: none"> • 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	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment,</p>
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	social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Secure Cloud Sharing - Google or Office 365
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Statutory obligations and to support educational entitlement
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	school computer, laptop
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Designated Admin staff, Class Teacher, LA Workers as appropriate
How long is data kept?	3 years after date closed
Who is data shared with?	Parent/Carer as appropriate, key workers as appropriate, LA workers as appropriate, Police
Legal basis for sharing	Statutory and Legitimate
How is data shared?	Secure Cloud Sharing, Google or Office 365

Description	Records relating to safeguarding of children
Personal Data Items	<p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Child Protection Plan/Actions <p>Parent/Carers</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>Social Care Worker</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>External Support Workers</p> <ul style="list-style-type: none"> • 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	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment,</p>
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	<p>social security or social protection law or a collective agreement.</p> <p>Significant Public Interest</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>
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Secure Messenger, verbal
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Statutory obligations and to support educational entitlement
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure cabinet,
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Designated admin staff, Class Teacher, LA workers as appropriate
How long is data kept?	3 years after date closed
Who is data shared with?	Parent/Carer as appropriate, key workers as appropriate, LA workers as appropriate, Police
Legal basis for sharing	Statutory and Legitimate interest
How is data shared?	Verbal or secure messenger

System used: School360	
Description	Learning platform for Northumberland schools with links to 3rd party educational resource providers.
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • School id • Class/Group • Year • UPN (Unique Pupil Number) • Gender • Attendance (If School360 used for registration) • Pupil concern reports • EYFS reflections <p>Staff</p> <ul style="list-style-type: none"> • Name • Staff Alternative e-mail address • Teacher pupil notes
<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"> • 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	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Electronically, encrypted on transfer and storage.
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To facilitate setting up and access to the County learning platform - School360
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	Guidance from ICO Tool
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	Rackspace London
Is it secure and/or encrypted?	Yes - See Rackspace Privacy Policy
Who can access data?	School Administrator NCC ICT Team Seven360 development staff Users (own data)
How long is data kept?	3 years after date closed
Who is data shared with?	SIMs Wonde Frog Learning Just2easy Interactive Resources
Legal basis for sharing	Public task and legal obligation
How is data shared?	Electronically, encrypted on transfer and storage.
References	Click to download School360 Privacy Policy Click to download School360 EYFS App Privacy Policy Click to download School360 Parent App Privacy Policy

System used: SEND electronic records

Description	Records relating to Special Educational Needs and Disability for individual pupils
Personal Data Items	Pupils <ul style="list-style-type: none">• Name• Date of Birth• Address• Health Needs• Social Care Status• Educational Needs• SEND History Parents / Carers <ul style="list-style-type: none">• Name• Address• Contact details Staff <ul style="list-style-type: none">• Name• Position External Support Workers <ul style="list-style-type: none">• 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 <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
Special Category Evidence for legal basis	Article 9

How is the Special Category data shared?	Secure cloud share - Google or Office 365
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To ensure appropriate levels of support for the student in relation SEND needs
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Google Drive or Office 360 secure cloud storage
Is it secure and/or encrypted?	Yes
Who can access data?	Head, SENDCO, Teachers, Key Workers
How long is data kept?	3 years after date closed
Who is data shared with?	Parents/Carers as appropriate; Social Workers; Health Care Professionals; Receiving Schools; Youth Offending Teams (case dependent); LA Workers as appropriate
Legal basis for sharing	Public Task
How is data shared?	Secure cloud share or secure messenger if printed.

System used: Send Paper Records

Description	Records relating to individual pupil's SEND history
Personal Data Items	Pupil <ul style="list-style-type: none">• Name• Date Of Birth• Address• Medical Information• Health & Social Care• Specific Educational Needs• Interventions In Place Parents <ul style="list-style-type: none">• Name• Address• Contact Details Staff <ul style="list-style-type: none">• Name• Position External Support <ul style="list-style-type: none">• 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 <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
Special Category Evidence for legal basis	Article 9
How is the Special Category data	Secure messenger

shared?	
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To support educational entitlement to meet statutory obligations
Legal Basis	<p>Legal Obligation</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>Legitimate Interest</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: Senso Cloud	
Description	The Cloud Based Platform for Device Monitoring and Management. All-In-One Software for Network, Classroom, Safeguarding and Asset Management, and for managing and monitoring any Windows and Chrome device from a Centralised Web portal
Personal Data Items	User <ul style="list-style-type: none"> • Name • Marital status • Title • DOB • Gender • Address • Email Address • Telephone number
Why is it being processed?	For filtering and monitoring services across school devices, to carry out our obligations arising from the performance of the contract entered and to comply with a legal or regulatory obligation.
Legal Basis	Contract Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract” Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” Legitimate Interest Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”
Evidence for legal basis	ICO toolkit
Is Consent Required?	No but consent can be withdrawn at any time
Data Source	School
Where is data stored?	Secure cloud server
Is it secure and/or encrypted?	Yes
Who can access data?	The authorised person(s) within school only - staff
How long is data kept?	3 years after date closed

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

System used: Sign-In App	
Description	Electronic sign-in software for the school / fire regulations / emergency evacuation
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Job title • Car registration • Photo • Email address • IP addresses • Usage data • Cookies data • Online navigation data • Location data • Browser data <p>Parent</p> <ul style="list-style-type: none"> • Name • Car registration • Photo • Email address • IP addresses • Usage data • Cookies data • Online navigation data • Location data • Browser data • Purpose of visit <p>Visitor</p> <ul style="list-style-type: none"> • Name • Car registration • Job title/company • Photo • Email address • IP addresses • Usage data • Cookies data • Online navigation data • Location data • Browser data • Purpose of visit
Why is it being processed?	Safeguarding, health and safety, fire regulations, emergency evacuation
Legal Basis	<p>Legal Obligation</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>

	Public task Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	School system, SIA software database
Is it secure and/or encrypted?	Yes
Who can access data?	School staff, visitors
How long is data kept?	3 years after date closed
Who is data shared with?	School staff, visitors
Legal basis for sharing	Public task and legal obligation
How is data shared?	Secure school server/SIA software

System used: SIMS

Description

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

Personal Data Items

Pupil

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

Parent/Carer

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

Staff

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

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

This system has been identified as containing Special Category Information

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

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

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

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

System used: SPAG	
Description	Online SPaG tests for instant gap analysis SPaG.com provides KS1 and KS2 practice punctuation & grammar tests. Plus 80 additional tests covering grammar objectives for every year group
Personal Data Items	Teacher <ul style="list-style-type: none"> • Name Child <ul style="list-style-type: none"> • Age • Name
Why is it being processed?	https://www.spag.com/Content/privacy.pdf
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO - Legal Basis Tool Kit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.spag.com/Content/privacy.pdf
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.spag.com/Content/privacy.pdf
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.spag.com/Content/privacy.pdf
Legal basis for sharing	Public Task
How is data shared?	https://www.spag.com/Content/privacy.pdf

System used: Sports Leader UK	
Description	Awarding body for L3 award in Sport leadership
Personal Data Items	Child <ul style="list-style-type: none"> • Name • D.o.B • Contact details • Unique Learner Number • Assessment details
Why is it being processed?	To gain qualifications
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Sport Leader gateway
Is it secure and/or encrypted?	Yes- password protected
Who can access data?	School staff
How long is data kept?	3 years after date closed
Who is data shared with?	Sport Leader UK
Legal basis for sharing	Public task
How is data shared?	Via secure gateway

System used: SumDog	
Description	Personalised maths & spelling practice that pupils love Engage your pupils with adaptive learning games aligned to the National Curriculum, for children aged 5 to 14. Proven to accelerate progress.
Personal Data Items	Teachers <ul style="list-style-type: none"> • Name Child <ul style="list-style-type: none"> • Name
Why is it being processed?	https://www.sumdog.com/en/about/privacy/
Legal Basis	Legal Obligation <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> Public task <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>
Evidence for legal basis	ICO legal Basis tool
Is Consent Required?	NO
Data Source	School 360
Where is data stored?	https://www.sumdog.com/en/about/privacy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.sumdog.com/en/about/privacy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.sumdog.com/en/about/privacy/
Legal basis for sharing	Legal Obligation/Public task
How is data shared?	https://www.sumdog.com/en/about/privacy/

System used: Testbase	
Description	This is an online resource provided by Doublestruck which enables children to prepare for National SAT examinations. Doublestruck is an Educational Technology company that is part of the AQA family. It specialises in technology that addresses the needs of teachers in formative assessment and reporting.
Personal Data Items	<p>School</p> <ul style="list-style-type: none"> • Name • Contact Address • Contact Email • Contact Telephone Number • Billing Address <p>Staff</p> <ul style="list-style-type: none"> • Name <p>Pupil</p> <ul style="list-style-type: none"> • Name • UPN • Admission number • Gender • Year Group • Registration group • Class name • Teacher name • Ethnicity • Eligibility for free school meals • Pupil premium indicator • SEN Status • In LEA care
<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"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10 	
Special Category Data Legal Basis	Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for	Article 9

legal basis	
How is the Special Category data shared?	AQA; Doublestruck Service Providers (including internet service platform providers; payment processing providers); Local authorities; Doublestruck advisors and auditors; other approved third parties necessary to provide the service.
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To provide a service and resources which enables schools to assess pupil attainment and track? progress? of individuals and groups.
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO Legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure server
Is it secure and/or encrypted?	Account is password protected, Store on Doublestruck secure servers.
Who can access data?	School; Teastbase (Doublestruck LTD) for technical support.
How long is data kept?	6 years after date closed
Who is data shared with?	AQA; Doublestruck Service Providers (including internet service platform providers; payment processing providers); Local authorities; Doublestruck advisors and auditors; other approved third parties necessary to provide the service.
Legal basis for sharing	Legal obligation and public task
How is data shared?	In a structure, commonly used, machine readable format.
References	Click to download Testbase privacy notice

System used: The National College	
Description	A provider of online training for staff & governors
Personal Data Items	<p>Staff member</p> <ul style="list-style-type: none"> • Name • Job Title • Email • Phone number <p>Governor</p> <ul style="list-style-type: none"> • Name • Email • Phone number
Why is it being processed?	In order to provide access to online training and for billing purposes
Legal Basis	<p>Contract</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>Public task</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>
Evidence for legal basis	ICO Toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	On Server of National Education Group in UK
Is it secure and/or encrypted?	Yes both secure and encrypted
Who can access data?	College staff or their contractors to provide service and school
How long is data kept?	3 years after date closed
Who is data shared with?	Contractors to provide service
Legal basis for sharing	Contract
How is data shared?	Via encrypted transfer

System used: Twinkl

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

System used: UCAS	
Description	University Applications
Personal Data Items	<p>Child</p> <ul style="list-style-type: none"> • Name • Predicted Grades • References <p>Teacher</p> <ul style="list-style-type: none"> • Name • email address
Why is it being processed?	To enable students to apply for university
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	ON UCAS secure platform
Is it secure and/or encrypted?	Yes
Who can access data?	University admissions and pupils
How long is data kept?	3 years after date closed
Who is data shared with?	N/A
Legal basis for sharing	N/A
How is data shared?	N/A
References	Click to download UCAS Privacy Policy

System used: WardHadaway

Description

As a full service law firm, we offer a huge variety of services to a wide cross section of client groups. Those working in the public and third sectors operate in an often sensitive environment. They can be under significant scrutiny, as they use limited resources to try to achieve maximum impact and benefit. So whether working with educational establishments, local authorities or blue light services, with charities or social enterprises, our teams are highly experienced in providing a robust, efficient and effective service.

Personal Data Items

Staff

- Name
- DOB
- Address

Pupil

- Name
- Address
- DOB
-

parent

- Name
- DOB
- Addresss

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

Special Category Data Legal Basis

Explicit Consent

Explicit consent to the Data Subject, unless dependence on consent is prohibited by EU or member state law.

Obligation

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

Public

	Processing relates to personal data manifestly made public by the Data Subject.
Special Category Evidence for legal basis	Explicit consent, obligation, public interest (in respect of information provided to school for pupils/staff)
How is the Special Category data shared?	
Legal basis for sharing Special Category data	
Why is it being processed?	https://www.wardhadaway.com/privacy-notice/
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.wardhadaway.com/privacy-notice/
Is it secure and/or encrypted?	https://www.wardhadaway.com/privacy-notice/
Who can access data?	https://www.wardhadaway.com/privacy-notice/
How long is data kept?	6 years after date closed
Who is data shared with?	https://www.wardhadaway.com/privacy-notice/
Legal basis for sharing	https://www.wardhadaway.com/privacy-notice/
How is data shared?	https://www.wardhadaway.com/privacy-notice/

System used: Wonde	
Description	Manages transfer of data from Sims MIS to School360.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name <p>Pupil</p> <ul style="list-style-type: none"> • Name • School id • Class/group • Year • UPN • Gender • Attendance
<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"> • 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	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	School 360 secure servers
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To facilitate the exchange of data to allow the set up of school360 for a school.
Legal Basis	<p>Contract</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>
Evidence for legal basis	ICO legal basis toolkit

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

System used: Zoom	
Description	Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Our easy, reliable cloud platform for video, voice, content sharing, and chat runs across mobile devices, desktops, telephones, and room systems.
Personal Data Items	<p>Teacher</p> <ul style="list-style-type: none"> • Name <p>Parent</p> <ul style="list-style-type: none"> • Name
Why is it being processed?	https://zoom.us/trust
Legal Basis	<p>Legal Obligation</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>Public task</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>
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://zoom.us/trust
Is it secure and/or encrypted?	Secure
Who can access data?	https://zoom.us/trust
How long is data kept?	3 years after date closed
Who is data shared with?	https://zoom.us/trust
Legal basis for sharing	Public task
How is data shared?	https://zoom.us/trust