



# **Red Row First School**

## **GDPR Asset Register**

**Date: 21/04/2019**

Data Protection Officer: Linda Papaioannou

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## Introduction

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

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

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

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

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

## Systems included in this report

System Name	Description	Special Category
Accident book	Log of accidents / minor injuries in school	
Accident Report Form	ACC1 form for reporting accidents to NCC	
Assessment Records	Electronic and paper mark books	
Attendance file	Attendance information about pupils and classes	yes
Class Dojo	Class Dojo is a classroom management and behaviour rewards system which includes a digital portfolio for pupils which can be accessed by staff, pupils and parents?/carers.	
Consent for educational visits	Consent information for all educational visits including day trips and residential visits	yes
CPOMS	CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral welfare for schools. CPOMS is software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Working alongside a school's existing safeguarding processes, CPOMS is an intuitive system to help with the management and recording of child protection, behavioural issues, bullying, special educational needs, domestic issues and much much more. Using CPOMS, schools can ensure that students are safe and fully supported, whilst school staff can focus on teaching and providing support, instead of administration.	yes
Data tracking spreadsheets	Spreadhseets (excel) to track progress of children over the course of their school career.	yes
Dietary requirements information sheets	Required documents for specific children with severe allergies / intolerances and religious observations (food)	yes
Eschools Website Provider	On-line school website building tool	
EVOLVE visits	An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities.	
Futures Cloud	Internet / Network monitoring and reporting tool	
Google drive for education	suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.	
Governance	Details of all members of the Governing Body	

Health & Safety	Records pertaining to Health & Safety	
Interactive Resources	Pupil / teacher online learning resources for Numeracy.	
Just2easy	Suite of online tools for Desk Top Publishing, Blogging, Infant toolkit and Tables, spelling an arithmetic SATs testers.	
Learning Ladders	Learning Ladders provides a range of teacher tools for curriculum design, progress tracking and assessment.	yes
Lexia	Students work independently to develop critical reading and language skills through individualized, motivating learning paths. All students, regardless of their skill level, can each work at their own pace and the teacher is notified (on web-based reports and via email) only when they require support.	
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.	
Medical log	File of medical information for each child: asthma, medication administered, health care plans, risk assessments	yes
My Maths	MyMaths is an interactive online teaching and homework subscription website for schools that builds pupil engagement and consolidates maths knowledge.	
Nursery (Early Years) files	Early years registration information and funding information for Early Years entitlement, hours taken each week	yes
Parent mail	Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events	
Personnel files	Information relating to staff employment	
Phonics play	Interactive phonics games, phonics planning, assessment ideas and many teaching ideas and resources to help children to learn	
Photographs and videos of staff and pupils.	Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms.	
PIRA - Rising stars	Reliably assess reading attainment and progress with termly standardised reading tests Progress in Reading Assessment (PiRA) termly tests produce standardised	yes

	results and age related scores to enable schools to track pupil progress term by term, predict future progress and benchmark performance against national averages.	
PIVATS	An online assessment and target setting tool	yes
Recruitment information	Part of the job application process	yes
Registers	Daily register, after school club registers, lunch register	
School360	Learning platform for Northumberland schools with links to 3rd party educational resource providers.	yes
Send Paper Records	Records relating to individual pupil's SEND history	yes
SIMS	SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools.	yes
Tapestry	An online journal recording all the learning and fun of children's early years education.	
Target Tracker	Pupil assessment and tracking software?.	yes
Thrive	Social and Emotional Screening Programme	yes
Times Tables Rock Stars	Online times tables practice and testing.	
Visitor book	Log of all visitors into school / fire regulations	

System used: Accident book

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

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

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



System used: Assessment Records

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

System used: Attendance file

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Class Dojo

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

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

System used: Consent for educational visits

<b>Description</b>	Consent information for all educational visits including day trips and residential visits
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Health conditions</li> <li>• Medication</li> <li>• Dietary requirements</li> <li>• Contact information</li> <li>• Family doctor</li> </ul>

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

<b>Special Category Data Legal Basis</b>	<p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	Shared by phone
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	To ensure school has up to date information when taking children off site
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit

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

System used: CPOMS

**Description**

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

**Personal Data Items**

**Pupil**

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

**Main contact**

- Name
- Telephone Number

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- Sex life and or sexual orientation
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**Special Category Data Legal Basis**

**Obligation**

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



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

System used: Data tracking spreadsheets

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

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

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

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

System used: Dietary requirements information sheets

<b>Description</b>	Required documents for specific children with severe allergies / intolerances and religious observations (food)
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Dietary information</li> </ul>

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<b>Special Category Data Legal Basis</b>	<p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	Paper records
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	Health and safety - to avoid children coming into contact with specific foods
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No

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

System used: Eschools Website Provider

<b>Description</b>	On-line school website building tool
<b>Personal Data Items</b>	<p><b>School Information</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact information</li> <li>• Class names</li> <li>• Staff names</li> <li>• Governor names</li> <li>• Year group information (planning, homework)</li> <li>• Newsletters</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Photographs</li> <li>•</li> <li>•</li> </ul>
<b>Why is it being processed?</b>	To inform parents and the wider community about the life of the school
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	Consent not required to put on school information. Consent required to use pupil photographs
<b>Data Source</b>	School
<b>Where is data stored?</b>	On eschool secure server through school 360 platform 4. Transfer of School Data 4.1. The School hereby consents to eSchools accessing School Data held on the Management Information System through Wonde, for the purpose of extracting and transferring such School Data to eSchools. 4.2. Prior to leaving the School premises by electronic means (via HTTPS) the School Data will be encrypted by Wonde and eSchools.
<b>Is it secure and/or encrypted?</b>	Yes 4.2. Prior to leaving the School premises by electronic means (via HTTPS) the School Data will be encrypted by Wonde and eSchools. 5.1. The School Data shall always remain the property of the School. 5.2. eSchools shall have no responsibility to maintain the security of any School Data held or controlled by the School. 5.3. eSchools shall keep all Confidential Information and School Data confidential and shall not:- 5.3.1.1. use any Confidential Information or School Data except for the purpose of performing the services it provides to the School; or 5.3.1.2.

	disclose any Confidential Information in whole or in part to any third party, except as expressly permitted by this Agreement, or as required for the purpose of any services provided by eSchools to the School, or to the extent required by law. 6.1. Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing to be carried out by eSchools, as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, eSchools shall in relation to the School Data implement appropriate technical and organisational measures to ensure a level of security appropriate to that risk. 6.2. In assessing the appropriate level of security, eSchools shall take account in particular of the risks that are presented by processing of the School Data, in particular from a Personal Data Breach.
<b>Who can access data?</b>	Parents and wider community. Information available to the public on the internet. Eschools can access the data. DFE
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	The general public eschools is a public facing website
<b>Legal basis for sharing</b>	Public interest & legal obligation
<b>How is data shared?</b>	On the school's website page with designated URL
<b>References</b>	<a href="#">Click to download Eschools data agreement</a>

System used: EVOLVE visits

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



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

System used: Futures Cloud

<b>Description</b>	Internet / Network monitoring and reporting tool
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• I/P address</li> <li>• URL's visited</li> </ul> <p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• I / P address</li> <li>• URL's visited</li> </ul>
<b>Why is it being processed?</b>	Fulfills statutory requirement for the school to monitor, log and report inappropriate network activity.
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School 360
<b>Where is data stored?</b>	Future Digital Secure Servers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Designated teachers in school (normally online safety lead.
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	NCC Online safety staff, Northumberland Safeguarding Children Board, Police if serious incident, Staff within school.
<b>Legal basis for sharing</b>	Public task & legal obligation.
<b>How is data shared?</b>	Electronically. through a secure connection.
<b>References</b>	<a href="#">Click to download Future Digital</a>

System used: Google drive for education

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

System used: Governance

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

System used: Health & Safety

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

System used: Interactive Resources

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

System used: Just2easy

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

System used: Learning Ladders

<b>Description</b>	Learning Ladders provides a range of teacher tools for curriculum design, progress tracking and assessment.
<b>Personal Data Items</b>	<b>Staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• Email</li><li>• Job title</li><li>• MIS Id</li></ul> <b>Pupil</b> <ul style="list-style-type: none"><li>• Name</li><li>• UPN</li><li>• ULN</li><li>• Date of birth</li><li>• Gender</li><li>• Year group</li><li>• Class</li><li>• Eligibility for Pupil Premium</li><li>• SEND</li><li>• Ethnicity</li></ul> <b>Parent</b> <ul style="list-style-type: none"><li>• Name</li><li>• Email address</li></ul>

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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



<b>Why is it being processed?</b>	To provide teachers with a range of tools for planning the curriculum, tracking pupils and assessing performance and progress.
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Learning Ladders secure servers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Teaching staff with logins
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Shared internally within school.
<b>Legal basis for sharing</b>	Public task & legal obligation
<b>How is data shared?</b>	Electronically via secure servers
<b>References</b>	<a href="#">Click to download Learning Ladders</a>

System used: Lexia

**Description**

Students work independently to develop critical reading and language skills through individualized, motivating learning paths. All students, regardless of their skill level, can each work at their own pace and the teacher is notified (on web-based reports and via email) only when they require support.

**Personal Data Items**

**Staff**

- Name
- Job title
- School
- Address
- Telephone number
- e-mail address
- IP address
- Browser information
- 

**School**

- Name
- Payment details
- Usage data

**Pupil**

- Name
- Age
- Class
- Group

**Why is it being processed?**

To provide access for staff and pupils to a comprehensive range of teaching resources

**Legal Basis**

**Public task**

Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

**Evidence for legal basis**

ICO Legal Basis Toolkit

**Is Consent Required?**

No

**Data Source**

School

**Where is data stored?**

Lexia secure servers

**Is it secure and/or encrypted?**

Lexia has appropriate measures in place to help ensure that our users’ Data is protected against unauthorized access or use, alteration, unlawful or accidental destruction and accidental loss. Although we make reasonable efforts to protect your Personal Information from loss, misuse, or alteration by third parties, you should be aware that there is always some risk involved in transmitting information over the Internet. There is also some risk that thieves could find a way to thwart our security

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

System used: Lightspeed Internet Filtering

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



System used: Local Authority moderation of work

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

System used: Medical log

<b>Description</b>	File of medical information for each child: asthma, medication administered, health care plans, risk assessments
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Inhaler / medication information (doseage)</li> <li>• DOB</li> <li>• Class</li> <li>• Medical condition</li> <li>• Signs and symptoms</li> <li>• Treatment</li> <li>• Parental consent</li> <li>• Name of medication and dose</li> <li>• Side effects</li> <li>• Storage requirements</li> <li>• Special equipment</li> <li>• Testing needed</li> <li>• Access to food drink</li> <li>• Dietary requirement</li> <li>• Staff support</li> <li>• Contingency arrangements</li> <li>• Family / emergency contacts</li> <li>• Hazard</li> <li>• Risk</li> <li>• Control measures / risk evaluation</li> </ul>

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

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

<b>Why is it being processed?</b>	Health and safety of child
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	Parent
<b>Where is data stored?</b>	Medical log in secure storage held in the school office
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	School staff
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Staff, NCC and NHS professionals
<b>Legal basis for sharing</b>	Public task and legal obligation
<b>How is data shared?</b>	Verbally, written and electronically via secure servers.



System used: My Maths

<b>Description</b>	MyMaths is an interactive online teaching and homework subscription website for schools that builds pupil engagement and consolidates maths knowledge.
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School</li> <li>• Email</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Age</li> <li>• Gender</li> <li>• Year</li> <li>• Class</li> <li>• Performance data</li> </ul>
<b>Why is it being processed?</b>	To provide pupils and staff with access to a wider range of mathematics online teaching and learning materials.
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	MyMaths secure servers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	School staff and pupils with login. Mymaths staff for technical support.
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Shared within school.
<b>Legal basis for sharing</b>	Public task
<b>How is data shared?</b>	Electronically via secure servers.
<b>References</b>	<a href="#">Click to download MyMaths</a>

System used: Nursery (Early Years) files

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Parent mail

<b>Description</b>	Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events
<b>Personal Data Items</b>	<b>School</b> <ul style="list-style-type: none"><li>• Name</li><li>• School email address</li></ul> <b>Staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• Class</li><li>• Title</li><li>• e-mail</li><li>• Gender</li><li>• Telephone number</li><li>• DOB</li><li>• School address</li></ul> <b>Pupil</b> <ul style="list-style-type: none"><li>• Name</li><li>• Year</li><li>• Parent/carer name</li><li>• Title</li><li>• Class</li><li>• Gender</li><li>• DOB</li><li>• Address</li><li>• DOB</li></ul> <b>Parent/carer</b> <ul style="list-style-type: none"><li>• Name</li><li>• Telephone number</li><li>• email address</li><li>• Title</li><li>• Gender</li><li>• Address</li></ul>
<b>Why is it being processed?</b>	To provide access to a range of communication and payment tools
<b>Legal Basis</b>	<b>Public task</b> Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	Parent

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

System used: Personnel files

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

System used: Phonics play

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

System used: Photographs and videos of staff and pupils.

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



System used: PIRA - Rising stars

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

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

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

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

System used: PIVATS

<b>Description</b>	An online assessment and target setting tool
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Year Group</li> <li>• UPN</li> <li>• Assessment information</li> <li>• LAC</li> <li>• FSM</li> <li>• Gender</li> <li>• Primary Need</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• e-mail</li> </ul>

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

<b>Special Category Data Legal Basis</b>	<b>Obligation</b> Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	Secure online database
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	Attainment tracking
<b>Legal Basis</b>	<b>Legal Obligation</b> Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”

	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Online secure database
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	School staff
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Local Authority, NHS Services (CYPS)
<b>Legal basis for sharing</b>	Public task and legal obligation
<b>How is data shared?</b>	Online secure database
<b>References</b>	<a href="#">Click to download PIVATS Lancashire County Council</a>

System used: Recruitment information

<b>Description</b>	Part of the job application process
<b>Personal Data Items</b>	<p><b>Name</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Address</li> <li>• Educational establishments attended</li> <li>• Qualifications</li> <li>• Disciplinary Records</li> <li>• Appraisal Records</li> <li>• Salary information</li> </ul>

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- Criminal Records information - protected in Article 10

<b>Special Category Data Legal Basis</b>	<p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	Electronically via secure online servers
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	As part of the recruitment process
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	Safer recruitment process

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

System used: Registers

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

System used: School360

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

This system has been identified as containing Special Category Information

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

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



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

System used: Send Paper Records

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

This system has been identified as containing Special Category Information

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

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

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

System used: SIMS

**Description**

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

**Personal Data Items**

**Pupil**

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

**Parent/Carer**

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

**Staff**

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

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Tapestry

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

**References**

[Click to download Tapestry Privacy Policy](#)



System used: Target Tracker

<b>Description</b>	Pupil assessment and tracking software?.
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> </ul> <p><b>Pupils</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Age</li> <li>• Classes</li> <li>• Ethnicity</li> <li>• SEN data</li> <li>• Pupil premium eligibility</li> <li>• Performance data</li> <li>• Attendance data</li> </ul>

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

<b>Special Category Data Legal Basis</b>	<b>Obligation</b> Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	Shared internally with staff.
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	To help track progress and set targets for pupils.
<b>Legal Basis</b>	<b>Legal Obligation</b> Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”

	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Target Tracker servers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	School staff
<b>How long is data kept?</b>	3+ years
<b>Who is data shared with?</b>	School Staff
<b>Legal basis for sharing</b>	Public task & legal obligation
<b>How is data shared?</b>	Target tracker servers
<b>References</b>	<a href="#">Click to download Target Tracker Privacy Notice</a>

System used: Thrive

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Times Tables Rock Stars

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

System used: Visitor book

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