



Wark C of E Primary School

GDPR Asset Register

Date: 07/12/2025

Data Protection Officer: Wallis Bath

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 book	Log of accidents / minor injuries in school	
Accident Report Form	ACC1 form for reporting accidents to NCC	
Adobe Creative Cloud Express [formerly Adobe Spark]	Creates videos & stores them	
Assessment Records	Electronic and paper mark books	
Attendance file	Attendance information about pupils and classes	yes
Behaviour Files - Paper (in class)	Information relating to the behaviours of particular pupils	yes
Bikeability	The Bikeability Trust run on behalf of Department of Transport. Courses and resources for schools in England	
Black and Banton	Black and Banton is one of the North East of England's leading providers of occupational and physical health services. Established in 2001 we have experienced strong growth each year based on our successful focus on our client's needs, many of whom we've partnered for more than ten years. They include leading names across a wide range of sectors including oil & gas, manufacturing, chemical, pharmaceutical, transport, housing , construction and demolition industry. We also private clients with health services, including sports injury treatment, shoulder, back and joint pain programmes, vaccinations, massage and pilates. Our approach is simple. We provide the highest level of bespoke occupational and physical health services, cost effectively and efficiently both empathetically and at times and locations to suit our clients	yes
Book Creator	Allows pupils to write books and store them in an online library	
Busy Things	Online games & activities for learning	
Child Protection Records - Paper	Records relating to child protection issues for individual pupils	yes
Class Dojo	Class Dojo is a classroom management and behaviour rewards system which includes a digital portfolio for pupils which can be accessed by staff, pupils and	

	parents?/carers.	
Consent for educational visits	Consent information for all educational visits including day trips and residential visits	yes
Covid-19 Lateral Flow Testing	About 1 in 3 people with coronavirus do not have symptoms but can still pass it on to others. Regular testing of people without symptoms is important to help stop the virus spreading and protect your loved ones. As lockdown restrictions gradually ease we all need to play our part to help protect each other. The following people in England will have access to regular rapid lateral flow testing made available to them as schools reopen: secondary school pupils primary and secondary school staff households, childcare and support bubbles of primary and secondary-age pupils households, childcare and support bubbles of primary and secondary staff	yes
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 children with severe allergies / intolerances and religious observations (food)	yes
Ed Shed	EdShed, or Education Shed Ltd. as our accountant calls us, is the umbrella for several educational products and brands. These include The Literacy Shed, Literacy Shed Plus, Spelling Shed and MathShed. We are a company run by teachers for teachers and we try to maintain particular values within all of our products: The best quality product we can create Making the most educational impact possible Transparent and affordable pricing The least hassle for teachers and schools	
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	
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.	
Interactive Resources	Pupil / teacher online learning resources for Numeracy.	
Just2easy	Suite of online tools for Desk Top Publishing, Blogging, Infant toolkit and Tables, spelling and arithmetic SATs testers.	
Lightspeed Internet Filtering	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.	

Local Authority moderation of work	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.	
Mathletics _ online numeracy activities	Mathletics is a captivating online learning space providing students with all the tools they need to be successful learners, both in the classroom and beyond. Powerful courses aligned to the various National Curricula of the UK & Ireland, from Foundation Stage to Key Stage 5, matched with dynamic tools and reporting for teachers. Mathletics supports and caters to each teacher's unique blend of student-driven learning and teacher-led instruction.	
Medical 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.	
National Centre for Excellence in the Teaching of Mathematics (NCETM)	NCETM provides professional development for staff in the teaching of Mathematics Children's chances of succeeding in education and life will be maximised if they develop deep and lasting procedural and conceptual mathematical understanding. The NCETM's teaching for mastery section explains the rationale for this teaching approach, and presents case studies from schools, together with interviews with teachers involved in mastery projects through the Maths Hubs programme.	
Nereo (Matrix)	North East Regional Employers' Organisation is one of eleven regional bodies that support local authorities across England, Wales and Northern Ireland. NEREO's function is to support local authorities and partner organisations in the fields of Human Resources, Organisational Development and Employee Relations in all their complex and varied forms. NEREO is a small organisation with a big reputation. Our staff have over a hundred years experience of working in the public sector. Some have voluntary and private sector experience too. The Governance of NEREO is carried out by an Executive Committee made up of Elected Member representatives from each of the local authorities.	
Nessy	Nessy has been making fun, educational software for children since 1999 and has developed a reputation for exceptional quality. Nessy offers the complete dyslexia aware solution with a suite of multisensory products aimed at making learning to read, write and spell fun. Nessy is used globally by hundreds of thousands of	

	teachers and students and is a 3 time winner at the prestigious Educational Resources Awards.	
NFER	Assessment materials, reading test and pupil progress data	
Northumberland School Readiness Passport	The School Readiness Passport is primarily a transition document. It will be used to gather information about key events in a child's early life.	
Nursery (Early Years) files	Early years registration information and funding information for Early Years entitlement, hours taken each week	yes
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
Recruitment information	Part of the job application process	yes
Registers	Daily register, after school club registers, lunch register	
SAS - Staff absence Insurance	AIS offer staff absence insurance support aimed specifically at schools with restrictive budgets. We guarantee a saving on any like-for-like quote, meaning your school can retain more of your budget to invest in other areas. Along with the financial support, AIS also offer several health and wellbeing services for staff and pupils to access. Included as standard is: • Continuous Cover • Cover for all Staff up to 70 Years Old • Flexible Cover; choose who you insure, along with your own Excess and Daily Benefit options • Maternity, Paternity & Adoption Benefit (optional) • Phased Return Benefit • Stress cover options of 0, 30 days or full cover • Generous time limits – schools have 30 calendar days to report a claim • Cover for sickness, accident, jury service and bereavement • Nurse Telephone Support Service through our in-house NMC registered nurses • 24/7 365 days a year, worldwide GP helpline, that always goes through to a trained medical professional	
School Gateway	School Gateway is your school's app available on Android, iOS and the web. It'll work on phones tablets, laptops and even smart watches. Your school can decide which services they'd like parents to access	

	with it. When you log into the app, each of the services your school provides will appear in a list for you to choose from. Below are some examples of the services your school might provide on School Gateway.	
School meals identification	Identification of pupils for meals	yes
School360	Learning platform for Northumberland schools with links to 3rd party educational resource providers.	yes
Schoolcomms	Communication app for parents	
SEND electronic records	Records relating to Special Educational Needs and Disability for individual pupils	yes
Send Paper Records	Records relating to individual pupil's SEND history	yes
SIMS	SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools.	yes
Social media sites e.g. Twitter, Facebook	Social Media tool used to inform parents about events in school and celebrate children's achievement.	
Spelling Shed	The Spelling Shed - proudly powered by EdShed - is a spelling platform designed by a team of teachers. It is built with students, teachers and parents in mind and aims to make spelling fun for students as well as simple for adults to manage.	
Times Tables Rock Stars	Online times tables practice and testing.	
Twinkl	We're here to 'help those who teach'. It's what brings us to work every day. We're proud to create educational resources that can be used at each step of a child's learning journey. Our teacher-created resources provide entire schemes of work, lesson planning and assessments right through to online educational games, augmented reality and so much more. We have over 525,000 resources and new content gets added every day. You'll find we've normally got what you need before you even know you want it.	
Visitor book	Log of all visitors into school / fire regulations	
Vocabulary Ninja	THE HOME OF HIGH-QUALITY TEACHING AND LEARNING RESOURCES. WHICH TEACHING RESOURCES DO YOU NEED? At Vocabulary Ninja we provide a wide variety of high-quality products and systems that help to support pupils, teachers and schools.	
White Rose Maths and Science	Influenced, inspired and informed by the work of leading maths researchers and practitioners across the world, White Rose Maths brings together a team of	yes

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

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

System used: Accident Report Form	
Description	ACC1 form for reporting accidents to NCC
Personal Data Items	<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: Adobe Creative Cloud Express [formerly Adobe Spark]	
Description	Creates videos & stores them
Personal Data Items	<p>Teacher</p> <ul style="list-style-type: none"> • Name • email • technical info -IP address device <p>Pupil</p> <ul style="list-style-type: none"> • Name • School email
Why is it being processed?	To allow use of 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 toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Adobe’s servers and the servers of companies we hire to provide services to us
Is it secure and/or encrypted?	We employ administrative, technical and physical security controls where appropriate, such as encryption, 2-step verification and strict contractual confidentiality obligations for employees and contractors.
Who can access data?	School Adobe staff & contractors as needed to provide service
How long is data kept?	3 years after date closed
Who is data shared with?	Contractors to provide service
Legal basis for sharing	ICO Toolkit contract & public task
How is data shared?	Secure & encrypted transfer

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	<p>Pupil</p> <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	<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, 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	<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</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
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

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

System used: Bikeability	
Description	The Bikeability Trust run on behalf of Department of Transport. Courses and resources for schools in England
Why is it being processed?	https://bikeability.org.uk/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 toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://bikeability.org.uk/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://bikeability.org.uk/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://bikeability.org.uk/privacy-policy/
Legal basis for sharing	Public Task
How is data shared?	https://bikeability.org.uk/privacy-policy/

System used: Black and Banton	
Description	Black and Banton is one of the North East of England's leading providers of occupational and physical health services. Established in 2001 we have experienced strong growth each year based on our successful focus on our client's needs, many of whom we've partnered for more than ten years. They include leading names across a wide range of sectors including oil & gas, manufacturing, chemical, pharmaceutical, transport, housing , construction and demolition industry. We also private clients with health services, including sports injury treatment, shoulder, back and joint pain programmes, vaccinations, massage and pilates. Our approach is simple. We provide the highest level of bespoke occupational and physical health services, cost effectively and efficiently both empathetically and at times and locations to suit our clients
Personal Data Items	All Staff <ul style="list-style-type: none"> • Name • all employment 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	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 legal basis tool kit
How is the Special Category data shared?	Securely with staff
Legal basis for sharing Special Category data	Consent
Why is it being processed?	Staff wellbeing and to allow investiagtion of any health problems for school HR processes
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 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?	Both
Is it secure and/or encrypted?	secure & encrypted on Black & Banton Server/Staff PC
Who can access data?	Staff member and Senior Leadership team
How long is data kept?	3 years after date closed
Who is data shared with?	Staff and those who staff may nominate e.g. professional association. HR provider
Legal basis for sharing	public task/legal obligation
How is data shared?	https://www.blackandbantton.co.uk/

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

System used: Busy Things	
Description	Online games & activities for learning
Personal Data Items	<p>Taecher</p> <ul style="list-style-type: none"> • Name • email <p>Pupil</p> <ul style="list-style-type: none"> • Name
Why is it being processed?	To allow use of the 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 Toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	All data collected and processed by Busy Things is stored in a secure data centre in the UK meeting industry standards for security (ISO270001).
Is it secure and/or encrypted?	All data is transmitted to and from this location using SSL encryption technologies. All data is backed up on a regular basis and stored securely off-site
Who can access data?	School & busy things 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

System used: Child Protection Records - Paper

Description	Records relating to child protection issues for individual pupils
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Personal Data Items

Pupils

- Name
-
- Date of Birth
- Address
- Health Needs
- Social Care Status
- Educational needs
- Child Protection Plan/Actions

Parents/Carers

- Name
- Address
- Contact Details

Staff

- Name
- Position

Social Care Worker

- Name
- Address
- Contact Details

External Support Workers

- Name
- Organisation
- Position
- Address
- Contact Details

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

Special Category Data Legal Basis	Obligation
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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: Class Dojo	
Description	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.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Phone number • email • Password • Device id • Gender • School • School address • Geo Location • Photos, Videos, Docs and audio • IP address <p>Pupil</p> <ul style="list-style-type: none"> • Name • Password • Age • School • IP Address <p>Parent/carers</p> <ul style="list-style-type: none"> • Name • Phone number • Email address • Password • Device id • Gender • School • Geo location • IP Address
Why is it being processed?	To provide access to the online curriculum and classroom management? tools
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 Class Dojo servers

Is it secure and/or encrypted?	Yes, comprehensive approach to security provided by Class Dojo
Who can access data?	School account users.
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?	Online through secure login.
References	Click to download Class Dojo 1 Click to download Class Dojo 2

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: Covid-19 Lateral Flow Testing

Description	About 1 in 3 people with coronavirus do not have symptoms but can still pass it on to others. Regular testing of people without symptoms is important to help stop the virus spreading and protect your loved ones. As lockdown restrictions gradually ease we all need to play our part to help protect each other. The following people in England will have access to regular rapid lateral flow testing made available to them as schools reopen: secondary school pupils primary and secondary school staff households, childcare and support bubbles of primary and secondary-age pupils households, childcare and support bubbles of primary and secondary staff
Personal Data Items	<p>Child</p> <ul style="list-style-type: none"> • Name • Date of Birth • Postcode • Test Result <p>Parent</p> <ul style="list-style-type: none"> • Name • Email address • Telephone number

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

Special Category Data Legal Basis	<p>Public Interest / Public Health</p> <p>Processing necessary for reasons of public interest in the area of public health such as protecting against serious cross-border threats to health or guaranteeing high standards of healthcare and of medical products or medical devices.</p>
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Electronically/verbally with PHE
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To support the national effort in the fight against Covid-19. Under

	instruction from the DfE and PHE.
Legal Basis	<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	Parent
Where is data stored?	Electronic school system
Is it secure and/or encrypted?	Yes
Who can access data?	School staff
How long is data kept?	3+ years
Who is data shared with?	Public Health England
Legal basis for sharing	Legal obligation & public task
How is data shared?	Electronically through secure servers.

System used: 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: Ed Shed	
Description	EdShed, or Education Shed Ltd. as our accountant calls us, is the umbrella for several educational products and brands. These include The Literacy Shed, Literacy Shed Plus, Spelling Shed and MathShed. We are a company run by teachers for teachers and we try to maintain particular values within all of our products: The best quality product we can create Making the most educational impact possible Transparent and affordable pricing The least hassle for teachers and schools
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.edshed.com/en-gb/privacy
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 360
Where is data stored?	https://www.edshed.com/en-gb/privacy
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.edshed.com/en-gb/privacy
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.edshed.com/en-gb/privacy
Legal basis for sharing	Legal Obligation/public Task
How is data shared?	https://www.edshed.com/en-gb/privacy

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	<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#infocollect
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 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: 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: Interactive Resources	
Description	Pupil / teacher online learning resources for Numeracy.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Class / Year group • School <p>Pupil</p> <ul style="list-style-type: none"> • Name • Class / Year group • School
Why is it being processed?	Necessary to provide access to learning resources through School360
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 360
Where is data stored?	Interactive Resources secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	Individual users can access their own accounts. Interactive Resources staff to enable support.
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 Interactive Resources Privacy Notices

System used: Just2easy	
Description	Suite of online tools for Desk Top Publishing, Blogging, Infant toolkit and Tables, spelling an arithmetic SATs testers.
Personal Data Items	<p>Child</p> <ul style="list-style-type: none"> • Name • Gender • Class / Year group • School <p>Staff</p> <ul style="list-style-type: none"> • Name • Class / Year group • School
Why is it being processed?	To provide access for staff and pupils to a variety of learning resources through School360
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 360
Where is data stored?	J2e secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	J2e and school360 staff to manage accounts
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 Just2easy Privacy & Data Policy

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: Mathletics _ online numeracy activities

Description	Mathletics is a captivating online learning space providing students with all the tools they need to be successful learners, both in the classroom and beyond. Powerful courses aligned to the various National Curricula of the UK & Ireland, from Foundation Stage to Key Stage 5, matched with dynamic tools and reporting for teachers. Mathletics supports and caters to each teacher's unique blend of student-driven learning and teacher-led instruction.
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • School • Year group • Test results <p>Staff</p> <ul style="list-style-type: none"> • Name • School
Why is it being processed?	To Provide secure individual access to the online 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	SIMS
Where is data stored?	3P - providers of Mathletics secure servers.
Is it secure and/or encrypted?	Yes
Who can access data?	School Staff, individual pupils their own data, 3P staff for support.
How long is data kept?	3 years after date closed
Who is data shared with?	School staff
Legal basis for sharing	Public task
How is data shared?	Secure online servers.
References	Click to download Privacy Policy for Mathletics

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

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

System used: 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: Nessy	
Description	Nessy has been making fun, educational software for children since 1999 and has developed a reputation for exceptional quality. Nessy offers the complete dyslexia aware solution with a suite of multisensory products aimed at making learning to read, write and spell fun. Nessy is used globally by hundreds of thousands of teachers and students and is a 3 time winner at the prestigious Educational Resources Awards.
Personal Data Items	Teacher <ul style="list-style-type: none"> • Name Parent <ul style="list-style-type: none"> • Name child <ul style="list-style-type: none"> • Name
Why is it being processed?	https://www.nessy.com/uk/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?	Yes
Data Source	School
Where is data stored?	https://www.nessy.com/uk/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.nessy.com/uk/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.nessy.com/uk/privacy-policy/
Legal basis for sharing	Public Task
How is data shared?	https://www.nessy.com/uk/privacy-policy/

System used: NFER	
Description	Assessment materials, reading test and pupil progress data
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • School • Contact details <p>Pupil</p> <ul style="list-style-type: none"> • Name • Date of birth • School • Performance data
Why is it being processed?	To assess pupil attainment and help staff track progress and set targets.
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?	In school NFER secure servers (analysis and marking)
Is it secure and/or encrypted?	Yes
Who can access data?	School staff and NFER 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 NFER

System used: Northumberland School Readiness Passport	
Description	The School Readiness Passport is primarily a transition document. It will be used to gather information about key events in a child's early life.
Personal Data Items	Child <ul style="list-style-type: none"> • Name • Gender • Date of Birth • Unique Identifier • PP Information • Entitlement of hours • Special Needs Information • Development Progress •
Why is it being processed?	This information will be gathered from the child's parents/carers and we do not access or use this data in any way other than as required to enable developmental progress tracking of young children and promote clear transitions between early years settings.
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	Parent
Where is data stored?	https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf
Is it secure and/or encrypted?	https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf
Who can access data?	https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf
Legal basis for sharing	Public Task
How is data shared?	https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf

System used: Nursery (Early Years) files

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: 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: 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.

System used: SAS - Staff absence Insurance

Description	<p>AIS offer staff absence insurance support aimed specifically at schools with restrictive budgets. We guarantee a saving on any like-for-like quote, meaning your school can retain more of your budget to invest in other areas. Along with the financial support, AIS also offer several health and wellbeing services for staff and pupils to access. Included as standard is:</p> <ul style="list-style-type: none"> • Continuous Cover • Cover for all Staff up to 70 Years Old • Flexible Cover; choose who you insure, along with your own Excess and Daily Benefit options • Maternity, Paternity & Adoption Benefit (optional) • Phased Return Benefit • Stress cover options of 0, 30 days or full cover • Generous time limits – schools have 30 calendar days to report a claim • Cover for sickness, accident, jury service and bereavement • Nurse Telephone Support Service through our in-house NMC registered nurses • 24/7 365 days a year, worldwide GP helpline, that always goes through to a trained medical professional
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Date of Birth
Why is it being processed?	https://schooladvice.co.uk/wp-content/uploads/2019/11/PrivacyPolicy.pdf
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?	yes
Data Source	School
Where is data stored?	https://schooladvice.co.uk/wp-content/uploads/2019/11/PrivacyPolicy.pdf
Is it secure and/or encrypted?	secure
Who can access data?	https://schooladvice.co.uk/wp-content/uploads/2019/11/PrivacyPolicy.pdf
How long is data kept?	3 years after date closed
Who is data shared with?	https://schooladvice.co.uk/wp-content/uploads/2019/11/PrivacyPolicy.pdf
Legal basis for sharing	Public task
How is data shared?	https://schooladvice.co.uk/wp-content/uploads/2019/11/PrivacyPolicy.pdf

System used: School Gateway	
Description	School Gateway is your school's app available on Android, iOS and the web. It'll work on phones tablets, laptops and even smart watches. Your school can decide which services they'd like parents to access with it. When you log into the app, each of the services your school provides will appear in a list for you to choose from. Below are some examples of the services your school might provide on School Gateway.
Personal Data Items	<p>parent</p> <ul style="list-style-type: none"> • Name • email <p>child</p> <ul style="list-style-type: none"> • Name • Date of birth • medical condition
Why is it being processed?	https://schoolcomms.com/privacy-policy/
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?	yes
Data Source	School
Where is data stored?	https://schoolcomms.com/privacy-policy/
Is it secure and/or encrypted?	secure
Who can access data?	https://schoolcomms.com/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://schoolcomms.com/privacy-policy/
Legal basis for sharing	public task
How is data shared?	https://schoolcomms.com/privacy-policy/

System used: School meals identification	
Description	Identification of pupils for meals
Personal Data Items	Pupil <ul style="list-style-type: none"> • Name • Photograph • Dietary requirement
<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?	n/a
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To ensure the pupils receive appropriate dietary requirements, particularly those with food allergies.
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?	Paper file - held securely within school premises, accessed daily
Is it secure and/or encrypted?	Yes - secure storage
Who can access data?	Kitchen and office 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

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: Schoolcomms	
Description	Communication app for parents
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • Attendance data <p>Parent</p> <ul style="list-style-type: none"> • Name • Address • e-mail address • Mobile number
Why is it being processed?	To allow regular communication between the school and parent, plus attendance data and payment information if the school chooses these modules.
Legal Basis	<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, app conditions of use, app privacy notice
Is Consent Required?	Yes
Data Source	SIMS
Where is data stored?	'Schoolcomms do not transfer data to countries outside of the EEA. The cloud providers that we work with guarantee data is only processed in the EEA, or that they explicitly abide by the regulation.'
Is it secure and/or encrypted?	'Security of data is essential. Schoolcomms uses best of class protection measures and carry out regular external audits to assess our security posture.'
Who can access data?	Schoolcomm staff - 'our own staff may see information in the course of providing technical support to the school but this will not be shared with anyone without permission of the Data Controller.'
How long is data kept?	3 years after date closed
Who is data shared with?	'We may pass your own details to another organisation to supply/deliver products or services you have purchased and/or to provide after-sales service. We share data with our Payments Processing Service Providers when you make a purchase using our Payments module. This information will be used to authenticate you as a cardholder when making credit or debit card transactions. This data includes name, mobile phone number,

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

System used: 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

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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: SIMS

Description

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

Personal Data Items

Pupil

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

Parent/Carer

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

Staff

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

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

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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: Spelling Shed	
Description	The Spelling Shed - proudly powered by EdShed - is a spelling platform designed by a team of teachers. It is built with students, teachers and parents in mind and aims to make spelling fun for students as well as simple for adults to manage.
Personal Data Items	<p>Child</p> <ul style="list-style-type: none"> • Name • Age • <p>Parent</p> <ul style="list-style-type: none"> • Name • Contact Details
Why is it being processed?	https://www.edshed.com/en-gb/privacy
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 toolkit
Is Consent Required?	Yes as part of registration process
Data Source	School
Where is data stored?	https://www.edshed.com/en-gb/privacy
Is it secure and/or encrypted?	Secure
Who can access data?	School, teachers and parents
How long is data kept?	3+ years
Who is data shared with?	https://www.edshed.com/en-gb/privacy
Legal basis for sharing	Public Task
How is data shared?	https://www.edshed.com/en-gb/privacy

System used: Times Tables Rock Stars	
Description	Online times tables practice and testing.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Email address • School name • School address <p>Pupil</p> <ul style="list-style-type: none"> • Name • Year group • Maths group
Why is it being processed?	To provide access to online learning tool.
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?	Maths circle EU servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff
How long is data kept?	3 years after date closed
Who is data shared with?	Staff
Legal basis for sharing	Public task
How is data shared?	Online secure servers
References	Click to download Times Tables Rock Stars Click to download Times Tables Rock Stars GDPR

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

System used: Vocabulary Ninja	
Description	THE HOME OF HIGH-QUALITY TEACHING AND LEARNING RESOURCES. WHICH TEACHING RESOURCES DO YOU NEED? At Vocabulary Ninja we provide a wide variety of high-quality products and systems that help to support pupils, teachers and schools.
Personal Data Items	Teacher <ul style="list-style-type: none"> • Name child <ul style="list-style-type: none"> • Name • age
Why is it being processed?	https://vocabularyninja.co.uk/privacy-policy-vn/
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://vocabularyninja.co.uk/privacy-policy-vn/
Is it secure and/or encrypted?	Secure
Who can access data?	https://vocabularyninja.co.uk/privacy-policy-vn/
How long is data kept?	3 years after date closed
Who is data shared with?	https://vocabularyninja.co.uk/privacy-policy-vn/
Legal basis for sharing	Public Task
How is data shared?	https://vocabularyninja.co.uk/privacy-policy-vn/

System used: White Rose Maths and Science

Description

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

- Personal Data Items**
- Teacher**
- Name
 - Date of Birth
 - Gender
 - Email address
 - Payment details
- Child**
- Name
 - Age
 - Gender
 - Email address
- Parent**
- Name
 - Age
 - Gender
 - Email address
 -

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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.

Special Category Evidence for

Article 9

legal basis	
How is the Special Category data shared?	https://whiterosemaths.com/privacy/
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	https://whiterosemaths.com/privacy/
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://whiterosemaths.com/privacy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://whiterosemaths.com/privacy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://whiterosemaths.com/privacy/
Legal basis for sharing	Legal Obligation/Public Task
How is data shared?	https://whiterosemaths.com/privacy/