



**Eastlea**

# **GDPR Asset Register**

**Date: 25/05/2019**

Data Protection Officer: Sarah Atkinson

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## Introduction

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

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

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

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

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

## Systems included in this report

System Name	Description	Special Category
Code for Life	Code for Life aims to teach children the basic principles of coding, to help them flourish in an increasingly digital world.	
EVOLVE visits	An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities.	
Futures Cloud	Internet / Network monitoring and reporting tool	
Google drive for education	suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.	
Interactive Resources	Pupil / teacher online learning resources for Numeracy.	
Lexia	Students work independently to develop critical reading and language skills through individualized, motivating learning paths. All students, regardless of their skill level, can each work at their own pace and the teacher is notified (on web-based reports and via email) only when they require support.	
Lightspeed Internet Filtering	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.	
Local Authority moderation of work	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.	
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.	
NFER	Assessment materials, reading test and pupil progress data	
Parent mail	Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening	

	Manager Online Form Collection Meetings & Events	
Personnel files	Information relating to staff employment	
Phonics play	Interactive phonics games, phonics planning, assessment ideas and many teaching ideas and resources to help children to learn	
School360	Learning platform for Northumberland schools with links to 3rd party educational resource providers.	yes
Seesaw	Seesaw - Student driven digital portfolios and simple parent communication.	
Send Paper Records	Records relating to individual pupil's SEND history	yes
SIMS	SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools.	yes
Tapestry	An online journal recording all the learning and fun of children's early years education.	
Target Tracker	Pupil assessment and tracking software?.	yes
Thrive	Social and Emotional Screening Programme	yes

System used: Code for Life

<b>Description</b>	Code for Life aims to teach children the basic principles of coding, to help them flourish in an increasingly digital world.
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• email address</li> <li>• School name</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class</li> </ul>
<b>Why is it being processed?</b>	To provide staff and pupils with access to the online teaching resources.
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Ocado secure servers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Staff and? pupils with accounts
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Shared within school
<b>Legal basis for sharing</b>	Public task
<b>How is data shared?</b>	Online with users with logins
<b>References</b>	<a href="#">Click to download Code for Life</a>

System used: EVOLVE visits

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

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

System used: Futures Cloud

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



System used: Google drive for education

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

System used: Interactive Resources

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

System used: Lexia

**Description**

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

**Personal Data Items**

**Staff**

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

**School**

- Name
- Payment details
- Usage data

**Pupil**

- Name
- Age
- Class
- Group

**Why is it being processed?**

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

**Legal Basis**

**Public task**

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

**Evidence for legal basis**

ICO Legal Basis Toolkit

**Is Consent Required?**

No

**Data Source**

School

**Where is data stored?**

Lexia secure servers

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

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

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

System used: Lightspeed Internet Filtering

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



System used: Local Authority moderation of work

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

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

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



System used: NFER

<b>Description</b>	Assessment materials, reading test and pupil progress data
<b>Personal Data Items</b>	<b>Staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• School</li><li>• Contact details</li></ul> <b>Pupil</b> <ul style="list-style-type: none"><li>• Name</li><li>• Date of birth</li><li>• School</li><li>• Performance data</li></ul>
<b>Why is it being processed?</b>	To assess pupil attainment and help staff track progress and set targets.
<b>Legal Basis</b>	<b>Public task</b> Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
<b>Evidence for legal basis</b>	ICO legal basis toolkit.
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	In school NFER secure servers (analysis and marking)
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	School staff and NFER staff
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Not shared
<b>Legal basis for sharing</b>	N/A
<b>How is data shared?</b>	N/A
<b>References</b>	<a href="#">Click to download NFER</a>

System used: Parent mail

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

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

System used: Personnel files

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

System used: Phonics play

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

System used: School360

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

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

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

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

System used: Seesaw

<b>Description</b>	Seesaw - Student driven digital portfolios and simple parent communication.
<b>Personal Data Items</b>	<b>Staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• School</li><li>• Classes</li></ul> <b>Pupil</b> <ul style="list-style-type: none"><li>• Name</li><li>• School</li><li>• Year</li><li>• Classes</li></ul>
<b>Why is it being processed?</b>	To provide Staff and pupil accounts on Seesaw and to enable the production of pupil portfolios.
<b>Legal Basis</b>	<b>Legal Obligation</b> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <b>Public task</b> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Seesaw servers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	School staff with logins and pupils (own account).
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Not shared
<b>Legal basis for sharing</b>	N/A
<b>How is data shared?</b>	N/A
<b>References</b>	<a href="#">Click to download Seesaw Privacy Policy</a>



System used: Send Paper Records

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

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

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

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

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

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

System used: Tapestry

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

**References**

[Click to download Tapestry Privacy Policy](#)

System used: Target Tracker

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

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

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



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

System used: Thrive

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

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

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