



# **Greenhaugh Primary School**

## **GDPR Asset Register**

**Date: 22/12/2024**

Data Protection Officer: Vicki Evans

## 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
BBC Bitesize	BBC Bitesize is a free online study support resource designed to help with learning, revision and homework! Bitesize provides support for learners aged 5 to 16+ across a wide range of school subjects. It also supports children and young people's wellbeing and career choices. Bitesize also has hundreds of published lessons to help students across the UK with home schooling. Bitesize guides are written by teachers and subject experts and are mapped to follow the curricula of the UK. Secondary Bitesize follows exam board specifications for the main exam boards in the UK, including for GCSE in England, Wales and Northern Ireland and National 4, National 5 & Highers in Scotland, ensuring students are preparing for the right exams	
Charanga	Charanga Music School, the best-selling, modern resource for primary music — online, easy to use and great value. Includes A complete scheme to teach the national curriculum for music A vast library of songs, topics, instrument courses and creative apps In-depth support for assessment, SEND and personalised teaching and learning	
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.	
Classroom Secrets	Classroom Secrets was founded by Claire and Ed Riley in 2013 after Claire took a supply role in a primary school. Being a trained secondary school teacher of performing arts, Claire was used to differentiating by outcome rather than by activity. When planning for her Year 4 class, she came across a problem – the activities and resources available did not allow all children in the same class to access them. Claire was used to providing the same activity for all children, with a choice of levels that would suit each child. And with that, the idea for Classroom Secrets was born... Based in Claire and Ed's hometown of Halifax, we have seen rapid growth since the spring of 2018. We now have over 50 employees working hard on a daily basis to bring you resources that help children learn and teachers reduce their workloads.	
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
Dietary requirements information sheets	Required documents for specific chidlren 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 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.	
Lightspeed Internet Filtering	The Lightspeed Rockets provide DfE compliant	

	Internet Filtering Services for all schools connected to the Internet through NCC.	
Local Authority moderation of work	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.	
Looked After Children Records - Electronic	Information relating to children who are in Looked After Care	yes
Looked After Children Records - Paper	Information relating to children who are Looked After	yes
Medical Files - Electronic	Information in respect of specific medical needs of an individual student	yes
Medical Files - Paper	Information in respect of specific medical needs of an individual student	yes
Medical log	File of medical information for each child: asthma, medication administered, health care plans, risk assessments	yes
Microsoft Teams	Remote learning with Office 365 for students Microsoft Teams for Education Whether you're learning at home for long periods of time or just outside of class, access Office 365 for free, stay connected, and learn in a way that's right for you. Get started Tips for successful online learning Get set up Students at eligible institutions can sign up for Office 365 Education for free. That means access to apps like Word, PowerPoint, and Teams from any web browser. Plus, all the work you create will automatically be saved and backed up in the cloud. Get started with Office 365 for free Already have Office 365? Sign in. Tip: Click Install Office from Office.com to download Office apps to your desktop device. Work together as a class or group Microsoft Teams is a digital hub that brings conversations, content, and apps together in one place. If your classes are using Teams, you'll be able to connect with your classmates, ask your teacher questions, work on your homework, and track the work you've got coming up. Not part of any teams yet? No problem! You can create your own to work on group projects and keep in touch from your computer or phone. Join virtual meetings set up by your teacher and even blur your background	
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	
Oak Academy	Oak National Academy provides free video lessons, slides and worksheets to support teachers and pupils to keep learning. Created by teachers in response to coronavirus, the resources are freely available, to complement schools' own teaching. Lessons cover a broad range of subjects, from reception to year 11. There are no sign-ups or logins required.	
Parents Evening Booking System	Online booking system for parents evenings and other school events.	
Performance Management	Staff appraisals	
Personnel files	Information relating to staff employment	
Photographs and videos of staff and pupils.	Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms.	
PIRA - Rising stars (Wordblaze)	Reliably assess reading attainment and progress with termly standardised reading tests Progress in Reading Assessment (PiRA) termly tests produce standardised results and age related scores to enable schools to track pupil progress term by term, predict future progress and benchmark performance against national averages.	yes
Purple Mash	The all-in-one Edtech solution for your Primary School. Embed computing and digital skills across your whole curriculum with award-winning teaching and learning software for KS1 and KS2.	
Recruitment information	Part of the job application process	yes
Registers	Daily register, after school club registers, lunch register	
Safeguarding Records - Paper	Records relating to safeguarding of children	yes
School360	Learning platform for Northumberland schools with links to 3rd party educational resource providers.	yes
Scratch	With Scratch, you can program your own interactive stories, games, and animations — and share your creations with others in the online community. Scratch helps young people learn to think creatively, reason systematically, and work collaboratively — essential skills for life in the 21st century. Scratch is a project of the Lifelong Kindergarten Group at the MIT Media Lab. It is provided free of charge.	
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
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.	
STEM	Developing teachers and leaders Explore programmes and resources that support professional development and drive the impact of teaching across schools and colleges. o support parents and carers, our subject experts have put together a selection of activities and materials, which are free for everyone to access.	
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.	
White Rose Maths and Science	Influenced, inspired and informed by the work of leading maths researchers and practitioners across the world, White Rose Maths brings together a team of highly experienced and passionate maths teaching experts to train, guide, help and support all those who want to make change happen in their schools. We're guessing that might include YOU! If so, we offer you in-depth training programmes, a vast bank of clear, practical resources (many of them available free of charge), and the bespoke support you want and need to keep raising the bar. We'll not only make your job a whole lot simpler, we'll help you change the future for every child.	yes

System used: BBC Bitesize

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



System used: Charanga

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

System used: Class Dojo

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

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

System used: Classroom Secrets

<b>Description</b>	Classroom Secrets was founded by Claire and Ed Riley in 2013 after Claire took a supply role in a primary school. Being a trained secondary school teacher of performing arts, Claire was used to differentiating by outcome rather than by activity. When planning for her Year 4 class, she came across a problem – the activities and resources available did not allow all children in the same class to access them. Claire was used to providing the same activity for all children, with a choice of levels that would suit each child. And with that, the idea for Classroom Secrets was born... Based in Claire and Ed’s hometown of Halifax, we have seen rapid growth since the spring of 2018. We now have over 50 employees working hard on a daily basis to bring you resources that help children learn and teachers reduce their workloads.
<b>Personal Data Items</b>	<p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>•</li> <li>•</li> </ul> <p><b>child</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>
<b>Why is it being processed?</b>	<a href="https://classroomsecrets.co.uk/privacy-policy/">https://classroomsecrets.co.uk/privacy-policy/</a>
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO toolkit
<b>Is Consent Required?</b>	yes
<b>Data Source</b>	School 360
<b>Where is data stored?</b>	<a href="https://classroomsecrets.co.uk/privacy-policy/">https://classroomsecrets.co.uk/privacy-policy/</a>
<b>Is it secure and/or encrypted?</b>	secure
<b>Who can access data?</b>	<a href="https://classroomsecrets.co.uk/privacy-policy/">https://classroomsecrets.co.uk/privacy-policy/</a>
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	<a href="https://classroomsecrets.co.uk/privacy-policy/">https://classroomsecrets.co.uk/privacy-policy/</a>
<b>Legal basis for sharing</b>	Public Task
<b>How is data shared?</b>	<a href="https://classroomsecrets.co.uk/privacy-policy/">https://classroomsecrets.co.uk/privacy-policy/</a>

System used: Consent for educational visits

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Covid-19 Lateral Flow Testing

<b>Description</b>	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
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<b>Personal Data Items</b>	<p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• Postcode</li> <li>• Test Result</li> </ul> <p><b>Parent</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• Telephone number</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>Public Interest / Public Health</b> 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.
<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	Electronically/verbally with PHE
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	To support the national effort in the fight against Covid-19. Under

	instruction from the DfE and PHE.
<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>	Parent
<b>Where is data stored?</b>	Electronic school system
<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>	Public Health England
<b>Legal basis for sharing</b>	Legal obligation & public task
<b>How is data shared?</b>	Electronically through secure servers.



System used: Data tracking spreadsheets

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Dietary requirements information sheets

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Ed Shed

<b>Description</b>	EdShed, or Education Shed Ltd. as our accountant calls us, is the umbrella for several educational products and brands. These include The Literacy Shed, Literacy Shed Plus, Spelling Shed and MathShed. We are a company run by teachers for teachers and we try to maintain particular values within all of our products: The best quality product we can create Making the most educational impact possible Transparent and affordable pricing The least hassle for teachers and schools
<b>Personal Data Items</b>	<b>Teacher</b> <ul style="list-style-type: none"><li>• Name</li></ul> <b>Child</b> <ul style="list-style-type: none"><li>• Name</li></ul>
<b>Why is it being processed?</b>	<a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>
<b>Legal Basis</b>	<b>Legal Obligation</b> <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 tool
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School 360
<b>Where is data stored?</b>	<a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>
<b>Is it secure and/or encrypted?</b>	Secure
<b>Who can access data?</b>	<a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	<a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>
<b>Legal basis for sharing</b>	Legal Obligation/public Task
<b>How is data shared?</b>	<a href="https://www.edshed.com/en-gb/privacy">https://www.edshed.com/en-gb/privacy</a>

System used: 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: Google Classroom

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



System used: Google Meet

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

System used: Governance

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

System used: Health & Safety

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

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

System used: 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: 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



<b>Description</b>	Information relating to children who are in Looked After Care
<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>• Personal Education Plan</li> <li>• Health Needs</li> <li>• Social Care Needs</li> <li>• Educational Needs</li> <li>• Family Background</li> </ul> <p><b>Parents &amp; Carers</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact Details</li> <li>• Address</li> <li>•</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> </ul> <p><b>External Support</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>

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

<b>How is the Special Category data shared?</b>	Verbally or secure cloud sharing (Google or Office 365 etc)
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	To support the education of children who are Looked After
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	School computer, laptop
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Head Teacher, Class Teacher, Designated Key Worker
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Social Workers, Local Authority, Carers, Receiving school
<b>Legal basis for sharing</b>	Legal Obligation, Public Task
<b>How is data shared?</b>	via secure electronic means, Google or Office 365

<b>Description</b>	Information relating to children who are Looked After
<b>Personal Data Items</b>	<p><b>Pupils</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• Address</li> <li>• Personal Education Plan</li> <li>• Health Needs</li> <li>• Social Care Needs</li> <li>• Educational Needs</li> <li>• Family Background</li> <li>•</li> </ul> <p><b>Parents &amp; Carers</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact Details</li> <li>• Address</li> <li>•</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> </ul> <p><b>External Support Workers</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Organisation</li> <li>• Position</li> <li>• Address</li> <li>• Contact Details</li> </ul>

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- Trade union membership
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- Criminal Records information - protected in Article 10

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

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

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- 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>	Secure encrypted laptops and pens, secure messenger
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	To ensure access to education
<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>	Secure encrypted laptops/ school desktop computers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Head, SENDCO, Teachers, Key Workers
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Parents/Carers (as appropriate), Social Workers, Health Care Professionals, receiving schools, LA workers (as appropriate)
<b>Legal basis for sharing</b>	Public task
<b>How is data shared?</b>	Secure encrypted laptops

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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



System used: Medical log

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

This system has been identified as containing Special Category Information

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

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

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

System used: Microsoft Teams

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

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

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

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

System used: 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: Oak Academy

<b>Description</b>	Oak National Academy provides free video lessons, slides and worksheets to support teachers and pupils to keep learning. Created by teachers in response to coronavirus, the resources are freely available, to complement schools' own teaching. Lessons cover a broad range of subjects, from reception to year 11. There are no sign-ups or logins required.
<b>Personal Data Items</b>	<b>Teacher</b> <ul style="list-style-type: none"><li>• Name</li></ul> <b>Pupil</b> <ul style="list-style-type: none"><li>• Name</li><li>• Age</li></ul>
<b>Why is it being processed?</b>	<a href="https://privacy.thenational.academy/">https://privacy.thenational.academy/</a>
<b>Legal Basis</b>	<b>Legal Obligation</b> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <b>Public task</b> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	Yes
<b>Data Source</b>	School
<b>Where is data stored?</b>	<a href="https://privacy.thenational.academy/">https://privacy.thenational.academy/</a>
<b>Is it secure and/or encrypted?</b>	Secure
<b>Who can access data?</b>	<a href="https://privacy.thenational.academy/">https://privacy.thenational.academy/</a>
<b>How long is data kept?</b>	3+ years
<b>Who is data shared with?</b>	<a href="https://privacy.thenational.academy/">https://privacy.thenational.academy/</a>
<b>Legal basis for sharing</b>	Public Task/Legal Obligation
<b>How is data shared?</b>	<a href="https://privacy.thenational.academy/">https://privacy.thenational.academy/</a>

System used: Parents Evening Booking System

<b>Description</b>	Online booking system for parents evenings and other school events.
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email</li> <li>• Classes</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Classes</li> <li>• Year</li> </ul> <p><b>Parent</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email</li> </ul>
<b>Why is it being processed?</b>	To provide parents/carers with an online system for booking parents evening and other school events.
<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>	PEBS servers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Staff, parents
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Shared with individual? parents and appropriate staff.
<b>Legal basis for sharing</b>	Public task
<b>How is data shared?</b>	Secure online servers
<b>References</b>	<a href="#">Click to download PEBS</a>



System used: Performance Management

<b>Description</b>	Staff appraisals
<b>Why is it being processed?</b>	To assist SLT in reviewing performance
<b>Legal Basis</b>	<b>Contract</b>  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”
<b>Evidence for legal basis</b>	Legitimate interest and public task
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Online Paper
<b>Is it secure and/or encrypted?</b>	Yes encrypted on line Paper in a locked drawer
<b>Who can access data?</b>	SLT and line managers
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Staff member
<b>Legal basis for sharing</b>	Public task
<b>How is data shared?</b>	Verbally Paper copy Electronic copy

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: Photographs and videos of staff and pupils.

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

System used: PIRA - Rising stars (Wordblaze)

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

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

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

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

System used: Purple Mash

<b>Description</b>	The all-in-one Edtech solution for your Primary School. Embed computing and digital skills across your whole curriculum with award-winning teaching and learning software for KS1 and KS2.
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Year Group</li> <li>• School</li> <li>• Age</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School</li> </ul>
<b>Why is it being processed?</b>	To provide online access to a range of Edtech software.
<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>	Purple Mash secure online system
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Staff, Pupils both in school and home
<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 online purple mash servers

System used: Recruitment information

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

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

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

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



System used: Registers

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

<b>Description</b>	Records relating to safeguarding of children
<b>Personal Data Items</b>	<p><b>Pupils</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• Address</li> <li>• Health Needs</li> <li>• Social Care Status</li> <li>• Educational Needs</li> <li>• Child Protection Plan/Actions</li> </ul> <p><b>Parent/Carers</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> </ul> <p><b>Social Care Worker</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details</li> </ul> <p><b>External Support Workers</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Organisation</li> <li>• Position</li> <li>• Address</li> <li>• Contact Details</li> </ul>

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,

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

System used: 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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- 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: Scratch	
<b>Description</b>	With Scratch, you can program your own interactive stories, games, and animations — and share your creations with others in the online community. Scratch helps young people learn to think creatively, reason systematically, and work collaboratively — essential skills for life in the 21st century. Scratch is a project of the Lifelong Kindergarten Group at the MIT Media Lab. It is provided free of charge.
<b>Personal Data Items</b>	<p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>•</li> <li>• Age</li> </ul> <p><b>Parent</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>
<b>Why is it being processed?</b>	<a href="https://scratch.mit.edu/privacy_policy">https://scratch.mit.edu/privacy_policy</a>
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO - Legal basis tool
<b>Is Consent Required?</b>	Yes
<b>Data Source</b>	School
<b>Where is data stored?</b>	<a href="https://scratch.mit.edu/privacy_policy">https://scratch.mit.edu/privacy_policy</a>
<b>Is it secure and/or encrypted?</b>	Secure
<b>Who can access data?</b>	<a href="https://scratch.mit.edu/privacy_policy">https://scratch.mit.edu/privacy_policy</a>
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	<a href="https://scratch.mit.edu/privacy_policy">https://scratch.mit.edu/privacy_policy</a>
<b>Legal basis for sharing</b>	Public Task
<b>How is data shared?</b>	<a href="https://scratch.mit.edu/privacy_policy">https://scratch.mit.edu/privacy_policy</a>

System used: SEND electronic records

<b>Description</b>	Records relating to Special Educational Needs and Disability for individual pupils
<b>Personal Data Items</b>	<b>Pupils</b> <ul style="list-style-type: none"><li>• Name</li><li>• Date of Birth</li><li>• Address</li><li>• Health Needs</li><li>• Social Care Status</li><li>• Educational Needs</li><li>• SEND History</li></ul> <b>Parents / Carers</b> <ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• Contact details</li></ul> <b>Staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• Position</li></ul> <b>External Support Workers</b> <ul style="list-style-type: none"><li>• Name</li><li>• Organisation</li><li>• Position</li><li>• Address</li><li>• Contact details</li></ul>

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

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

<b>How is the Special Category data shared?</b>	Secure cloud share - Google or Office 365
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	To ensure appropriate levels of support for the student in relation SEND needs
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis tool
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Google Drive or Office 360 secure cloud storage
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Head, SENDCO, Teachers, Key Workers
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Parents/Carers as appropriate; Social Workers; Health Care Professionals; Receiving Schools; Youth Offending Teams (case dependent); LA Workers as appropriate
<b>Legal basis for sharing</b>	Public Task
<b>How is data shared?</b>	Secure cloud share or secure messenger if printed.



System used: Send Paper Records

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

System used: SIMS

**Description**

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

**Personal Data Items**

**Pupil**

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

**Parent/Carer**

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

**Staff**

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

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

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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 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: Spelling Shed

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

System used: STEM

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

System used: Twinkl

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



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

**Obligation**

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

**Special Category Evidence for**

Article 9

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