The Grove Special School

GDPR Asset Register

Date: 11/10/2026

Data Protection Officer: Linda Papaioannou

01289306390

admin@thegrove.northumberland.sch.uk

Introduction

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

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

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

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

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

Systems included in this report

System Name	Description	Special Category
Accident book	Log of accidents / minor injuries in school	
Accident Report Form	ACC1 form for reporting accidents to NCC	
ASDAN - Award Scheme Development and Accreditation Network	ASDAN is an education charity and awarding organisation engaging learners through relevant and motivating courses, which elevate them to progress to further education, training and work, and empower them to take control of their lives.	
Assessment Records	Electronic and paper mark books	
Attendance file	Attendance information about pupils and classes	yes
BBC Bitesize	BBC Bitesize is a free online study support resource designed to help with learning, revision and homework! Bitesize provides support for learners aged 5 to 16+ across a wide range of school subjects. It also supports children and young people's wellbeing and career choices. Bitesize also has hundreds of published lessons to help students across the UK with home schooling. Bitesize guides are written by teachers and subject experts and are mapped to follow the curricula of the UK. Secondary Bitesize follows exam board specifications for the main exam boards in the UK, including for GCSE in England, Wales and Northern Ireland and National 4, National 5 & Highers in Scotland, ensuring students are preparing for the right exams	
Behaviour Files - Paper (in class)	Information relating to the behaviours of particular pupils	yes
Book Creator	Allows pupils to write books and store them in an online library	
BSquared Connecting Steps	Tool for assessing pupil progress	
Busy Things	Online games & activities for learning	
Capita	MIS used for data storage for educational providers/local authorities	yes
CCTV	CCTV	
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	
Child Protection Records - Electronic	Records relating to child protection issues for individual pupils	yes
Child Protection Records - Paper	Records relating to child protection issues for individual pupils	yes
Civica- Occupational Health (formerly OPAS)	Occupation health software	yes
Consent for educational visits	Consent information for all educational visits including day trips and residential visits	yes
Data tracking spreadsheets	Spreadhseets (excel) to track progress of children over the course of their school career.	yes
DfE (Gov.uk)	The Department for Education (DfE) is data controller for the personal data DfE and our executive agencies process. Our executive agencies are: Education and Skills Funding Agency (ESFA) Standards and Testing Agency (STA) Teaching Regulation Agency (TRA)	
DFE-Census and workforce Census	The school workforce census is a statutory data collection that takes place each autumn. You must complete statutory censuses by law unless there's a good reason not to. The census collects data on all teaching and support staff in regular employment, including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data.	
Dietary requirements information sheets	Required documents for specific chidlren with severe allergies / intolerances and religious observations (food)	yes
Doodle English	Proxima™, the award-winning in-built intelligence that powers DoodleEnglish, builds an individual work programme for your child that's perfectly tailored to their level, strengths, and weaknesses. They work on short, snappy exercises that conveniently fit around busy schedules. They can even use it offline and upload progress later. Motivational features ensure they come back every day feeling more and more confident about their English.	
Doodle Maths	Personalised maths tuition – anywhere, anytime Curriculum-aligned Ages 4 to 14	
ECT Manager	ECT Manager is an online system that makes it easy	

	for Appropriate Bodies and schools to manage every part of the ECT induction process in one place.	
Eschools Website Provider	On-line school website building tool	
EVOLVE visits	An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities.	
Examination Boards administration	Pearson/OCR/AQA/ASDAN/Edexcel and any other examination board	
Futures Cloud	Internet / Network monitoring and reporting tool	
GL-Assessment	GL assessments provide a range of tests for schools including reading, progress and cognitive tests	
Google Classroom	A free and easy tool helping educators efficiently manage and assess progress, while enhancing connections with learners from school, from home, or on the go.	
Google drive for education	suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.	
Google Meet	Google Meet is a video-communication service developed by Google. It is one of two apps that constitute the replacement for Google Hangouts, the other being Google Chat	
Governance	Details of all members of the Governing Body	
Health & Safety	Records pertaining to Health & Safety	
Huggg	Purchase and send supermarket vouchers to those in need. Manage funds and give recipients choice all in one simple to use platform.	
ICT North	IT services for schools	
Jigsaw Education Group	provide comprehensive, high-quality resources for PSHE and RE that empower teachers and support student wellbeing. Our innovative curriculum helps students develop the knowledge, skills, and values they need to thrive in today's world. We offer a range of ready-to-use resources, including lesson plans, activities, and interactive tools, designed to make teaching engaging and effective. From Early Years to Secondary, Jigsaw provides everything teachers need to deliver meaningful, impactful lessons that promote both personal growth and academic success.	
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, heath 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 startedTips for successful online learning Get set up Students at eligible institutions can sign up for Office 365 Education for free. That means access to apps like Word, PowerPoint, and Teams from any web browser. Plus, all the work you create will automatically be saved and backed up in the cloud. Get started with Office 365 for free Already have Office 365? Sign in. Tip: Click Install Office from Office.com to download Office apps to your desktop device. Work together as a class or group Microsoft Teams is a digital hub that brings conversations, content, and apps together in one place. If your classes are using Teams, you'll be able to connect with your classmates, ask your teacher questions, work on your homework, and track the work you've got coming up. Not part of any teams yet? No problem! You can create your own to work on group projects and keep in touch from your computer or phone. Join virtual meetings set up by your teacher and even blur your background	
MS Office Suite	Suite of online tools for staff and pupils, including OneDrive, Word, Powerpoint, Excel, Outlook, Video and Teams.	
NFER	Assessment materials, reading test and pupil progress data	
Northumberland School Readiness Passport	The School Readiness Passport is primarily a transition document. It will be used to gather information about key events in a child's early life.	
Nursery (Early Years) files	Early years registration information and funding informaiton for Early Years entitlement, hours taken	yes

	each week	
ParentPay	ParentPay is an online payment service for schools and families.	yes
Pebble	Online platform to help schools fundraise.	
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.	
Places Leisure- School Swimming Management System	The SSMS is a digital assessment tool, assessing pupils using Swim England School Swimming and Water Safety Charter. It is matched against the National Curriculum programmes of study and provides schools with termly reports. Reports evidence statistics to unlock Sports Premium funding for further swimming lessons. The product gives Places Leisure an important opportunity to gather national data to report on school swimming and influence national networks. Data gathered will strengthen potential to 'close the gap' for the 30% not yet meeting the standard. The system requires a school pupil data upload containing basic details for pupils swimming each term. Data is automatically uploaded to the Places Leisure School Swim App where school swim instructors assess pupils against Swim England's School Swimming Awards. Schools receive a termly update on pupil attainment for all pupils we have the data for.	yes
Plickers	Plickers is a powerfully simple tool that lets teachers collect real-time formative assessment data without the need for student devices. The Services are made available to teachers who may use them as an aid to classroom instruction.	
Reception Baseline Assessment (RBA)	The RBA is an age-appropriate assessment and has been a statutory assessment since 2021. It is made up of 2 components assessing: early mathematics early literacy, communication and language	
Recruitment information	Part of the job application process	yes
Registers	Daily register, after school club registers, lunch register	
Safeguarding Records - Electronic	Records relating to safeguarding of children	yes
Safeguarding Records - Paper	Records relating to safeguarding of children	yes
School Jotter	School Jotter provide website design and hosting services to schools. They host and store pupil and staff images that are displayed on the public facing website.	

School meals identification	Identification of pupils for meals	yes
School360	Learning platform for Northumberland schools with links to 3rd party educational resource providers.	yes
SEND electronic records	Records relating to Special Educational Needs and Disability for individual pupils	yes
Send Paper Records	Records relating to individual pupil's SEND history	yes
Senso Cloud	The Cloud Based Platform for Device Monitoring and Management. All-In-One Software for Network, Classroom, Safeguarding and Asset Management, and for managing and monitoring any Windows and Chrome device from a Centralised Web portal	
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
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.	
TACPAC	TACPAC draws together touch and music to create a structured half hour of sensory communication between two people. TACPAC creates sensory alignment and helps people of any age who have sensory impairment, for example, visual impairment, developmental delay, complex learning difficulties, Sensory Processing Disorder (SPD) or limited or pre-verbal levels of communication	
The National College	A provider of online training for staff & governors	
Twinkl	We're here to 'help those who teach'. It's what brings us to work every day. We're proud to create educational resources that can be used at each step of a child's learning journey. Our teacher-created resources provide entire schemes of work, lesson planning and assessments right through to online educational games, augmented reality and so much more. We have over 525,000 resources and new content gets added every day.You'll find we've normally got what you need before you even know you want it.	
Visitor book	Log of all visitors into school / fire regulations	
Widget	Communication Symbol Software	
Wonde	Manages transfer of data from Sims MIS to School360.	yes

System used: Accident book	
Description	Log of accidents / minor injuries in school
Personal Data Items	**Pupil** • Name • class • Injury • first aid •
Why is it being processed?	To record injuries in school
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	File in office
Is it secure and/or encrypted?	No
Who can access data?	School staff
How long is data kept?	3 years after date closed
Who is data shared with?	Parents
Legal basis for sharing	Legal obligation
How is data shared?	Verbally

System used: Accident Report Form	
Description	ACC1 form for reporting accidents to NCC
Personal Data Items	**Pupil** • Name • DOB • Gender • Address • Telephone number • Date and time of accident • nature of injury • Place of accident • First aid • Circumstances • Action taken • Witness information • **Staff member** • Name • Occupation • DOB • Gender • Address • Telephone number • Date and time of injury • nature of injury • place of accident • First aid • Circumstances • Action taken • Witness information •
Why is it being processed?	Statutory obligations to comply with Health and Safety regulations.
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School

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

System used: ASDAN - Award Scheme Development and Accreditation Network	
Description	ASDAN is an education charity and awarding organisation engaging learners through relevant and motivating courses, which elevate them to progress to further education, training and work, and empower them to take control of their lives.
Personal Data Items	**Staff member responsible for contact with ASDAN** • Name • Job title • Address • Contact details • Credit card details (school) • Details of courses delivered • Data collected as part of documents completed **Learners** • Name • Gender • DOB • Unique learning number
Why is it being processed?	https://www.asdan.org.uk/privacy-statement/
Legal Basis	**Contract** Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract” **Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Legitimate Interest** Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”
Evidence for legal basis	https://www.asdan.org.uk/privacy-statement/
Is Consent Required?	https://www.asdan.org.uk/privacy-statement/
Data Source	School
Where is data stored?	https://www.asdan.org.uk/privacy-statement/
Is it secure and/or encrypted?	https://www.asdan.org.uk/privacy-statement/

Who can access data?	https://www.asdan.org.uk/privacy-statement/
How long is data kept?	6 years after date closed
Who is data shared with?	https://www.asdan.org.uk/privacy-statement/
Legal basis for sharing	https://www.asdan.org.uk/privacy-statement/
How is data shared?	https://www.asdan.org.uk/privacy-statement/

System used: Assessment Records	
Description	Electronic and paper mark books
Personal Data Items	**Child** • Name • Gender • Disadvantaged cohort • SEND Code • Key Stage 2 Assessment data • Internal Assessment Data
Why is it being processed?	To track student achievement and report to parents
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO lawful basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	On-site Secure Network Google Drive On paper- Class Context Files
Is it secure and/or encrypted?	On-site Network- This solution has user authentication and access controls which determine the level of access to data that a user requires. The solution also utilises the Schools' Information Security policy which includes password, physical and network security controls. Google Drive- authentication and access controls which determine the level of access to data that a user requires. G-Suite complies with the Schools' Information Security policy which includes password security controls. Class Context Files- teachers follow privacy culture procedures
Who can access data?	Staff
How long is data kept?	3+ years
Who is data shared with?	Parents
Legal basis for sharing	Legal obligation, Public task
How is data shared?	Parents evenings, reports

System used: Attendance file	
Description	Attendance information about pupils and classes
Personal Data Items	**Pupil** • Name • DOB • Class • Gender • UPN • Address • Telephone number • Parental contact • Ethnic origin • Current attendance • Past attendance
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbally, Secure cloud,
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To regularly check pupil's attendance towards a desired goal
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing

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

System used: BBC Bitesize	
Description	BBC Bitesize is a free online study support resource designed to help with learning, revision and homework! Bitesize provides support for learners aged 5 to 16+ across a wide range of school subjects. It also supports children and young people's wellbeing and career choices. Bitesize also has hundreds of published lessons to help students across the UK with home schooling. Bitesize guides are written by teachers and subject experts and are mapped to follow the curricula of the UK. Secondary Bitesize follows exam board specifications for the main exam boards in the UK, including for GCSE in England, Wales and Northern Ireland and National 4, National 5 & Highers in Scotland, ensuring students are preparing for the right exams
Personal Data Items	**teacher** • Name • email address **child** • Name • Age • Year group
Why is it being processed?	https://www.bbc.co.uk/usingthebbc/privacy/
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.bbc.co.uk/usingthebbc/privacy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.bbc.co.uk/usingthebbc/privacy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.bbc.co.uk/usingthebbc/privacy/
Legal basis for sharing	Public Task
How is data shared?	https://www.bbc.co.uk/usingthebbc/privacy/

System used: Behaviour Files - Paper (in class)	
Description	Information relating to the behaviours of particular pupils
Personal Data Items	**Pupils** • Name • Date of Birth • Address • Health Needs • Educational Behavioural Needs • Social Care Status • **Parents/Carers** • Name • Address • Contact Details **Staff** • Name • Position **External Support Workers** • Name • Organisation • Position • Address • Contact Details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement. **Significant Public Interest** Processing is required for reasons of significant public interest on the basis of Union or Member State Law that is equivalent to the aim pursued

	and which contains suitable safeguards.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbally & by Secure Messenger
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To ensure access to education appropriate to needs
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure cabinet
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Class Teacher and key workers as appropriate
How long is data kept?	3 years after date closed
Who is data shared with?	External support workers as applies
Legal basis for sharing	Public Task & Legal Obligation
How is data shared?	Verbal or secure messenger

System used: Book Creator	
Description	Allows pupils to write books and store them in an online library
Personal Data Items	**Teacher** • Name • email • profile picture from schools 360 [used to sign in] • Technical data -Type of device IP **Pupil** • Name • Pupil's [school] email
Why is it being processed?	To allow use of the system
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Stored in Google Cloud using Google’s security model
Is it secure and/or encrypted?	Yes and encrypted by Google Cloud
Who can access data?	School & Book Creator staff
How long is data kept?	3 years after date closed
Who is data shared with?	With third party service providers, such as hosting providers or an email service, so that they can provide services to us. In cases where we share student personal data with these third parties they will be obligated to comply with the commitments in this policy. We maintain a list of these third party service providers;
Legal basis for sharing	ICO Toolkit -contract & public task
How is data shared?	Data is transmitted securely over SSL

System used: BSquared Connecting Steps	
Description	Tool for assessing pupil progress
Personal Data Items	**Pupil** • Name • Progress Level •
Why is it being processed?	To provide data for staff to assess progress/attainment.
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure internal systems
Is it secure and/or encrypted?	Yes
Who can access data?	Staff
How long is data kept?	3 years after date closed
Who is data shared with?	Internal only
Legal basis for sharing	Public task and legal obligation
How is data shared?	Secure access folders

System used: Busy Things	
Description	Online games & activities for learning
Personal Data Items	**Taecher** • Name • email **Pupil** • Name
Why is it being processed?	To allow use of the system
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	All data collected and processed by Busy Things is stored in a secure data centre in the UK meeting industry standards for security (ISO270001).
Is it secure and/or encrypted?	All data is transmitted to and from this location using SSL encryption technologies. All data is backed up on a regular basis and stored securely off-site
Who can access data?	School & busy things staff
How long is data kept?	3 years after date closed
Who is data shared with?	Not Shared
Legal basis for sharing	N/A
How is data shared?	N/A

System used: Capita	
Description	MIS used for data storage for educational providers/local authorities
Personal Data Items	**User** • Name • DOB • Address • DBS information • Gender • Other applicable personal data/special category data as stored on education provider/local authority
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement. **Public** Processing relates to personal data manifestly made public by the Data Subject.
Special Category Evidence for legal basis	ICO Toolkit
How is the Special Category data shared?	By education provider/local authority
Legal basis for sharing Special Category data	Obligation, Public
Why is it being processed?	To perform task as per obligation, public task, MIS storage of data for education provider/local authority
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task**

	Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Toolkit
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	https://www.capita.com/about-capita/privacy-notice#3925188384-2973987467
Is it secure and/or encrypted?	Yes
Who can access data?	https://www.capita.com/about-capita/privacy-notice#3925188384-2973987467
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.capita.com/about-capita/privacy-notice#3925188384-2973987467
Legal basis for sharing	ICO Toolkit
How is data shared?	https://www.capita.com/about-capita/privacy-notice#3925188384-2973987467

System used: CCTV	
Description	CCTV
Personal Data Items	**Staff** • Images **Child** • Images **Visitor** • Images
Why is it being processed?	Safeguarding
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	School servers and recordings
Is it secure and/or encrypted?	Yes
Who can access data?	School staff
How long is data kept?	See school's CCTV policy for their specific retention period - typically 30/40 days.
Who is data shared with?	Police in event of criminal investigations
Legal basis for sharing	ICO legal basis toolkit
How is data shared?	Hard Copy

System used: Charanga	
Description	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
Personal Data Items	**Staff** • Name • School • email address • Mobile phone umber • Pupils groups **Pupil** • Name • School • Assessment information
Why is it being processed?	To provide online access to teaching and learning materials.
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	Charanga privacy notice.
Is Consent Required?	No
Data Source	School
Where is data stored?	Securely stored on servers in Ireland.
Is it secure and/or encrypted?	Yes
Who can access data?	Strictly controlled internally in Charanga, Teachers and pupils.
How long is data kept?	3 years after date closed
Who is data shared with?	Shared with partner company Soundation AB
Legal basis for sharing	
How is data shared?	Electronically
References	Click to download Privacy Notice Click to download Soundation Privacy Policy

System used: Child Protection Records - Electronic	
Description	Records relating to child protection issues for individual pupils
Personal Data Items	**Pupils** • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Child Protection Plan/Actions • **Parents** • Name • Address • Contact Details **Staff** • Name • Position **Social Care Worker** • Name • Address • Contact Details **External Support Workers** • Name • Organisation • Position • Address • Contact Details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation**

	Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbally or secure cloud sharing (Google or Office 365 etc)
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Statutory obligations and to support educational entitlement
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	School computer, laptop
Is it secure and/or encrypted?	Yes
Who can access data?	Designated Child Protection Lead & Deputy, Designated Admin Staff
How long is data kept?	3 years after date closed
Who is data shared with?	Social Workers, Parent/Carers as appropriate, some information shared with key workers, health care professionals and Police, receiving school
Legal basis for sharing	Statutory & Legitimate interest
How is data shared?	Verbally or secure cloud sharing (Google or Office 365 etc)

System used: Child Protection Records - Paper	
Description	Records relating to child protection issues for individual pupils
Personal Data Items	**Pupils** • Name • • Date of Birth • Address • Health Needs • Social Care Status • Educational needs • Child Protection Plan/Actions **Parents/Carers** • Name • Address • Contact Details **Staff** • Name • Position **Social Care Worker** • Name • Address • Contact Details **External Support Workers** • Name • Organisation • Position • Address • Contact Details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation**

	Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbal or secure messenger
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Statutory obligations and to support educational entitlement
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure cabinet
Is it secure and/or encrypted?	Yes
Who can access data?	Designated Child Protection Lead & Deputy; Designation admin staff
How long is data kept?	3 years after date closed
Who is data shared with?	Social Workers, Parent/Carer as appropriate, some information shared with key workers, health care professionals and Police, receiving school
Legal basis for sharing	Statutory and Legitimate interest
How is data shared?	Verbal or secure messenger

System used: Civica- Occupational Health (formerly OPAS)	
Description	Occupation health software
Personal Data Items	**Staff** • Name • Contact Details • Employment Details • Health Information • Absence Information
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Medical** Processing is required for the purposes of preventative or occupational medicine; for evaluating the working capacity of the employee,; medical diagnosis; the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional. **Public** Processing relates to personal data manifestly made public by the Data Subject.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	https://www.civica.com/en-gb/policies-and-statements/privacy-notice/
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To provide occupational health support to staff
Legal Basis	**Contract** Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”

	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Legitimate Interest** Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.civica.com/en-gb/policies-and-statements/privacy-notice/
Is it secure and/or encrypted?	Yes
Who can access data?	School
How long is data kept?	3+ years
Who is data shared with?	School staff, HR provider, Staff member
Legal basis for sharing	As above
How is data shared?	School staff, HR provider, Staff member

System used: Consent for educational visits	
Description	Consent information for all educational visits including day trips and residential visits
Personal Data Items	**Pupil** • Name • DOB • Health conditions • Medication • Dietary requirements • Contact information • Family doctor
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Shared by phone
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To ensure school has up to date information when taking children off site
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit

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

System used: Data tracking spreadsheets	
Description	Spreadhseets (excel) to track progress of children over the course of their school career.
Personal Data Items	**pupil** • Name • date of birth • gender • class • year • FSM • SEN • Assessment info
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Secure google drive and paper copies
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Processing this data is necessary for the completion of a public task and for the school to meet statutory requirements
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School

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

System used: DfE (Gov.uk)	
Description	The Department for Education (DfE) is data controller for the personal data DfE and our executive agencies process. Our executive agencies are: Education and Skills Funding Agency (ESFA) Standards and Testing Agency (STA) Teaching Regulation Agency (TRA)
Why is it being processed?	We receive your personal information indirectly from other organisations. For example, we collect information about: you, your learning and your achievements - we collect this information from educational settings like early years providers, schools, academies, independent schools, colleges and training providers and from your employer, if applicable children in need, children looked after and alternative provision - we collect this information from local authorities you to support research and to safeguard children - we collect this information from other government departments, early years providers, schools, academies, independent schools, colleges and training providers your exam results - we receive this from awarding organisations and exam boards teachers and employees in educational settings or local authorities - we collect this information from the educational setting or local authorities
Legal Basis	**Legitimate Interest** Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Toolkit
Is Consent Required?	https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter#how-we-use-your-information
Data Source	School
Where is data stored?	https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter#how-we-use-your-information
Is it secure and/or encrypted?	Yes
Who can access data?	https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter#how-we-use-your-information
How long is data kept?	10+ years
Who is data shared with?	https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter#how-we-use-your-information
Legal basis for sharing	Legitimate interest, public task
How is data shared?	https://www.gov.uk/government/organisations/department-for-education/a

	bout/personal-information-charter#how-we-use-your-information

System used: DFE-Census and workforce Census	
Description	The school workforce census is a statutory data collection that takes place each autumn. You must complete statutory censuses by law unless there's a good reason not to. The census collects data on all teaching and support staff in regular employment, including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data.
Personal Data Items	**Staff** • Name
Why is it being processed?	https://www.gov.uk/help/privacy-notice
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." **Public task** Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	yes
Data Source	School
Where is data stored?	https://www.gov.uk/help/privacy-notice
Is it secure and/or encrypted?	secure
Who can access data?	https://www.gov.uk/help/privacy-notice
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.gov.uk/help/privacy-notice
Legal basis for sharing	public task/legal obligation
How is data shared?	https://www.gov.uk/help/privacy-notice

System used: Dietary requirements information sheets	
Description	Required documents for specific chidlren with severe allergies / intolerances and religious observations (food)
Personal Data Items	**Pupil** • Name • DOB • Dietary information
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Paper records
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Health and safety - to avoid children coming into contact with specific foods
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No

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

System used: Doodle English	
Description	Proxima™, the award-winning in-built intelligence that powers DoodleEnglish, builds an individual work programme for your child that's perfectly tailored to their level, strengths, and weaknesses. They work on short, snappy exercises that conveniently fit around busy schedules. They can even use it offline and upload progress later. Motivational features ensure they come back every day feeling more and more confident about their English.
Personal Data Items	**Teacher** • Name **Child** • Name • Age
Why is it being processed?	https://www.doodleenglish.com/privacy-policy/
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO- Legal Basis Tool Kit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.doodleenglish.com/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	Teacher, Child. https://www.doodleenglish.com/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.doodleenglish.com/privacy-policy/
Legal basis for sharing	Public Task
How is data shared?	https://www.doodleenglish.com/privacy-policy/

System used: Doodle Maths	
Description	Personalised maths tuition – anywhere, anytime Curriculum-aligned Ages 4 to 14
Personal Data Items	**Teacher** • Name **Child** • Name • **Parent** • Name
Why is it being processed?	https://www.doodlemaths.com/privacy-policy/
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO- Legal Basis Tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.doodlemaths.com/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	Teacher, Parent, Child https://www.doodlemaths.com/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.doodlemaths.com/privacy-policy/
Legal basis for sharing	Public Task
How is data shared?	https://www.doodlemaths.com/privacy-policy/

System used: ECT Manager	
Description	ECT Manager is an online system that makes it easy for Appropriate Bodies and schools to manage every part of the ECT induction process in one place.
Personal Data Items	**Staff** • Name • Job Role • Contact Details
Why is it being processed?	To manage ECT induction
Legal Basis	**Legitimate Interest** Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Toolkit
Is Consent Required?	https://www.ectmanager.com/privacy-notice/
Data Source	School
Where is data stored?	https://www.ectmanager.com/privacy-notice/
Is it secure and/or encrypted?	Yes
Who can access data?	https://www.ectmanager.com/privacy-notice/
How long is data kept?	3+ years
Who is data shared with?	https://www.ectmanager.com/privacy-notice/
Legal basis for sharing	Legitimate Interest, Public Task
How is data shared?	https://www.ectmanager.com/privacy-notice/

System used: Eschools Website Provider	
Description	On-line school website building tool
Personal Data Items	**School Information** • Name • Address • Contact information • Class names • Staff names • Governor names • Year group information (planning, homework) • Newsletters **Pupil** • Photographs • •
Why is it being processed?	To inform parents and the wider community about the life of the school
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Consent not required to put on school information. Consent required to use pupil photographs
Data Source	School
Where is data stored?	On eschool secure server through school 360 platform 4. Transfer of School Data 4.1. The School hereby consents to eSchools accessing School Data held on the Management Information System through Wonde, for the purpose of extracting and transferring such School Data to eSchools. 4.2. Prior to leaving the School premises by electronic means (via HTTPS) the School Data will be encrypted by Wonde and eSchools.
Is it secure and/or encrypted?	Yes 4.2. Prior to leaving the School premises by electronic means (via HTTPS) the School Data will be encrypted by Wonde and eSchools. 5.1. The School Data shall always remain the property of the School. 5.2. eSchools shall have no responsibility to maintain the security of any School Data held or controlled by the School. 5.3. eSchools shall keep all Confidential Information and School Data confidential and shall not:- 5.3.1.1. use any Confidential Information or School Data except for the purpose of performing the services it provides to the School; or 5.3.1.2.

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

System used: EVOLVE visits	
Description	An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities.
Personal Data Items	**Staff** • Name • e-mail address • IP address • Location data • Qualifications **Pupil** • Name • Date of Birth • UPN
Why is it being processed?	To reduce paperwork, simplify procedures, produce self-review and inspection preparation data, and improve staff confidence in that they automatically follow both employer, and National Guidelines.
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	SIMS
Where is data stored?	'We store all of the Customer Data (including your personal data) on servers which are located in the United Kingdom. These servers are protected by passwords and firewalls.'
Is it secure and/or encrypted?	Yes
Who can access data?	Evolve staff
How long is data kept?	3 years after date closed
Who is data shared with?	'The only time that any information will be shared by us outside of our services is where our Customer has asked us to configure the service so that it shares certain data with specified third party programs including calendars.'
Legal basis for sharing	Public task & legal obligation
How is data shared?	See contract/agreement

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

System used: Examination Boards administration	
Description	Pearson/OCR/AQA/ASDAN/Edexcel and any other examination board
Personal Data Items	**Child** • Name • Date of birth • Gender • Unique Candidiate identifier • Unique Learner Number • Legal Name • Coursework marks • Forecast grades
Why is it being processed?	Exam entry and issuing of qualifications
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO lawful basis tool
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	Secure gateway
Is it secure and/or encrypted?	Yes- password protected on secure gateway and sent via EDI
Who can access data?	Examination Board, teachers, exams officer
How long is data kept?	3 years after date closed
Who is data shared with?	Examination Board
Legal basis for sharing	Public Task & legal obligation
How is data shared?	Via secure gateway- Privacy Notices for each exam board can be found on the website for each board.

System used: Futures Cloud	
Description	Internet / Network monitoring and reporting tool
Personal Data Items	**Pupil** • Name • I/P address • URL's visited **Teacher** • Name • I / P address • URL's visited
Why is it being processed?	Fulfills statutory requirement for the school to monitor, log and report inappropriate network activity.
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School 360
Where is data stored?	Future Digital Secure Servers
Is it secure and/or encrypted?	Yes
Who can access data?	Designated teachers in school (normally online safety lead.
How long is data kept?	3 years after date closed
Who is data shared with?	NCC Online safety staff, Northumberland Safeguarding Children Board, Police if serious incident, Staff within school.
Legal basis for sharing	Public task & legal obligation.
How is data shared?	Electronically. through a secure connection.
References	Click to download Future Digital

System used: GL-Assessment	
Description	GL assessments provide a range of tests for schools including reading, progress and cognitive tests
Personal Data Items	**Staff** • Name • School • Email • Class **Pupil** • Name • Age • Gender • Class • Year • Performance data
Why is it being processed?	To provide? access to a range of testing and diagnostic tools for teaching staff.
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	GL assessment? secure servers and secure school servers
Is it secure and/or encrypted?	Yes
Who can access data?	School staff, GL staff for technical support.
How long is data kept?	3 years after date closed
Who is data shared with?	Shared with school
Legal basis for sharing	Public task
How is data shared?	Electronically via secure networks
References	Click to download GL-Assessment Privacy Policy

System used: Google Classroom	
Description	A free and easy tool helping educators efficiently manage and assess progress, while enhancing connections with learners from school, from home, or on the go.
Personal Data Items	**Teacher** • Name **Child** • Name
Why is it being processed?	https://policies.google.com/privacy?hl=en-GB#infocollect
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal tool kit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://policies.google.com/privacy?hl=en-GB#infocollect
Is it secure and/or encrypted?	Secure
Who can access data?	https://policies.google.com/privacy?hl=en-GB#infocollect
How long is data kept?	3 years after date closed
Who is data shared with?	https://policies.google.com/privacy?hl=en-GB#infocollect
Legal basis for sharing	Public Task/legal obligation
How is data shared?	https://policies.google.com/privacy?hl=en-GB#infocollect

System used: Google drive for education	
Description	suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.
Personal Data Items	**Staff** • Name • Classes / groups • Gmail address **Pupil** • Name • Classes / groups • Gmail address **Governor** • Name • Gmail address
Why is it being processed?	To provide Google drive for education to staff, pupils and governors.
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit.
Is Consent Required?	No
Data Source	School 360
Where is data stored?	Google secure servers in Europe
Is it secure and/or encrypted?	Yes secure and encrypted
Who can access data?	Individual users can access their own accounts. School360 and ICT Team can access management tool.
How long is data kept?	3 years after date closed
Who is data shared with?	Staff and Pupils
Legal basis for sharing	Public task
How is data shared?	Secure google cloud.
References	Click to download Google Drive Policy Notice Click to download Google GSuite Privacy Policy

System used: Google Meet	
Description	Google Meet is a video-communication service developed by Google. It is one of two apps that constitute the replacement for Google Hangouts, the other being Google Chat
Personal Data Items	**teacher** • Name • • **child** • Name
Why is it being processed?	https://policies.google.com/privacy?hl=en-GB
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal tool kit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://policies.google.com/privacy?hl=en-GB
Is it secure and/or encrypted?	Secsure
Who can access data?	https://policies.google.com/privacy?hl=en-GB
How long is data kept?	3 years after date closed
Who is data shared with?	https://policies.google.com/privacy?hl=en-GB
Legal basis for sharing	Public Task
How is data shared?	https://policies.google.com/privacy?hl=en-GB

System used: Governance	
Description	Details of all members of the Governing Body
Personal Data Items	**Name** • Name • Address • Contact Details • Photos • Attendance at Meetings • Pecuniary Interests
Why is it being processed?	Statutory Requirement
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure school systems
Is it secure and/or encrypted?	Yes
Who can access data?	Admin staff/ SLT
How long is data kept?	3+ years
Who is data shared with?	Local Authority and the general public
Legal basis for sharing	Public task and legal obligation
How is data shared?	Electronically via a secure server.

System used: Health & Safety	
Description	Records pertaining to Health & Safety
Personal Data Items	**Staff** • Name • Contact details • D.o.B • Record of Accident/Incident **Child** • Name • Contact details • D.o.B • Record of Accident/Incident **Visitor** • Name • Contact details • D.o.B • Record of Accident/Incident
Why is it being processed?	To ensure Health and Safety Regulations are followed
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	School network Paper copies- secure private office
Is it secure and/or encrypted?	Yes
Who can access data?	School staff
How long is data kept?	3 years after date closed
Who is data shared with?	NCC, school staff and parents
Legal basis for sharing	Public task and legal obligation.
How is data shared?	Electronically via a secure server.

System used: Huggg	
Description	Purchase and send supermarket vouchers to those in need. Manage funds and give recipients choice all in one simple to use platform.
Personal Data Items	**parent** • Name **child** • Name • age
Why is it being processed?	https://www.huggg.me/privacy
Evidence for legal basis	ICO Legal Basis tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.huggg.me/privacy
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.huggg.me/privacy
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.huggg.me/privacy
Legal basis for sharing	Public duty
How is data shared?	https://www.huggg.me/privacy

System used: ICT North	
Description	IT services for schools
Personal Data Items	**Staff** • Name • Username • Email address • Temporary passwords **Pupil** • Name • Username • Email address • Temporary passwords
Why is it being processed?	ICT support to end users at site / access to school IT equipment.
Legal Basis	**Consent** Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes” **Contract** Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	School software/ICT North systems
Is it secure and/or encrypted?	Yes
Who can access data?	Staff, pupils, ICT North administrators
How long is data kept?	1+ year
Who is data shared with?	Staff, pupils, ICT North administrators
Legal basis for sharing	Contract, consent, pupil task
How is data shared?	School software/ICT North systems

System used: Jigsaw Education Group	
Description	provide comprehensive, high-quality resources for PSHE and RE that empower teachers and support student wellbeing. Our innovative curriculum helps students develop the knowledge, skills, and values they need to thrive in today's world. We offer a range of ready-to-use resources, including lesson plans, activities, and interactive tools, designed to make teaching engaging and effective. From Early Years to Secondary, Jigsaw provides everything teachers need to deliver meaningful, impactful lessons that promote both personal growth and academic success.
Personal Data Items	**Staff** • Name • Role at school/place of work • work email • school telephone
Why is it being processed?	To fulfill contract to provide resources/services.
Legal Basis	**Contract** Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract” **Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Legitimate Interest** Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”
Evidence for legal basis	ICO toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	All information you provide to us electronically is stored and transferred using up-to-date strong encryption technologies. Where available, data may be further encrypted (at rest) and all data, stored in the Internet zone or locally is secured by restriction of access to relevant personnel only.
Is it secure and/or encrypted?	We back up local data using strong encryption software.
Who can access data?	Company's data processors

How long is data kept?	3 years after date closed
Who is data shared with?	We will not sell or disclose your personal information to a third party. However, we will disclose specific information if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on us or the site; (b) protect and defend the rights or property of the J gsaw Education Group; and, (c) act under exigent circumstances to protect the personal safety of users of the Jigsaw Education Group, or the public
Legal basis for sharing	Legal obligation
How is data shared?	By company

System used: Lightspeed Internet Filtering	
Description	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.
Personal Data Items	**Staff** • Name • Machine name • I/P address • URLs visited • School **Pupil** • Name • Name • Machine name • I/P address • URLs visited • School
Why is it being processed?	Statutory requirement to filter Internet services for school users
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	Lightspeed Rockets at County Hall Northumberland
Is it secure and/or encrypted?	Yes
Who can access data?	NCC school support Staff, Curriculum ICT Team, Lightspeed staff for support
How long is data kept?	3 years after date closed
Who is data shared with?	School leadership, LSCB and police if serious incident occurs
Legal basis for sharing	Public task and legal obligation
How is data shared?	Secure electron communication
References	Click to download Lightspeed Privacy Notice

System used: Local Authority moderation of work	
Description	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.
Personal Data Items	**School** • Name **Staff** • Initials **Pupil** • Initials • Gender • Unique pupil number (UPN)
Why is it being processed?	As part of the statutory? requires for assessment and moderation in schools
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	At County Hall in secure Filing systems and online, encrypted
Is it secure and/or encrypted?	Yes
Who can access data?	Local Authority school data team and assessment/moderation team.
How long is data kept?	3 years after date closed
Who is data shared with?	Other NCC staff
Legal basis for sharing	Public task and legal obligation
How is data shared?	Secure server and hard copies

System used: Looked After Children Records - Electronic	
Description	Information relating to children who are in Looked After Care
Personal Data Items	**Pupil** • Name • Date of Birth • Address • Personal Education Plan • Health Needs • Social Care Needs • Educational Needs • Family Background **Parents & Carers** • Name • Contact Details • Address • **Staff** • Name • Position **External Support** • Name • Organisation • Position • Address • Contact Details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9

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

System used: Looked After Children Records - Paper	
Description	Information relating to children who are Looked After
Personal Data Items	**Pupils** • Name • Date of Birth • Address • Personal Education Plan • Health Needs • Social Care Needs • Educational Needs • Family Background • **Parents & Carers** • Name • Contact Details • Address • **Staff** • Name • Position **External Support Workers** • Name • Organisation • Position • Address • Contact Details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement. **Significant Public Interest**

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

System used: Medical Files - Electronic	
Description	Information in respect of specific medical needs of an individual student
Personal Data Items	**Pupils** • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Medical History • Medication Details **Parents/Carers** • Name • Address • Contact Details **Staff** • Name • Position **External Support Workers** • Name • Organisation • Position • Address • Contact Details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9

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

System used: Medical Files - Paper	
Description	Information in respect of specific medical needs of an individual student
Personal Data Items	**Pupils** • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Medical History • Medication Details **Parents/Carers** • Name • Address • Contact Details **Staff** • Name • Position **External Support Workers** • Name • Organisation • Position • address • Contact details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	ICO regs Article 9

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

System used: Medical log	
Description	File of medical information for each child: asthma, medication administered, heath care plans, risk assessments
Personal Data Items	**Pupil** • Name • Inhaler / medication information (doseage) • DOB • Class • Medical condition • Signs and symptoms • Treatment • Parental consent • Name of medication and dose • Side effects • Storage requirements • Special equipment • Testing needed • Access to food drink • Dietary requirement • Staff support • Contingency arrangements • Family / emergency contacts • Hazard • Risk • Control measures / risk evaluation
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Internally with schoool / medical staff
Legal basis for sharing Special Category data	Article 9

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

System used: Microsoft Teams	
Description	Remote learning with Office 365 for students Microsoft Teams for Education Whether you're learning at home for long periods of time or just outside of class, access Office 365 for free, stay connected, and learn in a way that's right for you. Get startedTips for successful online learning Get set up Students at eligible institutions can sign up for Office 365 Education for free. That means access to apps like Word, PowerPoint, and Teams from any web browser. Plus, all the work you create will automatically be saved and backed up in the cloud. Get started with Office 365 for free Already have Office 365? Sign in. Tip: Click Install Office from Office.com to download Office apps to your desktop device. Work together as a class or group Microsoft Teams is a digital hub that brings conversations, content, and apps together in one place. If your classes are using Teams, you'll be able to connect with your classmates, ask your teacher questions, work on your homework, and track the work you've got coming up. Not part of any teams yet? No problem! You can create your own to work on group projects and keep in touch from your computer or phone. Join virtual meetings set up by your teacher and even blur your background
Personal Data Items	**Teacher** • Name **Child** • Name
Why is it being processed?	https://privacy.microsoft.com/en-us/privacystatement
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." **Public task** Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://privacy.microsoft.com/en-us/privacystatement
Is it secure and/or encrypted?	Secure
Who can access data?	https://privacy.microsoft.com/en-us/privacystatement
How long is data kept?	3 years after date closed
Who is data shared with?	https://privacy.microsoft.com/en-us/privacystatement

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

System used: MS Office Suite	
Description	Suite of online tools for staff and pupils, including OneDrive, Word, Powerpoint, Excel, Outlook, Video and Teams.
Personal Data Items	**Staff** • Name • Classes **Pupil** • Name **Governor** • Name
Why is it being processed?	To provide OneDrive for education to staff, pupils and governors.
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis tool.
Is Consent Required?	No
Data Source	School
Where is data stored?	Microsoft Servers based in the EU
Is it secure and/or encrypted?	Yes, secure and encrypted
Who can access data?	Individual users can access their own accounts. ICT Team can access management tool.
How long is data kept?	3 years after date closed
Who is data shared with?	N/A
Legal basis for sharing	N/A
How is data shared?	https://privacy.microsoft.com/en-gb/privacystatement

System used: NFER	
Description	Assessment materials, reading test and pupil progress data
Personal Data Items	**Staff** • Name • School • Contact details **Pupil** • Name • Date of birth • School • Performance data
Why is it being processed?	To assess pupil attainment and help staff track progress and set targets.
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit.
Is Consent Required?	No
Data Source	School
Where is data stored?	In school NFER secure servers (analysis and marking)
Is it secure and/or encrypted?	Yes
Who can access data?	School staff and NFER staff
How long is data kept?	3 years after date closed
Who is data shared with?	Not shared
Legal basis for sharing	N/A
How is data shared?	N/A
References	Click to download NFER

System used: Northumberland School Readiness Passport	
Description	The School Readiness Passport is primarily a transition document. It will be used to gather information about key events in a child's early life.
Personal Data Items	**Child** • Name • Gender • Date of Birth • Unique Identifier • PP Information • Entitlement of hours • Special Needs Information • Development Progress •
Why is it being processed?	This information will be gathered from the child's parents/carers and we do not access or use this data in any way other than as required to enable developmental progress tracking of young children and promote clear transitions between early years settings.
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	Parent
Where is data stored?	https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf
Is it secure and/or encrypted?	https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf
Who can access data?	https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf
Legal basis for sharing	Public Task
How is data shared?	https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/About-the-Council/information%20governance/Schools-Readiness-Passport-Privacy-Notice.pdf

System used: Nursery (Early Years) files	
Description	Early years registration information and funding informaiton for Early Years entitlement, hours taken each week
Personal Data Items	**Pupil** • Name • DOB • Gender • Address • Documents seen / recorded • Parents Nat. Insurance Number • Eligibility code • Religion • Email address • Telephone number • Parent work details • Emergency contact details • Former placements • Medical information • Ethnic origin • SEN information • EAL • Armed forces • Meal arrangements • Parental consent: medicine, photos, website, school publications, press, local excursions • Start dates • Desired sessions
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Internally within school
Legal basis for sharing Special	Article 9

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

System used: ParentPay	
Description	ParentPay is an online payment service for schools and families.
Personal Data Items	**staff** • Name • Gender **Pupil** • Name • Date of birth • Gender • Groups • Dietary requirements • Postal address • UPN • Roll number • Meal selections and history • Emergency contact information • Medical details • EHIC • Doctors contact • Passport **Parent/Carer** • Name • Gender • Address • Phone number • Email • Payment history & balance • Payment card details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for	Article 9

legal basis	
How is the Special Category data shared?	Via secure server
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To provide parents with an online payment system for meals, school trips and other activities/resources.
Legal Basis	**Contract** Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”
Evidence for legal basis	ICO lawful basis tool.
Is Consent Required?	No
Data Source	Parent
Where is data stored?	Parent pay secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	Parent, Parent pay staff
How long is data kept?	3 years after date closed
Who is data shared with?	School staff
Legal basis for sharing	Contract
How is data shared?	Via secure servers

System used: Pebble	
Description	Online platform to help schools fundraise.
Personal Data Items	**Staff** • Name • Address • Email **Parent** • Name • Address • Email
Why is it being processed?	To provide an online platform to help schools manage fundraising and provide an easy system for parents to access fundraising.
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO lawful basis tool
Is Consent Required?	No
Data Source	Parent
Where is data stored?	Pebble servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff and individual parents their own data.
How long is data kept?	3 years after date closed
Who is data shared with?	School staff
Legal basis for sharing	Public task
How is data shared?	Pebble secure servers
References	Click to download Pebble Privacy Policy

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

System used: Personnel files	
Description	Information relating to staff employment
Personal Data Items	**Staff** • Name • Address • Telephone number • e-mail address • National Insurance Number • Qualifications • DOB • Contract • Payroll no. • Employment history • References • Leave of absence • DBS checked
Why is it being processed?	Necessary for employment
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure filing cabinet & online secure servers.
Is it secure and/or encrypted?	Yes - secure storage
Who can access data?	Headteacher and office staff
How long is data kept?	3 years after date closed
Who is data shared with?	NCC and/or HR provider and/or Payroll provider
Legal basis for sharing	Public task and legal obligation
How is data shared?	Electronically or secure courier

System used: Photographs and videos of staff and pupils.	
Description	Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms.
Personal Data Items	**Staff** • Name • Photograph • Video **Pupil** • Photograph (unnamed) • Video (unnamed) **Governor** • Name • Photograph
Why is it being processed?	To celebrate the life and work of the school.
Legal Basis	**Consent** Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	School website and social media sites
Is it secure and/or encrypted?	Yes
Who can access data?	Publicly available on the www
How long is data kept?	3 years after date closed
Who is data shared with?	The public
Legal basis for sharing	ICO legal basis toolkit
How is data shared?	On www
References	Click to download Model photograph policy (including consent form)

System used: Places Leisure- School Swimming Management System	
Description	The SSMS is a digital assessment tool, assessing pupils using Swim England School Swimming and Water Safety Charter. It is matched against the National Curriculum programmes of study and provides schools with termly reports. Reports evidence statistics to unlock Sports Premium funding for further swimming lessons. The product gives Places Leisure an important opportunity to gather national data to report on school swimming and influence national networks. Data gathered will strengthen potential to 'close the gap' for the 30% not yet meeting the standard. The system requires a school pupil data upload containing basic details for pupils swimming each term. Data is automatically uploaded to the Places Leisure School Swim App where school swim instructors assess pupils against Swim England's School Swimming Awards. Schools receive a termly update on pupil attainment for all pupils we have the data for.
Personal Data Items	**Child** • Name • UPN • Year Group • DOB • Gender • SEN information • Medical Needs • EAL • Pupil Premium
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Inputted directly into the system by the school- Microsoft Azure
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To capture the progress of children in swimming
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: "processing

	is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Microsoft Dataverse
Is it secure and/or encrypted?	Yes
Who can access data?	Swim Instructors, Swim Coordinators, Managers, School
How long is data kept?	3 years after date closed
Who is data shared with?	N/A
Legal basis for sharing	Public Task & Legitimate Interest
How is data shared?	Microsoft Dataverse

System used: Plickers	
Description	Plickers is a powerfully simple tool that lets teachers collect real-time formative assessment data without the need for student devices. The Services are made available to teachers who may use them as an aid to classroom instruction.
Personal Data Items	**teacher** • Name • email address • date of birth **Pupil** • Name • Class
Why is it being processed?	To provide pupils with online accounts
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO lawful basis tool.
Is Consent Required?	No
Data Source	School
Where is data stored?	Plickers servers https://www.plickers.com/privacy
Is it secure and/or encrypted?	Yes https://www.plickers.com/privacy
Who can access data?	Staff
How long is data kept?	3 years after date closed
Who is data shared with?	School staff
Legal basis for sharing	Public task and legal obligation
How is data shared?	Online secure server

System used: Reception Baseline Assessment (RBA)	
Description	The RBA is an age-appropriate assessment and has been a statutory assessment since 2021. It is made up of 2 components assessing: early mathematics early literacy, communication and language
Personal Data Items	**Pupils** • Name • DOB • Unique Pupil Number (UPN) • Sex • Results from the assessment
Why is it being processed?	For the RBA, STA will use the child's information as part of STA's public task in providing a statutory assessment.
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	For the processing of personal data, the relevant condition is the UK General Data Protection Regulation (UK GDPR) Article 6 (1) (e) Public task. The Early Years Foundation Stage (Miscellaneous Amendments) and Childcare Fees (Amendment) Regulations 2021 set out the statutory basis of the RBA.
Is Consent Required?	https://www.gov.uk/government/publications/reception-baseline-assessment-privacy-notice/reception-baseline-assessment-privacy-notice-for-pupil-data-from-september-2025#:~:text=about%20your%20child-,What%20data%20will%20be%20collected?,results%20from%20the%20assessment
Data Source	School
Where is data stored?	https://www.gov.uk/government/publications/reception-baseline-assessment-privacy-notice/reception-baseline-assessment-privacy-notice-for-pupil-data-from-september-2025#:~:text=about%20your%20child-,What%20data%20will%20be%20collected?,results%20from%20the%20assessment
Is it secure and/or encrypted?	Yes
Who can access data?	https://www.gov.uk/government/publications/reception-baseline-assessment-privacy-notice/reception-baseline-assessment-privacy-notice-for-pupil-data-from-september-2025#:~:text=about%20your%20child-,What%20data%20will%20be%20collected?,results%20from%20the%20assessment
How long is data kept?	stored and safeguarded for up to 10 years. During this period, access to this information will be restricted so that it is not used for purposes other than the RBA. Afterwards, the data will be anonymised so that it will no longer be attributable to the child.
Who is data shared with?	https://www.gov.uk/government/publications/reception-baseline-assessment-privacy-notice/reception-baseline-assessment-privacy-notice-for-pupil-data-from-september-2025#:~:text=about%20your%20child-,What%20data%20will%20be%20collected?,results%20from%20the%20assessment
Legal basis for sharing	Public task

How is data shared?	https://www.gov.uk/government/publications/reception-baseline-assessment-privacy-notice/reception-baseline-assessment-privacy-notice-for-pupil-data-from-september-2025#:~:text=about%20your%20child-,What%20data%20will%20be%20collected?,results%20from%20the%20assessment

System used: Recruitment information	
Description	Part of the job application process
Personal Data Items	**Name** • Name • DOB • Address • Educational establishments attended • Qualifications • Disciplinary Records • Appraisal Records • Salary information
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Electronically via secure online servers
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	As part of the recruitment process
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	Safer recruitment process

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

System used: Registers	
Description	Daily register, after school club registers, lunch register
Personal Data Items	**Child** • Name • Address • Date of Birth • Lunch Status • Attendance
Why is it being processed?	To monitor children's attendance - legal obligation.
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Paper registers kept in the school office Electronic registers online
Is it secure and/or encrypted?	Yes- secure
Who can access data?	School staff, after school club providers
How long is data kept?	3 years after date closed
Who is data shared with?	School staff, after school club providers
Legal basis for sharing	Public task and legal obligation
How is data shared?	Through the paper register at the time of completion. Electronically with office/Sims.

System used: Safeguarding Records - Electronic	
Description	Records relating to safeguarding of children
Personal Data Items	**Pupils** • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Child Protection Plan/Actions **Parent/Carers** • Name • Address • Contact Details **Staff** • Name • Position **Social Care Worker** • Name • Address • Contact Details **External Support Workers** • Name • Organisation • Position • Address • Contact Details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment,

	social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Secure Cloud Sharing - Google or Office 365
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Statutory obligations and to support educational entitlement
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	school computer, laptop
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Designated Admin staff, Class Teacher, LA Workers as appropriate
How long is data kept?	3 years after date closed
Who is data shared with?	Parent/Carer as appropriate, key workers as appropriate, LA workers as appropriate, Police
Legal basis for sharing	Statutory and Legitimate
How is data shared?	Secure Cloud Sharing, Google or Office 365

System used: Safeguarding Records - Paper	
Description	Records relating to safeguarding of children
Personal Data Items	**Pupils** • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Child Protection Plan/Actions **Parent/Carers** • Name • Address • Contact Details **Staff** • Name • Position **Social Care Worker** • Name • Address • Contact Details **External Support Workers** • Name • Organisation • Position • Address • Contact Details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment,

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

System used: School Jotter	
Description	School Jotter provide website design and hosting services to schools. They host and store pupil and staff images that are displayed on the public facing website.
Personal Data Items	**Staff** • Photographs • Video **Pupil** • Photographs • Video
Why is it being processed?	To provide images for the school website to celebrate the life and work of the school.
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	parent consent form on Home School Agreement
Is Consent Required?	yes
Data Source	Parent
Where is data stored?	school website
Is it secure and/or encrypted?	yes
Who can access data?	Publically available on the website
How long is data kept?	3+ years
Who is data shared with?	The public
Legal basis for sharing	Public task
How is data shared?	On the school website https://beaconhill.home.schooljotter2.
References	Click to download School Jotter

System used: School meals identification	
Description	Identification of pupils for meals
Personal Data Items	**Pupil** • Name • Photograph • Dietary requirement
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	n/a
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To ensure the pupils receive appropriate dietary requirements, particularly those with food allergies.
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Paper file - held securely within school premises, accessed daily
Is it secure and/or encrypted?	Yes - secure storage
Who can access data?	Kitchen and office staff

How long is data kept?	3 years after date closed
Who is data shared with?	Not shared
Legal basis for sharing	N/A
How is data shared?	N/A

System used: School360	
Description	Learning platform for Northumberland schools with links to 3rd party educational resource providers.
Personal Data Items	**Pupil** • Name • School id • Class/Group • Year • UPN (Unique Pupil Number) • Gender • Attendance (If School360 used for registration) • Pupil concern reports • EYFS reflections **Staff** • Name • Staff Alternative e-mail address • Teacher pupil notes
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Electronically, encrypted on transfer and storage.
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To facilitate setting up and access to the County learning platform - School360
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing

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

System used: SEND electronic records	
Description	Records relating to Special Educational Needs and Disability for individual pupils
Personal Data Items	**Pupils** • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • SEND History **Parents / Carers** • Name • Address • Contact details **Staff** • Name • Position **External Support Workers** • Name • Organisation • Position • Address • Contact details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9

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

System used: Send Paper Records	
Description	Records relating to individual pupil's SEND history
Personal Data Items	**Pupil** • Name • Date Of Birth • Address • Medical Information • Health & Social Care • Specific Educational Needs • Interventions In Place **Parents** • Name • Address • Contact Details **Staff** • Name • Position **External Support** • Name • Organisation • Position • Address • Contact Details
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data	Secure messenger

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

System used: Senso Cloud	
Description	The Cloud Based Platform for Device Monitoring and Management. All-In-One Software for Network, Classroom, Safeguarding and Asset Management, and for managing and monitoring any Windows and Chrome device from a Centralised Web portal
Personal Data Items	**User** • Name • Marital status • Title • DOB • Gender • Address • Email Address • Telephone number
Why is it being processed?	For filtering and monitoring services across school devices, to carry out our obligations arising from the performance of the contract entered and to comply with a legal or regulatory obligation.
Legal Basis	**Contract** Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract” **Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Legitimate Interest** Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”
Evidence for legal basis	ICO toolkit
Is Consent Required?	No but consent can be withdrawn at any time
Data Source	School
Where is data stored?	Secure cloud server
Is it secure and/or encrypted?	Yes
Who can access data?	The authorised person(s) within school only - staff
How long is data kept?	3 years after date closed

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

System used: SIMS	
Description	SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools.
Personal Data Items	**Pupil** • Name • Date of birth • Address • Title • Gender • Class • Year • Parent/carer name • UPN • Dietary Requirements • Medical information • Attendance/exclusion • FSM • SEN • Assessment information • Child Protection Plan • School history • Looked After Information **Parent/Carer** • Name • Address • Phone number • email address • Gender • Title • DOB • Parental responsibility • Language • Occupation **Staff** • Name • Address • Phone number • email address • Title • Gender • DOB • NI Number • Ethnicity • Bank Account Information • Qualifications • Disability & Medical Information

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: STEM	
Description	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.
Personal Data Items	**Teacher** • Name **child** • Name **Age** • Name **Parent** • Name
Why is it being processed?	https://www.stem.org.uk/privacy-policy
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.stem.org.uk/privacy-policy
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.stem.org.uk/privacy-policy
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.stem.org.uk/privacy-policy
Legal basis for sharing	Public Task
How is data shared?	https://www.stem.org.uk/privacy-policy

System used: TACPAC	
Description	TACPAC draws together touch and music to create a structured half hour of sensory communication between two people. TACPAC creates sensory alignment and helps people of any age who have sensory impairment, for example, visual impairment, developmental delay, complex learning difficulties, Sensory Processing Disorder (SPD) or limited or pre-verbal levels of communication
Personal Data Items	**Staff** • Name • email
Why is it being processed?	https://tacpac.co.uk/privacy-policy/
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”
Evidence for legal basis	ICO legal toolkit
Is Consent Required?	Yes on registration
Data Source	School
Where is data stored?	https://tacpac.co.uk/privacy-policy/
Is it secure and/or encrypted?	secure
Who can access data?	https://tacpac.co.uk/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://tacpac.co.uk/privacy-policy/
Legal basis for sharing	Public task
How is data shared?	https://tacpac.co.uk/privacy-policy/

System used: The National College	
Description	A provider of online training for staff & governors
Personal Data Items	**Staff member** • Name • Job Title • Email • Phone number **Governor** • Name • Email • Phone number
Why is it being processed?	In order to provide access to online training and for billing purposes
Legal Basis	**Contract** Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	On Server of National Education Group in UK
Is it secure and/or encrypted?	Yes both secure and encrypted
Who can access data?	College staff or their contractors to provide service and school
How long is data kept?	3 years after date closed
Who is data shared with?	Contractors to provide service
Legal basis for sharing	Contract
How is data shared?	Via encrypted transfer

System used: Twinkl	
Description	We're here to 'help those who teach'. It's what brings us to work every day. We're proud to create educational resources that can be used at each step of a child's learning journey. Our teacher-created resources provide entire schemes of work, lesson planning and assessments right through to online educational games, augmented reality and so much more. We have over 525,000 resources and new content gets added every day.You'll find we've normally got what you need before you even know you want it.
Personal Data Items	**Teacher** • Name **child** • Name
Why is it being processed?	https://www.twinkl.co.uk/legal
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.twinkl.co.uk/legal
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.twinkl.co.uk/legal
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.twinkl.co.uk/legal
Legal basis for sharing	Public Task
How is data shared?	https://www.twinkl.co.uk/legal

System used: Visitor book	
Description	Log of all visitors into school / fire regulations
Personal Data Items	**Visitor** • Name • Date and time • Car registration • Purpose of visit • Company •
Why is it being processed?	Safeguarding, health and safety, fire regulations
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Visitor book (hard copy)
Is it secure and/or encrypted?	Yes
Who can access data?	School staff, visitors
How long is data kept?	3 years after date closed
Who is data shared with?	School staff, visitors
Legal basis for sharing	Public task & legal obligation
How is data shared?	Hard copy or secure online server.

System used: Widget	
Description	Communication Symbol Software
Personal Data Items	**Pupil** • Name • Progress Level
Why is it being processed?	To check Progress
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Online. Secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff only
How long is data kept?	3 years after date closed
Who is data shared with?	Staff
Legal basis for sharing	Legal obligation & Public task
How is data shared?	Online secure server
References	Click to download Widget Privacy Doc

System used: Wonde	
Description	Manages transfer of data from Sims MIS to School360.
Personal Data Items	**Staff** • Name **Pupil** • Name • School id • Class/group • Year • UPN • Gender • Attendance
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	School 360 secure servers
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To facilitate the exchange of data to allow the set up of school360 for a school.
Legal Basis	**Contract** Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”
Evidence for legal basis	ICO legal basis toolkit

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