

New Delaval Primary School

GDPR Asset Register

Date: 24/11/2026

Data Protection Officer: Wallis Bath

01670 353255

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
2Build a profile	EYFS email communication & observation system	yes
Accelerated Reader	Accelerated Reader gives teachers the information they need to monitor students' reading practice and make informed decisions to guide their future learning.	
Accident book	Log of accidents / minor injuries in school	
Accident Report Form	ACC1 form for reporting accidents to NCC	
Active Learn Pearsons - including Bug Club and Abacus Maths	Bug Club is a whole-school reading programme that combines an online reading world with print books and assessment tools. Abacus Maths is a whole school maths programme that combines an online maths world with printable books and assessment tools.	
Adobe Creative Cloud Express [formerly Adobe Spark]	Creates videos & stores them	
Assessment Records	Electronic and paper mark books	
Attendance file	Attendance information about pupils and classes	yes
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
Bikeability	The Bikeability Trust run on behalf of Department of Transport. Courses and resources for schools in England	
Book Creator	Allows pupils to write books and store them in an online library	
Canva	Canva is an online design and publishing tool	
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
ClassCharts - Edukey	Class Charts offers a solution for seating plans & improving and tracking behaviour in school. Seating plans for SIMS are available with this piece of Edukey software.	
Classroom monitor	Classroom Monitor is the most widely used assessment tool in the UK, it specialises in assessment for learning, pupil tracking and formative assessment.	
CLPE	Welcome to The Centre for Literacy in Primary Education The Centre for Literacy in Primary Education is a UK based children's literacy charity working with primary schools. Our work raises the achievement of children's reading and writing by helping schools to teach literacy creatively and effectively, putting quality children’s books at the heart of all learning. We offer courses at our literacy library in central London and deliver training in various regional locations as well as provide a wide range of free resources for Primary teachers.	
Code for Life	Code for Life aims to teach children the basic principles of coding, to help them flourish in an increasingly digital world.	
Commando Joes	The Commando Joe online judgement tool allows leaders to take a snapshot glance at progress of the 7 behaviour traits across the school/classes. This alongside academic attainment shows progress of all groups including pupils eligible for Pupil Premium or those with SEND.	yes
Consent for educational visits	Consent information for all educational visits including day trips and residential visits	yes
Covid-19 Lateral Flow Testing	About 1 in 3 people with coronavirus do not have symptoms but can still pass it on to others. Regular testing of people without symptoms is important to help stop the virus spreading and protect your loved ones. As lockdown restrictions gradually ease we all need to play our part to help protect each other. The following people in England will have access to regular rapid	yes

	lateral flow testing made available to them as schools reopen: secondary school pupils primary and secondary school staff households, childcare and support bubbles of primary and secondary-age pupils households, childcare and support bubbles of primary and secondary staff	
CPOMS	CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral welfare for schoolls. CPOMS is software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Working alongside a school's existing safeguarding processes, CPOMS is an intuitive system to help with the management and recording of child protection, behavioural issues, bullying, special educational needs, domestic issues and much much more. Using CPOMS, schools can ensure that students are safe and fully supported, whilst school staff can focus on teaching and providing support, instead of administration.	yes
CRB Cunninghams	CRB Cunninghams Education Solutions provide schools with their own identity management, cashless catering, and online payment system.	yes
Data tracking spreadsheets	Spreadhseets (excel) to track progress of children over the course of their school career.	yes
Dietary requirements information sheets	Required documents for specific chidlren with severe allergies / intolerances and religious observations (food)	yes
Discovery Education	Discovery Education is a trusted partner for schools, supporting them in realising their vision and achieving their goals with curriculum-matched content, professional development solutions and professional networking opportunities.	
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	
Ed Shed	EdShed, or Education Shed Ltd. as our accountant calls us, is the umbrella for several educational products and brands. These include The Literacy Shed, Literacy Shed Plus, Spelling Shed and	

	MathShed. We are a company run by teachers for teachers and we try to maintain particular values within all of our products: The best quality product we can create Making the most educational impact possible Transparent and affordable pricing The least hassle for teachers and schools	
Edenred	Edenred is all about motivating and engaging people and making life/work better. About helping organisations all over the world perform better. And here's a bit more about how we do it. We offer the widest range of incentives, rewards and benefits solutions, individually designed to fit your audience, your goals and your budget - a unique and unrivalled total reward & recognition solution. We help organisations and public institutions streamline and simplify payment processes, reduce administrative burdens, save money and make life easier for everyone. We do this through Vouchers, prepaid cards, online platforms and digital & SMS products to help engage and motivate your employees, customers and business partners. Over 20 different solutions last time we checked.	
ELibrary by Wheelers Books	We create a beautiful, customised eLibrary for your school, brimming with amazing titles Our selectors maintain the shared collections, suited to your school's student year groups. Leading international titles are combined with the best of local content. You are in full control and can add new titles (400,000+ to choose from), age restrict or disable titles as required. We use your school's 'single sign-on' to so it's simple for your students, to find and enjoy your huge digital collection	
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	
Frog Learning	Online learning application linked to School360. Provides resources for a wide range of curricular areas.	
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 Gemini	Google AI assistant	yes
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	
HAF- HolidayActivities	The dedicated platform built to run and report on your local authority HAF programme.	yes
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.	
Insight Tracking	An online data tracking system for teachers. The following data is collected: Pupil records include the following data: Unique Pupil Number (UPN) Legal first & last names Preferred first & last names Date of birth Gender Date pupil joined the school Date pupil left the school The following data can optionally be recorded as well: Address Ethnicity EAL status FSM history SEN history Service child status In-care status Attendance summaries Customer-defined groups Customer-defined notes and files	yes
Kahoot	Elevate learning at your entire school or district with Kahoot! EDU: Easily roll out a site license across your school, district or campus Empower teachers with interactive teaching and assessment tools Engage and motivate students in class and via distance learning Get more control and visibility into Kahoot! usage We believe that there should be no limits to when and where you can learn. Engage students in learning when your school is out and stay on track with curriculum while instructing online.	
Lexia	Students work independently to develop critical reading and language skills through individualized, motivating learning paths. All students, regardless of their skill level, can each work at their own pace and the teacher is notified (on web-based reports and via email) only when they require support.	
Lightspeed Internet Filtering	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.	
Literacy Assessment Online - Edukey	Online tools to measure, track & improve literacy in schools.	
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
Mathletics _ online numeracy activities	Mathletics is a captivating online learning space providing students with all the tools they need to be successful learners, both in the classroom and beyond. Powerful courses aligned to the various National Curricula of the UK & Ireland, from Foundation Stage to Key Stage 5, matched with dynamic tools and reporting for teachers. Mathletics supports and caters to each teacher's unique blend of student-driven learning and teacher-led instruction.	
Medical 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.	
Nereo (Matrix)	North East Regional Employers' Organisation is one	

	of eleven regional bodies that support local authorities across England, Wales and Northern Ireland. NEREO's function is to support local authorities and partner organisations in the fields of Human Resources, Organisational Development and Employee Relations in all their complex and varied forms. NEREO is a small organisation with a big reputation. Our staff have over a hundred years experience of working in the public sector. Some have voluntary and private sector experience too. The Governance of NEREO is carried out by an Executive Committee made up of Elected Member representatives from each of the local authorities.	
Newcastle United Foundation	Newcastle United Foundation is an independent registered charity using the power of football to connect, motivate and inspire people in our region. Through community, education, health and wellbeing, and sports programmes delivered across Newcastle, Northumberland, North Tyneside and Gateshead, we strive to improve physical and mental health, boost learning and career prospects and provide life-changing opportunities for everyone – no matter their goals in life.	
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.	
Nuffield Early Language Intervention (NELI)	The Nuffield Foundation is an independent charitable trust with a mission to advance educational opportunity and social well-being. We fund research that informs social policy, primarily in Education, Welfare and Justice. We also provide opportunities for young people to develop skills and confidence in science and research.	yes
Nursery (Early Years) files	Early years registration information and funding informaiton for Early Years entitlement, hours taken each week	yes
Oak Acadamy	Oak National Academy provides free video lessons, slides and worksheets to support teachers and pupils to keep learning. Created by teachers in response to coronavirus, the resources are freely available, to complement schools' own teaching. Lessons cover a broad range of subjects, from reception to year 11. There are no sign-ups or logins required.	
Padlet	A digital canvas where users can add photos, videos, audio, text, drawings, graphs, charts, and more.	
Parent mail	Parent mail provides a number of useful communication tools for the school, including: Text	

	Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events	
Performance Management	Staff appraisals	
Personnel files	Information relating to staff employment	
Phonics play	Interactive phonics games, phonics planning, assessment ideas and many teaching ideas and resources to help children to learn	
Photographs and videos of staff and pupils.	Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms.	
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
Provision Map Writer - Edukey	Online provision map writing tool.	yes
Purple Mash	The all-in-one Edtech solution for your Primary School. Embed computing and digital skills across your whole curriculum with award-winning teaching and learning software for KS1 and KS2.	
Reading Plus	Personalized intervention and instruction to develop silent reading proficiency and confident, lifelong readers.	
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 Cloud- TES	Parents evenings, clubs & events and room booking	
School meals identification	Identification of pupils for meals	yes

School360	Learning platform for Northumberland schools with links to 3rd party educational resource providers.	yes
Scratch	With Scratch, you can program your own interactive stories, games, and animations — and share your creations with others in the online community. Scratch helps young people learn to think creatively, reason systematically, and work collaboratively — essential skills for life in the 21st century. Scratch is a project of the Lifelong Kindergarten Group at the MIT Media Lab. It is provided free of charge.	
SEND electronic records	Records relating to Special Educational Needs and Disability for individual pupils	yes
Send Paper Records	Records relating to individual pupil's SEND history	yes
SIMS	SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools.	yes
Social media sites e.g. Twitter, Facebook	Social Media tool used to inform parents about events in school and celebrate children's achievement.	
Sonar Tracher	Sonar Tracker is the pupil progress and assessment platform brought to you by Juniper Education and developed by the expert teams behind Classroom Monitor, OTrack, Pupil Asset and Target Tracker. It has the straightforward insightful reports of OTrack, the pupil, parent, and key stakeholder engagement capabilities of Classroom Monitor, the pupil tracking software from Pupil Asset, and the wealth of educational expertise from the whole local authority behind Target Tracker. All combined to create one new, powerful platform that utilises over 60 years of education experience so schools can base their decisions on insights and intelligence that educators can rely on.	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.	
Steplab	Targeted professional development sytem	yes
Tapestry	An online journal recording all the learning and fun of children's early years education.	
Teachers2Parent	Parent/Staff/Other Text Messaging System	
Testbase	This is an online resource provided by Doublestruck which enables children to prepare for National SAT examinations. Doublestruck is an Educational	yes

	Technology company that is part of the AQA family. It specialises in technology that addresses the needs of teachers in formative assessment and reporting.	
The Headteacher Report	Here at The Headteacher's Report, our entire existence revolves around creating the most dynamic, professional and easy to understand reports for our Heads, CEOs and their Governors and trustees alike. We understand how many leadership hours it typically takes to produce a Headteacher's Report from scratch. With this in mind, we set ourselves the challenge of making this process quicker, simpler and smarter, whilst producing beautifully presented reports. We live and breathe education, no problem is too big to solve and we chuck in a big slice of our family orientated small-business passion into every single report. We help make reporting to Governors and trustees that little bit easier so that you don't have to burn the midnight oil trying to finish your report.	
The National College	A provider of online training for staff & governors	
Thrive	Social and Emotional Screening Programme	yes
Times Tables Rock Stars	Online times tables practice and testing.	
Twinkl	We're here to 'help those who teach'. It's what brings us to work every day. We're proud to create educational resources that can be used at each step of a child's learning journey. Our teacher-created resources provide entire schemes of work, lesson planning and assessments right through to online educational games, augmented reality and so much more. We have over 525,000 resources and new content gets added every day.You'll find we've normally got what you need before you even know you want it.	
Visitor book	Log of all visitors into school / fire regulations	
White Rose Maths and Science	Influenced, inspired and informed by the work of leading maths researchers and practitioners across the world, White Rose Maths brings together a team of highly experienced and passionate maths teaching experts to train, guide, help and support all those who want to make change happen in their schools. We're guessing that might include YOU! If so, we offer you in-depth training programmes, a vast bank of clear, practical resources (many of them available free of charge), and the bespoke support you want and need to keep raising the bar. We'll not only make your job a whole lot simpler, we'll help you change the future for every child.	yes
Widget	Communication Symbol Software	
Y4 Multiplication Check	What is the Multiplication Tables Check. The Multiplication Tables Check (MTC) is a key stage 2	

	assessment to be taken by pupils at the end of year 4 (in June). From the 2019 / 2020 academic year onwards. The purpose of the MTC is to make sure the times tables knowledge is at the expected level.	
Zoom	Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Our easy, reliable cloud platform for video, voice, content sharing, and chat runs across mobile devices, desktops, telephones, and room systems.	
3P Learning	3P Learning is the world's leading provider of blended teaching software for mathematics, literacy and science.	
Jumpstart Jonny	Online PE resource Jump Start Jonny is on a mission to get kids fit! His fun workouts and chill-out videos are loved by over 250,000 Jumpsters in schools	
NAACE ICT Mark	he Naace Self Review Framework (SRF) is a maturity model which helps schools to: Understand where they are in their technology strategy Plan the next stages of their technology strategy Record their progress	
National Governors Association	Information tool for Governors	
PHSE	Online tool for PHSE lead	
Portage Nursery	Assessment tool	
Primary Stars KS1	Resource site	
The Key	online advisory tool	

System used: 2Build a profile	
Description	EYFS email communication & observation system
Personal Data Items	**Pupil** • Name • Age • Class • Assessment Observations **Parent** • Name • Email address **Staff** • Name • School
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	**Public** Processing relates to personal data manifestly made public by the Data Subject.
Special Category Evidence for legal basis	Appendix 9
How is the Special Category data shared?	Secure web access
Legal basis for sharing Special Category data	Appendix 9
Why is it being processed?	To provide parental access to childs' developement
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?	Secure Server
Is it secure and/or encrypted?	Yes
Who can access data?	EYFS Staff & Parents
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 2Simple Privacy Policy

System used: Accelerated Reader	
Description	Accelerated Reader gives teachers the information they need to monitor students' reading practice and make informed decisions to guide their future learning.
Personal Data Items	**Pupil** • Name • Class **Staff** • Name
Why is it being processed?	To generate information on the reading abilities of pupils
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?	Renaissance Learning servers
Is it secure and/or encrypted?	We have taken certain physical, electronic, contractual and administrative steps to protect the confidentiality, security, and integrity of your personally identifiable information. However, no method of transmission over the Internet or method of electronic storage is completely secure, and we cannot guarantee its absolute security. It is your responsibility to maintain the confidentiality of your Website account information.
Who can access data?	Pupil (own data), staff, technical support staff
How long is data kept?	3 years after date closed
Who is data shared with?	Not shared
Legal basis for sharing	N/A
How is data shared?	N/A
References	Click to download Accelerated Reader Privacy Policy

System used: Accident book	
Description	Log of accidents / minor injuries in school
Personal Data Items	**Pupil** • 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: Active Learn Pearsons - including Bug Club and Abacus Maths	
Description	Bug Club is a whole-school reading programme that combines an online reading world with print books and assessment tools. Abacus Maths is a whole school maths programme that combines an online maths world with printable books and assessment tools.
Personal Data Items	**Pupil** • Name • Class **Staff** • Name
Why is it being processed?	To provide online access to curriculum materials for staff and pupils
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	SIMS
Where is data stored?	Pearsons secure servers
Is it secure and/or encrypted?	Yes Your privacy is extremely important to us. We’re committed to protecting any personal information you’ve given us, and we comply with all relevant data protection laws. This means that: • we take full responsibility for the information we hold about you • we will protect your privacy at all times • we will never sell your personal information Whether you’ve supplied your personal details online, by phone or text, by email or in a letter, we will never use them without a lawful reason to do so. We’ll use them for the purposes for which they were initially requested and as fully explained in this Privacy Notice and Cookie Policy.
Who can access data?	Staff, pupils own data, Pearsons staff for support.
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 Pearson GDPR readiness Click to download Bug Club Pearson Privacy Notice

System used: Adobe Creative Cloud Express [formerly Adobe Spark]	
Description	Creates videos & stores them
Personal Data Items	**Teacher** • Name • email • technical info -IP address device **Pupil** • Name • School email
Why is it being processed?	To allow use of 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?	Adobe’s servers and the servers of companies we hire to provide services to us
Is it secure and/or encrypted?	We employ administrative, technical and physical security controls where appropriate, such as encryption, 2-step verification and strict contractual confidentiality obligations for employees and contractors.
Who can access data?	School Adobe staff & contractors as needed to provide service
How long is data kept?	3 years after date closed
Who is data shared with?	Contractors to provide service
Legal basis for sharing	ICO Toolkit contract & public task
How is data shared?	Secure & encrypted transfer

System used: Assessment Records	
Description	Electronic and paper mark books
Personal Data Items	**Child** • 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: Bikeability	
Description	The Bikeability Trust run on behalf of Department of Transport. Courses and resources for schools in England
Why is it being processed?	https://bikeability.org.uk/privacy-policy/
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://bikeability.org.uk/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://bikeability.org.uk/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://bikeability.org.uk/privacy-policy/
Legal basis for sharing	Public Task
How is data shared?	https://bikeability.org.uk/privacy-policy/

System used: 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: Canva	
Description	Canva is an online design and publishing tool
Personal Data Items	**Teacher** • Name • date of birth • email • phone number • school • analytics data • usage data including device & location **Student** • Name • class • school • email • analytics data • usage data including device & location
Why is it being processed?	To allow use of Canva resources and to improve Canva service to users
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?	secured cloud
Is it secure and/or encrypted?	yes both encrypted and secure
Who can access data?	School and Canva employees as required to provide service
How long is data kept?	1+ year
Who is data shared with?	Third party companies to provide service
Legal basis for sharing	contractual legitimate interest
How is data shared?	secure encrypted transfer

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: ClassCharts - Edukey	
Description	Class Charts offers a solution for seating plans & improving and tracking behaviour in school. Seating plans for SIMS are available with this piece of Edukey software.
Personal Data Items	**Staff** • Name • Email address • Phone number • IP Address **Pupil** • Name • Photograph • Year • Class
Why is it being processed?	To provide access to the online tools in Classcharts
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?	Edukey secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	Schoool staff and pupils with accounts
How long is data kept?	3 years after date closed
Who is data shared with?	Shared securely with staff in school
Legal basis for sharing	Public task
How is data shared?	Online to users with login
References	Click to download Edukey DfE Cloud Services Project Click to download Edukey Software

System used: Classroom monitor	
Description	Classroom Monitor is the most widely used assessment tool in the UK, it specialises in assessment for learning, pupil tracking and formative assessment.
Personal Data Items	**Pupil** • Name • Age • Year • Class • Assessment data **Staff** • Name • Class
Why is it being processed?	To provide access to comprehensive? online assessment and pupil progress tracking tools.
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?	Prime Principle secure servers
Is it secure and/or encrypted?	ensure that we have in place appropriate technical and organisational measures to protect against unauthorised or unlawful processing of that personal data and against accidental loss or destruction of, or damage to, that personal data, appropriate to the harm that might result from the unauthorised or unlawful processing or accidental loss, destruction or damage and the nature of the data to be protected, having regard to the state of technological development and the cost of implementing any measures (those measures may include, where appropriate, pseudonymising and encrypting personal data, ensuring confidentiality, integrity, availability and resilience of its systems and services, ensuring that availability of and access to personal data can be restored in a timely manner after an incident, and regularly assessing and evaluating the effectiveness of the technical and organisational measures adopted by us);
Who can access data?	Staff, Classroom monitor for support

How long is data kept?	3 years after date closed
Who is data shared with?	Not shared
Legal basis for sharing	Public task and legal obligation
How is data shared?	N/A
References	Click to download Classroom Monitor Access Terms Click to download Classroom Monitor Terms of Website Use

System used: CLPE	
Description	Welcome to The Centre for Literacy in Primary Education The Centre for Literacy in Primary Education is a UK based children's literacy charity working with primary schools. Our work raises the achievement of children's reading and writing by helping schools to teach literacy creatively and effectively, putting quality children's books at the heart of all learning. We offer courses at our literacy library in central London and deliver training in various regional locations as well as provide a wide range of free resources for Primary teachers.
Personal Data Items	**Teacher** • Name
Why is it being processed?	https://clpe.org.uk/content/privacy-cookies
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://clpe.org.uk/content/privacy-cookies
Is it secure and/or encrypted?	Secure
Who can access data?	https://clpe.org.uk/content/privacy-cookies
How long is data kept?	3 years after date closed
Who is data shared with?	https://clpe.org.uk/content/privacy-cookies
Legal basis for sharing	Public Task
How is data shared?	https://clpe.org.uk/content/privacy-cookies

System used: Code for Life	
Description	Code for Life aims to teach children the basic principles of coding, to help them flourish in an increasingly digital world.
Personal Data Items	**Staff** • Name • email address • School name **Pupil** • Name • Class
Why is it being processed?	To provide staff and pupils with access to the online teaching resources.
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Ocado secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff and? pupils with accounts
How long is data kept?	3 years after date closed
Who is data shared with?	Shared within school
Legal basis for sharing	Public task
How is data shared?	Online with users with logins
References	Click to download Code for Life

System used: Commando Joes	
Description	The Commando Joe online judgement tool allows leaders to take a snapshot glance at progress of the 7 behaviour traits across the school/classes. This alongside academic attainment shows progress of all groups including pupils eligible for Pupil Premium or those with SEND.
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?	https://commandojoes.co.uk/privacy-policy/
Legal basis for sharing Special Category data	Public task and legal obligation
Why is it being processed?	To track the impact of the program on the children.
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?	https://commandojoes.co.uk/privacy-policy/
Is it secure and/or encrypted?	secure

Who can access data?	https://commandojoes.co.uk/privacy-policy/
How long is data kept?	3+ years
Who is data shared with?	https://commandojoes.co.uk/privacy-policy/
Legal basis for sharing	Public task and legal obligation
How is data shared?	https://commandojoes.co.uk/privacy-policy/

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: Covid-19 Lateral Flow Testing	
Description	About 1 in 3 people with coronavirus do not have symptoms but can still pass it on to others. Regular testing of people without symptoms is important to help stop the virus spreading and protect your loved ones. As lockdown restrictions gradually ease we all need to play our part to help protect each other. The following people in England will have access to regular rapid lateral flow testing made available to them as schools reopen: secondary school pupils primary and secondary school staff households, childcare and support bubbles of primary and secondary-age pupils households, childcare and support bubbles of primary and secondary staff
Personal Data Items	**Child** • Name • Date of Birth • Postcode • Test Result **Parent** • Name • Email address • Telephone number
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Public Interest / Public Health** Processing necessary for reasons of public interest in the area of public health such as protecting against serious cross-border threats to health or guaranteeing high standards of healthcare and of medical products or medical devices.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Electronically/verbally with PHE
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To support the national effort in the fight against Covid-19. Under

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

System used: CPOMS	
Description	CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral welfare for schoolls. CPOMS is software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Working alongside a school's existing safeguarding processes, CPOMS is an intuitive system to help with the management and recording of child protection, behavioural issues, bullying, special educational needs, domestic issues and much much more. Using CPOMS, schools can ensure that students are safe and fully supported, whilst school staff can focus on teaching and providing support, instead of administration.
Personal Data Items	**Pupil** • Name • Class • Details of incident • Admission Date • DOB • SEN, with status • Medical Conditions • UPN • Pupil Premium • Religion • EAL • LAC • Year Group • Ethnicity • First Language • Pregnancy **Main contact** • Name • Telephone Number
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 messenger, online secure servers.
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To comply with statutory obligations regarding safeguarding and child protection. To provide a secure repository for personal data and ensure that records are effectively maintained.
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?	Meritec secure servers.
Is it secure and/or encrypted?	Meritec Limited (CPOMS) is an accredited ISO27001 and GCloud supplier. As part of that accreditation, we have annual penetration/ vulnerability test performed by a trusted 3rd party partner. In addition to these tests Meritec Limited (CPOMS) uses a UK based Data Centre supplier who is also also accredited to ISO27001 and thus subject to the same security audits. Meritec is accredited to the latest version of the ISO27001 standard (2013) Accreditation requires annual external audits by the accreditation providers and regular internal audits by the senior management including persons at Director level.
Who can access data?	School staff, subsequent school if using CPOMS, Meritec for support and outside agencies.
How long is data kept?	3 years after date closed
Who is data shared with?	School staff, subsequent school if using CPOMS, Meritec for support, outside agencies, parents.
Legal basis for sharing	Legal obligation & public task
How is data shared?	Secure cloud based systems and secure servers.
References	Click to download CPOMS Cloud Services for Schools

System used: CRB Cunninghams	
Description	CRB Cunninghams Education Solutions provide schools with their own identity management, cashless catering, and online payment system.
Personal Data Items	**Pupil** • Name • Registration group • Year • Date of birth • Gender • Free school meal eligibility • Admission number • Photograph • Biometric data (if used by school). **Staff** • Name • School • Address
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?	Not shared
Legal basis for sharing Special Category data	N/A
Why is it being processed?	To provide users with access to the cashless payment system for school meals.
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 for biometric data
Data Source	Parent
Where is data stored?	Cunninghams secure servers
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?	Not shared
Legal basis for sharing	N/A
How is data shared?	N/A
References	Click to download CRB Cunninghams Privacy Policy

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: 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: Discovery Education	
Description	Discovery Education is a trusted partner for schools, supporting them in realising their vision and achieving their goals with curriculum-matched content, professional development solutions and professional networking opportunities.
Personal Data Items	**Teacher** • Name **Child** • Name
Why is it being processed?	https://www.discoveryeducation.co.uk/privacy-policy
Evidence for legal basis	ICO-Legal basis toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.discoveryeducation.co.uk/privacy-policy
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.discoveryeducation.co.uk/privacy-policy
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.discoveryeducation.co.uk/privacy-policy
Legal basis for sharing	Public Task
How is data shared?	https://www.discoveryeducation.co.uk/privacy-policy

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: Ed Shed	
Description	EdShed, or Education Shed Ltd. as our accountant calls us, is the umbrella for several educational products and brands. These include The Literacy Shed, Literacy Shed Plus, Spelling Shed and MathShed. We are a company run by teachers for teachers and we try to maintain particular values within all of our products: The best quality product we can create Making the most educational impact possible Transparent and affordable pricing The least hassle for teachers and schools
Personal Data Items	**Teacher** • Name **Child** • Name
Why is it being processed?	https://www.edshed.com/en-gb/privacy
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis tool
Is Consent Required?	No
Data Source	School 360
Where is data stored?	https://www.edshed.com/en-gb/privacy
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.edshed.com/en-gb/privacy
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.edshed.com/en-gb/privacy
Legal basis for sharing	Legal Obligation/public Task
How is data shared?	https://www.edshed.com/en-gb/privacy

System used: Edenred	
Description	Edenred is all about motivating and engaging people and making life/work better. About helping organisations all over the world perform better. And here's a bit more about how we do it. We offer the widest range of incentives, rewards and benefits solutions, individually designed to fit your audience, your goals and your budget - a unique and unrivalled total reward & recognition solution. We help organisations and public institutions streamline and simplify payment processes, reduce administrative burdens, save money and make life easier for everyone. We do this through Vouchers, prepaid cards, online platforms and digital & SMS products to help engage and motivate your employees, customers and business partners. Over 20 different solutions last time we checked.
Personal Data Items	**parent** • Name **child** • Name • age
Why is it being processed?	https://www.edenred.co.uk/legal/legal-entity/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	Parent
Where is data stored?	https://www.edenred.co.uk/legal/legal-entity/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.edenred.co.uk/legal/legal-entity/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.edenred.co.uk/legal/legal-entity/privacy-policy/
Legal basis for sharing	Public Task
How is data shared?	https://www.edenred.co.uk/legal/legal-entity/privacy-policy/

System used: ELibrary by Wheelers Books	
Description	We create a beautiful, customised eLibrary for your school, brimming with amazing titles Our selectors maintain the shared collections, suited to your school's student year groups. Leading international titles are combined with the best of local content. You are in full control and can add new titles (400,000+ to choose from), age restrict or disable titles as required. We use your school's 'single sign-on' to so it's simple for your students, to find and enjoy your huge digital collection
Personal Data Items	**Teacher** • Name **Child** • Name • age
Why is it being processed?	https://www.eplatform.co/us/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?	No
Data Source	School
Where is data stored?	https://www.eplatform.co/us/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.eplatform.co/us/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.eplatform.co/us/privacy-policy/
Legal basis for sharing	Public Task
How is data shared?	https://www.eplatform.co/us/privacy-policy/

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: Frog Learning	
Description	Online learning application linked to School360. Provides resources for a wide range of curricular areas.
Personal Data Items	**Pupil** • Name • Class / Year group **Teacher** • Name • Class / Year group
Why is it being processed?	To allow secure individual access access to the online 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	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School 360
Where is data stored?	Frog Learning secure servers
Is it secure and/or encrypted?	Yes - see Frog privacy notice.
Who can access data?	School staff, ICT team, Frog learning for support.
How long is data kept?	3 years after date closed
Who is data shared with?	Shared with school with Staff.
Legal basis for sharing	Public task
How is data shared?	Online through secure access login by staff
References	Click to download Frog Learning GDPR

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 Gemini	
Description	Google AI assistant
Personal Data Items	**User** • What you say to Gemini Apps (prompts submitted or spoken) • Shared information - files, videos, photos, content from browser etc. • Transcripts and records of interactions with Gemini Live (video/audio/text) • Names and custom instructions • Note: all of above may contain personal data/special category data but only advised under Closed AI
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	https://support.google.com/gemini/answer/13594961?hl=en-GB#pn_what_data
How is the Special Category data shared?	https://support.google.com/gemini/answer/13594961?hl=en-GB#pn_what_data
Legal basis for sharing Special Category data	https://support.google.com/gemini/answer/13594961?hl=en-GB#pn_what_data
Why is it being processed?	
Evidence for legal basis	https://support.google.com/gemini/answer/13594961?hl=en-GB#pn_what_data
Is Consent Required?	https://support.google.com/gemini/answer/13594961?hl=en-GB#pn_what_data
Data Source	Other
Where is data stored?	https://support.google.com/gemini/answer/13594961?hl=en-GB#pn_what_data
Is it secure and/or encrypted?	https://support.google.com/gemini/answer/13594961?hl=en-GB#pn_what_data
Who can access data?	https://support.google.com/gemini/answer/13594961?hl=en-GB#pn_what_data
How long is data kept?	We retain your data for different periods of time, depending on what it is and how we use it, as explained in Google's Privacy Policy and How

	Google retains data we collect. You can change your auto-delete period in Gemini Apps activity from the default of 18 months to 3 months, 36 months or indefinite. You can also manually delete your Gemini Apps chats at any time. Chats reviewed by human reviewers (and related data like your language, device type, location info or feedback) are not deleted when you delete your activity. Instead, they are retained for up to three years. We keep some data until you delete your Google Account, such as information about how often you use Gemini Apps. We retain some data for longer when necessary for legitimate business or legal purposes, such as security, fraud and abuse prevention, or financial record-keeping.
Who is data shared with?	https://support.google.com/gemini/answer/13594961?hl=en-GB#pn_what_data
Legal basis for sharing	https://support.google.com/gemini/answer/13594961?hl=en-GB#pn_what_data
How is data shared?	https://support.google.com/gemini/answer/13594961?hl=en-GB#pn_what_data

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: HAF- HolidayActivities	
Description	The dedicated platform built to run and report on your local authority HAF programme.
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	Article 9
How is the Special Category data shared?	https://www.holidayactivities.com/privacy-notice/
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To run and report HAF programme for 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.” **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.holidayactivities.com/privacy-notice/
Data Source	School
Where is data stored?	https://www.holidayactivities.com/privacy-notice/
Is it secure and/or encrypted?	Yes
Who can access data?	https://www.holidayactivities.com/privacy-notice/
How long is data kept?	3+ years
Who is data shared with?	https://www.holidayactivities.com/privacy-notice/
Legal basis for sharing	Legal obligation, public task and legitimate interest
How is data shared?	https://www.holidayactivities.com/privacy-notice/

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: Insight Tracking	
Description	An online data tracking system for teachers. The following data is collected: Pupil records include the following data: Unique Pupil Number (UPN) Legal first & last names Preferred first & last names Date of birth Gender Date pupil joined the school Date pupil left the school The following data can optionally be recorded as well: Address Ethnicity EAL status FSM history SEN history Service child status In-care status Attendance summaries Customer-defined groups Customer-defined notes and files
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?	
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To track progress and attainment of children.
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?	online- secure website
Is it secure and/or encrypted?	yes
Who can access data?	https://www.insighttracking.com/terms https://www.insighttracking.com/privacy/

How long is data kept?	3+ years
Who is data shared with?	https://www.insighttracking.com/privacy/
Legal basis for sharing	https://www.insighttracking.com/privacy/
How is data shared?	https://www.insighttracking.com/privacy/

System used: Kahoot	
Description	Elevate learning at your entire school or district with Kahoot! EDU: Easily roll out a site license across your school, district or campus Empower teachers with interactive teaching and assessment tools Engage and motivate students in class and via distance learning Get more control and visibility into Kahoot! usage We believe that there should be no limits to when and where you can learn. Engage students in learning when your school is out and stay on track with curriculum while instructing online.
Personal Data Items	**Teacher** • Name **Pupil** • Name • Age
Why is it being processed?	https://kahoot.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://kahoot.com/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://kahoot.com/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://kahoot.com/privacy-policy/
Legal basis for sharing	Public Task
How is data shared?	https://kahoot.com/privacy-policy/

System used: Lexia	
Description	Students work independently to develop critical reading and language skills through individualized, motivating learning paths. All students, regardless of their skill level, can each work at their own pace and the teacher is notified (on web-based reports and via email) only when they require support.
Personal Data Items	**Staff** • Name • Job title • School • Address • Telephone number • e-mail address • IP address • Browser information • **School** • Name • Payment details • Usage data **Pupil** • Name • Age • Class • Group
Why is it being processed?	To provide access for staff and pupils to a comprehensive range of teaching resources
Legal Basis	**Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis Toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Lexia secure servers
Is it secure and/or encrypted?	Lexia has appropriate measures in place to help ensure that our users’ Data is protected against unauthorized access or use, alteration, unlawful or accidental destruction and accidental loss. Although we make reasonable efforts to protect your Personal Information from loss, misuse, or alteration by third parties, you should be aware that there is always some risk involved in transmitting information over the Internet. There is also some risk that thieves could find a way to thwart our security

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

System used: Lightspeed Internet Filtering	
Description	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.
Personal Data Items	**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: Literacy Assessment Online - Edukey	
Description	Online tools to measure, track & improve literacy in schools.
Personal Data Items	**Staff** • Name • School • Email address **Pupil** • Name • Age • Year • Class • Gender • Performance data
Why is it being processed?	To provide access to a range of tools to support schools in raising standards in Literacy across 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	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Edukey UK secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	School staff with logins
How long is data kept?	3 years after date closed
Who is data shared with?	Shared internally in school.
Legal basis for sharing	Public task
How is data shared?	Electronically via secure servers.
References	Click to download Edukey DfE Click to download Edukey Software

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: Mathletics _ online numeracy activities	
Description	Mathletics is a captivating online learning space providing students with all the tools they need to be successful learners, both in the classroom and beyond. Powerful courses aligned to the various National Curricula of the UK & Ireland, from Foundation Stage to Key Stage 5, matched with dynamic tools and reporting for teachers. Mathletics supports and caters to each teacher's unique blend of student-driven learning and teacher-led instruction.
Personal Data Items	**Pupil** • Name • School • Year group • Test results **Staff** • Name • School
Why is it being processed?	To Provide secure individual access to the online 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	ICO legal basis toolkit
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	3P - providers of Mathletics secure servers.
Is it secure and/or encrypted?	Yes
Who can access data?	School Staff, individual pupils their own data, 3P staff for support.
How long is data kept?	3 years after date closed
Who is data shared with?	School staff
Legal basis for sharing	Public task
How is data shared?	Secure online servers.
References	Click to download Privacy Policy for Mathletics

System used: Medical 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: Nereo (Matrix)	
Description	North East Regional Employers' Organisation is one of eleven regional bodies that support local authorities across England, Wales and Northern Ireland. NEREO's function is to support local authorities and partner organisations in the fields of Human Resources, Organisational Development and Employee Relations in all their complex and varied forms. NEREO is a small organisation with a big reputation. Our staff have over a hundred years experience of working in the public sector. Some have voluntary and private sector experience too. The Governance of NEREO is carried out by an Executive Committee made up of Elected Member representatives from each of the local authorities.
Personal Data Items	**All Staff** • Name • Date of birth
Why is it being processed?	https://www.nereo.gov.uk/privacy-notice/
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." **Public task** Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	yes
Data Source	School
Where is data stored?	https://www.nereo.gov.uk/privacy-notice/
Is it secure and/or encrypted?	secure
Who can access data?	https://www.nereo.gov.uk/privacy-notice/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.nereo.gov.uk/privacy-notice/
Legal basis for sharing	Public task/legal obligation
How is data shared?	https://www.nereo.gov.uk/privacy-notice/

System used: Newcastle United Foundation	
Description	Newcastle United Foundation is an independent registered charity using the power of football to connect, motivate and inspire people in our region. Through community, education, health and wellbeing, and sports programmes delivered across Newcastle, Northumberland, North Tyneside and Gateshead, we strive to improve physical and mental health, boost learning and career prospects and provide life-changing opportunities for everyone – no matter their goals in life.
Personal Data Items	**Child** • Forename • Surname • Gender • Ethnicity • Disability • School • Year Group • Class name
Why is it being processed?	to provide data to premier league on progress of children using NUFC Foundation
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.newcastlesupportdirectory.org.uk/node/41
Is it secure and/or encrypted?	Secure
Who can access data?	School/Newcastle Foundation
How long is data kept?	3 years after date closed
Who is data shared with?	School/Newcastle Foundation
Legal basis for sharing	Public Task/Legal Obligation
How is data shared?	Secure - https://www.newcastlesupportdirectory.org.uk/node/41

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: Nuffield Early Language Intervention (NELI)	
Description	The Nuffield Foundation is an independent charitable trust with a mission to advance educational opportunity and social well-being. We fund research that informs social policy, primarily in Education, Welfare and Justice. We also provide opportunities for young people to develop skills and confidence in science and research.
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	n/a
Why is it being processed?	To support schools with Language Intervention
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 Nuffield server
Is it secure and/or encrypted?	Secure
Who can access data?	Staff with login and nuffield for technical support
How long is data kept?	3 years after date closed
Who is data shared with?	n/a

Legal basis for sharing	n/a
How is data shared?	https://www.nuffieldfoundation.org/about/governance/privacy-policy

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: Oak Acadamy	
Description	Oak National Academy provides free video lessons, slides and worksheets to support teachers and pupils to keep learning. Created by teachers in response to coronavirus, the resources are freely available, to complement schools' own teaching. Lessons cover a broad range of subjects, from reception to year 11. There are no sign-ups or logins required.
Personal Data Items	**Teacher** • Name **Pupil** • Name • Age
Why is it being processed?	https://privacy.thenational.academy/
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.thenational.academy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://privacy.thenational.academy/
How long is data kept?	3+ years
Who is data shared with?	https://privacy.thenational.academy/
Legal basis for sharing	Public Task/Legal Obligation
How is data shared?	https://privacy.thenational.academy/

System used: Padlet	
Description	A digital canvas where users can add photos, videos, audio, text, drawings, graphs, charts, and more.
Personal Data Items	**Child** • Name **Staff** • Name
Why is it being processed?	https://padlet.com/
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://privacy.commonsense.org/evaluation/padlet
Is it secure and/or encrypted?	Secure
Who can access data?	https://privacy.commonsense.org/evaluation/padlet
How long is data kept?	3 years after date closed
Who is data shared with?	https://privacy.commonsense.org/evaluation/padlet
Legal basis for sharing	Public Task
How is data shared?	https://privacy.commonsense.org/evaluation/padlet

System used: Parent mail	
Description	Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events
Personal Data Items	**School** • Name • School email address **Staff** • Name • Class • Title • e-mail • Gender • Telephone number • DOB • School address **Pupil** • Name • Year • Parent/carer name • Title • Class • Gender • DOB • Address • DOB **Parent/carer** • Name • Telephone number • email address • Title • Gender • Address
Why is it being processed?	To provide access to a range of communication and payment tools
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	Parent

Where is data stored?	Parent mail secure servers
Is it secure and/or encrypted?	GDPR requires ParentMail to adhere to a number of key principles with regards to your data and you can be assured that we take these responsibilities extremely seriously. As part of our commitment to GDPR we make the following promises to our customers and partners; • We will only manage data where we have an explicit agreement with the data controller • We will only retain data for as long as we have a processing agreement with the controller or need to do so with the data subject • All data used in our systems is encrypted when at rest (stored) and whilst in transit (when accessed using a browser or the ParentMail app)
Who can access data?	Staff, Parent mail staff for technical support.
How long is data kept?	3 years after date closed
Who is data shared with?	School staff
Legal basis for sharing	Public task
How is data shared?	Via secure login
References	Click to download Parentmail 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: Phonics play	
Description	Interactive phonics games, phonics planning, assessment ideas and many teaching ideas and resources to help children to learn
Personal Data Items	**School** • Name **Pupil** • Name **Staff** • Name
Why is it being processed?	To provide access to online learning resources for pupils and 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?	Phonics play servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff, Phonics Play for support
How long is data kept?	3 years after date closed
Who is data shared with?	Staff
Legal basis for sharing	Public task
How is data shared?	Online secure server
References	Click to download Phonics Play Privacy Policy

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: Provision Map Writer - Edukey	
Description	Online provision map writing tool.
Personal Data Items	**Staff** • Name • school • Classes **Pupil** • Name • Classes • Year • SEND 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?	Edukey servers
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To provide teachers with an online tool for provision mapping for pupils with special educational needs and disabilities.
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	SIMS
Where is data stored?	Edukey servers in UK.
Is it secure and/or encrypted?	Yes
Who can access data?	School staff with logins
How long is data kept?	3 years after date closed
Who is data shared with?	Internally with staff.
Legal basis for sharing	Public task
How is data shared?	Electronically
References	Click to download Edukey DfE Click to download Edukey Software

System used: Purple Mash	
Description	The all-in-one Edtech solution for your Primary School. Embed computing and digital skills across your whole curriculum with award-winning teaching and learning software for KS1 and KS2.
Personal Data Items	**Pupil** • Name • Year Group • School • Age **Staff** • Name • School
Why is it being processed?	To provide online access to a range of Edtech software.
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?	Purple Mash secure online system
Is it secure and/or encrypted?	Yes
Who can access data?	Staff, Pupils both in school and home
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?	Via online purple mash servers

System used: Reading Plus	
Description	Personalized intervention and instruction to develop silent reading proficiency and confident, lifelong readers.
Personal Data Items	**Teacher** • Name **Child** • Name • Age
Why is it being processed?	https://www.readingplus.com/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.” **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.readingplus.com/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.readingplus.com/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.readingplus.com/privacy-policy/
Legal basis for sharing	Public task/Legal Obligation
How is data shared?	https://www.readingplus.com/privacy-policy/

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 Cloud- TES	
Description	Parents evenings, clubs & events and room booking
Why is it being processed?	To marents evenings, clubs & events and room bookings
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?	https://www.schoolcloud.co.uk/privacy-notice.asp
Data Source	School
Where is data stored?	https://www.schoolcloud.co.uk/privacy-notice.asp
Is it secure and/or encrypted?	Yes
Who can access data?	https://www.schoolcloud.co.uk/privacy-notice.asp
How long is data kept?	3+ years
Who is data shared with?	https://www.schoolcloud.co.uk/privacy-notice.asp
Legal basis for sharing	Legal obligation and public task
How is data shared?	https://www.schoolcloud.co.uk/privacy-notice.asp

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: Scratch	
Description	With Scratch, you can program your own interactive stories, games, and animations — and share your creations with others in the online community. Scratch helps young people learn to think creatively, reason systematically, and work collaboratively — essential skills for life in the 21st century. Scratch is a project of the Lifelong Kindergarten Group at the MIT Media Lab. It is provided free of charge.
Personal Data Items	**Teacher** • Name **Child** • Name • • Age **Parent** • Name
Why is it being processed?	https://scratch.mit.edu/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://scratch.mit.edu/privacy_policy
Is it secure and/or encrypted?	Secure
Who can access data?	https://scratch.mit.edu/privacy_policy
How long is data kept?	3 years after date closed
Who is data shared with?	https://scratch.mit.edu/privacy_policy
Legal basis for sharing	Public Task
How is data shared?	https://scratch.mit.edu/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: 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: Social media sites e.g. Twitter, Facebook	
Description	Social Media tool used to inform parents about events in school and celebrate children's achievement.
Personal Data Items	**Pupil** • Photos (unnamed) • Videos (unnamed) • School name • Classes
Why is it being processed?	Unnamed photos of pupils and their work are used on the site
Legal Basis	**Consent** Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	Twitter or Facebook servers and in school
Is it secure and/or encrypted?	Twitter account is password protected. Only parents who have been approved by the school can access or follow the school twitter account
Who can access data?	Parents of children in school who have requested to follow the school on twitter and who have been approved by the admin team.
How long is data kept?	3 years after date closed
Who is data shared with?	Information shared with parents
Legal basis for sharing	Consent
How is data shared?	Online via secure servers

System used: Sonar Tracher	
Description	Sonar Tracker is the pupil progress and assessment platform brought to you by Juniper Education and developed by the expert teams behind Classroom Monitor, OTrack, Pupil Asset and Target Tracker. It has the straightforward insightful reports of OTrack, the pupil, parent, and key stakeholder engagement capabilities of Classroom Monitor, the pupil tracking software from Pupil Asset, and the wealth of educational expertise from the whole local authority behind Target Tracker. All combined to create one new, powerful platform that utilises over 60 years of education experience so schools can base their decisions on insights and intelligence that educators can rely on.
Personal Data Items	**Pupil Name** • Name • Pupil Year Group • Date of birth • Ethnicity • SEN data • Pupil Premium Eligibility • Performance data • Attendance data
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 staff
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To help track progress and set targets for pupils.
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?	https://junipereducation.org/privacy-policy/
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?	School staff
Legal basis for sharing	public task and legal obligation
How is data shared?	https://junipereducation.org/privacy-policy/

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: Steplab	
Description	Targeted professional development sytem
Personal Data Items	**Staff** • Name • Gender • Race • DoB • Title • School Role • Subject Taught • URN • Coaching data • Email • Telephone Number
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**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	Article 9
How is the Special Category data shared?	https://steplab.co/support/policies/privacy
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To support professional development
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." **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://steplab.co/support/policies/privacy
Data Source	School
Where is data stored?	https://steplab.co/support/policies/privacy
Is it secure and/or encrypted?	Yes
Who can access data?	https://steplab.co/support/policies/privacy
How long is data kept?	3+ years
Who is data shared with?	https://steplab.co/support/policies/privacy
Legal basis for sharing	Legal obligation, legitimate interest and public task
How is data shared?	https://steplab.co/support/policies/privacy

System used: Tapestry	
Description	An online journal recording all the learning and fun of children's early years education.
Personal Data Items	**School** • Name • Address • Email address and name of person who pays for service in school **Pupil** • Name • Date of birth • Notes on progress • Photographs • Videos • Address **Parent** • Name • email address **Staff** • Name • Email address
Why is it being processed?	To provide access to an online early years journal which records pupil activity and progress throughout the year.
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 for parent access element
Data Source	School
Where is data stored?	Tapestry? secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff, parents (own child), other settings if child moves school and new school if it uses Tapestry.
How long is data kept?	3 years after date closed
Who is data shared with?	The child's? new school if it uses Tapestry.
Legal basis for sharing	Public task
How is data shared?	Electronically over secure link.

References	Click to download Tapestry Privacy Policy

System used: Teachers2Parent	
Description	Parent/Staff/Other Text Messaging System
Personal Data Items	**Staff** • Name • Telephone number **Pupil** • Name • Registration group • Year group **Parent/Carer** • Name • Primary telephone number • Secondary telephone number **Taxi driver** • Taxi drivers name • Taxi drivers telephone number **Taxi escort** • taxi escort name • Taxi escort telephone number
Why is it being processed?	To provide access to Communication tool for contact between school and parent/carer/staff/other
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?	T2P secure servers
Is it secure and/or encrypted?	This site has security measures in place to protect the loss, misuse, and alteration of the information under our control. All instances of unauthorised attempted access to our site are logged and investigated.

	Where necessary Eduspot will inform law enforcement agencies or other relevant organisations regarding misconduct.
Who can access data?	Admin staff, teachers to parents staff for support.
How long is data kept?	3 years after date closed
Who is data shared with?	School staff
Legal basis for sharing	Public task
How is data shared?	Secure server
References	Click to download T2P Privacy Policy

System used: Testbase	
Description	This is an online resource provided by Doublestruck which enables children to prepare for National SAT examinations. Doublestruck is an Educational Technology company that is part of the AQA family. It specialises in technology that addresses the needs of teachers in formative assessment and reporting.
Personal Data Items	**School** • Name • Contact Address • Contact Email • Contact Telephone Number • Billing Address **Staff** • Name **Pupil** • Name • UPN • Admission number • Gender • Year Group • Registration group • Class name • Teacher name • Ethnicity • Eligibilty for free school meals • Pupil premium indicator • SEN Status • In LEA care
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?	AQA; Doublestruck Service Providers (including internet service platform providers; payment processing providers); Local authorities; Doublestruck advisors and auditors; other approved third parties necessary to provide the service.
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To provide a service and resources which enables schools to assess pupil attainment and track? progress? of individuals and groups.
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 server
Is it secure and/or encrypted?	Account is password protected, Store on Doublestruck secure servers.
Who can access data?	School; Teastbase (Doublestruck LTD) for technical support.
How long is data kept?	6 years after date closed
Who is data shared with?	AQA; Doublestruck Service Providers (including internet service platform providers; payment processing providers); Local authorities; Doublestruck advisors and auditors; other approved third parties necessary to provide the service.
Legal basis for sharing	Legal obligation and public task
How is data shared?	In a structure, commonly used, machine readable format.
References	Click to download Testbase privacy notice

System used: The Headteacher Report	
Description	Here at The Headteacher's Report, our entire existence revolves around creating the most dynamic, professional and easy to understand reports for our Heads, CEOs and their Governors and trustees alike. We understand how many leadership hours it typically takes to produce a Headteacher's Report from scratch. With this in mind, we set ourselves the challenge of making this process quicker, simpler and smarter, whilst producing beautifully presented reports. We live and breathe education, no problem is too big to solve and we chuck in a big slice of our family orientated small-business passion into every single report. We help make reporting to Governors and trustees that little bit easier so that you don't have to burn the midnight oil trying to finish your report.
Personal Data Items	**Pupil** • Name **Teacher** • Name
Why is it being processed?	https://theheadteachersreport.com/data-protection-privacy-policy/
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 legal framework
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://theheadteachersreport.com/data-protection-privacy-policy/
Is it secure and/or encrypted?	secure
Who can access data?	https://theheadteachersreport.com/data-protection-privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://theheadteachersreport.com/data-protection-privacy-policy/
Legal basis for sharing	https://theheadteachersreport.com/data-protection-privacy-policy/
How is data shared?	https://theheadteachersreport.com/data-protection-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: Thrive	
Description	Social and Emotional Screening Programme
Personal Data Items	**Pupil** • Name • DOB • Class • Year Group • UPN • Assessment information • LAC **Staff** • Name • Class
This system has been identified as containing Special Category Information Special category information is data which has the following characteristics: • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10	
Special Category Data Legal Basis	**Obligation** Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Online secure server
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Social & emotional development tracking
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?	Thrive secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	Thrive employees for support, school staff
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?	Online secure server

System used: Times Tables Rock Stars	
Description	Online times tables practice and testing.
Personal Data Items	**Staff** • Name • Email address • School name • School address **Pupil** • Name • Year group • Maths group
Why is it being processed?	To provide access to online learning tool.
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?	Maths circle EU servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff
How long is data kept?	3 years after date closed
Who is data shared with?	Staff
Legal basis for sharing	Public task
How is data shared?	Online secure servers
References	Click to download Times Tables Rock Stars Click to download Times Tables Rock Stars GDPR

System used: Twinkl	
Description	We're here to 'help those who teach'. It's what brings us to work every day. We're proud to create educational resources that can be used at each step of a child's learning journey. Our teacher-created resources provide entire schemes of work, lesson planning and assessments right through to online educational games, augmented reality and so much more. We have over 525,000 resources and new content gets added every day.You'll find we've normally got what you need before you even know you want it.
Personal Data Items	**Teacher** • 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: White Rose Maths and Science	
Description	Influenced, inspired and informed by the work of leading maths researchers and practitioners across the world, White Rose Maths brings together a team of highly experienced and passionate maths teaching experts to train, guide, help and support all those who want to make change happen in their schools. We're guessing that might include YOU! If so, we offer you in-depth training programmes, a vast bank of clear, practical resources (many of them available free of charge), and the bespoke support you want and need to keep raising the bar. We'll not only make your job a whole lot simpler, we'll help you change the future for every child.
Personal Data Items	**Teacher** • Name • Date of Birth • Gender • Email address • Payment details **Child** • Name • Age • Gender • Email address **Parent** • Name • Age • Gender • Email address •
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?	https://whiterosemaths.com/privacy/
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	https://whiterosemaths.com/privacy/
Legal Basis	**Legal Obligation** Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” **Public task** Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://whiterosemaths.com/privacy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://whiterosemaths.com/privacy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://whiterosemaths.com/privacy/
Legal basis for sharing	Legal Obligation/Public Task
How is data shared?	https://whiterosemaths.com/privacy/

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: Y4 Multiplication Check	
Description	What is the Multiplication Tables Check. The Multiplication Tables Check (MTC) is a key stage 2 assessment to be taken by pupils at the end of year 4 (in June). From the 2019 / 2020 academic year onwards. The purpose of the MTC is to make sure the times tables knowledge is at the expected level.
Personal Data Items	**child** • • Name
Why is it being processed?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
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 framework tool kit
Is Consent Required?	yes
Data Source	School
Where is data stored?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
Is it secure and/or encrypted?	secure
Who can access data?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
Legal basis for sharing	Public task
How is data shared?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance

System used: Zoom	
Description	Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Our easy, reliable cloud platform for video, voice, content sharing, and chat runs across mobile devices, desktops, telephones, and room systems.
Personal Data Items	**Teacher** • Name **Parent** • Name
Why is it being processed?	https://zoom.us/trust
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?	Yes
Data Source	School
Where is data stored?	https://zoom.us/trust
Is it secure and/or encrypted?	Secure
Who can access data?	https://zoom.us/trust
How long is data kept?	3 years after date closed
Who is data shared with?	https://zoom.us/trust
Legal basis for sharing	Public task
How is data shared?	https://zoom.us/trust

System used: 3P Learning	
Description	3P Learning is the world's leading provider of blended teaching software for mathematics, literacy and science.
Why is it being processed?	Teaching software for maths
Legal Basis	**Consent** Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”
Evidence for legal basis	
Is Consent Required?	
Data Source	School
Where is data stored?	
Is it secure and/or encrypted?	
Who can access data?	
How long is data kept?	3 years after date closed
Who is data shared with?	
Legal basis for sharing	
How is data shared?	

System used: Jumpstart Jonny	
Description	Online PE resource Jump Start Jonny is on a mission to get kids fit! His fun workouts and chill-out videos are loved by over 250,000 Jumpsters in schools
Why is it being processed?	Teaching staff access site to obtain workouts
Legal Basis	**Consent** Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”
Evidence for legal basis	
Is Consent Required?	No
Data Source	School
Where is data stored?	
Is it secure and/or encrypted?	
Who can access data?	
How long is data kept?	3 years after date closed
Who is data shared with?	
Legal basis for sharing	
How is data shared?	

System used: NAACE ICT Mark	
Description	he Naace Self Review Framework (SRF) is a maturity model which helps schools to: Understand where they are in their technology strategy Plan the next stages of their technology strategy Record their progress
Why is it being processed?	
Evidence for legal basis	
Is Consent Required?	
Data Source	School
Where is data stored?	
Is it secure and/or encrypted?	
Who can access data?	
How long is data kept?	3 years after date closed
Who is data shared with?	
Legal basis for sharing	
How is data shared?	

System used: National Governors Association	
Description	Information tool for Governors
Why is it being processed?	
Evidence for legal basis	
Is Consent Required?	
Data Source	School
Where is data stored?	
Is it secure and/or encrypted?	
Who can access data?	
How long is data kept?	3 years after date closed
Who is data shared with?	
Legal basis for sharing	
How is data shared?	

System used: PHSE	
Description	Online tool for PHSE lead
Why is it being processed?	
Legal Basis	**Consent** Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”
Evidence for legal basis	
Is Consent Required?	
Data Source	School
Where is data stored?	Online
Is it secure and/or encrypted?	yes
Who can access data?	PHSE lead
How long is data kept?	3 years after date closed
Who is data shared with?	Teaching Staff
Legal basis for sharing	
How is data shared?	electronically

System used: Portage Nursery	
Description	Assessment tool
Why is it being processed?	
Legal Basis	**Consent** Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”
Evidence for legal basis	
Is Consent Required?	Yes
Data Source	Other
Where is data stored?	Electronic
Is it secure and/or encrypted?	Yes
Who can access data?	Nursery Staff
How long is data kept?	3 years after date closed
Who is data shared with?	
Legal basis for sharing	
How is data shared?	

System used: Primary Stars KS1	
Description	Resource site
Why is it being processed?	
Evidence for legal basis	
Is Consent Required?	
Data Source	School
Where is data stored?	
Is it secure and/or encrypted?	
Who can access data?	
How long is data kept?	3 years after date closed
Who is data shared with?	
Legal basis for sharing	
How is data shared?	

System used: The Key	
Description	online advisory tool
Why is it being processed?	
Legal Basis	**Consent** Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”
Evidence for legal basis	
Is Consent Required?	
Data Source	School
Where is data stored?	PC/hardcopy
Is it secure and/or encrypted?	Yes
Who can access data?	Management and office staff
How long is data kept?	3 years after date closed
Who is data shared with?	
Legal basis for sharing	
How is data shared?	