



Prudhoe Castle First School

GDPR Asset Register

Date: 03/07/2022

Data Protection Officer: Louise Gilmour

01661 833122

admin@prudhoecastle.northumberland.gov.uk

Introduction

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

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

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

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

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

Systems included in this report

System Name	Description	Special Category
Accident book	Log of accidents / minor injuries in school	
Accident Report Form	ACC1 form for reporting accidents to NCC	
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	
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	
Code for Life	Code for Life aims to teach children the basic principles of coding, to help them flourish in an increasingly digital world.	
Consent for educational visits	Consent information for all educational visits including day trips and residential visits	yes
Data tracking spreadsheets	Spreadhseets (excel) to track progress of children over the course of their school career.	yes
Dietary requirements information sheets	Required documents for specific chidlren with severe allergies / intolerances and religious observations (food)	yes
Education City	EducationCity offers a flexible range of teaching resources, linked to teaching, planning and assessment.	

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.	
Futures Cloud	Internet / Network monitoring and reporting tool	
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.	
Governance	Details of all members of the Governing Body	
Health & Safety	Records pertaining to Health & Safety	
Lightspeed Internet Filtering	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.	
Local Authority moderation of work	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.	
Mathletics _ online numeracy activities	Mathletics is a captivating online learning space providing students with all the tools they need to be successful learners, both in the classroom and beyond. Powerful courses aligned to the various National Curricula of the UK & Ireland, from Foundation Stage to Key Stage 5, matched with dynamic tools and reporting for teachers. Mathletics supports and caters to each teacher's unique blend of student-driven learning and teacher-led instruction.	
Medical log	File of medical information for each child: asthma, medication administered, health care plans, risk assessments	yes
Nursery (Early Years) files	Early years registration information and funding information for Early Years entitlement, hours taken each week	yes
Oak Academy	Oak National Academy provides free video lessons, slides and worksheets to support teachers and pupils to keep learning. Created by teachers in response to coronavirus, the resources are freely available, to complement schools' own teaching. Lessons cover a broad range of subjects, from reception to year 11. There are no sign-ups or logins required.	
Oxford Owls	Oxford Owl for School Teaching resources and expert school improvement support Remote learning	

	guidance and support Award-winning subscriptions and leadership support Free teaching resources and eBooks Advice and support for parents Educational activities and games Free eBook library for 3- to 11-year-olds	
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.	
Purple Mash	The all-in-one Edtech solution for your Primary School. Embed computing and digital skills across your whole curriculum with award-winning teaching and learning software for KS1 and KS2.	
Recruitment information	Part of the job application process	yes
Registers	Daily register, after school club registers, lunch register	
Safeguarding Records - Electronic	Records relating to safeguarding of children	yes
Safeguarding Records - Paper	Records relating to safeguarding of children	yes
School meals identification	Identification of pupils for meals	yes
School360	Learning platform for Northumberland schools with links to 3rd party educational resource providers.	yes
Schoolcomms	Communication app for parents	
Seesaw	Seesaw - Student driven digital portfolios and simple parent communication.	
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.	
Tapestry	An online journal recording all the learning and fun of children's early years education.	
Times Tables Rock Stars	Online times tables practice and testing.	
Wonde	Manages transfer of data from Sims MIS to School360.	yes

Admission data	Data collected by the school admission form (paper or online)	yes
Head Teacher's Report	Termly report provided by the head-teacher on matters relating to the running of the school	

System used: Accident book

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

Description	ACC1 form for reporting accidents to NCC
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Gender • Address • Telephone number • Date and time of accident • nature of injury • Place of accident • First aid • Circumstances • Action taken • Witness information • <p>Staff member</p> <ul style="list-style-type: none"> • Name • Occupation • DOB • Gender • Address • Telephone number • Date and time of injury • nature of injury • place of accident • First aid • Circumstances • Action taken • Witness information •
Why is it being processed?	Statutory obligations to comply with Health and Safety regulations.
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School

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

System used: Assessment Records

Description	Electronic and paper mark books
Personal Data Items	<p>Child</p> <ul style="list-style-type: none"> • Name • Gender • Disadvantaged cohort • SEND Code • Key Stage 2 Assessment data • Internal Assessment Data
Why is it being processed?	To track student achievement and report to parents
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO lawful basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	On-site Secure Network Google Drive On paper- Class Context Files
Is it secure and/or encrypted?	On-site Network- This solution has user authentication and access controls which determine the level of access to data that a user requires. The solution also utilises the Schools' Information Security policy which includes password, physical and network security controls. Google Drive- authentication and access controls which determine the level of access to data that a user requires. G-Suite complies with the Schools' Information Security policy which includes password security controls. Class Context Files- teachers follow privacy culture procedures
Who can access data?	Staff
How long is data kept?	3+ years
Who is data shared with?	Parents
Legal basis for sharing	Legal obligation, Public task
How is data shared?	Parents evenings, reports

System used: Attendance file

Description	Attendance information about pupils and classes
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Class • Gender • UPN • Address • Telephone number • Parental contact • Ethnic origin • Current attendance • Past attendance

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

Special Category Data Legal Basis	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbally, Secure cloud,
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To regularly check pupil's attendance towards a desired goal
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing</p>

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

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	<p>teacher</p> <ul style="list-style-type: none"> • Name • email address <p>child</p> <ul style="list-style-type: none"> • 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: CCTV	
Description	CCTV
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Images <p>Child</p> <ul style="list-style-type: none"> • Images <p>Visitor</p> <ul style="list-style-type: none"> • Images
Why is it being processed?	Safeguarding
Legal Basis	<p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	School servers and recordings
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?	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	<p>Staff</p> <ul style="list-style-type: none"> • Name • School • email address • Mobile phone number • Pupils groups <p>Pupil</p> <ul style="list-style-type: none"> • 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: 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	<p>Staff</p> <ul style="list-style-type: none"> • Name • email address • School name <p>Pupil</p> <ul style="list-style-type: none"> • Name • Class
Why is it being processed?	To provide staff and pupils with access to the online teaching resources.
Legal Basis	<p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	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: Consent for educational visits

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

This system has been identified as containing Special Category Information

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

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

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

System used: Data tracking spreadsheets

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

This system has been identified as containing Special Category Information

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

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

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

System used: Dietary requirements information sheets

Description	Required documents for specific children with severe allergies / intolerances and religious observations (food)
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • 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	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	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	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No

Data Source	Parent
Where is data stored?	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: Education City

Description	EducationCity offers a flexible range of teaching resources, linked to teaching, planning and assessment.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Email • School <p>Pupil</p> <ul style="list-style-type: none"> • Name • Gender • Age • Class
Why is it being processed?	To provide access for teachers and pupils to a range of online teaching and learning tools.
Legal Basis	<p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Education City secure servers in the U.K>
Is it secure and/or encrypted?	Yes
Who can access data?	School users with login, Education city 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?	Secure online server
References	Click to download Education City

System used: Eschools Website Provider

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

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

System used: Futures Cloud

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

System used: Google Classroom

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

System used: Google drive for education

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

System used: Governance

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

System used: Health & Safety

Description	Records pertaining to Health & Safety
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Contact details • D.o.B • Record of Accident/Incident <p>Child</p> <ul style="list-style-type: none"> • Name • Contact details • D.o.B • Record of Accident/Incident <p>Visitor</p> <ul style="list-style-type: none"> • Name • Contact details • D.o.B • Record of Accident/Incident
Why is it being processed?	To ensure Health and Safety Regulations are followed
Legal Basis	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: Lightspeed Internet Filtering

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

System used: Local Authority moderation of work

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

System used: Mathletics _ online numeracy activities

Description	Mathletics is a captivating online learning space providing students with all the tools they need to be successful learners, both in the classroom and beyond. Powerful courses aligned to the various National Curricula of the UK & Ireland, from Foundation Stage to Key Stage 5, matched with dynamic tools and reporting for teachers. Mathletics supports and caters to each teacher's unique blend of student-driven learning and teacher-led instruction.
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • School • Year group • Test results <p>Staff</p> <ul style="list-style-type: none"> • Name • School
Why is it being processed?	To Provide secure individual access to the online learning materials
Legal Basis	<p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	3P - providers of Mathletics secure servers.
Is it secure and/or encrypted?	Yes
Who can access data?	School Staff, individual pupils their own data, 3P staff for support.
How long is data kept?	3 years after date closed
Who is data shared with?	School staff
Legal basis for sharing	Public task
How is data shared?	Secure online servers.
References	Click to download Privacy Policy for Mathletics

System used: Medical log

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Nursery (Early Years) files

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

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

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

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

System used: Oak Academy

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 <ul style="list-style-type: none">• Name Pupil <ul style="list-style-type: none">• Name• Age
Why is it being processed?	https://privacy.thenational.academy/
Legal Basis	Legal Obligation <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> Public task <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://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: Oxford Owls

Description	Oxford Owl for School Teaching resources and expert school improvement support Remote learning guidance and support Award-winning subscriptions and leadership support Free teaching resources and eBooks Advice and support for parents Educational activities and games Free eBook library for 3- to 11-year-olds
Personal Data Items	<p>Teacher</p> <ul style="list-style-type: none"> • Name <p>Parent</p> <ul style="list-style-type: none"> • Name <p>Child</p> <ul style="list-style-type: none"> • Name • Age
Why is it being processed?	https://global.oup.com/privacy?cc=us
Legal Basis	<p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis Tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://global.oup.com/privacy?cc=us
Is it secure and/or encrypted?	Secure
Who can access data?	https://global.oup.com/privacy?cc=us
How long is data kept?	3 years after date closed
Who is data shared with?	https://global.oup.com/privacy?cc=us
Legal basis for sharing	Public Interest
How is data shared?	https://global.oup.com/privacy?cc=us

System used: Personnel files

Description	Information relating to staff employment
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Address • Telephone number • e-mail address • National Insurance Number • Qualifications • DOB • Contract • Payroll no. • Employment history • References • Leave of absence • DBS checked
Why is it being processed?	Necessary for employment
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure 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 <ul style="list-style-type: none">• Name Pupil <ul style="list-style-type: none">• Name Staff <ul style="list-style-type: none">• 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	<p>Staff</p> <ul style="list-style-type: none"> • Name • Photograph • Video <p>Pupil</p> <ul style="list-style-type: none"> • Photograph (unnamed) • Video (unnamed) <p>Governor</p> <ul style="list-style-type: none"> • Name • Photograph
Why is it being processed?	To celebrate the life and work of the school.
Legal Basis	<p>Consent</p> <p>Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	School website and social media sites
Is it secure and/or encrypted?	Yes
Who can access data?	Publicly available on the www
How long is data kept?	3 years after date closed
Who is data shared with?	The public
Legal basis for sharing	ICO legal basis toolkit
How is data shared?	On www
References	Click to download Model photograph policy (including consent form)

System used: 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	<p>Pupil</p> <ul style="list-style-type: none"> • Name • Year Group • School • Age <p>Staff</p> <ul style="list-style-type: none"> • 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: Recruitment information

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

This system has been identified as containing Special Category Information

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

Special Category Data Legal Basis	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Electronically 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	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	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	<p>Child</p> <ul style="list-style-type: none"> • Name • Address • Date of Birth • Lunch Status • Attendance
Why is it being processed?	To monitor children's attendance - legal obligation.
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	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.

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

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

Special Category Data Legal Basis	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment,</p>
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	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	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	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

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

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

Special Category Data Legal Basis

Obligation

Processing is required for carrying out obligations under employment,

	<p>social security or social protection law or a collective agreement.</p> <p>Significant Public Interest</p> <p>Processing is required for reasons of significant public interest on the basis of Union or Member State Law that is equivalent to the aim pursued and which contains suitable safeguards.</p>
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	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure cabinet,
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, 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 meals identification

Description	Identification of pupils for meals
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • 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	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	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	<p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Paper file - held securely within school premises, accessed daily
Is it secure and/or encrypted?	Yes - secure storage
Who can access data?	Kitchen and office staff

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

System used: School360

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

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

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

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

System used: Schoolcomms

Description	Communication app for parents
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • Attendance data <p>Parent</p> <ul style="list-style-type: none"> • Name • Address • e-mail address • Mobile number
Why is it being processed?	To allow regular communication between the school and parent, plus attendance data and payment information if the school chooses these modules.
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis tool, app conditions of use, app privacy notice
Is Consent Required?	Yes
Data Source	SIMS
Where is data stored?	'Schoolcomms do not transfer data to countries outside of the EEA. The cloud providers that we work with guarantee data is only processed in the EEA, or that they explicitly abide by the regulation.'
Is it secure and/or encrypted?	'Security of data is essential. Schoolcomms uses best of class protection measures and carry out regular external audits to assess our security posture.'
Who can access data?	Schoolcomm staff - 'our own staff may see information in the course of providing technical support to the school but this will not be shared with anyone without permission of the Data Controller.'
How long is data kept?	3 years after date closed
Who is data shared with?	'We may pass your own details to another organisation to supply/deliver products or services you have purchased and/or to provide after-sales service. We share data with our Payments Processing Service Providers when you make a purchase using our Payments module. This information will be used to authenticate you as a cardholder when making credit or debit card transactions. This data includes name, mobile phone number,

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

System used: Seesaw

Description	Seesaw - Student driven digital portfolios and simple parent communication.
Personal Data Items	Staff <ul style="list-style-type: none">• Name• School• Classes Pupil <ul style="list-style-type: none">• Name• School• Year• Classes
Why is it being processed?	To provide Staff and pupil accounts on Seesaw and to enable the production of pupil portfolios.
Legal Basis	Legal Obligation <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> Public task <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Seesaw servers
Is it secure and/or encrypted?	Yes
Who can access data?	School staff with logins and pupils (own account).
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 Seesaw Privacy Policy

System used: SEND electronic records

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

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

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

System used: Send Paper Records

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

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

Description

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

Personal Data Items

Pupil

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

Parent/Carer

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

Staff

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

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

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

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	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No

Data Source	SIMS
Where is data stored?	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	<p>Pupil</p> <ul style="list-style-type: none"> • Photos (unnamed) • Videos (unnamed) • School name • Classes
Why is it being processed?	Unnamed photos of pupils and their work are used on the site
Legal Basis	<p>Consent</p> <p>Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”</p>
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: Tapestry

Description	An online journal recording all the learning and fun of children's early years education.
Personal Data Items	<p>School</p> <ul style="list-style-type: none"> • Name • Address • Email address and name of person who pays for service in school <p>Pupil</p> <ul style="list-style-type: none"> • Name • Date of birth • Notes on progress • Photographs • Videos • Address <p>Parent</p> <ul style="list-style-type: none"> • Name • email address <p>Staff</p> <ul style="list-style-type: none"> • 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	<p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes 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: Times Tables Rock Stars

Description	Online times tables practice and testing.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Email address • School name • School address <p>Pupil</p> <ul style="list-style-type: none"> • Name • Year group • Maths group
Why is it being processed?	To provide access to online learning tool.
Legal Basis	<p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Maths circle EU servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff
How long is data kept?	3 years after date closed
Who is data shared with?	Staff
Legal basis for sharing	Public task
How is data shared?	Online secure servers
References	<p>Click to download Times Tables Rock Stars</p> <p>Click to download Times Tables Rock Stars GDPR</p>

System used: Wonde

Description	Manages transfer of data from Sims MIS to School360.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name <p>Pupil</p> <ul style="list-style-type: none"> • Name • School id • Class/group • Year • UPN • Gender • Attendance

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Special Category Data Legal Basis	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	School 360 secure servers
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To facilitate the exchange of data to allow the set up of school360 for a school.
Legal Basis	<p>Contract</p> <p>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”</p>
Evidence for legal basis	ICO legal basis toolkit

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

System used: Admission data

Description

Data collected by the school admission form (paper or online)

Personal Data Items

Pupil

- Name
- Forename(s)
- Legal surname
- Preferred surname
- Gender
- Date of birth
- Address
- Postcode
- Services child
- Ethnicity
- GP
- Medical requirements
- Special educational needs
- Dietary requirements
- Method of travel to school
- Language spoken at home
- Religion

Parent

- Name
- Relationship to child
- Telephone number (home)
- Telephone number (mobile)
- Email address
- Occupation
- Place of work
- Telephone number (work)

Sibling

- Name

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

Special Category Data Legal Basis

Obligation

Processing is required for carrying out obligations under employment,

	<p>social security or social protection law or a collective agreement.</p> <p>Vital Interests</p> <p>Processing is required to protect the vital interests of a Data Subject or another individual where the Data Subject is legally or physically unable to give consent.</p>
Special Category Evidence for legal basis	Section 537A of the Education Act (1996)
How is the Special Category data shared?	Via school census
Legal basis for sharing Special Category data	Statutory obligation
Why is it being processed?	To inform and aid school admission
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p>
Evidence for legal basis	Education Act (1996)
Is Consent Required?	No
Data Source	Parent
Where is data stored?	Locked filing cabinet and school servers
Is it secure and/or encrypted?	Yes
Who can access data?	School administrator
How long is data kept?	5+ years
Who is data shared with?	Local authority Basic identifying/contact data ONLY is shared with Active Northumberland (swimming & other health activities) Health and contact data is shared with NHS staff visiting for hearing/sight tests or immunisations
Legal basis for sharing	With local authority: Statutory requirement With Active Northumberland: Consent With NHS: Vital interests of the data subject
How is data shared?	With local authority: Via school census and SIMS With active Northumberland: Hard-copy lists With NHS: Access granted to hard-copy files

System used: Head Teacher's Report

Description	Termly report provided by the head-teacher on matters relating to the running of the school
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Educational performance • Incidents of bullying / racist incidents • SEND / medical details <p>Member of staff</p> <ul style="list-style-type: none"> • Job performance • Disciplinary incidents • Employment disputes • Salary information
Why is it being processed?	This data is provided to the governors to meet the statutory obligations of school governance. The report DOES NOT provide identifying information on either pupils or staff, but given the size of the school it may reasonably be possible to associate the anonymised information with a natural person.
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p>
Evidence for legal basis	Education Act (1996)
Is Consent Required?	No
Data Source	School
Where is data stored?	Electronic copies created in school and e-mailed to the governing body
Is it secure and/or encrypted?	School copy is secure. Emailed copies should be considered unsecured
Who can access data?	Head teacher, governors
How long is data kept?	5+ years
Who is data shared with?	Members of the governing body
Legal basis for sharing	Statutory requirement
How is data shared?	Email