



# **Tritlington C of E First School**

## **GDPR Asset Register**

**Date: 02/04/2026**

Data Protection Officer: Wallis Bath

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## Introduction

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

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

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

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

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

## Systems included in this report

System Name	Description	Special Category
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.	
Assessment Records	Electronic and paper mark books	
Attendance file	Attendance information about pupils and classes	yes
BBC Super Movers	Fun curriculum linked resources to get your class moving while they learn	
Behaviour Files - Paper (in class)	Information relating to the behaviours of particular pupils	yes
Canva	Canva is an online design and publishing tool	
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
Consent for educational visits	Consent information for all educational visits including day trips and residential visits	yes
Covid-19 Lateral Flow Testing	About 1 in 3 people with coronavirus do not have symptoms but can still pass it on to others. Regular testing of people without symptoms is important to help stop the virus spreading and protect your loved ones. As lockdown restrictions gradually ease we all need to play our part to help protect each other. The following people in England will have access to regular rapid lateral flow testing made available to them as schools reopen: secondary school pupils primary and secondary school staff households, childcare and support bubbles of primary and secondary-age pupils households, childcare and support bubbles of primary and secondary staff	yes
CPOMS	CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral	yes

	welfare for schools. 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.	
Data tracking spreadsheets	Spreadhseets (excel) to track progress of children over the course of their school career.	yes
DfE (Gov.uk)	The Department for Education (DfE) is data controller for the personal data DfE and our executive agencies process. Our executive agencies are: Education and Skills Funding Agency (ESFA) Standards and Testing Agency (STA) Teaching Regulation Agency (TRA)	
DFE-Census and workforce Census	The school workforce census is a statutory data collection that takes place each autumn. You must complete statutory censuses by law unless there's a good reason not to. The census collects data on all teaching and support staff in regular employment, including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data.	
Dietary requirements information sheets	Required documents for specific children with severe allergies / intolerances and religious observations (food)	yes
Eduspot	Teachers2parents; School Money; Behaviour Watch; School Pod; School Website Design; Parents Evening; Cashless Catering; School App	yes
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.	
Google drive for education	suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.	
Google Meet	Google Meet is a video-communication service	

	developed by Google. It is one of two apps that constitute the replacement for Google Hangouts, the other being Google Chat	
Governance	Details of all members of the Governing Body	
Health & Safety	Records pertaining to Health & Safety	
Hugg	Purchase and send supermarket vouchers to those in need. Manage funds and give recipients choice all in one simple to use platform.	
Kapow	Engaging, knowledge-rich and progressive curriculums and lesson plans for foundation subjects. Includes teacher CPD videos and planning materials.	
Language Angels	Language Angels award-winning language teaching resources are designed so every primary school teacher - irrespective of their linguistic ability - can teach the foreign language of their choice. Our experienced team of foreign language teaching specialists have spent thousands of hours over a number of years creating, testing and refining our lessons and resources to bring them to where they are now. We won't rest on our laurels though. We continue to work, adding innovative and exciting new units and resources all the time. By providing a multitude of teaching units (each designed to run for 6 weeks) there are more than enough resources to enable you to teach the language of your choice throughout the whole of your primary school.	
Lightspeed Internet Filtering	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.	
Local Authority moderation of work	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.	
Looked After Children Records - Electronic	Information relating to children who are in Looked After Care	yes
Looked After Children Records - Paper	Information relating to children who are Looked After	yes
Medical Files - Electronic	Information in respect of specific medical needs of an individual student	yes
Medical Files - Paper	Information in respect of specific medical needs of an individual student	yes
Medical log	File of medical information for each child: asthma, medication administered, health care plans, risk assessments	yes
Microsoft Teams	Remote learning with Office 365 for students Microsoft	

	<p>Teams for Education Whether you're learning at home for long periods of time or just outside of class, access Office 365 for free, stay connected, and learn in a way that's right for you. Get started Tips for successful online learning Get set up Students at eligible institutions can sign up for Office 365 Education for free. That means access to apps like Word, PowerPoint, and Teams from any web browser. Plus, all the work you create will automatically be saved and backed up in the cloud. Get started with Office 365 for free Already have Office 365? Sign in. Tip: Click Install Office from Office.com to download Office apps to your desktop device. Work together as a class or group Microsoft Teams is a digital hub that brings conversations, content, and apps together in one place. If your classes are using Teams, you'll be able to connect with your classmates, ask your teacher questions, work on your homework, and track the work you've got coming up. Not part of any teams yet? No problem! You can create your own to work on group projects and keep in touch from your computer or phone. Join virtual meetings set up by your teacher and even blur your background</p>	
MS Office Suite	Suite of online tools for staff and pupils, including OneDrive, Word, Powerpoint, Excel, Outlook, Video and Teams.	
Nereo (Matrix)	<p>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.</p>	
NFER	Assessment materials, reading test and pupil progress data	
Numbots- Maths Circle LTD	NumBots is a website and app that helps build an understanding in and recall of addition and subtraction facts.	
Nursery (Early Years) files	Early years registration information and funding information for Early Years entitlement, hours taken each week	yes
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	
ParentPay	ParentPay is an online payment service for schools and families.	yes
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.	
PIRA - Rising stars (Wordblaze)	Reliably assess reading attainment and progress with termly standardised reading tests Progress in Reading Assessment (PIRA) termly tests produce standardised results and age related scores to enable schools to track pupil progress term by term, predict future progress and benchmark performance against national averages.	yes
Read Write Inc Website (www.ruthmiskin.com)	A website linked to the scheme Read Write Inc which includes a staff portal.	
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
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.	
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.	
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.	
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.	
Unifrog	Research platform for destinations	
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
Wonde	Manages transfer of data from Sims MIS to School360.	yes
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.	
Child protection records	Records of Disclosures and records from external agencies involved with a child	
DBS file	Records relating to all members of staff: current and	

	past	
Financial records	Accounts	
Head Teachers monitoring	File of observations, lesson observations, scrutiny, external support visits	
Health and safety	files containing: fire safety, asbestos, substance control,	
Language Angels	Language Angels award-winning language teaching resources are designed so every primary school teacher - irrespective of their linguistic ability - can teach the foreign language of their choice.	
Oxford Owl	Oxford Owl for School is home to online teaching, learning and assessment resources, expert support and subscriptions for Primary Schools.	
Pupil data collection systems	Paper record of details in order to contact parents in an emergency;	yes
Pupil reports	copy of annual report	
Pupils work	Books and work produced by the child	
SUMDOG	an online maths game and teaching tool	
Tritlington Friends minutes	Tritlington friends minutes stored and passed on to the parent/carer body	

System used: Accelerated Reader

<b>Description</b>	Accelerated Reader gives teachers the information they need to monitor students' reading practice and make informed decisions to guide their future learning.
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>
<b>Why is it being processed?</b>	To generate information on the reading abilities of pupils
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
<b>Evidence for legal basis</b>	ICO Legal Basis Tool
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Renaissance Learning servers
<b>Is it secure and/or encrypted?</b>	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.
<b>Who can access data?</b>	Pupil (own data), staff, technical support staff
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Not shared
<b>Legal basis for sharing</b>	N/A
<b>How is data shared?</b>	N/A
<b>References</b>	<a href="#">Click to download Accelerated Reader Privacy Policy</a>

System used: Accident book

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

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

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

System used: Active Learn Pearsons - including Bug Club and Abacus Maths

<b>Description</b>	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.
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>
<b>Why is it being processed?</b>	To provide online access to curriculum materials for staff and pupils
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis tool
<b>Is Consent Required?</b>	No
<b>Data Source</b>	SIMS
<b>Where is data stored?</b>	Pearsons secure servers
<b>Is it secure and/or encrypted?</b>	<p>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:</p> <ul style="list-style-type: none"> <li>• we take full responsibility for the information we hold about you</li> <li>• we will protect your privacy at all times</li> <li>• we will never sell your personal information</li> </ul> <p>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.</p>
<b>Who can access data?</b>	Staff, pupils own data, Pearsons staff for support.
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Not shared
<b>Legal basis for sharing</b>	N/A
<b>How is data shared?</b>	N/A
<b>References</b>	<p><a href="#">Click to download Pearson GDPR readiness</a></p> <p><a href="#">Click to download Bug Club Pearson Privacy Notice</a></p>

System used: Assessment Records

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

System used: Attendance file

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

<b>Special Category Data Legal Basis</b>	<p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	Verbally, Secure cloud,
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	To regularly check pupil's attendance towards a desired goal
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing</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
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Attendance file and electronically
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	School staff
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	EWO and other agencies as required / parents
<b>Legal basis for sharing</b>	Legal obligation/ Public task
<b>How is data shared?</b>	Electronically

System used: BBC Super Movers

<b>Description</b>	Fun curriculum linked resources to get your class moving while they learn
<b>Personal Data Items</b>	<b>Teacher</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email</li> </ul>
<b>Why is it being processed?</b>	<a href="https://www.bbc.co.uk/usingthebbc/privacy/">https://www.bbc.co.uk/usingthebbc/privacy/</a>
<b>Legal Basis</b>	<b>Public task</b>  Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
<b>Evidence for legal basis</b>	ICO legal basis tool
<b>Is Consent Required?</b>	Yes
<b>Data Source</b>	School
<b>Where is data stored?</b>	<a href="https://www.bbc.co.uk/usingthebbc/privacy/">https://www.bbc.co.uk/usingthebbc/privacy/</a>
<b>Is it secure and/or encrypted?</b>	Secure
<b>Who can access data?</b>	<a href="https://www.bbc.co.uk/usingthebbc/privacy/">https://www.bbc.co.uk/usingthebbc/privacy/</a>
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	<a href="https://www.bbc.co.uk/usingthebbc/privacy/">https://www.bbc.co.uk/usingthebbc/privacy/</a>
<b>Legal basis for sharing</b>	Public Task
<b>How is data shared?</b>	<a href="https://www.bbc.co.uk/usingthebbc/privacy/">https://www.bbc.co.uk/usingthebbc/privacy/</a>

<b>Description</b>	Information relating to the behaviours of particular pupils
<b>Personal Data Items</b>	<p><b>Pupils</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• Address</li> <li>• Health Needs</li> <li>• Educational Behavioural Needs</li> <li>• Social Care Status</li> <li>•</li> </ul> <p><b>Parents/Carers</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact Details</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> </ul> <p><b>External Support Workers</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Organisation</li> <li>• Position</li> <li>• Address</li> <li>• Contact Details</li> </ul>

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

System used: Canva

<b>Description</b>	Canva is an online design and publishing tool
<b>Personal Data Items</b>	<b>Teacher</b> <ul style="list-style-type: none"><li>• Name</li><li>• date of birth</li><li>• email</li><li>• phone number</li><li>• school</li><li>• analytics data</li><li>• usage data including device &amp; location</li></ul> <b>Student</b> <ul style="list-style-type: none"><li>• Name</li><li>• class</li><li>• school</li><li>• email</li><li>• analytics data</li><li>• usage data including device &amp; location</li></ul>
<b>Why is it being processed?</b>	To allow use of Canva resources and to improve Canva service to users
<b>Legal Basis</b>	<b>Public task</b> Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
<b>Evidence for legal basis</b>	ICO toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	secured cloud
<b>Is it secure and/or encrypted?</b>	yes both encrypted and secure
<b>Who can access data?</b>	School and Canva employees as required to provide service
<b>How long is data kept?</b>	1+ year
<b>Who is data shared with?</b>	Third party companies to provide service
<b>Legal basis for sharing</b>	contractual legitimate interest
<b>How is data shared?</b>	secure encrypted transfer

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

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

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

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

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- Criminal Records information - protected in Article 10

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

System used: Consent for educational visits

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

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- Criminal Records information - protected in Article 10

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

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

System used: Covid-19 Lateral Flow Testing

**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

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- Criminal Records information - protected in Article 10

<b>Special Category Data Legal Basis</b>	<b>Public Interest / Public Health</b> Processing necessary for reasons of public interest in the area of public health such as protecting against serious cross-border threats to health or guaranteeing high standards of healthcare and of medical products or medical devices.
<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	Electronically/verbally with PHE
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	To support the national effort in the fight against Covid-19. Under

	instruction from the DfE and PHE.
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	Yes
<b>Data Source</b>	Parent
<b>Where is data stored?</b>	Electronic school system
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	School staff
<b>How long is data kept?</b>	3+ years
<b>Who is data shared with?</b>	Public Health England
<b>Legal basis for sharing</b>	Legal obligation & public task
<b>How is data shared?</b>	Electronically through secure servers.

System used: CPOMS

**Description**

CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral welfare for schools. 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

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**Special Category Data Legal Basis**

**Obligation**

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

<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	Verbally, secure messenger, online secure servers.
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	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.
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	SIMS
<b>Where is data stored?</b>	Meritec secure servers.
<b>Is it secure and/or encrypted?</b>	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.
<b>Who can access data?</b>	School staff, subsequent school if using CPOMS, Meritec for support and outside agencies.
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	School staff, subsequent school if using CPOMS, Meritec for support, outside agencies, parents.
<b>Legal basis for sharing</b>	Legal obligation & public task
<b>How is data shared?</b>	Secure cloud based systems and secure servers.
<b>References</b>	<a href="#">Click to download CPOMS Cloud Services for Schools</a>

System used: Data tracking spreadsheets

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

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

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

System used: DfE (Gov.uk)

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



System used: DFE-Census and workforce Census

<b>Description</b>	The school workforce census is a statutory data collection that takes place each autumn. You must complete statutory censuses by law unless there's a good reason not to. The census collects data on all teaching and support staff in regular employment, including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data.
<b>Personal Data Items</b>	<b>Staff</b> <ul style="list-style-type: none"> <li>• Name</li> </ul>
<b>Why is it being processed?</b>	<a href="https://www.gov.uk/help/privacy-notice">https://www.gov.uk/help/privacy-notice</a>
<b>Legal Basis</b>	<b>Legal Obligation</b> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	yes
<b>Data Source</b>	School
<b>Where is data stored?</b>	<a href="https://www.gov.uk/help/privacy-notice">https://www.gov.uk/help/privacy-notice</a>
<b>Is it secure and/or encrypted?</b>	secure
<b>Who can access data?</b>	<a href="https://www.gov.uk/help/privacy-notice">https://www.gov.uk/help/privacy-notice</a>
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	<a href="https://www.gov.uk/help/privacy-notice">https://www.gov.uk/help/privacy-notice</a>
<b>Legal basis for sharing</b>	public task/legal obligation
<b>How is data shared?</b>	<a href="https://www.gov.uk/help/privacy-notice">https://www.gov.uk/help/privacy-notice</a>

System used: Dietary requirements information sheets

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

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- Criminal Records information - protected in Article 10

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

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

System used: Eduspot

<b>Description</b>	Teachers2parents; School Money; Behaviour Watch; School Pod; School Website Design; Parents Evening; Cashless Catering; School App
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School</li> <li>• Classes</li> <li>• Email</li> </ul> <p><b>Pupils</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class</li> <li>• age</li> <li>• Performance Data</li> <li>• SEND</li> <li>• Gender</li> </ul>

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

<b>Special Category Data Legal Basis</b>	<b>Obligation</b> Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	n/a
<b>Legal basis for sharing Special Category data</b>	n/a
<b>Why is it being processed?</b>	To provide the school with a range of tools for recording reporting and communication with parents/carers
<b>Legal Basis</b>	<b>Public task</b> Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Eduspot secure server
<b>Is it secure and/or encrypted?</b>	secure
<b>Who can access data?</b>	School staff with logins, Eduspot staff for technical support
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	n/a
<b>Legal basis for sharing</b>	n/a
<b>How is data shared?</b>	n/a Link to privacy notice - <a href="https://eduspot.co.uk/privacy-policy/">https://eduspot.co.uk/privacy-policy/</a>

System used: Eschools Website Provider

<b>Description</b>	On-line school website building tool
<b>Personal Data Items</b>	<p><b>School Information</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact information</li> <li>• Class names</li> <li>• Staff names</li> <li>• Governor names</li> <li>• Year group information (planning, homework)</li> <li>• Newsletters</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Photographs</li> <li>•</li> <li>•</li> </ul>
<b>Why is it being processed?</b>	To inform parents and the wider community about the life of the school
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	Consent not required to put on school information. Consent required to use pupil photographs
<b>Data Source</b>	School
<b>Where is data stored?</b>	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.
<b>Is it secure and/or encrypted?</b>	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.
<b>Who can access data?</b>	Parents and wider community. Information available to the public on the internet. Eschools can access the data. DFE
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	The general public eschools is a public facing website
<b>Legal basis for sharing</b>	Public interest & legal obligation
<b>How is data shared?</b>	On the school's website page with designated URL
<b>References</b>	<a href="#">Click to download Eschools data agreement</a>

System used: EVOLVE visits

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

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

System used: Google drive for education

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

System used: Google Meet

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

System used: Governance

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

System used: Health & Safety

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

System used: Huggg

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

System used: Kapow	
<b>Description</b>	Engaging, knowledge-rich and progressive curriculums and lesson plans for foundation subjects. Includes teacher CPD videos and planning materials.
<b>Personal Data Items</b>	<p><b>Staff Member/User</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Title</li> <li>• Username / similar identifier</li> </ul>
<b>Why is it being processed?</b>	From Kapow's privacy notice: We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances: Where we need to perform the contract we are about to enter into or have entered into with you. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Where we need to comply with a legal or regulatory obligation.
<b>Legal Basis</b>	<p><b>Contract</b></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> <p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Legitimate Interest</b></p> <p>Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”</p>
<b>Evidence for legal basis</b>	ICO toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Kapow keeps personal subscription data (first name, last name, school email address) inside the UK; this data is stored on our own WordPress hosting provider, based in a Google cloud in London.
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Kapow, Staff User
<b>How long is data kept?</b>	1+ year

<b>Who is data shared with?</b>	From Kapow's privacy notice: 'We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above. Specific third parties including financial auditors, legal advisors, marketing agencies engaged to promote our business and products Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.'
<b>Legal basis for sharing</b>	ICO toolkit
<b>How is data shared?</b>	Transfer from parties

System used: Language Angels

<b>Description</b>	Language Angels award-winning language teaching resources are designed so every primary school teacher - irrespective of their linguistic ability - can teach the foreign language of their choice. Our experienced team of foreign language teaching specialists have spent thousands of hours over a number of years creating, testing and refining our lessons and resources to bring them to where they are now. We won't rest on our laurels though. We continue to work, adding innovative and exciting new units and resources all the time. By providing a multitude of teaching units (each designed to run for 6 weeks) there are more than enough resources to enable you to teach the language of your choice throughout the whole of your primary school.
<b>Personal Data Items</b>	<p><b>teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• age</li> </ul>
<b>Why is it being processed?</b>	Language_Angels_Home_School_Terms_&_Conditions.pdf
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
<b>Evidence for legal basis</b>	ICO Legal Basis Tool
<b>Is Consent Required?</b>	Yes
<b>Data Source</b>	School
<b>Where is data stored?</b>	Language_Angels_Home_School_Terms_&_Conditions.pdf
<b>Is it secure and/or encrypted?</b>	Secure
<b>Who can access data?</b>	Language_Angels_Home_School_Terms_&_Conditions.pdf
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Language_Angels_Home_School_Terms_&_Conditions.pdf
<b>Legal basis for sharing</b>	Public Task
<b>How is data shared?</b>	Language_Angels_Home_School_Terms_&_Conditions.pdf

System used: Lightspeed Internet Filtering

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



System used: Local Authority moderation of work

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

<b>Description</b>	Information relating to children who are in Looked After Care
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• Address</li> <li>• Personal Education Plan</li> <li>• Health Needs</li> <li>• Social Care Needs</li> <li>• Educational Needs</li> <li>• Family Background</li> </ul> <p><b>Parents &amp; Carers</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact Details</li> <li>• Address</li> <li>•</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Position</li> </ul> <p><b>External Support</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Organisation</li> <li>• Position</li> <li>• Address</li> <li>• Contact Details</li> </ul>
<p>This system has been identified as containing Special Category Information</p>	
<p>Special category information is data which has the following characteristics:</p>	
<ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Political opinions</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic data for the purpose of identifying a natural person</li> <li>• Sex life and or sexual orientation</li> <li>• Criminal Records information - protected in Article 10</li> </ul>	
<b>Special Category Data Legal Basis</b>	<p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
<b>Special Category Evidence for legal basis</b>	Article 9

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

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

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- Criminal Records information - protected in Article 10

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

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

System used: Medical Files - Paper

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

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

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

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

System used: Medical log

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

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

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

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

System used: Microsoft Teams

<p><b>Description</b></p>	<p>Remote learning with Office 365 for students Microsoft Teams for Education Whether you're learning at home for long periods of time or just outside of class, access Office 365 for free, stay connected, and learn in a way that's right for you. Get started Tips for successful online learning Get set up Students at eligible institutions can sign up for Office 365 Education for free. That means access to apps like Word, PowerPoint, and Teams from any web browser. Plus, all the work you create will automatically be saved and backed up in the cloud. Get started with Office 365 for free Already have Office 365? Sign in. Tip: Click Install Office from Office.com to download Office apps to your desktop device. Work together as a class or group Microsoft Teams is a digital hub that brings conversations, content, and apps together in one place. If your classes are using Teams, you'll be able to connect with your classmates, ask your teacher questions, work on your homework, and track the work you've got coming up. Not part of any teams yet? No problem! You can create your own to work on group projects and keep in touch from your computer or phone. Join virtual meetings set up by your teacher and even blur your background</p>
<p><b>Personal Data Items</b></p>	<p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>
<p><b>Why is it being processed?</b></p>	<p><a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a></p>
<p><b>Legal Basis</b></p>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
<p><b>Evidence for legal basis</b></p>	<p>ICO legal basis toolkit</p>
<p><b>Is Consent Required?</b></p>	<p>Yes</p>
<p><b>Data Source</b></p>	<p>School</p>
<p><b>Where is data stored?</b></p>	<p><a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a></p>
<p><b>Is it secure and/or encrypted?</b></p>	<p>Secure</p>
<p><b>Who can access data?</b></p>	<p><a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a></p>
<p><b>How long is data kept?</b></p>	<p>3 years after date closed</p>
<p><b>Who is data shared with?</b></p>	<p><a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a></p>

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

System used: MS Office Suite

<b>Description</b>	Suite of online tools for staff and pupils, including OneDrive, Word, Powerpoint, Excel, Outlook, Video and Teams.
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Classes</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Governor</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>
<b>Why is it being processed?</b>	To provide OneDrive for education to staff, pupils and governors.
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis tool.
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Microsoft Servers based in the EU
<b>Is it secure and/or encrypted?</b>	Yes, secure and encrypted
<b>Who can access data?</b>	Individual users can access their own accounts. ICT Team can access management tool.
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	N/A
<b>Legal basis for sharing</b>	N/A
<b>How is data shared?</b>	<a href="https://privacy.microsoft.com/en-gb/privacystatement">https://privacy.microsoft.com/en-gb/privacystatement</a>

System used: Nereo (Matrix)

<b>Description</b>	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.
<b>Personal Data Items</b>	<p><b>All Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> </ul>
<b>Why is it being processed?</b>	<a href="https://www.nereo.gov.uk/privacy-notice/">https://www.nereo.gov.uk/privacy-notice/</a>
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	yes
<b>Data Source</b>	School
<b>Where is data stored?</b>	<a href="https://www.nereo.gov.uk/privacy-notice/">https://www.nereo.gov.uk/privacy-notice/</a>
<b>Is it secure and/or encrypted?</b>	secure
<b>Who can access data?</b>	<a href="https://www.nereo.gov.uk/privacy-notice/">https://www.nereo.gov.uk/privacy-notice/</a>
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	<a href="https://www.nereo.gov.uk/privacy-notice/">https://www.nereo.gov.uk/privacy-notice/</a>
<b>Legal basis for sharing</b>	Public task/legal obligation
<b>How is data shared?</b>	<a href="https://www.nereo.gov.uk/privacy-notice/">https://www.nereo.gov.uk/privacy-notice/</a>

System used: NFER

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

System used: Numbots- Maths Circle LTD

<b>Description</b>	NumBots is a website and app that helps build an understanding in and recall of addition and subtraction facts.
<b>Personal Data Items</b>	<p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Year Group</li> <li>• Maths Class</li> </ul> <p><b>School</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> </ul> <p><b>Teachers</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email Address</li> </ul>
<b>Why is it being processed?</b>	<a href="https://trockstars.com/page/privacy">https://trockstars.com/page/privacy</a>
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal toolkit
<b>Is Consent Required?</b>	Yes upon registration
<b>Data Source</b>	School
<b>Where is data stored?</b>	<a href="https://trockstars.com/page/privacy">https://trockstars.com/page/privacy</a>
<b>Is it secure and/or encrypted?</b>	Secure
<b>Who can access data?</b>	School, teachers and Maths Circle LTD
<b>How long is data kept?</b>	3+ years
<b>Who is data shared with?</b>	<a href="https://trockstars.com/page/privacy">https://trockstars.com/page/privacy</a>
<b>Legal basis for sharing</b>	Pubic task
<b>How is data shared?</b>	<a href="https://trockstars.com/page/privacy">https://trockstars.com/page/privacy</a>

System used: Nursery (Early Years) files

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

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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

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

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

System used: Oxford Owls

<b>Description</b>	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
<b>Personal Data Items</b>	<p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Parent</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Age</li> </ul>
<b>Why is it being processed?</b>	<a href="https://global.oup.com/privacy?cc=us">https://global.oup.com/privacy?cc=us</a>
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis Tool
<b>Is Consent Required?</b>	Yes
<b>Data Source</b>	School
<b>Where is data stored?</b>	<a href="https://global.oup.com/privacy?cc=us">https://global.oup.com/privacy?cc=us</a>
<b>Is it secure and/or encrypted?</b>	Secure
<b>Who can access data?</b>	<a href="https://global.oup.com/privacy?cc=us">https://global.oup.com/privacy?cc=us</a>
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	<a href="https://global.oup.com/privacy?cc=us">https://global.oup.com/privacy?cc=us</a>
<b>Legal basis for sharing</b>	Public Interest
<b>How is data shared?</b>	<a href="https://global.oup.com/privacy?cc=us">https://global.oup.com/privacy?cc=us</a>

System used: ParentPay

<b>Description</b>	ParentPay is an online payment service for schools and families.
<b>Personal Data Items</b>	<b>staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• Gender</li></ul> <b>Pupil</b> <ul style="list-style-type: none"><li>• Name</li><li>• Date of birth</li><li>• Gender</li><li>• Groups</li><li>• Dietary requirements</li><li>• Postal address</li><li>• UPN</li><li>• Roll number</li><li>• Meal selections and history</li><li>• Emergency contact information</li><li>• Medical details</li><li>• EHIC</li><li>• Doctors contact</li><li>• Passport</li></ul> <b>Parent/Carer</b> <ul style="list-style-type: none"><li>• Name</li><li>• Gender</li><li>• Address</li><li>• Phone number</li><li>• Email</li><li>• Payment history &amp; balance</li><li>• Payment card details</li></ul>

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

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

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

System used: Personnel files

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

System used: Phonics play

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

System used: Photographs and videos of staff and pupils.

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

System used: PIRA - Rising stars (Wordblaze)

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

This system has been identified as containing Special Category Information

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

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

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

System used: Read Write Inc Website ([www.ruthmiskin.com](http://www.ruthmiskin.com))

<b>Description</b>	A website linked to the scheme Read Write Inc which includes a staff portal.
<b>Personal Data Items</b>	<b>Staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• Email</li><li>• Telephone Number</li><li>• Role</li></ul>
<b>Why is it being processed?</b>	<a href="https://www.ruthmiskin.com/en/privacy-policy/">https://www.ruthmiskin.com/en/privacy-policy/</a>
<b>Legal Basis</b>	<b>Public task</b> Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
<b>Evidence for legal basis</b>	ICO Legal Basis Tool
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	<a href="https://www.ruthmiskin.com/en/privacy-policy/">https://www.ruthmiskin.com/en/privacy-policy/</a>
<b>Is it secure and/or encrypted?</b>	Secure
<b>Who can access data?</b>	<a href="https://www.ruthmiskin.com/en/privacy-policy/">https://www.ruthmiskin.com/en/privacy-policy/</a>
<b>How long is data kept?</b>	3+ years
<b>Who is data shared with?</b>	<a href="https://www.ruthmiskin.com/en/privacy-policy/">https://www.ruthmiskin.com/en/privacy-policy/</a>
<b>Legal basis for sharing</b>	Public Task
<b>How is data shared?</b>	<a href="https://www.ruthmiskin.com/en/privacy-policy/">https://www.ruthmiskin.com/en/privacy-policy/</a>

System used: Recruitment information

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

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

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

System used: Registers

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

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

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**Special Category Data Legal Basis**

**Obligation**

Processing is required for carrying out obligations under employment,

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

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

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- Criminal Records information - protected in Article 10

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

System used: School meals identification

<b>Description</b>	Identification of pupils for meals
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Photograph</li> <li>• Dietary requirement</li> </ul>

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

<b>Special Category Data Legal Basis</b>	<p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	n/a
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	To ensure the pupils receive appropriate dietary requirements, particularly those with food allergies.
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO Legal Basis Tool
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Paper file - held securely within school premises, accessed daily
<b>Is it secure and/or encrypted?</b>	Yes - secure storage
<b>Who can access data?</b>	Kitchen and office staff

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

System used: School360

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

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

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

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

System used: SEND electronic records

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

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

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

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

System used: Send Paper Records

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: SIMS

**Description**

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

**Personal Data Items**

**Pupil**

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

**Parent/Carer**

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

**Staff**

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

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

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

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

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

System used: Social media sites e.g. Twitter, Facebook

<b>Description</b>	Social Media tool used to inform parents about events in school and celebrate children's achievement.
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Photos (unnamed)</li> <li>• Videos (unnamed)</li> <li>• School name</li> <li>• Classes</li> </ul>
<b>Why is it being processed?</b>	Unnamed photos of pupils and their work are used on the site
<b>Legal Basis</b>	<p><b>Consent</b></p> <p>Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	Yes
<b>Data Source</b>	School
<b>Where is data stored?</b>	Twitter or Facebook servers and in school
<b>Is it secure and/or encrypted?</b>	Twitter account is password protected. Only parents who have been approved by the school can access or follow the school twitter account
<b>Who can access data?</b>	Parents of children in school who have requested to follow the school on twitter and who have been approved by the admin team.
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Information shared with parents
<b>Legal basis for sharing</b>	Consent
<b>How is data shared?</b>	Online via secure servers

System used: STEM

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

System used: Tapestry

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

**References**

[Click to download Tapestry Privacy Policy](#)

System used: Times Tables Rock Stars

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

System used: Twinkl

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

System used: Unifrog	
<b>Description</b>	Research platform for destinations
<b>Personal Data Items</b>	<p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact Details</li> <li>• Assessment information</li> <li>• Date of birth</li> </ul>
<b>Why is it being processed?</b>	To enable students to research possible destinations for post 16 and 18 study
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Online secure servers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Tutors, SLT and students
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	SLT and tutors
<b>Legal basis for sharing</b>	Public task and legal obligation
<b>How is data shared?</b>	Online secure server
<b>References</b>	<a href="#">Click to download Unifrog Privacy Policy</a>

System used: Visitor book

<b>Description</b>	Log of all visitors into school / fire regulations
<b>Personal Data Items</b>	<p><b>Visitor</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date and time</li> <li>• Car registration</li> <li>• Purpose of visit</li> <li>• Company</li> <li>•</li> </ul>
<b>Why is it being processed?</b>	Safeguarding, health and safety, fire regulations
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Visitor book (hard copy)
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	School staff, visitors
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	School staff, visitors
<b>Legal basis for sharing</b>	Public task & legal obligation
<b>How is data shared?</b>	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
- 

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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**

**Obligation**

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

**Special Category Evidence for**

Article 9

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

System used: Wonde

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Y4 Multiplication Check

<b>Description</b>	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.
<b>Personal Data Items</b>	<p><b>child</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>
<b>Why is it being processed?</b>	<a href="https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance">https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance</a>
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal framework tool kit
<b>Is Consent Required?</b>	yes
<b>Data Source</b>	School
<b>Where is data stored?</b>	<a href="https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance">https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance</a>
<b>Is it secure and/or encrypted?</b>	secure
<b>Who can access data?</b>	<a href="https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance">https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance</a>
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	<a href="https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance">https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance</a>
<b>Legal basis for sharing</b>	Public task
<b>How is data shared?</b>	<a href="https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance">https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance</a>

System used: Zoom

<b>Description</b>	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.
<b>Personal Data Items</b>	<b>Teacher</b> <ul style="list-style-type: none"><li>• Name</li></ul> <b>Parent</b> <ul style="list-style-type: none"><li>• Name</li></ul>
<b>Why is it being processed?</b>	<a href="https://zoom.us/trust">https://zoom.us/trust</a>
<b>Legal Basis</b>	<b>Legal Obligation</b> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <b>Public task</b> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis tool
<b>Is Consent Required?</b>	Yes
<b>Data Source</b>	School
<b>Where is data stored?</b>	<a href="https://zoom.us/trust">https://zoom.us/trust</a>
<b>Is it secure and/or encrypted?</b>	Secure
<b>Who can access data?</b>	<a href="https://zoom.us/trust">https://zoom.us/trust</a>
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	<a href="https://zoom.us/trust">https://zoom.us/trust</a>
<b>Legal basis for sharing</b>	Public task
<b>How is data shared?</b>	<a href="https://zoom.us/trust">https://zoom.us/trust</a>

System used: Child protection records

<b>Description</b>	Records of Disclosures and records from external agencies involved with a child
<b>Personal Data Items</b>	<p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Address</li> <li>•</li> </ul> <p><b>Paret/ Carer</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> </ul> <p><b>Key worker/teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>
<b>Why is it being processed?</b>	to track and support entitlement in order to meet staturoy obligations
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Legitimate Interest</b></p> <p>Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”</p>
<b>Evidence for legal basis</b>	ICO Legal basis tool
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Secure files - office
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Head Teacher, Child Protection DSL
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Social Services, SEND Services, Parents/Carers as required
<b>Legal basis for sharing</b>	Legitimate interest and public task .
<b>How is data shared?</b>	Verbally, written or electronically (secure)

System used: DBS file

<b>Description</b>	Records relating to all members of staff: current and past
<b>Personal Data Items</b>	<b>Staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• Disclosure number</li><li>• Date of birth</li><li>• Address</li><li>• job title</li></ul>
<b>Why is it being processed?</b>	Legal requirement
<b>Legal Basis</b>	<b>Legal Obligation</b> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <b>Public task</b> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO Legal basis tools
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Office secure system -locked cabinet
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Head Teacher and Admin only
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Head teacher and Admin; governor sub committee if necessary
<b>Legal basis for sharing</b>	Statutory requirement and public task
<b>How is data shared?</b>	Verbally

System used: Financial records	
<b>Description</b>	Accounts
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Payroll number</li> <li>•</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• SEND code/ status</li> </ul>
<b>Why is it being processed?</b>	Legal requirement within FSVS
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO Legal basis tools
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Office - secure cupboard
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	HT, Admin, Governors, Local Authority
<b>How long is data kept?</b>	6 years after date closed
<b>Who is data shared with?</b>	LA, Governors, Diocese
<b>Legal basis for sharing</b>	Legal requirement within FSVS Public task
<b>How is data shared?</b>	Verbally and written report

System used: Head Teachers monitoring

<b>Description</b>	File of observations, lesson observations, scrutiny, external support visits
<b>Personal Data Items</b>	<p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>
<b>Why is it being processed?</b>	Legal requirement
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Legitimate Interest</b></p> <p>Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO Legal basis Tools
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Office - secure cupboard
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Head teacher
<b>How long is data kept?</b>	6 years after date closed
<b>Who is data shared with?</b>	SLT, Local authority, OFSTED
<b>Legal basis for sharing</b>	Legal requirement public task
<b>How is data shared?</b>	Verbally

System used: Health and safety

<b>Description</b>	files containing: fire safety, asbestos, substance control,
<b>Personal Data Items</b>	<p><b>governors</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Head teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>
<b>Why is it being processed?</b>	Health and safety requirements
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO Legal basis tool
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Office and school systems - caretakers locked cupboard Secure Server (FM4U)
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Head Teacher, Caretaker, Admin and staff, external engineers
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	External engineers, contractoris, governros, LA, diocese
<b>Legal basis for sharing</b>	Legitimate interest and public task
<b>How is data shared?</b>	Verbally and via written reports

System used: Language Angels

<b>Description</b>	Language Angels award-winning language teaching resources are designed so every primary school teacher - irrespective of their linguistic ability - can teach the foreign language of their choice.
<b>Personal Data Items</b>	<p><b>class teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>child - user</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>
<b>Why is it being processed?</b>	To provide online access to mfl resources
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
<b>Evidence for legal basis</b>	ICO legal basis tool education acts
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Language Angels
<b>Is it secure and/or encrypted?</b>	to be confirmed
<b>Who can access data?</b>	Pupils, Staff and Language Angels staff
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Within school
<b>Legal basis for sharing</b>	Assessment information and tracking
<b>How is data shared?</b>	Online records

System used: Oxford Owl

<b>Description</b>	Oxford Owl for School is home to online teaching, learning and assessment resources, expert support and subscriptions for Primary Schools.
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Email address</li> <li>• Name</li> <li>• Class</li> </ul>
<b>Why is it being processed?</b>	to provide online access to curriculum materials for staff and pupils
<b>Legal Basis</b>	<p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO Legal basis tool
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Oxford Owl servers: <a href="https://global.oup.com/privacy?cc=gb">https://global.oup.com/privacy?cc=gb</a>
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	School Staff, Oxford Owl support
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Not shared
<b>Legal basis for sharing</b>	N/A
<b>How is data shared?</b>	<a href="https://global.oup.com/privacy?cc=gb">https://global.oup.com/privacy?cc=gb</a>

System used: Pupil data collection systems

<b>Description</b>	Paper record of details in order to contact parents in an emergency;
<b>Personal Data Items</b>	<b>Child</b> <ul style="list-style-type: none"><li>• Name</li><li>• Date of birth</li><li>• Address</li><li>• Medical needs</li><li>• GP and Dentist</li><li>• Permissions for photographs/ website/ newspapers</li><li>• Ethnicity</li><li>• Religion</li><li>• Language spoken at home</li><li>• Gender</li></ul> <b>Parent</b> <ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• phone number</li><li>• E mail address</li></ul> <b>Emergency contact</b> <ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• Phone number</li></ul>

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

<b>Special Category Data Legal Basis</b>	<b>Medical</b> <p>Processing is required for the purposes of preventative or occupational medicine; for evaluating the working capacity of the employee; medical diagnosis; the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional.</p> <b>Obligation</b> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
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	<b>Vital Interests</b>  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.
<b>Special Category Evidence for legal basis</b>	ICO Legal basis tools
<b>How is the Special Category data shared?</b>	Verbal, written
<b>Legal basis for sharing Special Category data</b>	Legitimate interest
<b>Why is it being processed?</b>	Health and safety
<b>Legal Basis</b>	<b>Consent</b>  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”
<b>Evidence for legal basis</b>	ICO Lawful basis tool
<b>Is Consent Required?</b>	Yes
<b>Data Source</b>	Parent
<b>Where is data stored?</b>	Secure Office school system
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Staff - on a need to know basis if a child is ill
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Staff - on a need to know basis
<b>Legal basis for sharing</b>	Health and safety
<b>How is data shared?</b>	Verbal. written

System used: Pupil reports

<b>Description</b>	copy of annual report
<b>Personal Data Items</b>	<b>Child</b> <ul style="list-style-type: none"> <li>• Name</li> </ul>
<b>Why is it being processed?</b>	to support educational entitlement
<b>Legal Basis</b>	<b>Legal Obligation</b> Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”
<b>Evidence for legal basis</b>	Annukla report required by law
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Offics - school system
<b>Is it secure and/or encrypted?</b>	Secure
<b>Who can access data?</b>	Staff
<b>How long is data kept?</b>	6 years after date closed
<b>Who is data shared with?</b>	Parents
<b>Legal basis for sharing</b>	Legitimate interest
<b>How is data shared?</b>	Written report

System used: Pupils work

<b>Description</b>	Books and work produced by the child
<b>Personal Data Items</b>	<p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Comments and scores</li> <li>• Photographs</li> <li>•</li> </ul>
<b>Why is it being processed?</b>	to ensure child has educational entitlement met
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO Legal tools
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Classrooms
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Teachers
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Parents/Carers
<b>Legal basis for sharing</b>	Legitimate interest and public task
<b>How is data shared?</b>	Verbally, reports, school display and parents evenings

System used: SUMDOG

<b>Description</b>	an online maths game and teaching tool
<b>Personal Data Items</b>	<p><b>staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>pupils</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>
<b>Why is it being processed?</b>	
<b>Evidence for legal basis</b>	ICO Legal basis tool education acts
<b>Is Consent Required?</b>	No
<b>Where is data stored?</b>	We are a "data controller". By "we", we mean Sumdog Ltd and our wholly-owned US subsidiary, Sumdog Inc.
<b>Is it secure and/or encrypted?</b>	We encrypt your information using SSL while it's being transferred between your computer and our servers. On your web browser, you'll see a padlock beside the Sumdog web address. Clicking the padlock gives you the details of our security certification.
<b>Who can access data?</b>	If you're a Student User, this information may be accessed by Parent Users in your Sumdog Family, or the Teacher Users linked to your Sumdog School.
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Not shared
<b>Legal basis for sharing</b>	N/A
<b>How is data shared?</b>	<a href="http://www.sumdog.com/en/Privacy_Policy/">http://www.sumdog.com/en/Privacy_Policy/</a>

System used: Tritlington Friends minutes

<b>Description</b>	Tritlington friends minutes stored and passed on to the parent/carer body
<b>Personal Data Items</b>	<p><b>Pupils</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Parents/carers</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Work email</li> </ul>
<b>Why is it being processed?</b>	Contains information
<b>Legal Basis</b>	<p><b>Legitimate Interest</b></p> <p>Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	Information for parents
<b>Is Consent Required?</b>	No
<b>Data Source</b>	Other
<b>Where is data stored?</b>	Electronically and paper copies.
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Parents, Teachers
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Parents, carers, FACEBOOK
<b>Legal basis for sharing</b>	Legitimate interest
<b>How is data shared?</b>	Written, verbal and electronic, secure systems