

Tritlington C of E First School GDPR Asset Register Date: 17/12/2025

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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 schoolls. CPOMS is software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Working alongside a school's existing safeguarding processes, CPOMS is an intuitive system to help with the management and recording of child protection, behavioural issues, bullying, special educational needs, domestic issues and much much more. Using CPOMS, schools can ensure that students are safe and fully supported, whilst school staff can focus on teaching and providing support, instead of administration.	
Data tracking spreadsheets	Spreadhseets (excel) to track progress of children over the course of their school career.	yes
DfE (Gov.uk)	The Department for Education (DfE) is data controller for the personal data DfE and our executive agencies process. Our executive agencies are: Education and Skills Funding Agency (ESFA) Standards and Testing Agency (STA) Teaching Regulation Agency (TRA)	
DFE-Census and workforce Census	The school workforce census is a statutory data collection that takes place each autumn. You must complete statutory censuses by law unless there's a good reason not to. The census collects data on all teaching and support staff in regular employment, including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data.	
Dietary requirements information sheets	Required documents for specific chidlren with severe allergies / intolerances and religious observations (food)	yes
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	
Huggg	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, heath care plans, risk assessments	yes
Microsoft Teams	Remote learning with Office 365 for students Microsoft	

	Teams for Education Whether you're learning at home for long periods of time or just outside of class, access Office 365 for free, stay connected, and learn in a way that's right for you. Get startedTips for successful online learning Get set up Students at eligible institutions can sign up for Office 365 Education for free. That means access to apps like Word, PowerPoint, and Teams from any web browser. Plus, all the work you create will automatically be saved and backed up in the cloud. Get started with Office 365 for free Already have Office 365? Sign in. Tip: Click Install Office from Office.com to download Office apps to your desktop device. Work together as a class or group Microsoft Teams is a digital hub that brings conversations, content, and apps together in one place. If your classes are using Teams, you'll be able to connect with your classmates, ask your teacher questions, work on your homework, and track the work you've got coming up. Not part of any teams yet? No problem! You can create your own to work on group projects and keep in touch from your computer or phone. Join virtual meetings set up by your teacher and even blur your background	
MS Office Suite	Suite of online tools for staff and pupils, including OneDrive, Word, Powerpoint, Excel, Outlook, Video and Teams.	
Nereo (Matrix)	North East Regional Employers' Organisation is one of eleven regional bodies that support local authorities across England, Wales and Northern Ireland. NEREO's function is to support local authorities and partner organisations in the fields of Human Resources, Organisational Development and Employee Relations in all their complex and varied forms. NEREO is a small organisation with a big reputation. Our staff have over a hundred years experience of working in the public sector. Some have voluntary and private sector experience too. The Governance of NEREO is carried out by an Executive Committee made up of Elected Member representatives from each of the local authorities.	
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 informaiton 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 indepth 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	
Description	Accelerated Reader gives teachers the information they need to monitor students' reading practice and make informed decisions to guide their future learning.
Personal Data Items	Pupil Name Class Staff Name
Why is it being processed?	To generate information on the reading abilities of pupils
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Renaissance Learning servers
Is it secure and/or encrypted?	We have taken certain physical, electronic, contractual and administrative steps to protect the confidentiality, security, and integrity of your personally identifiable information. However, no method of transmission over the Internet or method of electronic storage is completely secure, and we cannot guarantee its absolute security. It is your responsibility to maintain the confidentiality of your Website account information.
Who can access data?	Pupil (own data), staff, technical support staff
How long is data kept?	3 years after date closed
Who is data shared with?	Not shared
Legal basis for sharing	N/A
How is data shared?	N/A
References	Click to download Accelerated Reader Privacy Policy

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

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

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

System used: Active Learn Pearsons	- including Bug Club and Abacus Maths
Description	Bug Club is a whole-school reading programme that combines an online reading world with print books and assessment tools. Abacus Maths is a whole school maths programme that combines an online maths world with printable books and assessment tools.
Personal Data Items	Pupil
	Name Class Staff
	Starr
	Name
Why is it being processed?	To provide online access to curriculum materials for staff and pupils
Legal Basis	Public task
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	Pearsons secure servers
Is it secure and/or encrypted?	Yes Your privacy is extremely important to us. We're committed to protecting any personal information you've given us, and we comply with all relevant data protection laws. This means that: • we take full responsibility for the information we hold about you • we will protect your privacy at all times • we will never sell your personal information Whether you've supplied your personal details online, by phone or text, by email or in a letter, we will never use them without a lawful reason to do so. We'll use them for the purposes for which they were initially requested and as fully explained in this Privacy Notice and Cookie Policy.
Who can access data?	Staff, pupils own data, Pearsons staff for support.
How long is data kept?	3 years after date closed
Who is data shared with?	Not shared
Legal basis for sharing	N/A
How is data shared?	N/A
References	Click to download Pearson GDPR readiness Click to download Bug Club Pearson Privacy Notice

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

System used: Attendance file	
Description	Attendance information about pupils and classes
Personal Data Items	Pupil Name DOB Class Class Gender UPN Address Telephone number Parental contact Ethnic origin Current attendance Past attendance

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

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

System used: BBC Super Movers	
Description	Fun curriculum linked resources to get your class moving while they learn
Personal Data Items	Teacher • Name • Email
Why is it being processed?	https://www.bbc.co.uk/usingthebbc/privacy/
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.bbc.co.uk/usingthebbc/privacy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.bbc.co.uk/usingthebbc/privacy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.bbc.co.uk/usingthebbc/privacy/
Legal basis for sharing	Public Task
How is data shared?	https://www.bbc.co.uk/usingthebbc/privacy/

System used: Behaviour Files - Paper (in class)	
Description	Information relating to the behaviours of particular pupils
Personal Data Items	Pupils Name Date of Birth Address Health Needs Educational Behavioural Needs Social Care Status Parents/Carers Name Address Contact Details Staff Name Position External Support Workers Name Organisation Position Address Contact Details

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

Special Category Data Legal Basis	Obligation
	Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
	Significant Public Interest
	Processing is required for reasons of significant public interest on the basis of Union or Member State Law that is equivalent to the aim pursued

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

System used: Canva		
Description	Canva is an online design and publishing tool	
Personal Data Items	Peacher Name date of birth email phone number school analytics data usage data including device & location Student Name class school email analytics data usage data including device & location	
Why is it being processed?	To allow use of Canva resources and to improve Canva service to users	
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
Evidence for legal basis	ICO toolkit	
Is Consent Required?	No	
Data Source	School	
Where is data stored?	secured cloud	
Is it secure and/or encrypted?	yes both encrypted and secure	
Who can access data?	School and Canva employees as required to provide service	
How long is data kept?	1+ year	
Who is data shared with?	Third party companies to provide service	
Legal basis for sharing	contractual legitimate interest	
How is data shared?	secure encrypted transfer	

System used: Child Protection Records - Electronic		
Description	Records relating to child protection issues for individual pupils	
Personal Data Items	 Name Date of Birth Address Health Needs Social Care Status Educational Needs Child Protection Plan/Actions 	
	Parents • Name • Address • Contact Details	
	• Name • Position	
	Social Care Worker • Name • Address • Contact Details	
	 External Support Workers Name Organisation Position Address Contact Details 	

Special category information is data which has the following characteristics:

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

Special	Category	Data	Legal
Basis			

Obligation

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

System used: Child Protection Records - Paper	
Description	Records relating to child protection issues for individual pupils
Personal Data Items	Pupils Name Date of Birth Address Health Needs Social Care Status Educational needs Child Protection Plan/Actions Parents/Carers
	 Name Address Contact Details Staff Name Position
	Social Care Worker • Name • Address • Contact Details
	 Name Organisation Position Address Contact Details

Special category information is data which has the following characteristics:

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

Special	Category	Data	Legal
Basis			

Obligation

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

System used: Consent for educational visits	
Description	Consent information for all educational visits including day trips and residential visits
Personal Data Items	Pupil Name DOB Health conditions Medication Dietary requirements Contact information Family doctor

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

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

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

System used: Covid-19 Lateral Flow Testing	
Description	About 1 in 3 people with coronavirus do not have symptoms but can still pass it on to others. Regular testing of people without symptoms is important to help stop the virus spreading and protect your loved ones. As lockdown restrictions gradually ease we all need to play our part to help protect each other. The following people in England will have access to regular rapid lateral flow testing made available to them as schools reopen: secondary school pupils primary and secondary school staff households, childcare and support bubbles of primary and secondary-age pupils households, childcare and support bubbles of primary and secondary staff
Personal Data Items	 Name Date of Birth Postcode Test Result Parent Name Email address Telephone number

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

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

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

System used: CPOMS Description

CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral welfare for schoolls. CPOMS is software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Working alongside a school's existing safeguarding processes, CPOMS is an intuitive system to help with the management and recording of child protection, behavioural issues, bullying, special educational needs, domestic issues and much much more. Using CPOMS, schools can ensure that students are safe and fully supported, whilst school staff can focus on teaching and providing support, instead of administration.

Personal Data Items

Pupil

- Name
- Class
- · Details of incident
- Admission Date
- DOB
- SEN, with status
- Medical Conditions
- UPN
- Pupil Premium
- Religion
- EAL
- LAC
- Year Group
- Ethnicity
- First Language
- Pregnancy

Main contact

- Name
- Telephone Number

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

Special Category Data Legal Basis

Obligation

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

Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbally, secure messenger, online secure servers.
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To comply with statutory obligations regarding safeguarding and child protection. To provide a secure repository for personal data and ensure that records are effectively maintained.
Legal Basis	Legal Obligation
	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."
	Public task
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	Meritec secure servers.
Is it secure and/or encrypted?	Meritec Limited (CPOMS) is an accredited ISO27001 and GCloud supplier. As part of that accreditation, we have annual penetration/vulnerability test performed by a trusted 3rd party partner. In addition to these tests Meritec Limited (CPOMS) uses a UK based Data Centre supplier who is also also accredited to ISO27001 and thus subject to the same security audits. Meritec is accredited to the latest version of the ISO27001 standard (2013) Accreditation requires annual external audits by the accreditation providers and regular internal audits by the senior management including persons at Director level.
Who can access data?	School staff, subsequent school if using CPOMS, Meritec for support and outside agencies.
How long is data kept?	3 years after date closed
Who is data shared with?	School staff, subsequent school if using CPOMS, Meritec for support, outside agencies, parents.
Legal basis for sharing	Legal obligation & public task
How is data shared?	Secure cloud based systems and secure servers.
References	Click to download CPOMS Cloud Services for Schools

System used: Data tracking spreadsheets	
Description	Spreadhseets (excel) to track progress of children over the course of their school career.
Personal Data Items	 Name date of birth gender class year FSM SEN Assessment info

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

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

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

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

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

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

System used: Dietary requirements information sheets	
Description	Required documents for specific chidlren with severe allergies / intolerances and religious observations (food)
Personal Data Items	PupilNameDOBDietary information

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

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

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

System used: Eduspot	
Description	Teachers2parents; School Money; Behaviour Watch; School Pod; School Website Design; Parents Evening; Cashless Catering; School App
Personal Data Items	• Name • School • Classes • Email
	 Name Class age Performance Data SEND Gender

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

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

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

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

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

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

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

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

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

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

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

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

System used: Kapow	
Description	Engaging, knowledge-rich and progressive curriculums and lesson plans for foundation subjects. Includes teacher CPD videos and planning materials.
Personal Data Items	Staff Member/User
	NameTitleUsername / similar identifier
Why is it being processed?	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.
Legal Basis	Contract
	Article 6(1)(b) gives you a lawful basis for processing where: "processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract"
	Legal Obligation
	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."
	Legitimate Interest
	Article 6(1)(f) gives you a lawful basis for processing where: "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child."
Evidence for legal basis	ICO toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	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.
Is it secure and/or encrypted?	Yes
Who can access data?	Kapow, Staff User
How long is data kept?	1+ year

Who is data shared with?	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.'
Legal basis for sharing	ICO toolkit
How is data shared?	Transfer from parties

System used: Language Angels	
Description	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.
Personal Data Items	teacher
	Name
	child
	Nameage
Why is it being processed?	Language_Angels_Home_School_Terms_&_Conditions.pdf
Legal Basis	Public task
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	Language_Angels_Home_School_Terms_&_Conditions.pdf
Is it secure and/or encrypted?	Secure
Who can access data?	Language_Angels_Home_School_Terms_&_Conditions.pdf
How long is data kept?	3 years after date closed
Who is data shared with?	Language_Angels_Home_School_Terms_&_Conditions.pdf
Legal basis for sharing	Public Task
How is data shared?	Language_Angels_Home_School_Terms_&_Conditions.pdf

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

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

System used: Looked After Children Records - Electronic	
Description	Information relating to children who are in Looked After Care
Personal Data Items	Pupil Name Date of Birth Address Personal Education Plan Health Needs Social Care Needs Educational Needs Family Background Parents & Carers Name Contact Details Address Staff Name Position External Support Name Organisation Position Address Contact Details Contact Details

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

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

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

System used: Looked After Children Records - Paper	
Description	Information relating to children who are Looked After
Personal Data Items	Pupils Name Date of Birth Address Personal Education Plan Health Needs Social Care Needs Educational Needs Family Background Parents & Carers Name Contact Details Address
	 Name Position External Support Workers Name Organisation Position Address Contact Details

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

Special Category Data Legal Basis	Obligation
	Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
	Significant Public Interest

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

System used: Medical Files - Electronic	
Description	Information in respect of specific medical needs of an individual student
Personal Data Items	Pupils Name Date of Birth Address Health Needs Social Care Status Educational Needs Medical History Medication Details Parents/Carers Name Address Contact Details
	Name Position External Support Workers Name Organisation Position Address Contact Details

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

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

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

System used: Medical Files - Paper	
Description	Information in respect of specific medical needs of an individual student
Personal Data Items	Pupils Name Date of Birth Address Health Needs Social Care Status Educational Needs Medical History Medication Details Parents/Carers Name Address Contact Details
	Name Position External Support Workers Name Organisation Position address Contact details

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

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

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

System used: Medical log	
Description	File of medical information for each child: asthma, medication administered, heath care plans, risk assessments
Personal Data Items	Pupil Name Inhaler / medication information (doseage) DOB Class Medical condition Signs and symptoms Treatment Parental consent Name of medication and dose Side effects Storage requirements Special equipment Testing needed Access to food drink Dietary requirement Staff support Contingency arrangements Family / emergency contacts Hazard Risk Control measures / risk evaluation

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

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

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

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

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

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

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

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

System used: Numbots- Maths Circle	System used: Numbots- Maths Circle LTD	
Description	NumBots is a website and app that helps build an understanding in and recall of addition and subtraction facts.	
Personal Data Items	Child Name Year Group Maths Class School Name Address Teachers Name Email Address	
Why is it being processed?	https://ttrockstars.com/page/privacy	
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
Evidence for legal basis	ICO legal toolkit	
Is Consent Required?	Yes upon registration	
Data Source	School	
Where is data stored?	https://ttrockstars.com/page/privacy	
Is it secure and/or encrypted?	Secure	
Who can access data?	School, teachers and Maths Circle LTD	
How long is data kept?	3+ years	
Who is data shared with?	https://ttrockstars.com/page/privacy	
Legal basis for sharing	Pubic task	
How is data shared?	https://ttrockstars.com/page/privacy	

System used: Nursery (Early Years) files	
Description	Early years registration information and funding information for Early Years entitlement, hours taken each week
Personal Data Items	 Name DOB Gender Address Documents seen / recorded Parents Nat. Insurance Number Eligibility code Religion Email address Telephone number Parent work details Emergency contact details Former placements Medical information Ethnic origin SEN information EAL Armed forces Meal arrangements Parental consent: medicine, photos, website, school publications, press, local excursions Start dates Desired sessions

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

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

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

System used: Oxford Owls	System used: Oxford Owls	
Description	Oxford Owl for School Teaching resources and expert school improvement support Remote learning guidance and support Award-winning subscriptions and leadership support Free teaching resources and eBooks Advice and support for parents Educational activities and games Free eBook library for 3- to 11-year-olds	
Personal Data Items	Teacher	
	Name	
	Parent	
	Name	
	Child	
	NameAge	
Why is it being processed?	https://global.oup.com/privacy?cc=us	
Legal Basis	Public task	
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
Evidence for legal basis	ICO legal basis Tool	
Is Consent Required?	Yes	
Data Source	School	
Where is data stored?	https://global.oup.com/privacy?cc=us	
Is it secure and/or encrypted?	Secure	
Who can access data?	https://global.oup.com/privacy?cc=us	
How long is data kept?	3 years after date closed	
Who is data shared with?	https://global.oup.com/privacy?cc=us	
Legal basis for sharing	Public Interest	
How is data shared?	https://global.oup.com/privacy?cc=us	

System used: ParentPay	
Description	ParentPay is an online payment service for schools and families.
Personal Data Items	staff Name Gender Pupil Name Date of birth Gender Groups Dietary requirements Postal address UPN Roll number Meal selections and history Emergency contact information Medical details EHIC Doctors contact Passport Parent/Carer Name Gender Address Phone number Email Payment history & balance Payment card details

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

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

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

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

System used: Phonics play	System used: Phonics play	
Description	Interactive phonics games, phonics planning, assessment ideas and many teaching ideas and resources to help children to learn	
Personal Data Items	School	
	Name	
	Pupil	
	Name	
	Staff	
	• Name	
Why is it being processed?	To provide access to online learning resources for pupils and staff.	
Legal Basis	Public task	
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
Evidence for legal basis	ICO legal basis toolkit	
Is Consent Required?	No	
Data Source	School	
Where is data stored?	Phonics play servers	
Is it secure and/or encrypted?	Yes	
Who can access data?	Staff, Phonics Play for support	
How long is data kept?	3 years after date closed	
Who is data shared with?	Staff	
Legal basis for sharing	Public task	
How is data shared?	Online secure server	
References	Click to download Phonics Play Privacy Policy	

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

System used: PIRA - Rising stars (Wordblaze)	
Description	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.
Personal Data Items	School Name Staff Name Job title email address Telephone number
	 Name Age Date of birth Gender Ethnic origin First Language Unique pupil number Pupil premium information Assessment results

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

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

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

System used: Read Write Inc Websit	System used: Read Write Inc Website (www.ruthmiskin.com)	
Description	A website linked to the scheme Read Write Inc which includes a staff portal.	
Personal Data Items	Staff Name Address Email Telephone Number Role	
Why is it being processed?	https://www.ruthmiskin.com/en/privacy-policy/	
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
Evidence for legal basis	ICO Legal Basis Tool	
Is Consent Required?	No	
Data Source	School	
Where is data stored?	https://www.ruthmiskin.com/en/privacy-policy/	
Is it secure and/or encrypted?	Secure	
Who can access data?	https://www.ruthmiskin.com/en/privacy-policy/	
How long is data kept?	3+ years	
Who is data shared with?	https://www.ruthmiskin.com/en/privacy-policy/	
Legal basis for sharing	Public Task	
How is data shared?	https://www.ruthmiskin.com/en/privacy-policy/	

System used: Recruitment information	
Description	Part of the job application process
Personal Data Items	Name Name DOB Address Educational establishments attended Qualifications Disciplinary Records Appraisal Records Salary information

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

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

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

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

System used: Safeguarding Records - Electronic	
Description	Records relating to safeguarding of children
Personal Data Items	Pupils Name Date of Birth Address Health Needs Social Care Status Educational Needs Child Protection Plan/Actions
	Parent/Carers Name Address Contact Details Staff Name Position
	Social Care Worker • Name • Address • Contact Details
	 Name Organisation Position Address Contact Details

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

Special Category Data Legal Basis	Obligation
	Processing is required for carrying out obligations under employment,

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

System used: Safeguarding Records - Paper	
Description	Records relating to safeguarding of children
Personal Data Items	Pupils Name Date of Birth Address Health Needs Social Care Status Educational Needs Child Protection Plan/Actions
	Parent/Carers Name Address Contact Details Staff Name Position
	Social Care Worker Name Address Contact Details External Support Workers
	 Name Organisation Position Address Contact Details

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

Special Category Data Legal Basis	Obligation
	Processing is required for carrying out obligations under employment,

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

System used: School meals identification	
Description	Identification of pupils for meals
Personal Data Items	Pupil Name Photograph Dietary requirement

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

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

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

System used: School360	
Description	Learning platform for Northumberland schools with links to 3rd party educational resource providers.
Personal Data Items	Pupil Name School id Class/Group Year UPN (Unique Pupil Number) Gender Attendance (If School360 used for registration) Pupil concern reports EYFS reflections Staff Name Staff Alternative e-mail address Teacher pupil notes

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

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

System used: SEND electronic records	
Description	Records relating to Special Educational Needs and Disability for individual pupils
Personal Data Items	Pupils Name Date of Birth Address Health Needs Social Care Status Educational Needs SEND History Parents / Carers Name Address Contact details Staff Name Position External Support Workers Name
	OrganisationPositionAddressContact details

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

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

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

System used: Send Paper Records	
Description	Records relating to individual pupil's SEND history
Personal Data Items	Pupil Name Date Of Birth Address Medical Information Health & Social Care Specific Educational Needs Interventions In Place Parents Name Address Contact Details Staff Name Position External Support Name Organisation Position Address Address

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

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

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

System used: SIMS	
Description	SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools.
Personal Data Items	Pupil Name Date of birth Address Title Gender Class Year Parent/carer name UPN Dietary Requirements Medical information Attendance/exclusion FSM SEN
	 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

- ReligionMarital statusLanguage
- Passport Information
- Dietary requirements
- Absences
- Car information
- Next of Kin
- Payroll number
- DBS Information

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

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

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

System used: Social media sites e.g. Twitter, Facebook	
Description	Social Media tool used to inform parents about events in school and celebrate children's achievement.
Personal Data Items	Pupil Photos (unnamed) Videos (unnamed) School name Classes
Why is it being processed?	Unnamed photos of pupils and their work are used on the site
Legal Basis	Consent Article 6(1)(a) gives you a lawful basis for processing where: "the data subject has given consent to the processing of their personal data for one or more specific purposes"
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	Twitter or Facebook servers and in school
Is it secure and/or encrypted?	Twitter account is password protected. Only parents who have been approved by the school can access or follow the school twitter account
Who can access data?	Parents of children in school who have requested to follow the school on twitter and who have been approved by the admin team.
How long is data kept?	3 years after date closed
Who is data shared with?	Information shared with parents
Legal basis for sharing	Consent
How is data shared?	Online via secure servers

System used: STEM	
Description	Developing teachers and leaders Explore programmes and resources that support professional development and drive the impact of teaching across schools and colleges. o support parents and carers, our subject experts have put together a selection of activities and materials, which are free for everyone to access.
Personal Data Items	Teacher Name child Name Age Name Name Parent Name
Why is it being processed?	https://www.stem.org.uk/privacy-policy
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.stem.org.uk/privacy-policy
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.stem.org.uk/privacy-policy
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.stem.org.uk/privacy-policy
Legal basis for sharing	Public Task
How is data shared?	https://www.stem.org.uk/privacy-policy

System used: Tapestry	
Description	An online journal recording all the learning and fun of children's early years education.
Personal Data Items	School Name Address Email address and name of person who pays for service in school Pupil Name Date of birth Notes on progress Photographs Videos Address Parent Name email address Staff Name Email address
Why is it being processed?	To provide access to an online early years journal which records pupil activity and progress throughout the year.
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Yes for parent access element
Data Source	School
Where is data stored?	Tapestry? secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff, parents (own child), other settings if child moves school and new school if it uses Tapestry.
How long is data kept?	3 years after date closed
Who is data shared with?	The child's? new school if it uses Tapestry.
Legal basis for sharing	Public task
How is data shared?	Electronically over secure link.

References	Click to download Tapestry Privacy Policy

System used: Times Tables Rock Stars	
Description	Online times tables practice and testing.
Personal Data Items	Name Email address School name School address Pupil Name Year group Maths group
Why is it being processed?	To provide access to online learning tool.
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Maths circle EU servers
Is it secure and/or encrypted?	Yes
Who can access data?	Staff
How long is data kept?	3 years after date closed
Who is data shared with?	Staff
Legal basis for sharing	Public task
How is data shared?	Online secure servers
References	Click to download Times Tables Rock Stars Click to download Times Tables Rock Stars GDPR

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

System used: Unifrog	
Description	Research platform for destinations
Personal Data Items	 Child Name Contact Details Assessment information Date of birth
Why is it being processed?	To enable students to research possible destinations for post 16 and 18 study
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Online secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	Tutors, SLT and students
How long is data kept?	3 years after date closed
Who is data shared with?	SLT and tutors
Legal basis for sharing	Public task and legal obligation
How is data shared?	Online secure server
References	Click to download Unifrog Privacy Policy

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

System used: White Rose Maths and Science

Description

Influenced, inspired and informed by the work of leading maths researchers and practitioners across the world, White Rose Maths brings together a team of highly experienced and passionate maths teaching experts to train, guide, help and support all those who want to make change happen in their schools. We're guessing that might include YOU! If so, we offer you in-depth training programmes, a vast bank of clear, practical resources (many of them available free of charge), and the bespoke support you want and need to keep raising the bar. We'll not only make your job a whole lot simpler, we'll help you change the future for every child.

Personal Data Items

Teacher

- Name
- Date of Birth
- Gender
- Email address
- Payment details

Child

- Name
- Age
- Gender
- Email address

Parent

- Name
- Age
- Gender
- Email address

•

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Wonde	
Description	Manages transfer of data from Sims MIS to School360.
Personal Data Items	Staff Name Name Name School id Class/group Year UPN Gender Attendance

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

Special Category Data Legal Basis	Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	School 360 secure servers
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To facilitate the exchange of data to allow the set up of school360 for a school.
Legal Basis	Contract Article 6(1)(b) gives you a lawful basis for processing where: "processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract"
Evidence for legal basis	ICO legal basis toolkit

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

System used: Y4 Multiplication Chec	k
Description	What is the Multiplication Tables Check. The Multiplication Tables Check (MTC) is a key stage 2 assessment to be taken by pupils at the end of year 4 (in June). From the 2019 / 2020 academic year onwards. The purpose of the MTC is to make sure the times tables knowledge is at the expected level.
Personal Data Items	child Name
Why is it being processed?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal framework tool kit
Is Consent Required?	yes
Data Source	School
Where is data stored?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
Is it secure and/or encrypted?	secure
Who can access data?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
Legal basis for sharing	Public task
How is data shared?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance

System used: Zoom	
Description	Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Our easy, reliable cloud platform for video, voice, content sharing, and chat runs across mobile devices, desktops, telephones, and room systems.
Personal Data Items	Teacher • Name Parent • Name
Why is it being processed?	https://zoom.us/trust
Legal Basis	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://zoom.us/trust
Is it secure and/or encrypted?	Secure
Who can access data?	https://zoom.us/trust
How long is data kept?	3 years after date closed
Who is data shared with?	https://zoom.us/trust
Legal basis for sharing	Public task
How is data shared?	https://zoom.us/trust

System used: Child protection record	ds
Description	Records of Disclosures and records from external agencies involved with a child
Personal Data Items	Child Name Date of birth Address Paret/ Carer Name Address Key worker/teacher Name
Why is it being processed?	to track and support entitlement in order to meet staturoy obligations
Legal Basis	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Legitimate Interest Article 6(1)(f) gives you a lawful basis for processing where: "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child."
Evidence for legal basis	ICO Legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure files - office
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Child Protection DSL
How long is data kept?	3 years after date closed
Who is data shared with?	Social Services, SEND Services, Parents/Carers as required
Legal basis for sharing	Legitimate interest and public task .
How is data shared?	Verbally, written or electronically (secure)

System used: DBS file	System used: DBS file	
Description	Records relating to all members of staff: current and past	
Personal Data Items	Name Disclosure number Date of birth Address job title	
Why is it being processed?	Legal requirement	
Legal Basis	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller	
Evidence for legal basis	ICO Legal basis tools	
Is Consent Required?	No	
Data Source	School	
Where is data stored?	Office secure system -locked cabinet	
Is it secure and/or encrypted?	Yes	
Who can access data?	Head Teacher and Admin only	
How long is data kept?	3 years after date closed	
Who is data shared with?	Head teacher and Admin; governor sub committee if neceessary	
Legal basis for sharing	Statutory requirement and public task	
How is data shared?	Verbally	

System used: Financial records	
Description	Accounts
Personal Data Items	• Name • Payroll number • Pupil • SEND code/ status
Why is it being processed?	Legal requirement within FSVS
Legal Basis	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal basis tools
Is Consent Required?	No
Data Source	School
Where is data stored?	Office - secure cupboard
Is it secure and/or encrypted?	Yes
Who can access data?	HT, Admin, Governors, Local Authority
How long is data kept?	6 years after date closed
Who is data shared with?	LA, Governors, Diocese
Legal basis for sharing	Legal requirement within FSVS Public task
How is data shared?	Verbally and written report

System used: Head Teachers monitor	pring
Description	File of observations, lesson observations, scrutiny, external support visits
Personal Data Items	Child • Name Staff • Name
Why is it being processed?	Legal requirement
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Legitimate Interest Article 6(1)(f) gives you a lawful basis for processing where: "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal basis Tools
Is Consent Required?	No
Data Source	School
Where is data stored?	Office - secure cupboard
Is it secure and/or encrypted?	Yes
Who can access data?	Head teacher
How long is data kept?	6 years after date closed
Who is data shared with?	SLT, Local authority, OFSTED
Legal basis for sharing	Legal requirement public task
How is data shared?	Verbally

System used: Health and safety	
Description	files containing: fire safety, asbestos, substance control,
Personal Data Items	governors
	Name
	Head teacher
	Name
	Staff
	Name
Why is it being processed?	Health and safety requirements
Legal Basis	Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Office and school systems - caretakers locked cupboard Secure Server (FM4U)
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Caretaker, Admin and staff, external engineers
How long is data kept?	3 years after date closed
Who is data shared with?	External engineers, contractoris, governros, LA, diocese
Legal basis for sharing	Legitimate interest and public task
How is data shared?	Verbally and via written reports

System used: Language Angels	
Description	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.
Personal Data Items	class teacher
	Name
	child - user
	Name
Why is it being processed?	To provide online access to mfl resources
Legal Basis	Public task
	Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO legal basis tool education acts
Is Consent Required?	No
Data Source	School
Where is data stored?	Language Angels
Is it secure and/or encrypted?	to be confirmed
Who can access data?	Pupils, Staff and Language Angels staff
How long is data kept?	3 years after date closed
Who is data shared with?	Within school
Legal basis for sharing	Assessment information and tracking
How is data shared?	Online records

System used: Oxford Owl	
Description	Oxford Owl for School is home to online teaching, learning and assessment resources, expert support and subscriptions for Primary Schools.
Personal Data Items	Staff
	Email addressNameClass
Why is it being processed?	to provide online access to curriculum materials for staff and pupils
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Oxford Owl servers: https://global.oup.com/privacy?cc=gb
Is it secure and/or encrypted?	Yes
Who can access data?	Schoool Staff, Oxford Owl support
How long is data kept?	3 years after date closed
Who is data shared with?	Not shared
Legal basis for sharing	N/A
How is data shared?	https://global.oup.com/privacy?cc=gb

System used: Pupil data collection systems	
Description	Paper record of details in order to contact parents in an emergency;
Personal Data Items	 Name Date of bitrth Address Medical needs GP and Dentist Permissions for photographs/ website/ newspapers Ethnicity Religion Language spoken at home Gender
	Parent Name Address phone number Email address Emergency contact Name Address Phone number

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

Special	Category	Data	Legal
Basis			

Medical

Processing is required for the purposes of preventative or occupational medicine; for evaluating the working capacity of the employee,; medical diagnosis; the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional.

Obligation

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

	Vital Interests
	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.
Special Category Evidence for legal basis	ICO Legal basis tools
How is the Special Category data shared?	Verbal, written
Legal basis for sharing Special Category data	Legitimate interest
Why is it being processed?	Health and safety
Legal Basis	Consent
	Article 6(1)(a) gives you a lawful basis for processing where: "the data subject has given consent to the processing of their personal data for one or more specific purposes"
Evidence for legal basis	ICO Lawful basis tool
Is Consent Required?	Yes
Data Source	Parent
Where is data stored?	Secure Office school system
Is it secure and/or encrypted?	Yes
Who can access data?	Staff - on a need to know basis if a child is ill
How long is data kept?	3 years after date closed
Who is data shared with?	Staff - on a need to know basis
Legal basis for sharing	Health and safety
How is data shared?	Verbal. written

System used: Pupil reports	
Description	copy of annual report
Personal Data Items	Child
	Name
Why is it being processed?	to support educational entitlement
Legal Basis	Legal Obligation
	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."
Evidence for legal basis	Annukla report required by law
Is Consent Required?	No
Data Source	School
Where is data stored?	Offics - school system
Is it secure and/or encrypted?	Secure
Who can access data?	Staff
How long is data kept?	6 years after date closed
Who is data shared with?	Parents
Legal basis for sharing	Legitimate interest
How is data shared?	Written report

System used: Pupils work	
Description	Books and work produced by the child
Personal Data Items	 Child Name Comments and scores Photographs
Why is it being processed?	to ensure child has educational entitlement met
Legal Basis	Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO Legal tools
Is Consent Required?	No
Data Source	School
Where is data stored?	Classrooms
Is it secure and/or encrypted?	Yes
Who can access data?	Teachers
How long is data kept?	3 years after date closed
Who is data shared with?	Parents/Carers
Legal basis for sharing	Legitimate interest and public task
How is data shared?	Verbally, reports, school display and parents evenings

System used: SUMDOG	
Description	an online maths game and teaching tool
Personal Data Items	staff
	Name
	pupils
	Name
Why is it being processed?	
Evidence for legal basis	ICO Legal basis tool education acts
Is Consent Required?	No
Where is data stored?	We are a "data controller". By "we", we mean Sumdog Ltd and our whollyowned US subsidiary, Sumdog Inc.
Is it secure and/or encrypted?	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.
Who can access data?	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.
How long is data kept?	3 years after date closed
Who is data shared with?	Not shared
Legal basis for sharing	N/A
How is data shared?	http://www.sumdog.com/en/Privacy_Policy/

System used: Tritlington Friends minutes	
Description	Tritlington friends minutes stored and passed on to the parent/carer body
Personal Data Items	Pupils Name Parents/carers Name Name Work email
Why is it being processed?	Contains information
Legal Basis	Article 6(1)(f) gives you a lawful basis for processing where: "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child." Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	Inofrmation for parents
Is Consent Required?	No
Data Source	Other
Where is data stored?	Electronically and paper copies.
Is it secure and/or encrypted?	Yes
Who can access data?	Parents, Teachers
How long is data kept?	3 years after date closed
Who is data shared with?	Parents, carers, FACEBOOK
Legal basis for sharing	Legitimate interest
How is data shared?	Written, verbal and electronic, secure systems