



Beaconhill Community Primary School

GDPR Asset Register

Date: 10/04/2026

Data Protection Officer: Karen Carnaffin

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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 | |
| Assessment Records | Electronic and paper mark books | |
| Attendance file | Attendance information about pupils and classes | yes |
| BBC Bitesize | BBC Bitesize is a free online study support resource designed to help with learning, revision and homework! Bitesize provides support for learners aged 5 to 16+ across a wide range of school subjects. It also supports children and young people's wellbeing and career choices. Bitesize also has hundreds of published lessons to help students across the UK with home schooling. Bitesize guides are written by teachers and subject experts and are mapped to follow the curricula of the UK. Secondary Bitesize follows exam board specifications for the main exam boards in the UK, including for GCSE in England, Wales and Northern Ireland and National 4, National 5 & Highers in Scotland, ensuring students are preparing for the right exams | |
| CCTV | CCTV | |
| Charanga | Charanga Music School, the best-selling, modern resource for primary music — online, easy to use and great value. Includes A complete scheme to teach the national curriculum for music A vast library of songs, topics, instrument courses and creative apps In-depth support for assessment, SEND and personalised teaching and learning | |
| 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 |
| Class Dojo | Class Dojo is a classroom management and behaviour rewards system which includes a digital portfolio for pupils which can be accessed by staff, pupils and parents?/carers. | |
| Consent for educational visits | Consent information for all educational visits including day trips and residential visits | yes |

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| CPOMS | CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral welfare for schools. CPOMS is software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Working alongside a school's existing safeguarding processes, CPOMS is an intuitive system to help with the management and recording of child protection, behavioural issues, bullying, special educational needs, domestic issues and much much more. Using CPOMS, schools can ensure that students are safe and fully supported, whilst school staff can focus on teaching and providing support, instead of administration. | yes |
| Data tracking spreadsheets | Spreadhseets (excel) to track progress of children over the course of their school career. | yes |
| Dietary requirements information sheets | Required documents for specific children with severe allergies / intolerances and religious observations (food) | yes |
| EVOLVE visits | An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities. | |
| Futures Cloud | Internet / Network monitoring and reporting tool | |
| Google drive for education | suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom. | |
| Governance | Details of all members of the Governing Body | |
| Health & Safety | Records pertaining to Health & Safety | |
| Inventry | A system for visitors, staff & pupils. It takes details & a photo & can make a badge of this. Subject signs in & signs out. This allows monitoring of who is present & unlike visitor book cannot be seen by others plus the photo badge identifies visitors etc for safeguarding | |
| Lexia | Students work independently to develop critical reading and language skills through individualized, motivating learning paths. All students, regardless of their skill level, can each work at their own pace and the teacher is notified (on web-based reports and via email) only when they require support. | |
| Lightspeed Internet Filtering | The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC. | |
| 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. | |
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| Looked After Children Records - Electronic | Information relating to children who are in Looked After Care | yes |
| Looked After Children Records - Paper | Information relating to children who are Looked After | yes |
| Mathletics _ online numeracy activities | Mathletics is a captivating online learning space providing students with all the tools they need to be successful learners, both in the classroom and beyond. Powerful courses aligned to the various National Curricula of the UK & Ireland, from Foundation Stage to Key Stage 5, matched with dynamic tools and reporting for teachers. Mathletics supports and caters to each teacher's unique blend of student-driven learning and teacher-led instruction. | |
| Medical Files - Electronic | Information in respect of specific medical needs of an individual student | yes |
| Medical Files - Paper | Information in respect of specific medical needs of an individual student | yes |
| Medical log | File of medical information for each child: asthma, medication administered, health care plans, risk assessments | yes |
| Micro Librarian | Micro Librarian Systems (MLS) , supplier of Library Management Systems to Education in the UK and the worlds first to use biometric identification data | yes |
| MS Office Suite | Suite of online tools for staff and pupils, including OneDrive, Word, Powerpoint, Excel, Outlook, Video and Teams. | |
| My Maths | MyMaths is an interactive online teaching and homework subscription website for schools that builds pupil engagement and consolidates maths knowledge. | |
| National Centre for Excellence in the Teaching of Mathematics (NCETM) | NCETM provides professional development for staff in the teaching of Mathematics Children's chances of succeeding in education and life will be maximised if they develop deep and lasting procedural and conceptual mathematical understanding. The NCETM's teaching for mastery section explains the rationale for this teaching approach, and presents case studies from schools, together with interviews with teachers involved in mastery projects through the Maths Hubs programme. | |
| Nursery (Early Years) files | Early years registration information and funding informaiton for Early Years entitlement, hours taken each week | yes |
| Oak Academy | Oak National Academy provides free video lessons, slides and worksheets to support teachers and pupils to keep learning. Created by teachers in response to coronavirus, the resources are freely available, to | |

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| | complement schools' own teaching. Lessons cover a broad range of subjects, from reception to year 11. There are no sign-ups or logins required. | |
| Parents Evening Booking System | Online booking system for parents evenings and other school events. | |
| Personnel files | Information relating to staff employment | |
| Phonics play | Interactive phonics games, phonics planning, assessment ideas and many teaching ideas and resources to help children to learn | |
| Photographs and videos of staff and pupils. | Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms. | |
| Purple Mash | The all-in-one Edtech solution for your Primary School. Embed computing and digital skills across your whole curriculum with award-winning teaching and learning software for KS1 and KS2. | |
| Recruitment information | Part of the job application process | yes |
| Registers | Daily register, after school club registers, lunch register | |
| Safeguarding Records - Electronic | Records relating to safeguarding of children | yes |
| Safeguarding Records - Paper | Records relating to safeguarding of children | yes |
| School Jotter | School Jotter provide website design and hosting services to schools. They host and store pupil and staff images that are displayed on the public facing website. | |
| School meals identification | Identification of pupils for meals | yes |
| School360 | Learning platform for Northumberland schools with links to 3rd party educational resource providers. | yes |
| Schoolcomms | Communication app for parents | |
| 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. | |
| Spelling Shed | The Spelling Shed - proudly powered by EdShed - is a spelling platform designed by a team of teachers. It is built with students, teachers and parents in mind and aims to make spelling fun for students as well as | |

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| | simple for adults to manage. | |
| SumDog | Personalised maths & spelling practice that pupils love Engage your pupils with adaptive learning games aligned to the National Curriculum, for children aged 5 to 14. Proven to accelerate progress. | |
| Tapestry | An online journal recording all the learning and fun of children's early years education. | |
| Target Tracker | Pupil assessment and tracking software?. | yes |
| Teachers2Parent | Parent/Staff/Other Text Messaging System | |
| Times Tables Rock Stars | Online times tables practice and testing. | |
| Top Marks Spelling Games | Welcome to Topmarks Topmarks is a leading independent educational website for children, teaching professionals and parents. Topmarks gives children the opportunity to learn online, through safe, fun and engaging games and activities. We feature great, educationally sound online resources. Topmarks is a safe environment for children because we only include trustworthy, reliable educational content. A good place to start is our fun learning games area. | |
| Visitor book | Log of all visitors into school / fire regulations | |
| White Rose Maths and Science | Influenced, inspired and informed by the work of leading maths researchers and practitioners across the world, White Rose Maths brings together a team of highly experienced and passionate maths teaching experts to train, guide, help and support all those who want to make change happen in their schools. We're guessing that might include YOU! If so, we offer you in-depth training programmes, a vast bank of clear, practical resources (many of them available free of charge), and the bespoke support you want and need to keep raising the bar. We'll not only make your job a whole lot simpler, we'll help you change the future for every child. | yes |
| school jotter | permission to use pupil photographs on the school website | |

System used: Accelerated Reader

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| 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 | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Class <p>Staff</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | To generate information on the reading abilities of pupils |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p> |
| Evidence for legal basis | ICO Legal Basis Tool |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | 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

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

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| Description | ACC1 form for reporting accidents to NCC |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Gender • Address • Telephone number • Date and time of accident • nature of injury • Place of accident • First aid • Circumstances • Action taken • Witness information • <p>Staff member</p> <ul style="list-style-type: none"> • Name • Occupation • DOB • Gender • Address • Telephone number • Date and time of injury • nature of injury • place of accident • First aid • Circumstances • Action taken • Witness information • |
| Why is it being processed? | Statutory obligations to comply with Health and Safety regulations. |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
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| Where is data stored? | Secure filing cabinet in office |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | SLT |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | NCC / parents |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | Carbon copy |

System used: Assessment Records

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

System used: Attendance file

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: BBC Bitesize

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|---------------------------------------|--|
| Description | BBC Bitesize is a free online study support resource designed to help with learning, revision and homework! Bitesize provides support for learners aged 5 to 16+ across a wide range of school subjects. It also supports children and young people's wellbeing and career choices. Bitesize also has hundreds of published lessons to help students across the UK with home schooling. Bitesize guides are written by teachers and subject experts and are mapped to follow the curricula of the UK. Secondary Bitesize follows exam board specifications for the main exam boards in the UK, including for GCSE in England, Wales and Northern Ireland and National 4, National 5 & Highers in Scotland, ensuring students are preparing for the right exams |
| Personal Data Items | <p>teacher</p> <ul style="list-style-type: none"> • Name • email address <p>child</p> <ul style="list-style-type: none"> • Name • Age • Year group |
| Why is it being processed? | https://www.bbc.co.uk/usingthebbc/privacy/ |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://www.bbc.co.uk/usingthebbc/privacy/ |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://www.bbc.co.uk/usingthebbc/privacy/ |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.bbc.co.uk/usingthebbc/privacy/ |
| Legal basis for sharing | Public Task |
| How is data shared? | https://www.bbc.co.uk/usingthebbc/privacy/ |

| System used: CCTV | |
|---------------------------------------|---|
| Description | CCTV |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Images <p>Child</p> <ul style="list-style-type: none"> • Images <p>Visitor</p> <ul style="list-style-type: none"> • Images |
| Why is it being processed? | Safeguarding |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | School servers and recordings |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Police in event of criminal investigations |
| Legal basis for sharing | ICO legal basis toolkit |
| How is data shared? | Hard Copy |

System used: Charanga

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|---------------------------------------|--|
| Description | Charanga Music School, the best-selling, modern resource for primary music — online, easy to use and great value. Includes A complete scheme to teach the national curriculum for music A vast library of songs, topics, instrument courses and creative apps In-depth support for assessment, SEND and personalised teaching and learning |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • School • email address • Mobile phone number • Pupils groups <p>Pupil</p> <ul style="list-style-type: none"> • Name • School • Assessment information |
| Why is it being processed? | To provide online access to teaching and learning materials. |
| Legal Basis | Public task Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller |
| Evidence for legal basis | Charanga privacy notice. |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Securely stored on servers in Ireland. |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Strictly controlled internally in Charanga, Teachers and pupils. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Shared with partner company Soundation AB |
| Legal basis for sharing | |
| How is data shared? | Electronically |
| References | Click to download Privacy Notice Click to download Soundation Privacy Policy |

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

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

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

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

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

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| Special Category Data Legal Basis | Obligation |
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| | 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 | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis tool |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Secure cabinet |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | 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: Class Dojo

| | |
|-----------------------------------|---|
| Description | Class Dojo is a classroom management and behaviour rewards system which includes a digital portfolio for pupils which can be accessed by staff, pupils and parents?/carers. |
| Personal Data Items | Staff <ul style="list-style-type: none">• Name• Phone number• email• Password• Device id• Gender• School• School address• Geo Location• Photos, Videos, Docs and audio• IP address Pupil <ul style="list-style-type: none">• Name• Password• Age• School• IP Address Parent/carer <ul style="list-style-type: none">• Name• Phone number• Email address• Password• Device id• Gender• School• Geo location• IP Address |
| Why is it being processed? | To provide access to the online curriculum and classroom management? tools |
| Legal Basis | Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Secure Class Dojo servers |
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| Is it secure and/or encrypted? | Yes, comprehensive approach to security provided by Class Dojo |
| Who can access data? | School account users. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Shared within school |
| Legal basis for sharing | Public task |
| How is data shared? | Online through secure login. |
| References | Click to download Class Dojo 1 Click to download Class Dojo 2 |

System used: Consent for educational visits

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

This system has been identified as containing Special Category Information

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

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

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

System used: CPOMS

Description

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

Personal Data Items

Pupil

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

Main contact

- Name
- Telephone Number

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.

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| 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 | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | SIMS |
| Where is data stored? | 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 | <p>pupil</p> <ul style="list-style-type: none"> • Name • date of birth • gender • class • year • FSM • SEN • Assessment info |

This system has been identified as containing Special Category Information

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

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

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

System used: Dietary requirements information sheets

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: EVOLVE visits

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

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

System used: Futures Cloud

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

System used: Google drive for education

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

System used: Governance

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

System used: Health & Safety

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

| System used: Invenry | |
|---------------------------------------|---|
| Description | A system for visitors, staff & pupils. It takes details & a photo & can make a badge of this. Subject signs in & signs out. This allows monitoring of who is present & unlike visitor book cannot be seen by others plus the photo badge identifies visitors etc for safeguarding |
| Personal Data Items | <p>Visitor</p> <ul style="list-style-type: none"> • Name • Company [if any] • Photograph • Vehicle Reg • Times in & out • Who visiting • email <p>Staff member</p> <ul style="list-style-type: none"> • Name • Times signed in & out <p>Student</p> <ul style="list-style-type: none"> • Name • Form group • Year group • Times signed in & out |
| Why is it being processed? | School security- school has real time view of who is visiting. System makes a badge with photo which is useful for identifying visitors - safeguarding |
| Legal Basis | Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller" |
| Evidence for legal basis | Public task |
| Is Consent Required? | No |
| Data Source | Other |
| Where is data stored? | Secure cloud storage and school IT system |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff - Invenry when requested eg emergency |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Only shared with systems when customer requests this |
| Legal basis for sharing | Public task |
| How is data shared? | Secure encrypted |

System used: Lexia

Description

Students work independently to develop critical reading and language skills through individualized, motivating learning paths. All students, regardless of their skill level, can each work at their own pace and the teacher is notified (on web-based reports and via email) only when they require support.

Personal Data Items

Staff

- Name
- Job title
- School
- Address
- Telephone number
- e-mail address
- IP address
- Browser information
-

School

- Name
- Payment details
- Usage data

Pupil

- Name
- Age
- Class
- Group

Why is it being processed?

To provide access for staff and pupils to a comprehensive range of teaching resources

Legal Basis

Public task

Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

Evidence for legal basis

ICO Legal Basis Toolkit

Is Consent Required?

No

Data Source

School

Where is data stored?

Lexia secure servers

Is it secure and/or encrypted?

Lexia has appropriate measures in place to help ensure that our users’ Data is protected against unauthorized access or use, alteration, unlawful or accidental destruction and accidental loss. Although we make reasonable efforts to protect your Personal Information from loss, misuse, or alteration by third parties, you should be aware that there is always some risk involved in transmitting information over the Internet. There is also some risk that thieves could find a way to thwart our security

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

System used: Lightspeed Internet Filtering

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

System used: Local Authority moderation of work

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

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

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

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Mathletics _ online numeracy activities

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

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

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

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| Special Category Data Legal Basis | Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement. |
| Special Category Evidence for legal basis | Article 9 |
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|--|---|
| 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 | <p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Health Needs • Social Care Status • Educational Needs • Medical History • Medication Details <p>Parents/Carers</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>External Support Workers</p> <ul style="list-style-type: none"> • Name • Organisation • Position • address • Contact details |

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- 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

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| Special Category Data Legal Basis | Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement. |
| Special Category Evidence for legal basis | ICO regs Article 9 |
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|--|---|
| 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, health care plans, risk assessments |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Inhaler / medication information (doseage) • DOB • Class • Medical condition • Signs and symptoms • Treatment • Parental consent • Name of medication and dose • Side effects • Storage requirements • Special equipment • Testing needed • Access to food drink • Dietary requirement • Staff support • Contingency arrangements • Family / emergency contacts • Hazard • Risk • Control measures / risk evaluation |

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

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

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

System used: Micro Librarian

| | |
|----------------------------|--|
| Description | Micro Librarian Systems (MLS) , supplier of Library Management Systems to Education in the UK and the worlds first to use biometric identification data |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • School • email • Biometric data (if used) <p>Pupil</p> <ul style="list-style-type: none"> • Name • Age • Year • Biometric data (if used) <p>Parent</p> <ul style="list-style-type: none"> • Name • email |

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

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| Special Category Data Legal Basis | Explicit Consent Explicit consent to the Data Subject, unless dependence on consent is prohibited by EU or member state law. |
| Special Category Evidence for legal basis | Consent required from Parent/Carer, or pupil (dependent on age) if biometric data element is used. |
| How is the Special Category data shared? | Not shared |
| Legal basis for sharing Special Category data | N/A |
| Why is it being processed? | To provide online access to a range of library and literacy tools. |
| Legal Basis | Public task |

| | |
|---------------------------------------|--|
| | Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller |
| Evidence for legal basis | ICO legal basis tool |
| Is Consent Required? | Yes for biometric data if this element of the service is used. |
| Data Source | School |
| Where is data stored? | Micro library secure servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff, ML 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 |
| References | Click to download Micro Librarian |

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 <ul style="list-style-type: none">• Name• Classes Pupil <ul style="list-style-type: none">• Name Governor <ul style="list-style-type: none">• 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: My Maths

| | |
|---------------------------------------|--|
| Description | MyMaths is an interactive online teaching and homework subscription website for schools that builds pupil engagement and consolidates maths knowledge. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • School • Email <p>Pupil</p> <ul style="list-style-type: none"> • Name • Age • Gender • Year • Class • Performance data |
| Why is it being processed? | To provide pupils and staff with access to a wider range of mathematics online teaching and learning materials. |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | MyMaths secure servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | School staff and pupils with login. Mymaths staff for technical support. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Shared within school. |
| Legal basis for sharing | Public task |
| How is data shared? | Electronically via secure servers. |
| References | Click to download MyMaths |

System used: National Centre for Excellence in the Teaching of Mathematics (NCETM)

| | |
|---------------------------------------|--|
| Description | NCETM provides professional development for staff in the teaching of Mathematics Children's chances of succeeding in education and life will be maximised if they develop deep and lasting procedural and conceptual mathematical understanding. The NCETM's teaching for mastery section explains the rationale for this teaching approach, and presents case studies from schools, together with interviews with teachers involved in mastery projects through the Maths Hubs programme. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • email address • School |
| Why is it being processed? | To provide access to the wide range of resources available online. |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p> |
| Evidence for legal basis | ICO legal basis toolkit. |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Tribal secure servers |
| Is it secure and/or encrypted? | Yes. |
| Who can access data? | Staff, Tribal staff for support. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Tribal and school staff. |
| Legal basis for sharing | Public task |
| How is data shared? | With user details removed. |
| References | Click to download National Centre for Excellence in the Teaching of Mathematics |

System used: Nursery (Early Years) files

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

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

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

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

System used: Oak Academy

| | |
|---------------------------------------|---|
| Description | Oak National Academy provides free video lessons, slides and worksheets to support teachers and pupils to keep learning. Created by teachers in response to coronavirus, the resources are freely available, to complement schools' own teaching. Lessons cover a broad range of subjects, from reception to year 11. There are no sign-ups or logins required. |
| Personal Data Items | Teacher <ul style="list-style-type: none">• Name Pupil <ul style="list-style-type: none">• Name• Age |
| Why is it being processed? | https://privacy.thenational.academy/ |
| Legal Basis | Legal Obligation <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> Public task <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://privacy.thenational.academy/ |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://privacy.thenational.academy/ |
| How long is data kept? | 3+ years |
| Who is data shared with? | https://privacy.thenational.academy/ |
| Legal basis for sharing | Public Task/Legal Obligation |
| How is data shared? | https://privacy.thenational.academy/ |

System used: Parents Evening Booking System

| | |
|---------------------------------------|---|
| Description | Online booking system for parents evenings and other school events. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • Email • Classes <p>Pupil</p> <ul style="list-style-type: none"> • Name • Classes • Year <p>Parent</p> <ul style="list-style-type: none"> • Name • Email |
| Why is it being processed? | To provide parents/carers with an online system for booking parents evening and other school events. |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | PEBS servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Staff, parents |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Shared with individual? parents and appropriate staff. |
| Legal basis for sharing | Public task |
| How is data shared? | Secure online servers |
| References | Click to download PEBS |

System used: Personnel files

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

System used: Phonics play

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

System used: Photographs and videos of staff and pupils.

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

System used: Purple Mash

| | |
|---------------------------------------|---|
| Description | The all-in-one Edtech solution for your Primary School. Embed computing and digital skills across your whole curriculum with award-winning teaching and learning software for KS1 and KS2. |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Year Group • School • Age <p>Staff</p> <ul style="list-style-type: none"> • Name • School |
| Why is it being processed? | To provide online access to a range of Edtech software. |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Purple Mash secure online system |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Staff, Pupils both in school and home |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | School staff |
| Legal basis for sharing | Public task |
| How is data shared? | Via online purple mash servers |

System used: Recruitment information

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

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

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

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

System used: Registers

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

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

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

| | |
|--|---|
| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment,</p> |
|--|---|

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

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

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

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

| System used: School Jotter | |
|---------------------------------------|---|
| Description | School Jotter provide website design and hosting services to schools. They host and store pupil and staff images that are displayed on the public facing website. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Photographs • Video <p>Pupil</p> <ul style="list-style-type: none"> • Photographs • Video |
| Why is it being processed? | To provide images for the school website to celebrate the life and work of the school. |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | parent consent form on Home School Agreement |
| Is Consent Required? | yes |
| Data Source | Parent |
| Where is data stored? | school website |
| Is it secure and/or encrypted? | yes |
| Who can access data? | Publically available on the website |
| How long is data kept? | 3+ years |
| Who is data shared with? | The public |
| Legal basis for sharing | Public task |
| How is data shared? | On the school website https://beaconhill.home.schooljotter2 . |
| References | Click to download School Jotter |

System used: School meals identification

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: School360

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

This system has been identified as containing Special Category Information

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

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

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

System used: Schoolcomms

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

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

System used: SEND electronic records

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

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

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

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

System used: Send Paper Records

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

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- 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

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

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

System used: SIMS

Description

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

Personal Data Items

Pupil

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

Parent/Carer

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

Staff

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

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

This system has been identified as containing Special Category Information

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

System used: Spelling Shed

| | |
|---------------------------------------|---|
| Description | The Spelling Shed - proudly powered by EdShed - is a spelling platform designed by a team of teachers. It is built with students, teachers and parents in mind and aims to make spelling fun for students as well as simple for adults to manage. |
| Personal Data Items | <p>Child</p> <ul style="list-style-type: none"> • Name • Age • <p>Parent</p> <ul style="list-style-type: none"> • Name • Contact Details |
| Why is it being processed? | https://www.edshed.com/en-gb/privacy |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal toolkit |
| Is Consent Required? | Yes as part of registration process |
| Data Source | School |
| Where is data stored? | https://www.edshed.com/en-gb/privacy |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | School, teachers and parents |
| How long is data kept? | 3+ years |
| Who is data shared with? | https://www.edshed.com/en-gb/privacy |
| Legal basis for sharing | Public Task |
| How is data shared? | https://www.edshed.com/en-gb/privacy |

System used: SumDog

| | |
|---------------------------------------|--|
| Description | Personalised maths & spelling practice that pupils love Engage your pupils with adaptive learning games aligned to the National Curriculum, for children aged 5 to 14. Proven to accelerate progress. |
| Personal Data Items | Teachers <ul style="list-style-type: none">• Name Child <ul style="list-style-type: none">• Name |
| Why is it being processed? | https://www.sumdog.com/en/about/privacy/ |
| Legal Basis | Legal Obligation <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> Public task <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal Basis tool |
| Is Consent Required? | NO |
| Data Source | School 360 |
| Where is data stored? | https://www.sumdog.com/en/about/privacy/ |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://www.sumdog.com/en/about/privacy/ |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.sumdog.com/en/about/privacy/ |
| Legal basis for sharing | Legal Obligation/Public task |
| How is data shared? | https://www.sumdog.com/en/about/privacy/ |

System used: Tapestry

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

References

[Click to download Tapestry Privacy Policy](#)

System used: Target Tracker

| | |
|----------------------------|---|
| Description | Pupil assessment and tracking software?. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • Email address <p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of birth • Age • Classes • Ethnicity • SEN data • Pupil premium eligibility • Performance data • Attendance data |

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

| | |
|--|---|
| Special Category Data Legal Basis | Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement. |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Shared internally with staff. |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To help track progress and set targets for pupils. |
| Legal Basis | Legal Obligation Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.” |

| | |
|---------------------------------------|---|
| | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Target Tracker servers |
| 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? | School Staff |
| Legal basis for sharing | Public task & legal obligation |
| How is data shared? | Target tracker servers |
| References | Click to download Target Tracker Privacy Notice |

| | |
|---------------------------------------|---|
| Description | Parent/Staff/Other Text Messaging System |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • Telephone number <p>Pupil</p> <ul style="list-style-type: none"> • Name • Registration group • Year group <p>Parent/Carer</p> <ul style="list-style-type: none"> • Name • Primary telephone number • Secondary telephone number <p>Taxi driver</p> <ul style="list-style-type: none"> • Taxi drivers name • Taxi drivers telephone number <p>Taxi escort</p> <ul style="list-style-type: none"> • taxi escort name • Taxi escort telephone number |
| Why is it being processed? | To provide access to Communication tool for contact between school and parent/carers/staff/other |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | Parent |
| Where is data stored? | T2P secure servers |
| Is it secure and/or encrypted? | This site has security measures in place to protect the loss, misuse, and alteration of the information under our control. All instances of unauthorised attempted access to our site are logged and investigated. |

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

System used: Times Tables Rock Stars

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

System used: Top Marks Spelling Games

| | |
|---------------------------------------|--|
| Description | Welcome to Topmarks Topmarks is a leading independent educational website for children, teaching professionals and parents. Topmarks gives children the opportunity to learn online, through safe, fun and engaging games and activities. We feature great, educationally sound online resources. Topmarks is a safe environment for children because we only include trustworthy, reliable educational content. A good place to start is our fun learning games area. |
| Personal Data Items | <p>Teacher</p> <ul style="list-style-type: none"> • Name <p>Child</p> <ul style="list-style-type: none"> • Name • Age <p>Parents</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | https://www.topmarks.co.uk/PrivacyPolicy |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO - Legal Basis Tool Kit |
| Is Consent Required? | Yes |
| Data Source | School |
| Where is data stored? | https://www.topmarks.co.uk/PrivacyPolicy |
| Is it secure and/or encrypted? | Secure |
| Who can access data? | https://www.topmarks.co.uk/PrivacyPolicy |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | https://www.topmarks.co.uk/PrivacyPolicy |
| Legal basis for sharing | Public Task |
| How is data shared? | https://www.topmarks.co.uk/PrivacyPolicy |

System used: Visitor book

| | |
|---------------------------------------|--|
| Description | Log of all visitors into school / fire regulations |
| Personal Data Items | <p>Visitor</p> <ul style="list-style-type: none"> • Name • Date and time • Car registration • Purpose of visit • Company • |
| Why is it being processed? | Safeguarding, health and safety, fire regulations |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | 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 | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO Legal Basis Tool |
| Is Consent Required? | 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: school jotter | |
|---------------------------------------|---|
| Description | permission to use pupil photographs on the school website |
| Personal Data Items | <p>photographs</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | |
| Legal Basis | <p>Consent</p> <p>Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”</p> |
| Evidence for legal basis | parent consent form on Home School Agreement |
| Is Consent Required? | yes |
| Data Source | Parent |
| Where is data stored? | school website |
| Is it secure and/or encrypted? | yes |
| Who can access data? | Publically available on the website |
| How long is data kept? | 6+ years |
| Who is data shared with? | The public |
| Legal basis for sharing | consent |
| How is data shared? | https://beaconhill.home.schooljotter2 . |