



Newbrough C of E Primary School

GDPR Asset Register

Date: 24/05/2026

Data Protection Officer: Vicki Evans

Introduction

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

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

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

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

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

Systems included in this report

System Name	Description	Special Category
Accident book	Log of accidents / minor injuries in school	
Accident Report Form	ACC1 form for reporting accidents to NCC	
Assessment Records	Electronic and paper mark books	
Attendance file	Attendance information about pupils and classes	yes
Behaviour Files - Paper (in class)	Information relating to the behaviours of particular pupils	yes
Bikeability	The Bikeability Trust run on behalf of Department of Transport. Courses and resources for schools in England	
Black and Banton	Black and Banton is one of the North East of England's leading providers of occupational and physical health services. Established in 2001 we have experienced strong growth each year based on our successful focus on our client's needs, many of whom we've partnered for more than ten years. They include leading names across a wide range of sectors including oil & gas, manufacturing, chemical, pharmaceutical, transport, housing , construction and demolition industry. We also private clients with health services, including sports injury treatment, shoulder, back and joint pain programmes, vaccinations, massage and pilates. Our approach is simple. We provide the highest level of bespoke occupational and physical health services, cost effectively and efficiently both empathetically and at times and locations to suit our clients	yes
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
Classroom Secrets	Classroom Secrets was founded by Claire and Ed Riley in 2013 after Claire took a supply role in a primary school. Being a trained secondary school teacher of performing arts, Claire was used to	

	<p>differentiating by outcome rather than by activity. When planning for her Year 4 class, she came across a problem – the activities and resources available did not allow all children in the same class to access them. Claire was used to providing the same activity for all children, with a choice of levels that would suit each child. And with that, the idea for Classroom Secrets was born... Based in Claire and Ed's hometown of Halifax, we have seen rapid growth since the spring of 2018. We now have over 50 employees working hard on a daily basis to bring you resources that help children learn and teachers reduce their workloads.</p>	
Consent for educational visits	Consent information for all educational visits including day trips and residential visits	yes
Covid-19 Lateral Flow Testing	<p>About 1 in 3 people with coronavirus do not have symptoms but can still pass it on to others. Regular testing of people without symptoms is important to help stop the virus spreading and protect your loved ones. As lockdown restrictions gradually ease we all need to play our part to help protect each other. The following people in England will have access to regular rapid lateral flow testing made available to them as schools reopen: secondary school pupils primary and secondary school staff households, childcare and support bubbles of primary and secondary-age pupils households, childcare and support bubbles of primary and secondary staff</p>	yes
CPOMS	<p>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.</p>	yes
Data tracking spreadsheets	Spreadhseets (excel) to track progress of children over the course of their school career.	yes
DFE-Census and workforce Census	<p>The school workforce census is a statutory data collection that takes place each autumn. You must complete statutory censuses by law unless there's a good reason not to. The census collects data on all teaching and support staff in regular employment, including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools</p>	

	university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data.	
Dietary requirements information sheets	Required documents for specific children with severe allergies / intolerances and religious observations (food)	yes
Eschools Website Provider	On-line school website building tool	
EVOLVE visits	An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities.	
Examination Boards administration	Pearson/OCR/AQA/ASDAN/Edexcel and any other examination board	
Futures Cloud	Internet / Network monitoring and reporting tool	
Google Classroom	A free and easy tool helping educators efficiently manage and assess progress, while enhancing connections with learners from school, from home, or on the go.	
Google drive for education	suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.	
Governance	Details of all members of the Governing Body	
Health & Safety	Records pertaining to Health & Safety	
Hugg	Purchase and send supermarket vouchers to those in need. Manage funds and give recipients choice all in one simple to use platform.	
Interactive Resources	Pupil / teacher online learning resources for Numeracy.	
Language Angels	Language Angels award-winning language teaching resources are designed so every primary school teacher - irrespective of their linguistic ability - can teach the foreign language of their choice. Our experienced team of foreign language teaching specialists have spent thousands of hours over a number of years creating, testing and refining our lessons and resources to bring them to where they are now. We won't rest on our laurels though. We continue to work, adding innovative and exciting new units and resources all the time. By providing a multitude of teaching units (each designed to run for 6 weeks) there are more than enough resources to enable you to teach the language of your choice throughout the whole of your primary school.	

Lightspeed Internet Filtering	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.	
Little Wandle	Phonics programme. Little Wandle Letters and Sounds Revised has been developed by Wandle and Little Sutton English Hubs and taken forward by Little Sutton Primary School and Wandle Learning Trust in partnership with other phonics and early reading experts.	
Local Authority moderation of work	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.	
Looked After Children Records - Electronic	Information relating to children who are in Looked After Care	yes
Looked After Children Records - Paper	Information relating to children who are Looked After	yes
Medical Files - Electronic	Information in respect of specific medical needs of an individual student	yes
Medical Files - Paper	Information in respect of specific medical needs of an individual student	yes
Medical log	File of medical information for each child: asthma, medication administered, health care plans, risk assessments	yes
MS Office Suite	Suite of online tools for staff and pupils, including OneDrive, Word, Powerpoint, Excel, Outlook, Video and Teams.	
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.	
National Tutoring Programme (NTP)	The National Tutoring Programme offers highly tailored tuition support for pupils, to help those whose education has been most impacted by the pandemic.	yes
Nereo (Matrix)	North East Regional Employers' Organisation is one of eleven regional bodies that support local authorities across England, Wales and Northern Ireland. NEREO's function is to support local authorities and partner organisations in the fields of Human Resources, Organisational Development and	

	Employee Relations in all their complex and varied forms. NEREO is a small organisation with a big reputation. Our staff have over a hundred years experience of working in the public sector. Some have voluntary and private sector experience too. The Governance of NEREO is carried out by an Executive Committee made up of Elected Member representatives from each of the local authorities.	
NFER	Assessment materials, reading test and pupil progress data	
Numbots- Maths Circle LTD	NumBots is a website and app that helps build an understanding in and recall of addition and subtraction facts.	
Nursery (Early Years) files	Early years registration information and funding information for Early Years entitlement, hours taken each week	yes
Padlet	A digital canvas where users can add photos, videos, audio, text, drawings, graphs, charts, and more.	
Padlet	Padlet is a free online tool that is best described as an online notice board. Padlet can be used by students and teachers to post notes on a common page. The notes posted by teachers and students can contain links, videos, images and document files	
Parent mail	Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events	
ParentPay	ParentPay is an online payment service for schools and families.	yes
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.	
PIVATS	An online assessment and target setting tool	yes
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

Scholarpack	Cloud based system allowing school to enter & track pupil data	
School meals identification	Identification of pupils for meals	yes
School360	Learning platform for Northumberland schools with links to 3rd party educational resource providers.	yes
Scratch	With Scratch, you can program your own interactive stories, games, and animations — and share your creations with others in the online community. Scratch helps young people learn to think creatively, reason systematically, and work collaboratively — essential skills for life in the 21st century. Scratch is a project of the Lifelong Kindergarten Group at the MIT Media Lab. It is provided free of charge.	
SEND electronic records	Records relating to Special Educational Needs and Disability for individual pupils	yes
Send Paper Records	Records relating to individual pupil's SEND history	yes
Social media sites e.g. Twitter, Facebook	Social Media tool used to inform parents about events in school and celebrate children's achievement.	
STEM	Developing teachers and leaders Explore programmes and resources that support professional development and drive the impact of teaching across schools and colleges. o support parents and carers, our subject experts have put together a selection of activities and materials, which are free for everyone to access.	
Times Tables Rock Stars	Online times tables practice and testing.	
Virtual College	Online training that saves you time and money Looking for high quality compliance and professional development training? Our vast library of accredited and certified online courses can help. Covering everything from food safety, safeguarding, health and safety through to personal development and leadership & management, our online courses are simple, cost-effective and accessible for all.	
Visitor book	Log of all visitors into school / fire regulations	
White Rose Maths and Science	Influenced, inspired and informed by the work of leading maths researchers and practitioners across the world, White Rose Maths brings together a team of highly experienced and passionate maths teaching experts to train, guide, help and support all those who want to make change happen in their schools. We're guessing that might include YOU! If so, we offer you in-depth training programmes, a vast bank of clear, practical resources (many of them available free of charge), and the bespoke support you want and need to keep raising the bar. We'll not only make your job a whole lot simpler, we'll help you change the future for every child.	yes

Wonde	Manages transfer of data from Sims MIS to School360.	yes
Y4 Multiplication Check	What is the Multiplication Tables Check. The Multiplication Tables Check (MTC) is a key stage 2 assessment to be taken by pupils at the end of year 4 (in June). From the 2019 / 2020 academic year onwards. The purpose of the MTC is to make sure the times tables knowledge is at the expected level.	
Zoom	Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Our easy, reliable cloud platform for video, voice, content sharing, and chat runs across mobile devices, desktops, telephones, and room systems.	

System used: Accident book

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

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

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

System used: Assessment Records

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

System used: Attendance file

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

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

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

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

Description	Information relating to the behaviours of particular pupils
Personal Data Items	<p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Health Needs • Educational Behavioural Needs • Social Care Status • <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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- 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> <p>Processing is required for reasons of significant public interest on the basis of Union or Member State Law that is equivalent to the aim pursued</p>
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	and which contains suitable safeguards.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbally & by Secure Messenger
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To ensure access to education appropriate to needs
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure cabinet
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Class Teacher and key workers as appropriate
How long is data kept?	3 years after date closed
Who is data shared with?	External support workers as applies
Legal basis for sharing	Public Task & Legal Obligation
How is data shared?	Verbal or secure messenger

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

System used: Black and Banton

Description	Black and Banton is one of the North East of England’s leading providers of occupational and physical health services. Established in 2001 we have experienced strong growth each year based on our successful focus on our client’s needs, many of whom we’ve partnered for more than ten years. They include leading names across a wide range of sectors including oil & gas, manufacturing, chemical, pharmaceutical, transport, housing , construction and demolition industry. We also private clients with health services, including sports injury treatment, shoulder, back and joint pain programmes, vaccinations, massage and pilates. Our approach is simple. We provide the highest level of bespoke occupational and physical health services, cost effectively and efficiently both empathetically and at times and locations to suit our clients
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Personal Data Items	<p>All Staff</p> <ul style="list-style-type: none"> • Name • all employment details
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- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

Special Category Data Legal Basis	Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	ICO legal basis tool kit
How is the Special Category data shared?	Securely with staff
Legal basis for sharing Special Category data	Consent
Why is it being processed?	Staff wellbeing and to allow investiagtion of any health problems for school HR processes
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 kit
Is Consent Required?	yes
Data Source	School
Where is data stored?	Both
Is it secure and/or encrypted?	secure & encrypted on Black & Banton Server/Staff PC
Who can access data?	Staff member and Senior Leadership team
How long is data kept?	3 years after date closed
Who is data shared with?	Staff and those who staff may nominate e.g. professional association. HR provider
Legal basis for sharing	public task/legal obligation
How is data shared?	https://www.blackandbantton.co.uk/

System used: Charanga

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

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

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

Special Category Data Legal Basis	Obligation
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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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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: Classroom Secrets

Description	Classroom Secrets was founded by Claire and Ed Riley in 2013 after Claire took a supply role in a primary school. Being a trained secondary school teacher of performing arts, Claire was used to differentiating by outcome rather than by activity. When planning for her Year 4 class, she came across a problem – the activities and resources available did not allow all children in the same class to access them. Claire was used to providing the same activity for all children, with a choice of levels that would suit each child. And with that, the idea for Classroom Secrets was born... Based in Claire and Ed’s hometown of Halifax, we have seen rapid growth since the spring of 2018. We now have over 50 employees working hard on a daily basis to bring you resources that help children learn and teachers reduce their workloads.
Personal Data Items	<p>Teacher</p> <ul style="list-style-type: none"> • Name • • <p>child</p> <ul style="list-style-type: none"> • Name
Why is it being processed?	https://classroomsecrets.co.uk/privacy-policy/
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 toolkit
Is Consent Required?	yes
Data Source	School 360
Where is data stored?	https://classroomsecrets.co.uk/privacy-policy/
Is it secure and/or encrypted?	secure
Who can access data?	https://classroomsecrets.co.uk/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://classroomsecrets.co.uk/privacy-policy/
Legal basis for sharing	Public Task
How is data shared?	https://classroomsecrets.co.uk/privacy-policy/

System used: Consent for educational visits

Description	Consent information for all educational visits including day trips and residential visits
Personal Data Items	<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

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: Covid-19 Lateral Flow Testing

Description

About 1 in 3 people with coronavirus do not have symptoms but can still pass it on to others. Regular testing of people without symptoms is important to help stop the virus spreading and protect your loved ones. As lockdown restrictions gradually ease we all need to play our part to help protect each other. The following people in England will have access to regular rapid lateral flow testing made available to them as schools reopen: secondary school pupils primary and secondary school staff households, childcare and support bubbles of primary and secondary-age pupils households, childcare and support bubbles of primary and secondary staff

- Personal Data Items**
- Child**
- Name
 - Date of Birth
 - Postcode
 - Test Result
- Parent**
- Name
 - Email address
 - Telephone number

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

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

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

System used: CPOMS

Description

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

Personal Data Items

Pupil

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

Main contact

- Name
- Telephone Number

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

Special Category Data Legal Basis

Obligation

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

Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbally, secure messenger, online secure servers.
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To comply with statutory obligations regarding safeguarding and child protection. To provide a secure repository for personal data and ensure that records are effectively maintained.
Legal Basis	<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

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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?	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: DFE-Census and workforce Census

Description	The school workforce census is a statutory data collection that takes place each autumn. You must complete statutory censuses by law unless there's a good reason not to. The census collects data on all teaching and support staff in regular employment, including those working for: local authorities on central contracts local-authority-maintained schools academies free schools, including: studio schools university technical colleges pupil referral units (local authority establishments that provide education for children who cannot attend a mainstream school) Local authorities are responsible for: coordinating and approving the submission of census data from all their maintained schools submitting data for centrally employed school staff Academies are responsible for submitting and approving their own census data.
Personal Data Items	Staff <ul style="list-style-type: none"> • Name
Why is it being processed?	https://www.gov.uk/help/privacy-notice
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> <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.gov.uk/help/privacy-notice
Is it secure and/or encrypted?	secure
Who can access data?	https://www.gov.uk/help/privacy-notice
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.gov.uk/help/privacy-notice
Legal basis for sharing	public task/legal obligation
How is data shared?	https://www.gov.uk/help/privacy-notice

System used: Dietary requirements information sheets

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Eschools Website Provider

Description	On-line school website building tool
Personal Data Items	<p>School Information</p> <ul style="list-style-type: none"> • Name • Address • Contact information • Class names • Staff names • Governor names • Year group information (planning, homework) • Newsletters <p>Pupil</p> <ul style="list-style-type: none"> • Photographs • •
Why is it being processed?	To inform parents and the wider community about the life of the school
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	Consent not required to put on school information. Consent required to use pupil photographs
Data Source	School
Where is data stored?	On eschool secure server through school 360 platform 4. Transfer of School Data 4.1. The School hereby consents to eSchools accessing School Data held on the Management Information System through Wonde, for the purpose of extracting and transferring such School Data to eSchools. 4.2. Prior to leaving the School premises by electronic means (via HTTPS) the School Data will be encrypted by Wonde and eSchools.
Is it secure and/or encrypted?	Yes 4.2. Prior to leaving the School premises by electronic means (via HTTPS) the School Data will be encrypted by Wonde and eSchools. 5.1. The School Data shall always remain the property of the School. 5.2. eSchools shall have no responsibility to maintain the security of any School Data held or controlled by the School. 5.3. eSchools shall keep all Confidential Information and School Data confidential and shall not:- 5.3.1.1. use any Confidential Information or School Data except for the purpose of performing the services it provides to the School; or 5.3.1.2.

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

System used: EVOLVE visits

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

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

System used: Examination Boards administration

Description	Pearson/OCR/AQA/ASDAN/Edexcel and any other examination board
Personal Data Items	<p>Child</p> <ul style="list-style-type: none"> • Name • Date of birth • Gender • Unique Candidate identifier • Unique Learner Number • Legal Name • Coursework marks • Forecast grades
Why is it being processed?	Exam entry and issuing of qualifications
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 tool
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	Secure gateway
Is it secure and/or encrypted?	Yes- password protected on secure gateway and sent via EDI
Who can access data?	Examination Board, teachers, exams officer
How long is data kept?	3 years after date closed
Who is data shared with?	Examination Board
Legal basis for sharing	Public Task & legal obligation
How is data shared?	Via secure gateway- Privacy Notices for each exam board can be found on the website for each board.

System used: Futures Cloud

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

System used: Google Classroom

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

System used: Google drive for education

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

System used: Governance

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

System used: Health & Safety

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

System used: Huggg

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

System used: Interactive Resources

Description	Pupil / teacher online learning resources for Numeracy.
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • Class / Year group • School <p>Pupil</p> <ul style="list-style-type: none"> • Name • Class / Year group • School
Why is it being processed?	Necessary to provide access to learning resources through School360
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?	Interactive Resources secure servers
Is it secure and/or encrypted?	Yes
Who can access data?	Individual users can access their own accounts. Interactive Resources staff to enable 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 Interactive Resources Privacy Notices

System used: Language Angels

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

System used: Lightspeed Internet Filtering

Description	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.
Personal Data Items	<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: Little Wandle

Description	Phonics programme. Little Wandle Letters and Sounds Revised has been developed by Wandle and Little Sutton English Hubs and taken forward by Little Sutton Primary School and Wandle Learning Trust in partnership with other phonics and early reading experts.
Personal Data Items	<p>Teacher</p> <ul style="list-style-type: none"> • Name, email address, telephone number <p>Pupil</p> <ul style="list-style-type: none"> • Name, unique pupil numbers, assessment data <p>Parent</p> <ul style="list-style-type: none"> • Name, email address, telephone number
Why is it being processed?	https://www.littlewandlelettersandsounds.org.uk/privacy-policy/
Evidence for legal basis	ICO Toolkit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.littlewandlelettersandsounds.org.uk/privacy-policy/
Is it secure and/or encrypted?	Secure
Who can access data?	https://www.littlewandlelettersandsounds.org.uk/privacy-policy/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.littlewandlelettersandsounds.org.uk/privacy-policy/
Legal basis for sharing	Public task and legal obligation
How is data shared?	https://www.littlewandlelettersandsounds.org.uk/privacy-policy/

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

How is the Special Category data shared?	Verbally or secure cloud sharing (Google or Office 365 etc)
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To support the education of children who are Looked After
Legal Basis	<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

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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> <p>Significant Public Interest</p>
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	Processing is required for reasons of significant public interest on the basis of Union or Member State Law that is equivalent to the aim pursued and which contains suitable safeguards.
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

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

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

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

System used: Medical Files - Paper

Description	Information in respect of specific medical needs of an individual student
Personal Data Items	<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

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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	ICO regs Article 9

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

System used: Medical log

Description	File of medical information for each child: asthma, medication administered, 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

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

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

System used: 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: 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: National Tutoring Programme (NTP)

Description	The National Tutoring Programme offers highly tailored tuition support for pupils, to help those whose education has been most impacted by the pandemic.
Personal Data Items	<p>Child</p> <ul style="list-style-type: none"> • Name • SEN Status • PP Funding Status • Attainment Level • Special Learning Needs • Safeguarding Info/Risk Assessments

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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?	https://nationaltutoring.org.uk/legal/privacy-notice/
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To perform the services of the National Tutoring Programme
Legal Basis	<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 lawful basis toolkit
Is Consent Required?	No

Data Source	School
Where is data stored?	https://nationaltutoring.org.uk/legal/privacy-notice/
Is it secure and/or encrypted?	Secure
Who can access data?	https://nationaltutoring.org.uk/legal/privacy-notice/
How long is data kept?	6+ years
Who is data shared with?	https://nationaltutoring.org.uk/legal/privacy-notice/
Legal basis for sharing	Legitimate Interest
How is data shared?	https://nationaltutoring.org.uk/legal/privacy-notice/

System used: Nereo (Matrix)

Description	North East Regional Employers' Organisation is one of eleven regional bodies that support local authorities across England, Wales and Northern Ireland. NEREO's function is to support local authorities and partner organisations in the fields of Human Resources, Organisational Development and Employee Relations in all their complex and varied forms. NEREO is a small organisation with a big reputation. Our staff have over a hundred years experience of working in the public sector. Some have voluntary and private sector experience too. The Governance of NEREO is carried out by an Executive Committee made up of Elected Member representatives from each of the local authorities.
Personal Data Items	<p>All Staff</p> <ul style="list-style-type: none"> • Name • Date of birth
Why is it being processed?	https://www.nereo.gov.uk/privacy-notice/
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	School
Where is data stored?	https://www.nereo.gov.uk/privacy-notice/
Is it secure and/or encrypted?	secure
Who can access data?	https://www.nereo.gov.uk/privacy-notice/
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.nereo.gov.uk/privacy-notice/
Legal basis for sharing	Public task/legal obligation
How is data shared?	https://www.nereo.gov.uk/privacy-notice/

System used: NFER

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

System used: Numbots- Maths Circle LTD

Description	NumBots is a website and app that helps build an understanding in and recall of addition and subtraction facts.
Personal Data Items	<p>Child</p> <ul style="list-style-type: none"> • Name • Year Group • Maths Class <p>School</p> <ul style="list-style-type: none"> • Name • Address <p>Teachers</p> <ul style="list-style-type: none"> • Name • Email Address
Why is it being processed?	https://trockstars.com/page/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 upon registration
Data Source	School
Where is data stored?	https://trockstars.com/page/privacy
Is it secure and/or encrypted?	Secure
Who can access data?	School, teachers and Maths Circle LTD
How long is data kept?	3+ years
Who is data shared with?	https://trockstars.com/page/privacy
Legal basis for sharing	Pubic task
How is data shared?	https://trockstars.com/page/privacy

System used: Nursery (Early Years) files

Description	Early years registration information and funding information for Early Years entitlement, hours taken each week
Personal Data Items	<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

This system has been identified as containing Special Category Information

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

Special Category Data Legal Basis	<p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	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: Padlet	
Description	A digital canvas where users can add photos, videos, audio, text, drawings, graphs, charts, and more.
Personal Data Items	<p>Child</p> <ul style="list-style-type: none"> • Name <p>Staff</p> <ul style="list-style-type: none"> • Name
Why is it being processed?	https://padlet.com/
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://privacy.commonsense.org/evaluation/padlet
Is it secure and/or encrypted?	Secure
Who can access data?	https://privacy.commonsense.org/evaluation/padlet
How long is data kept?	3 years after date closed
Who is data shared with?	https://privacy.commonsense.org/evaluation/padlet
Legal basis for sharing	Public Task
How is data shared?	https://privacy.commonsense.org/evaluation/padlet

System used: Padlet

Description	Padlet is a free online tool that is best described as an online notice board. Padlet can be used by students and teachers to post notes on a common page. The notes posted by teachers and students can contain links, videos, images and document files
Personal Data Items	Pupil <ul style="list-style-type: none">• Name• Teacher
Why is it being processed?	To facilitate learning
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	Use by school in learning tasks
Is Consent Required?	No
Data Source	School
Where is data stored?	In school secure & electronically on Padlet system
Is it secure and/or encrypted?	Yes
Who can access data?	Padlet & business providers
How long is data kept?	1+ year
Who is data shared with?	Business providers e.g.billing
Legal basis for sharing	Contract
How is data shared?	Secure electronic

System used: Parent mail

Description	Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events
Personal Data Items	School <ul style="list-style-type: none">• Name• School email address Staff <ul style="list-style-type: none">• Name• Class• Title• e-mail• Gender• Telephone number• DOB• School address Pupil <ul style="list-style-type: none">• Name• Year• Parent/carer name• Title• Class• Gender• DOB• Address• DOB Parent/carer <ul style="list-style-type: none">• Name• Telephone number• email address• Title• Gender• Address
Why is it being processed?	To provide access to a range of communication and payment tools
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	Parent

Where is data stored?	Parent mail secure servers
Is it secure and/or encrypted?	GDPR requires ParentMail to adhere to a number of key principles with regards to your data and you can be assured that we take these responsibilities extremely seriously. As part of our commitment to GDPR we make the following promises to our customers and partners; • We will only manage data where we have an explicit agreement with the data controller • We will only retain data for as long as we have a processing agreement with the controller or need to do so with the data subject • All data used in our systems is encrypted when at rest (stored) and whilst in transit (when accessed using a browser or the ParentMail app)
Who can access data?	Staff, Parent mail staff for technical support.
How long is data kept?	3 years after date closed
Who is data shared with?	School staff
Legal basis for sharing	Public task
How is data shared?	Via secure login
References	Click to download Parentmail Privacy Policy

System used: ParentPay

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

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 <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	Article 9

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

System used: 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: PIVATS

Description	An online assessment and target setting tool
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Year Group • UPN • Assessment information • LAC • FSM • Gender • Primary Need <p>Staff</p> <ul style="list-style-type: none"> • Name • e-mail

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

Special Category Data Legal Basis	Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Secure online database
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Attainment tracking
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?	Online secure database
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?	Local Authority, NHS Services (CYPS)
Legal basis for sharing	Public task and legal obligation
How is data shared?	Online secure database
References	Click to download PIVATS Lancashire County Council

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

Special Category Data Legal Basis

Obligation

Processing is required for carrying out obligations under employment,

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

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

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Special Category Data Legal Basis

Obligation

Processing is required for carrying out obligations under employment,

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

System used: Scholarpack

Description	Cloud based system allowing school to enter & track pupil data
Personal Data Items	<p>Office admin</p> <ul style="list-style-type: none"> • Name • Contact details • Scholarpack Website use tracking <p>Pupil</p> <ul style="list-style-type: none"> • Name • Education progress & attendance data <p>Parent</p> <ul style="list-style-type: none"> • Name • website login email
Why is it being processed?	
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 toolkit
Is Consent Required?	For Parent log in only
Data Source	School
Where is data stored?	Secure Servers
Is it secure and/or encrypted?	Yes to both
Who can access data?	School, Parent [data for their child only]
How long is data kept?	6 years after date closed
Who is data shared with?	DFE & public bodies for public task
Legal basis for sharing	Public task
How is data shared?	Secure transfer anonymised

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

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

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

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

System used: School360

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

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- Criminal Records information - protected in Article 10

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

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

System used: Scratch

Description	With Scratch, you can program your own interactive stories, games, and animations — and share your creations with others in the online community. Scratch helps young people learn to think creatively, reason systematically, and work collaboratively — essential skills for life in the 21st century. Scratch is a project of the Lifelong Kindergarten Group at the MIT Media Lab. It is provided free of charge.
Personal Data Items	<p>Teacher</p> <ul style="list-style-type: none"> • Name <p>Child</p> <ul style="list-style-type: none"> • Name • • Age <p>Parent</p> <ul style="list-style-type: none"> • Name
Why is it being processed?	https://scratch.mit.edu/privacy_policy
Legal Basis	<p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO - Legal basis tool
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://scratch.mit.edu/privacy_policy
Is it secure and/or encrypted?	Secure
Who can access data?	https://scratch.mit.edu/privacy_policy
How long is data kept?	3 years after date closed
Who is data shared with?	https://scratch.mit.edu/privacy_policy
Legal basis for sharing	Public Task
How is data shared?	https://scratch.mit.edu/privacy_policy

System used: SEND electronic records

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

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

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

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

System used: Send Paper Records

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

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

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

shared?	
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To support educational entitlement to meet statutory obligations
Legal Basis	<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: 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: STEM

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

System used: 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: Virtual College	
Description	Online training that saves you time and money Looking for high quality compliance and professional development training? Our vast library of accredited and certified online courses can help. Covering everything from food safety, safeguarding, health and safety through to personal development and leadership & management, our online courses are simple, cost-effective and accessible for all.
Personal Data Items	teacher <ul style="list-style-type: none"> • Name • email
Why is it being processed?	https://www.virtual-college.co.uk/privacy-policy
Legal Basis	Public task Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
Evidence for legal basis	ICO tool skit
Is Consent Required?	Yes
Data Source	School
Where is data stored?	https://www.virtual-college.co.uk/privacy-policy
Is it secure and/or encrypted?	secure
Who can access data?	https://www.virtual-college.co.uk/privacy-policy
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.virtual-college.co.uk/privacy-policy
Legal basis for sharing	Public Task
How is data shared?	https://www.virtual-college.co.uk/privacy-policy

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: Wonde

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Y4 Multiplication Check

Description	What is the Multiplication Tables Check. The Multiplication Tables Check (MTC) is a key stage 2 assessment to be taken by pupils at the end of year 4 (in June). From the 2019 / 2020 academic year onwards. The purpose of the MTC is to make sure the times tables knowledge is at the expected level.
Personal Data Items	<p>child</p> <ul style="list-style-type: none"> • Name
Why is it being processed?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
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 framework tool kit
Is Consent Required?	yes
Data Source	School
Where is data stored?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
Is it secure and/or encrypted?	secure
Who can access data?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
How long is data kept?	3 years after date closed
Who is data shared with?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance
Legal basis for sharing	Public task
How is data shared?	https://www.gov.uk/government/publications/multiplication-tables-check-administration-guidance

System used: Zoom

Description	Zoom helps businesses and organizations bring their teams together in a frictionless environment to get more done. Our easy, reliable cloud platform for video, voice, content sharing, and chat runs across mobile devices, desktops, telephones, and room systems.
Personal Data Items	Teacher <ul style="list-style-type: none">• Name Parent <ul style="list-style-type: none">• Name
Why is it being processed?	https://zoom.us/trust
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?	Yes
Data Source	School
Where is data stored?	https://zoom.us/trust
Is it secure and/or encrypted?	Secure
Who can access data?	https://zoom.us/trust
How long is data kept?	3 years after date closed
Who is data shared with?	https://zoom.us/trust
Legal basis for sharing	Public task
How is data shared?	https://zoom.us/trust