



Whalton C of E Primary School

GDPR Asset Register

Date: 15/02/2026

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Introduction

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

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

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

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

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

Systems included in this report

| System Name | Description | Special Category |
|---|--|------------------|
| 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 |
| BSquared Connecting Steps | Tool for assessing pupil progress | |
| 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 monitor | Classroom Monitor is the most widely used assessment tool in the UK, it specialises in assessment for learning, pupil tracking and formative assessment. | |
| Consent for educational visits | Consent information for all educational visits including day trips and residential visits | yes |
| Data tracking spreadsheets | Spreadsheets (excel) to track progress of children over the course of their school career. | yes |
| Dietary requirements information sheets | Required documents for specific children with severe allergies / intolerances and religious observations (food) | yes |
| 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 | |

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| 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 | |
| Just2easy | Suite of online tools for Desk Top Publishing, Blogging, Infant toolkit and Tables, spelling and arithmetic SATs testers. | |
| Lightspeed Internet Filtering | The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC. | |
| Local Authority moderation of work | The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County. | |
| Looked After Children Records - Electronic | Information relating to children who are in Looked After Care | yes |
| Looked After Children Records - Paper | Information relating to children who are Looked After | yes |
| Mathletics _ online numeracy activities | Mathletics is a captivating online learning space providing students with all the tools they need to be successful learners, both in the classroom and beyond. Powerful courses aligned to the various National Curricula of the UK & Ireland, from Foundation Stage to Key Stage 5, matched with dynamic tools and reporting for teachers. Mathletics supports and caters to each teacher's unique blend of student-driven learning and teacher-led instruction. | |
| Medical Files - Electronic | Information in respect of specific medical needs of an individual student | yes |
| Medical Files - Paper | Information in respect of specific medical needs of an individual student | yes |
| Medical log | File of medical information for each child: asthma, medication administered, health care plans, risk assessments | yes |
| 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 | |

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| | studies from schools, together with interviews with teachers involved in mastery projects through the Maths Hubs programme. | |
| NFER | Assessment materials, reading test and pupil progress data | |
| Nursery (Early Years) files | Early years registration information and funding informaiton for Early Years entitlement, hours taken each week | yes |
| Pebble | Online platform to help schools fundraise. | |
| 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. | |
| Reading Eggs | The multi-award winning early learning resource supports your child's learn to read journey with carefully designed online reading games and activities that are easy to follow, self-paced, and highly engaging for young children. | |
| Recruitment information | Part of the job application process | yes |
| Registers | Daily register, after school club registers, lunch register | |
| Safeguarding Records - Electronic | Records relating to safeguarding of children | yes |
| Safeguarding Records - Paper | Records relating to safeguarding of children | yes |
| School meals identification | Identification of pupils for meals | yes |
| School360 | Learning platform for Northumberland schools with links to 3rd party educational resource providers. | yes |
| Schoolcomms | Communication app for parents | |
| SEND electronic records | Records relating to Special Educational Needs and Disability for individual pupils | yes |
| Send Paper Records | Records relating to individual pupil's SEND history | yes |
| SIMS | SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools. | yes |
| Social media sites e.g. Twitter, Facebook | Social Media tool used to inform parents about events in school and celebrate children's achievement. | |
| Tapestry | An online journal recording all the learning and fun of children's early years education. | |

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| Testbase | This is an online resource provided by Doublestruck which enables children to prepare for National SAT examinations. Doublestruck is an Educational Technology company that is part of the AQA family. It specialises in technology that addresses the needs of teachers in formative assessment and reporting. | yes |
| Thrive | Social and Emotional Screening Programme | yes |
| Times Tables Rock Stars | Online times tables practice and testing. | |
| Visitor book | Log of all visitors into school / fire regulations | |
| Wonde | Manages transfer of data from Sims MIS to School360. | yes |

| System used: Accident book | |
|---------------------------------------|--|
| Description | Log of accidents / minor injuries in school |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • class • Injury • first aid • |
| Why is it being processed? | To record injuries in 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> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | File in office |
| Is it secure and/or encrypted? | No |
| Who can access data? | School staff |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Parents |
| Legal basis for sharing | Legal obligation |
| How is data shared? | Verbally |

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

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

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

| System used: Attendance file | |
|---|--|
| Description | Attendance information about pupils and classes |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Class • Gender • UPN • Address • Telephone number • Parental contact • Ethnic origin • Current attendance • Past attendance |
| This system has been identified as containing Special Category Information | |
| Special category information is data which has the following characteristics: | |
| <ul style="list-style-type: none"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10 | |
| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Verbally, Secure cloud, |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To regularly check pupil's attendance towards a desired goal |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing</p> |

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

System used: Behaviour Files - Paper (in class)

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|----------------------------|---|
| 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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Special category information is data which has the following characteristics:

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

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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> <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: BSquared Connecting Steps | |
|--|--|
| Description | Tool for assessing pupil progress |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Progress Level • |
| Why is it being processed? | To provide data for staff to assess progress/attainment. |
| 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 internal systems |
| 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? | Internal only |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | Secure access folders |

| 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 umber • Pupils groups <p>Pupil</p> <ul style="list-style-type: none"> • Name • School • Assessment information |
| Why is it being processed? | To provide online access to teaching and learning materials. |
| Legal Basis | Public task Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller |
| Evidence for legal basis | Charanga privacy notice. |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Securely stored on servers in Ireland. |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Strictly controlled internally in Charanga, Teachers and pupils. |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Shared with partner company Soundation AB |
| Legal basis for sharing | |
| How is data shared? | Electronically |
| References | Click to download Privacy Notice Click to download Soundation Privacy Policy |

System used: Child Protection Records - Electronic

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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) |

System used: Child Protection Records - Paper

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

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

Special Category Data Legal Basis

Obligation

| | |
|--|--|
| | Processing is required for carrying out obligations under employment, 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 monitor | |
|---------------------------------------|--|
| Description | Classroom Monitor is the most widely used assessment tool in the UK, it specialises in assessment for learning, pupil tracking and formative assessment. |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Age • Year • Class • Assessment data <p>Staff</p> <ul style="list-style-type: none"> • Name • Class |
| Why is it being processed? | To provide access to comprehensive? online assessment and pupil progress tracking tools. |
| 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? | Prime Principle secure servers |
| Is it secure and/or encrypted? | ensure that we have in place appropriate technical and organisational measures to protect against unauthorised or unlawful processing of that personal data and against accidental loss or destruction of, or damage to, that personal data, appropriate to the harm that might result from the unauthorised or unlawful processing or accidental loss, destruction or damage and the nature of the data to be protected, having regard to the state of technological development and the cost of implementing any measures (those measures may include, where appropriate, pseudonymising and encrypting personal data, ensuring confidentiality, integrity, availability and resilience of its systems and services, ensuring that availability of and access to personal data can be restored in a timely manner after an incident, and regularly assessing and evaluating the effectiveness of the technical and organisational measures adopted by us); |
| Who can access data? | Staff, Classroom monitor for support |

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|---------------------------------|--|
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | Not shared |
| Legal basis for sharing | Public task and legal obligation |
| How is data shared? | N/A |
| References | Click to download Classroom Monitor Access Terms Click to download Classroom Monitor Terms of Website Use |

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

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

| System used: Data tracking spreadsheets | |
|---|---|
| Description | Spreadsheets (excel) to track progress of children over the course of their school career. |
| Personal Data Items | <p>pupil</p> <ul style="list-style-type: none"> • Name • date of birth • gender • class • year • FSM • SEN • Assessment info |
| This system has been identified as containing Special Category Information | |
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| <ul style="list-style-type: none"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10 | |
| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Secure google drive and paper copies |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | Processing this data is necessary for the completion of a public task and for the school to meet statutory requirements |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |

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

| System used: Dietary requirements information sheets | |
|---|---|
| Description | Required documents for specific children with severe allergies / intolerances and religious observations (food) |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Dietary information |
| This system has been identified as containing Special Category Information | |
| Special category information is data which has the following characteristics: | |
| <ul style="list-style-type: none"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10 | |
| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | 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. |

| | |
|---------------------------------|---|
| | <p>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.</p> |
| 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? | Fulfils statutory requirement for the school to monitor, log and report inappropriate network activity. |
| Legal Basis | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School 360 |
| Where is data stored? | Future Digital Secure Servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Designated teachers in school (normally online safety lead). |
| How long is data kept? | 3 years after date closed |
| Who is data shared with? | NCC Online safety staff, Northumberland Safeguarding Children Board, Police if serious incident, Staff within school. |
| Legal basis for sharing | Public task & legal obligation. |
| How is data shared? | Electronically. through a secure connection. |
| References | Click to download Future Digital |

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

| 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 | <p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> |
| Evidence for legal basis | 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: Just2easy | |
|---------------------------------------|---|
| Description | Suite of online tools for Desk Top Publishing, Blogging, Infant toolkit and Tables, spelling and arithmetic SATs testers. |
| Personal Data Items | <p>Child</p> <ul style="list-style-type: none"> • Name • Gender • Class / Year group • School <p>Staff</p> <ul style="list-style-type: none"> • Name • Class / Year group • School |
| Why is it being processed? | To provide access for staff and pupils to a variety of learning resources through School360 |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO legal basis tool |
| Is Consent Required? | No |
| Data Source | School 360 |
| Where is data stored? | J2e secure servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | J2e and school360 staff to manage accounts |
| 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 Just2easy Privacy & Data Policy |

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

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

System used: Looked After Children Records - Electronic

| | |
|----------------------------|---|
| 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 |

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

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

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

System used: Medical Files - Electronic

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

| | |
|--|--|
| 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 | <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 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

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 | 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 | <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, 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 |
| This system has been identified as containing Special Category Information | |
| Special category information is data which has the following characteristics: | |
| <ul style="list-style-type: none"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10 | |
| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | 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 | <p>Staff</p> <ul style="list-style-type: none"> • Name • Classes <p>Pupil</p> <ul style="list-style-type: none"> • Name <p>Governor</p> <ul style="list-style-type: none"> • Name |
| Why is it being processed? | To provide OneDrive 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 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 | Staff <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 | 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? | 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: NFER | |
|---------------------------------------|---|
| Description | Assessment materials, reading test and pupil progress data |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • School • Contact details <p>Pupil</p> <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 | <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? | 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: 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 | |
| Special category information is data which has the following characteristics: | |
| <ul style="list-style-type: none"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10 | |
| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | 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 | <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 | 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: Pebble | |
|---------------------------------------|---|
| Description | Online platform to help schools fundraise. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • Address • Email <p>Parent</p> <ul style="list-style-type: none"> • Name • Address • Email |
| Why is it being processed? | To provide an online platform to help schools manage fundraising and provide an easy system for parents to access fundraising. |
| 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 lawful basis tool |
| Is Consent Required? | No |
| Data Source | Parent |
| Where is data stored? | Pebble servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Staff and individual parents their own data. |
| 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? | Pebble secure servers |
| References | Click to download Pebble Privacy Policy |

| 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 | <p>School</p> <ul style="list-style-type: none"> • Name <p>Pupil</p> <ul style="list-style-type: none"> • Name <p>Staff</p> <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 | <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? | 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 |

| | |
|---|---|
| <p>System used: Photographs and videos of staff and pupils.</p> | |
| 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: Reading Eggs | |
|---------------------------------------|---|
| Description | The multi-award winning early learning resource supports your child's learn to read journey with carefully designed online reading games and activities that are easy to follow, self-paced, and highly engaging for young children. |
| Personal Data Items | <p>Staff</p> <ul style="list-style-type: none"> • Name • School • Email <p>Pupil</p> <ul style="list-style-type: none"> • Name • Age • Class |
| 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 legal basis toolkit |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Reading Eggs secure servers |
| 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? | School staff |
| Legal basis for sharing | Public task |
| How is data shared? | Reading eggs secure servers |

| System used: Recruitment information | |
|---|--|
| Description | Part of the job application process |
| Personal Data Items | <p>Name</p> <ul style="list-style-type: none"> • Name • DOB • Address • Educational establishments attended • Qualifications • Disciplinary Records • Appraisal Records • Salary information |
| This system has been identified as containing Special Category Information | |
| Special category information is data which has the following characteristics: | |
| <ul style="list-style-type: none"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10 | |
| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | 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. |

System used: Safeguarding Records - Electronic

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

| | |
|--|---|
| 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 |

System used: Safeguarding Records - Paper

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

| System used: School meals identification | |
|---|---|
| Description | Identification of pupils for meals |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Photograph • Dietary requirement |
| This system has been identified as containing Special Category Information | |
| Special category information is data which has the following characteristics: | |
| <ul style="list-style-type: none"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10 | |
| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | n/a |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To ensure the pupils receive appropriate dietary requirements, particularly those with food allergies. |
| Legal Basis | <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| Evidence for legal basis | ICO Legal Basis Tool |
| Is Consent Required? | No |
| Data Source | School |
| Where is data stored? | Paper file - held securely within school premises, accessed daily |
| Is it secure and/or encrypted? | Yes - secure storage |
| Who can access data? | Kitchen and office staff |

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

| System used: School360 | |
|---|---|
| Description | Learning platform for Northumberland schools with links to 3rd party educational resource providers. |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • School id • Class/Group • Year • UPN (Unique Pupil Number) • Gender • Attendance (If School360 used for registration) • Pupil concern reports • EYFS reflections <p>Staff</p> <ul style="list-style-type: none"> • Name • Staff Alternative e-mail address • Teacher pupil notes |
| This system has been identified as containing Special Category Information | |
| Special category information is data which has the following characteristics: | |
| <ul style="list-style-type: none"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10 | |
| Special Category Data Legal Basis | 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 | Click to download School360 Privacy Policy Click to download School360 EYFS App Privacy Policy Click to download School360 Parent App Privacy Policy |

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

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

| System used: SEND electronic records | |
|--------------------------------------|---|
| Description | Records relating to Special Educational Needs and Disability for individual pupils |
| Personal Data Items | <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 |

This system has been identified as containing Special Category Information

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

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

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| How is the Special Category data shared? | Secure 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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- Religious or philosophical beliefs
- Trade union membership
- Genetic data for the purpose of identifying a natural person
- Sex life and or sexual orientation
- Criminal Records information - protected in Article 10

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

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

System used: SIMS

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| Description | SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools. |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • Date of birth • Address • Title • Gender • Class • Year • Parent/carer name • UPN • Dietary Requirements • Medical information • Attendance/exclusion • FSM • SEN • Assessment information • Child Protection Plan • School history • Looked After Information <p>Parent/Carer</p> <ul style="list-style-type: none"> • Name • Address • Phone number • email address • Gender • Title • DOB • Parental responsibility • Language • Occupation <p>Staff</p> <ul style="list-style-type: none"> • Name • Address • Phone number • email address • Title • Gender • DOB • NI Number • Ethnicity • Bank Account Information • Qualifications • Disability & Medical Information |

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

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

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

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

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

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

References

[Click to download Tapestry Privacy Policy](#)

| System used: Testbase | |
|---|---|
| Description | This is an online resource provided by Doublestruck which enables children to prepare for National SAT examinations. Doublestruck is an Educational Technology company that is part of the AQA family. It specialises in technology that addresses the needs of teachers in formative assessment and reporting. |
| Personal Data Items | <p>School</p> <ul style="list-style-type: none"> • Name • Contact Address • Contact Email • Contact Telephone Number • Billing Address <p>Staff</p> <ul style="list-style-type: none"> • Name <p>Pupil</p> <ul style="list-style-type: none"> • Name • UPN • Admission number • Gender • Year Group • Registration group • Class name • Teacher name • Ethnicity • Eligibility for free school meals • Pupil premium indicator • SEN Status • In LEA care |
| This system has been identified as containing Special Category Information | |
| Special category information is data which has the following characteristics: | |
| <ul style="list-style-type: none"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10 | |
| Special Category Data Legal Basis | 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? | AQA; Doublestruck Service Providers (including internet service platform providers; payment processing providers); Local authorities; Doublestruck advisors and auditors; other approved third parties necessary to provide the service. |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | To provide a service and resources which enables schools to assess pupil attainment and track? progress? of individuals and groups. |
| 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 server |
| Is it secure and/or encrypted? | Account is password protected, Store on Doublestruck secure servers. |
| Who can access data? | School; Teastbase (Doublestruck LTD) for technical support. |
| How long is data kept? | 6 years after date closed |
| Who is data shared with? | AQA; Doublestruck Service Providers (including internet service platform providers; payment processing providers); Local authorities; Doublestruck advisors and auditors; other approved third parties necessary to provide the service. |
| Legal basis for sharing | Legal obligation and public task |
| How is data shared? | In a structure, commonly used, machine readable format. |
| References | Click to download Testbase privacy notice |

| | |
|----------------------------|--|
| System used: Thrive | |
| Description | Social and Emotional Screening Programme |
| Personal Data Items | <p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Class • Year Group • UPN • Assessment information • LAC <p>Staff</p> <ul style="list-style-type: none"> • Name • Class |

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

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| Special Category Data Legal Basis | Obligation Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement. |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | Online secure server |
| Legal basis for sharing Special Category data | Article 9 |
| Why is it being processed? | Social & emotional development tracking |
| 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? | Thrive secure servers |
| Is it secure and/or encrypted? | Yes |
| Who can access data? | Thrive employees for support, school staff |
| 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? | Online secure server |

| 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 | Click to download Times Tables Rock Stars Click to download Times Tables Rock Stars GDPR |

| 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: 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: | |
| <ul style="list-style-type: none"> • Racial or ethnic origin • Political opinions • Religious or philosophical beliefs • Trade union membership • Genetic data for the purpose of identifying a natural person • Sex life and or sexual orientation • Criminal Records information - protected in Article 10 | |
| Special Category Data Legal Basis | <p>Obligation</p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> |
| Special Category Evidence for legal basis | Article 9 |
| How is the Special Category data shared? | 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 |

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|---------------------------------------|---|
| 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 |