



# **Choppington Primary School**

## **GDPR Asset Register**

**Date: 30/01/2019**

Data Protection Officer: Vicki Evans

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## Introduction

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

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

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

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

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

## Systems included in this report

| System Name                             | Description  | Special Category |
|---|--|------------------|
| Accelerated Reader                      | Accelerated Reader gives teachers the information they need to monitor students' reading practice and make informed decisions to guide their future learning.  |                  |
| Accident book                           | Log of accidents / minor injuries in school  |                  |
| Accident Report Form                    | ACC1 form for reporting accidents to NCC   |                  |
| Assessment Records                      | Electronic and paper mark books  |                  |
| Attendance file                         | Attendance information about pupils and classes  |                  |
| CCTV                                    | CCTV   |                  |
| Class Dojo                              | Class Dojo is a classroom management and behaviour rewards system which includes a digital portfolio for pupils which can be accessed by staff, pupils and parents?/carers.  |                  |
| Consent for educational visits          | Consent information for all educational visits including day trips and residential visits  |                  |
| CPOMS                                   | CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral welfare for schools. CPOMS is software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Working alongside a school's existing safeguarding processes, CPOMS is an intuitive system to help with the management and recording of child protection, behavioural issues, bullying, special educational needs, domestic issues and much much more. Using CPOMS, schools can ensure that students are safe and fully supported, whilst school staff can focus on teaching and providing support, instead of administration. |                  |
| Data tracking spreadsheets              | Spreadhseets (excel) to track progress of children over the course of their school career.   |                  |
| Diagnostic questions                    | Diagnostic Questions is a leading assessment tool that provides detailed insights into student understanding in a fraction of the time, simultaneously reducing workload and improving student results and confidence.   |                  |
| Dietary requirements information sheets | Required documents for specific children with severe allergies / intolerances and religious observations (food)  |                  |
|   |  |                  |

|                                    |  |     |
|------------------------------------|--|-----|
| 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.   |     |
| Frog Learning                      | Online learning application linked to School360. Provides resources for a wide range of curricular areas.  |     |
| Futures Cloud                      | Internet / Network monitoring and reporting tool   |     |
| Google drive for education         | suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.  |     |
| Governance                         | Details of all members of the Governing Body   |     |
| Health & Safety                    | Records pertaining to Health & Safety  |     |
| Interactive Resources              | Pupil / teacher online learning resources for Numeracy.  |     |
| iTrack                             | Pupil tracking and reporting software for EYFS - KS3   |     |
| Lexia                              | Students work independently to develop critical reading and language skills through individualized, motivating learning paths. All students, regardless of their skill level, can each work at their own pace and the teacher is notified (on web-based reports and via email) only when they require support.   |     |
| Lightspeed Internet Filtering      | The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.  |     |
| Live Kitchen                       | Live kitchen provides a number of online tools for parents, pupils and school staff to manage school meals. These include: Direct Debit cash collection option Replaces dinner register and manages cash and cheques Account histories and payment reminders by email Pre-order system for classroom whiteboards with branding Children get the meal of their choice Controls food costs - waste is minimised Parents can log in from home to view the menu, check their account and pre-order meals Uptake graphs and reports help you track progress Lunchtimes are faster and more organised Optional menu costing and nutritional analysis |     |
| 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.   |     |
| Medical log                        | File of medical information for each child: asthma, medication administered, health care plans, risk assessments   | yes |

|   |   |     |
|---|---|-----|
| Nessy - Literacy interventions              | Nessy programs are designed to help students of all abilities learn to read, write, spell and type, especially those who learn differently, including: Mainstream EAL Homeschool Students with dyslexia   |     |
| Nursery (Early Years) files                 | Early years registration information and funding information for Early Years entitlement, hours taken each week   | yes |
| Parent mail                                 | Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events  |     |
| Personnel files                             | Information relating to staff employment  |     |
| 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.   |     |
| Recruitment information                     | Part of the job application process   |     |
| Registers                                   | Daily register, after school club registers, lunch register   |     |
| School360                                   | Learning platform for Northumberland schools with links to 3rd party educational resource providers.  |     |
| Send Paper Records                          | Records relating to individual pupil's SEND history   |     |
| 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.  |     |
| 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.   |     |
| Teach your Monster to Read                  | Teach Your Monster to Read is an award-winning series of games that's helped millions of children learn to read.  |     |
| Teachers2Parent                             | Parent/Staff/Other Text Messaging System  |     |
| 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 |
| Visitor book                                | Log of all visitors into school / fire regulations  |     |
| Wonde                                       | Manages transfer of data from Sims MIS to School360.  |     |
| Star Assessment                             | An online assessment system for reading & maths   | yes |

System used: Accelerated Reader

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Accelerated Reader gives teachers the information they need to monitor students' reading practice and make informed decisions to guide their future learning.  |
| <b>Personal Data Items</b>            | <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>   |
| <b>Why is it being processed?</b>     | To generate information on the reading abilities of pupils   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>   |
| <b>Evidence for legal basis</b>       | ICO Legal Basis Tool   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Renaissance Learning servers   |
| <b>Is it secure and/or encrypted?</b> | We have taken certain physical, electronic, contractual and administrative steps to protect the confidentiality, security, and integrity of your personally identifiable information. However, no method of transmission over the Internet or method of electronic storage is completely secure, and we cannot guarantee its absolute security. It is your responsibility to maintain the confidentiality of your Website account information. |
| <b>Who can access data?</b>           | Pupil (own data), staff, technical support staff   |
| <b>How long is data kept?</b>         | 1+ year  |
| <b>Who is data shared with?</b>       | Not shared   |
| <b>Legal basis for sharing</b>        | N/A  |
| <b>How is data shared?</b>            | N/A  |
| <b>References</b>                     | <a href="#">Click to download Accelerated Reader Privacy Policy</a>  |

System used: Accident book

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

System used: Accident Report Form

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | ACC1 form for reporting accidents to NCC   |
| <b>Personal Data Items</b>            | <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Gender</li> <li>• Address</li> <li>• Telephone number</li> <li>• Date and time of accident</li> <li>• nature of injury</li> <li>• Place of accident</li> <li>• First aid</li> <li>• Circumstances</li> <li>• Action taken</li> <li>• Witness information</li> <li>•</li> </ul> <p><b>Staff member</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Occupation</li> <li>• DOB</li> <li>• Gender</li> <li>• Address</li> <li>• Telephone number</li> <li>• Date and time of injury</li> <li>• nature of injury</li> <li>• place of accident</li> <li>• First aid</li> <li>• Circumstances</li> <li>• Action taken</li> <li>• Witness information</li> <li>•</li> </ul> |
| <b>Why is it being processed?</b>     | Health and safety  |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p>   |
| <b>Evidence for legal basis</b>       | Health and safety  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Filing cabinet in office   |
| <b>Is it secure and/or encrypted?</b> | No   |
| <b>Who can access data?</b>           | SLT  |
| <b>How long is data kept?</b>         | 3 years after date closed  |

|                                 |                   |
|---------------------------------|-------------------|
| <b>Who is data shared with?</b> | NCC / parents     |
| <b>Legal basis for sharing</b>  | Health and safety |
| <b>How is data shared?</b>      | Carbon copy       |

System used: Assessment Records

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Electronic and paper mark books  |
| <b>Personal Data Items</b>            | <p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Disadvantaged cohort</li> <li>• SEND Code</li> <li>• Key Stage 2 Assessment data</li> <li>• Internal Assessment Data</li> </ul>   |
| <b>Why is it being processed?</b>     | To track student achievement and report to parents   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>  |
| <b>Evidence for legal basis</b>       | N/A  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | On-site network Google Drive On paper- Class Context Files   |
| <b>Is it secure and/or encrypted?</b> | On-site Network- This solution has user authentication and access controls which determine the level of access to data that a user requires. The solution also utilises the Schools' Information Security policy which includes password, physical and network security controls. Google Drive- authentication and access controls which determine the level of access to data that a user requires. G-Suite complies with the Schools' Information Security policy which includes password security controls. Class Context Files- teachers follow privacy culture procedures |
| <b>Who can access data?</b>           | Staff  |
| <b>How long is data kept?</b>         | 5+ years   |
| <b>Who is data shared with?</b>       | Parents  |
| <b>Legal basis for sharing</b>        | To inform parents of progress  |
| <b>How is data shared?</b>            | Parents evenings, reports  |

System used: Attendance file

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Attendance information about pupils and classes  |
| <b>Personal Data Items</b>            | <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Class</li> <li>• Gender</li> <li>• UPN</li> <li>• Address</li> <li>• Telephone number</li> <li>• Parental contact</li> <li>• Ethnic origin</li> <li>• Current attendance</li> <li>• Past attendance</li> </ul>   |
| <b>Why is it being processed?</b>     | To regularly check pupil's attendance towards a desired goal   |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Legitimate Interest</b></p> <p>Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”</p> |
| <b>Evidence for legal basis</b>       | Check on attendance  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Attendance file and electronically   |
| <b>Is it secure and/or encrypted?</b> | File - no, electronically on encrypted drive   |
| <b>Who can access data?</b>           | School staff   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | EWO and other agencies as required / parents   |
| <b>Legal basis for sharing</b>        | To check attendance  |
| <b>How is data shared?</b>            | Electronically   |

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

System used: Class Dojo

|                                   |  |
|-----------------------------------|--|
| <b>Description</b>                | Class Dojo is a classroom management and behaviour rewards system which includes a digital portfolio for pupils which can be accessed by staff, pupils and parents?/carers.  |
| <b>Personal Data Items</b>        | <b>Staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• Phone number</li><li>• email</li><li>• Password</li><li>• Device id</li><li>• Gender</li><li>• School</li><li>• School address</li><li>• Geo Location</li><li>• Photos, Videos, Docs and audio</li><li>• IP address</li></ul> <b>Pupil</b> <ul style="list-style-type: none"><li>• Name</li><li>• Password</li><li>• Age</li><li>• School</li><li>• IP Address</li></ul> <b>Parent/carers</b> <ul style="list-style-type: none"><li>• Name</li><li>• Phone number</li><li>• Email address</li><li>• Password</li><li>• Device id</li><li>• Gender</li><li>• School</li><li>• Geo location</li><li>• IP Address</li></ul> |
| <b>Why is it being processed?</b> | To provide access to the online curriculum and classroom management? tools   |
| <b>Legal Basis</b>                | <b>Public task</b><br>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller   |
| <b>Evidence for legal basis</b>   | ICO lawful basis tool Education acts   |
| <b>Is Consent Required?</b>       | No   |
| <b>Data Source</b>                | School   |
| <b>Where is data stored?</b>      | Class Dojo servers   |
|                                   |  |

|                                       |  |
|---------------------------------------|--|
| <b>Is it secure and/or encrypted?</b> | Yes, comprehensive approach to security provided by Class Dojo                                   |
| <b>Who can access data?</b>           | School account users.  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Shared within school   |
| <b>Legal basis for sharing</b>        | Public task  |
| <b>How is data shared?</b>            | Online through secure login.   |
| <b>References</b>                     | <a href="#">Click to download Class Dojo 1</a><br><a href="#">Click to download Class Dojo 2</a> |

System used: Consent for educational visits

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Consent information for all educational visits including day trips and residential visits  |
| <b>Personal Data Items</b>            | <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Health conditions</li> <li>• Medication including consent for staff to administer</li> <li>• Dietary requirements</li> <li>• Contact information</li> <li>• Family doctor</li> </ul> |
| <b>Why is it being processed?</b>     | To ensure school has up to date information when taking children off site  |
| <b>Legal Basis</b>                    | <p><b>Consent</b></p> <p>Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”</p>  |
| <b>Evidence for legal basis</b>       | Health and safety and safeguarding   |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | Parent   |
| <b>Where is data stored?</b>          | paper records kept in school and taken on visit  |
| <b>Is it secure and/or encrypted?</b> | no   |
| <b>Who can access data?</b>           | Staff involved with visit  |
| <b>How long is data kept?</b>         | 1+ year  |
| <b>Who is data shared with?</b>       | NCC or medical practitioners / providers   |
| <b>Legal basis for sharing</b>        | Health and safety  |
| <b>How is data shared?</b>            | summarised document  |

System used: CPOMS

**Description**

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

**Personal Data Items**

**Pupil**

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

**Main contact**

- Name
- Telephone Number

**Why is it being processed?**

To comply with statutory obligations regarding safeguarding and child protection. To provide a secure repository for personal data and ensure that records are effectively maintained.

**Legal Basis**

**Legal Obligation**

Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."

**Public task**

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

**Evidence for legal basis**

ICT Legal basis tool Education Acts

|                                       |   |
|---------------------------------------|---|
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | SIMS  |
| <b>Where is data stored?</b>          | Meritec secure servers.   |
| <b>Is it secure and/or encrypted?</b> | Meritec Limited (CPOMS) is an accredited ISO27001 and GCloud supplier. As part of that accreditation, we have annual penetration/ vulnerability test performed by a trusted 3rd party partner. In addition to these tests Meritec Limited (CPOMS) uses a UK based Data Centre supplier who is also also accredited to ISO27001 and thus subject to the same security audits. Meritec is accredited to the latest version of the ISO27001 standard (2013) Accreditation requires annual external audits by the accreditation providers and regular internal audits by the senior management including persons at Director level. |
| <b>Who can access data?</b>           | School staff, subsequent school if using CPOMS, Meritec for support.  |
| <b>How long is data kept?</b>         | 75 years from date of birth   |
| <b>Who is data shared with?</b>       | <a href="http://www.cpoms.co.uk/cpoms-4-6/">http://www.cpoms.co.uk/cpoms-4-6/</a>   |
| <b>Legal basis for sharing</b>        |   |
| <b>How is data shared?</b>            |   |
| <b>References</b>                     | <a href="#">Click to download CPOMS Cloud Services for Schools</a>  |

System used: Data tracking spreadsheets

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Spreadhseets (excel) to track progress of children over the course of their school career.  |
| <b>Personal Data Items</b>            | <p><b>pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• date of birth</li> <li>• gender</li> <li>• class</li> <li>• year</li> <li>• FSM</li> <li>• SEN</li> <li>• Assessment info</li> </ul>   |
| <b>Why is it being processed?</b>     | Processing this data is necessary for the completion of a public task and for the school to meet statutory requirements   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| <b>Evidence for legal basis</b>       | Education acts  |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | Encrypted USB / Google drives   |
| <b>Is it secure and/or encrypted?</b> | Yes   |
| <b>Who can access data?</b>           | Teachers in school  |
| <b>How long is data kept?</b>         | 1+ year   |
| <b>Who is data shared with?</b>       | Different elemetns of data are shared with different parties including: other staff, Governors and parents  |
| <b>Legal basis for sharing</b>        | Necessary for completion of statutory tasks   |
| <b>How is data shared?</b>            | Electronically by secure encrypted communication  |

System used: Diagnostic questions

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Diagnostic Questions is a leading assessment tool that provides detailed insights into student understanding in a fraction of the time, simultaneously reducing workload and improving student results and confidence.   |
| <b>Personal Data Items</b>            | <p><b>School</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Credit card info (for purchases)</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• E-mail address</li> <li>• Primary role</li> <li>• What you teach</li> </ul> <p><b>Pupils</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Unique classroom id (generated by teacher)</li> </ul> |
| <b>Why is it being processed?</b>     | To provide online access for teachers and pupils to a variety of teaching and learning materials.  |
| <b>Legal Basis</b>                    | <b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller   |
| <b>Evidence for legal basis</b>       | ICO legal basis tool Education acts  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | Diagnostic questions servers   |
| <b>Is it secure and/or encrypted?</b> | Yes Diagnostic Questions have implemented a variety of security measures to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.   |
| <b>Who can access data?</b>           | Staff, Diagnostic Questions staff for support.   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Not Shared   |
| <b>Legal basis for sharing</b>        | N/A  |
| <b>How is data shared?</b>            | N/A  |
| <b>References</b>                     | <a href="#">Click to download Diagnostic Questions Privacy Policy</a>  |

System used: Dietary requirements information sheets

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Required documents for specific children with severe allergies / intolerances and religious observations (food)  |
| <b>Personal Data Items</b>            | <b>Pupil</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Dietary information</li> </ul>  |
| <b>Why is it being processed?</b>     | Health and safety - to avoid children coming into contact with specific foods  |
| <b>Legal Basis</b>                    | <b>Public task</b><br>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller |
| <b>Evidence for legal basis</b>       | Health and safety  |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | Parent   |
| <b>Where is data stored?</b>          | Accessible only to kitchen staff   |
| <b>Is it secure and/or encrypted?</b> | Secure - in locked kitchen office  |
| <b>Who can access data?</b>           | kitchen staff / school staff   |
| <b>How long is data kept?</b>         | 1+ year  |
| <b>Who is data shared with?</b>       | n/a  |
| <b>Legal basis for sharing</b>        | n/a  |
| <b>How is data shared?</b>            | n/a  |

System used: Eschools Website Provider

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

|                                 |  |
|---------------------------------|--|
|                                 | disclose any Confidential Information in whole or in part to any third party, except as expressly permitted by this Agreement, or as required for the purpose of any services provided by eSchools to the School, or to the extent required by law. 6.1. Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing to be carried out by eSchools, as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, eSchools shall in relation to the School Data implement appropriate technical and organisational measures to ensure a level of security appropriate to that risk. 6.2. In assessing the appropriate level of security, eSchools shall take account in particular of the risks that are presented by processing of the School Data, in particular from a Personal Data Breach. |
| <b>Who can access data?</b>     | Parents and wider community. Information available to the public on the internet. Eschools can access the data. DFE  |
| <b>How long is data kept?</b>   | 1+ year  |
| <b>Who is data shared with?</b> | The general public eschools is a public facing website   |
| <b>Legal basis for sharing</b>  | Public interest  |
| <b>How is data shared?</b>      | On the school's website page with designated URL   |
| <b>References</b>               | <a href="#">Click to download Eschools data agreement</a>  |

| System used: EVOLVE visits            |   |
|---------------------------------------|---|
| <b>Description</b>                    | An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities.  |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• e-mail address</li> <li>• IP address</li> <li>• Location data</li> <li>• Qualifications</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• UPN</li> </ul>                                      |
| <b>Why is it being processed?</b>     | To reduce paperwork, simplify procedures, produce self-review and inspection preparation data, and improve staff confidence in that they automatically follow both employer, and National Guidelines.   |
| <b>Legal Basis</b>                    | <p><b>Contract</b></p> <p>Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”</p>  |
| <b>Evidence for legal basis</b>       | ICO tool, website, privacy policy   |
| <b>Is Consent Required?</b>           | Yes   |
| <b>Data Source</b>                    | SIMS  |
| <b>Where is data stored?</b>          | 'We store all of the Customer Data (including your personal data) on servers which are located in the United Kingdom. These servers are protected by passwords and firewalls.'  |
| <b>Is it secure and/or encrypted?</b> | Yes, although 'Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect the Customer Data (including your personal data), we cannot guarantee the security of such data transmitted to us over such a public network, and any transmission is at your own risk.' |
| <b>Who can access data?</b>           | Evolve staff  |
| <b>How long is data kept?</b>         | 1+ year   |
| <b>Who is data shared with?</b>       | 'The only time that any information will be shared by us outside of our services is where our Customer has asked us to configure the service so that it shares certain data with specified third party programs including calendars.'   |
| <b>Legal basis for sharing</b>        | Contract/agreement with school  |
| <b>How is data shared?</b>            | See contract/agreement<br><a href="http://edufocus.co.uk/assets/files/gdpr/Data%20Processing%20Details.pdf">http://edufocus.co.uk/assets/files/gdpr/Data%20Processing%20Details.pdf</a>   |

|                   |   |
|-------------------|---|
|                   | f   |
| <b>References</b> | <a href="#">Click to download Evolve eduFOCUS Global Data Privacy</a> |

System used: Frog Learning

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Online learning application linked to School360. Provides resources for a wide range of curricular areas.   |
| <b>Personal Data Items</b>            | <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class / Year group</li> </ul> <p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class / Year group</li> </ul>                                     |
| <b>Why is it being processed?</b>     | To allow secure individual access access to the online learning materials.  |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| <b>Evidence for legal basis</b>       | ICO legal basis tool.   |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School 360  |
| <b>Where is data stored?</b>          | Frog Learning secure servers  |
| <b>Is it secure and/or encrypted?</b> | Yes - see Frog privacy notice.  |
| <b>Who can access data?</b>           | School staff, ICT team, Frog learning for support.  |
| <b>How long is data kept?</b>         | 50 years after date closed  |
| <b>Who is data shared with?</b>       | Shared with school with Staff.  |
| <b>Legal basis for sharing</b>        | Necessary for performance of contract.  |
| <b>How is data shared?</b>            | Online through secure access login by staff   |
| <b>References</b>                     | <a href="#">Click to download Frog Learning GDPR</a>  |

System used: Futures Cloud

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Internet / Network monitoring and reporting tool  |
| <b>Personal Data Items</b>            | <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• I/P address</li> <li>• URL's visited</li> </ul> <p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• I / P address</li> <li>• URL's visited</li> </ul> |
| <b>Why is it being processed?</b>     | Fulfills statutory requirement for the school to monitor, log and report inappropriate network activity.  |
| <b>Legal Basis</b>                    | <b>Legal Obligation</b><br><br>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."   |
| <b>Evidence for legal basis</b>       | Education legislation   |
| <b>Is Consent Required?</b>           | No - though users are given the option to accept the school AUP on logon - if the user declines Internet Services are not provided.   |
| <b>Data Source</b>                    | School 360  |
| <b>Where is data stored?</b>          | Future Digital Secure Servers   |
| <b>Is it secure and/or encrypted?</b> | Yes   |
| <b>Who can access data?</b>           | Designated teachers in school (normally online safety lead.   |
| <b>How long is data kept?</b>         | 25 years from date of birth   |
| <b>Who is data shared with?</b>       | NCC Online safety staff, Northumberland Safeguarding Children Board, Police if serious incident, Staff within school.   |
| <b>Legal basis for sharing</b>        | Part of statutory obligation and child protection duties  |
| <b>How is data shared?</b>            | Electronically. through a secure connection.  |
| <b>References</b>                     | <a href="#">Click to download Future Digital</a>  |

System used: Google drive for education

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.  |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Classes / groups</li> <li>• Gmail address</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Classes / groups</li> <li>• Gmail address</li> </ul> <p><b>Governor</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Gmail address</li> </ul> |
| <b>Why is it being processed?</b>     | To provide Google drive for education to staff, pupils and governors.  |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>  |
| <b>Evidence for legal basis</b>       | ICO legal basis tool. Contract with L.A. & School360   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School 360   |
| <b>Where is data stored?</b>          | Google servers in Europe   |
| <b>Is it secure and/or encrypted?</b> | Yes secure and encrypted   |
| <b>Who can access data?</b>           | Individual users can access their own accounts. School360 and ICT Team can access management tool.   |
| <b>How long is data kept?</b>         | 50 years after date closed   |
| <b>Who is data shared with?</b>       | N/A  |
| <b>Legal basis for sharing</b>        | N/A  |
| <b>How is data shared?</b>            | N/A  |
| <b>References</b>                     | <p><a href="#">Click to download Google Drive Policy Notice</a></p> <p><a href="#">Click to download Google GSuite Privacy Policy</a></p>  |

System used: Governance

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

System used: Health & Safety

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

System used: Interactive Resources

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Pupil / teacher online learning resources for Numeracy.   |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class / Year group</li> <li>• School</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class / Year group</li> <li>• School</li> </ul>   |
| <b>Why is it being processed?</b>     | Necessary to provide access to learning resources through School360   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| <b>Evidence for legal basis</b>       | ICO legal basis tool.   |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School 360  |
| <b>Where is data stored?</b>          | Interactive Resources secure servers  |
| <b>Is it secure and/or encrypted?</b> | Yes   |
| <b>Who can access data?</b>           | Individual users can access their own accounts. Interactive Resources staff to enable support.  |
| <b>How long is data kept?</b>         | 50 years after date closed  |
| <b>Who is data shared with?</b>       | N/A   |
| <b>Legal basis for sharing</b>        | N/A   |
| <b>How is data shared?</b>            | N/A   |
| <b>References</b>                     | <a href="#">Click to download Interactive Resources Privacy Notices</a>   |

System used: iTrack

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Pupil tracking and reporting software for EYFS - KS3  |
| <b>Personal Data Items</b>            | <b>Staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• School</li><li>• Email</li></ul> <b>Pupil</b> <ul style="list-style-type: none"><li>• Name</li><li>• Age</li><li>• Year</li><li>• Class</li><li>• Gender</li><li>• Performance data</li></ul> |
| <b>Why is it being processed?</b>     | To provide access to a range of online tracking and reporting tools.  |
| <b>Legal Basis</b>                    | <b>Public task</b><br>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller                  |
| <b>Evidence for legal basis</b>       | ICO lawful basis tool Education acts  |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | iTrack servers  |
| <b>Is it secure and/or encrypted?</b> | Yes   |
| <b>Who can access data?</b>           | School staff with login, iTrack staff for technical support.  |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | Shared with school.   |
| <b>Legal basis for sharing</b>        | Public task   |
| <b>How is data shared?</b>            | Electronically  |

System used: Lexia

**Description**

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

**Personal Data Items**

**Staff**

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

**School**

- Name
- Payment details
- Usage data

**Pupil**

- Name
- Age
- Class
- Group

**Why is it being processed?**

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

**Legal Basis**

**Public task**

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

**Evidence for legal basis**

ICO Legal Basis Tool

**Is Consent Required?**

No

**Data Source**

School

**Where is data stored?**

Lexia servers

**Is it secure and/or encrypted?**

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

|                                 |  |
|---------------------------------|--|
|                                 | systems. If you have any questions about the security of your personal information, you can contact us at <a href="mailto:privacyofficer@lexialearning.com">privacyofficer@lexialearning.com</a> . |
| <b>Who can access data?</b>     | Staff, pupil (own data), Lexia staff for technical support   |
| <b>How long is data kept?</b>   | 1+ year  |
| <b>Who is data shared with?</b> | Not shared   |
| <b>Legal basis for sharing</b>  | N/A  |
| <b>How is data shared?</b>      | N/A  |
| <b>References</b>               | <a href="#">Click to download LEXIA Privacy Policy</a>   |

System used: Lightspeed Internet Filtering

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.   |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Machine name</li> <li>• I/P address</li> <li>• URLs visited</li> <li>• School</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Name</li> <li>• Machine name</li> <li>• I/P address</li> <li>• URLs visited</li> <li>• School</li> </ul> |
| <b>Why is it being processed?</b>     | Statutory requirement to filter Internet services for school users  |
| <b>Legal Basis</b>                    | <b>Legal Obligation</b><br>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”   |
| <b>Evidence for legal basis</b>       | Education Act   |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | SIMS  |
| <b>Where is data stored?</b>          | Lightspeed Rockets at County Hall Northumberland  |
| <b>Is it secure and/or encrypted?</b> | Yes   |
| <b>Who can access data?</b>           | NCC school support Staff, Curriculum ICT Team, Lightspeed staff for support   |
| <b>How long is data kept?</b>         | 50 years after date closed  |
| <b>Who is data shared with?</b>       | School leadership, LSCB and police if serious incident occurs   |
| <b>Legal basis for sharing</b>        | Statutory requirement   |
| <b>How is data shared?</b>            | Secure electron communication   |
| <b>References</b>                     | <a href="#">Click to download Lightspeed Privacy Notice</a>   |

System used: Live Kitchen

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Live kitchen provides a number of online tools for parents, pupils and school staff to manage school meals. These include: Direct Debit cash collection option Replaces dinner register and manages cash and cheques Account histories and payment reminders by email Pre-order system for classroom whiteboards with branding Children get the meal of their choice Controls food costs - waste is minimised Parents can log in from home to view the menu, check their account and pre-order meals Uptake graphs and reports help you track progress Lunchtimes are faster and more organised Optional menu costing and nutritional analysis |
| <b>Personal Data Items</b>            | <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Age</li> </ul> <p><b>Parent</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• email address</li> <li>• Payment details if using direct debit</li> </ul>  |
| <b>Why is it being processed?</b>     | To provide additional functionality and a better service to pupils and parents at lunchtime.   |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>  |
| <b>Evidence for legal basis</b>       | ICO Legal basis tool   |
| <b>Is Consent Required?</b>           | Yes - for Parents details to be recorded   |
| <b>Data Source</b>                    | SIMS   |
| <b>Where is data stored?</b>          | ?  |
| <b>Is it secure and/or encrypted?</b> | ?  |
| <b>Who can access data?</b>           | ?  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Kitchen  |
| <b>Legal basis for sharing</b>        | Necessary for performance of function.   |
| <b>How is data shared?</b>            | Electronically   |
| <b>References</b>                     | <a href="#">Click to download Live Kitchen Privacy Policy v1.4</a>   |

System used: Local Authority moderation of work

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.   |
| <b>Personal Data Items</b>            | <p><b>School</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Initials</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Initials</li> <li>• Gender</li> <li>• Unique pupil number (UPN)</li> </ul> |
| <b>Why is it being processed?</b>     | As part of the statutory? requires for assessment and moderation in schools  |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p>   |
| <b>Evidence for legal basis</b>       | ICO Legal basis tool Education legislation   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | School   |
| <b>Where is data stored?</b>          | At County Hall in secure Filing systems and online, encrypted  |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Local Authority school data team and assessment/moderation team.   |
| <b>How long is data kept?</b>         | 10+ years  |
| <b>Who is data shared with?</b>       | Not shared   |
| <b>Legal basis for sharing</b>        | N/A  |
| <b>How is data shared?</b>            | N/A  |

System used: Medical log

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

|  |   |
|--|---|
| <b>Special Category Data Legal Basis</b>         | <p><b>Medical</b></p> <p>Processing is required for the purposes of preventative or occupational medicine; for evaluating the working capacity of the employee,; medical diagnosis; the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional.</p> |
| <b>Special Category Evidence for legal basis</b> | Education acts / consent  |
| <b>How is the Special Category data shared?</b>  | Internally with school / medical staff  |

|  |   |
|--|---|
| <b>Legal basis for sharing Special Category data</b> | Public task   |
| <b>Why is it being processed?</b>                    | Health and safety of child  |
| <b>Legal Basis</b>                                   | <p><b>Consent</b></p> <p>Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| <b>Evidence for legal basis</b>                      | ICO lawful basis tool   |
| <b>Is Consent Required?</b>                          | Yes   |
| <b>Data Source</b>                                   | Parent  |
| <b>Where is data stored?</b>                         | Medical log in school office  |
| <b>Is it secure and/or encrypted?</b>                | Yes   |
| <b>Who can access data?</b>                          | School staff  |
| <b>How long is data kept?</b>                        | 1+ year   |
| <b>Who is data shared with?</b>                      | Medical personnel   |
| <b>Legal basis for sharing</b>                       | Health and safety   |
| <b>How is data shared?</b>                           | Verbal, written   |

System used: Nessy - Literacy interventions

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Nessy programs are designed to help students of all abilities learn to read, write, spell and type, especially those who learn differently, including: Mainstream EAL Homeschool Students with dyslexia  |
| <b>Personal Data Items</b>            | <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Year group</li> <li>• Test results</li> </ul>   |
| <b>Why is it being processed?</b>     | To create a secure log in for individual pupils to access Online Literacy intervention materials.  |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>   |
| <b>Evidence for legal basis</b>       | ICO Legal basis tool   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | SIMS   |
| <b>Where is data stored?</b>          | Securely on Nessy Servers  |
| <b>Is it secure and/or encrypted?</b> | The security of personal information The secrecy of your personal information is important to Nessy. We do not store credit card details nor do we share customer details with any 3rd parties. Any information you provide will be held securely and in accordance with the Data Protection Act 1998. All of the data collected, including usernames, passwords and any test results achieved, is stored on secure servers. Nessy will not sell or rent any of your personal information. We ask you to provide your email and telephone number solely to assist in coordinating and confirming your access to your Nessy online adventure (called a “Nessy Subscription” for short). |
| <b>Who can access data?</b>           | School staff, pupils, Nessy staff for support  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Not shared   |
| <b>Legal basis for sharing</b>        | N/A  |
| <b>How is data shared?</b>            | N/A  |
| <b>References</b>                     | <a href="#">Click to download Nessy Privacy Policy</a>   |

System used: Nursery (Early Years) files

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

|  |   |
|--|---|
| <b>Special Category Data Legal Basis</b>         | <p><b>Public</b></p> <p>Processing relates to personal data manifestly made public by the Data Subject.</p> |
| <b>Special Category Evidence for legal basis</b> | Education acts  |
| <b>How is the Special Category data shared?</b>  | Internally within school  |
| <b>Legal basis for sharing Special</b>           | Public task   |

|                                       |   |
|---------------------------------------|---|
| <b>Category data</b>                  |   |
| <b>Why is it being processed?</b>     | To ensure registration of children into school and that children receive their entitlements   |
| <b>Legal Basis</b>                    | <p><b>Consent</b></p> <p>Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| <b>Evidence for legal basis</b>       | Accurate record of admission  |
| <b>Is Consent Required?</b>           | Yes   |
| <b>Data Source</b>                    | Parent  |
| <b>Where is data stored?</b>          | In school office  |
| <b>Is it secure and/or encrypted?</b> | No  |
| <b>Who can access data?</b>           | SLT   |
| <b>How long is data kept?</b>         | 6+ years  |
| <b>Who is data shared with?</b>       | School staff, NCC, outside agencies as required   |
| <b>Legal basis for sharing</b>        | Safeguarding  |
| <b>How is data shared?</b>            | Verbally / electronically   |

System used: Parent mail

|                                   |  |
|-----------------------------------|--|
| <b>Description</b>                | Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events   |
| <b>Personal Data Items</b>        | <p><b>School</b></p> <ul style="list-style-type: none"><li>• Name</li><li>• School email address</li></ul> <p><b>Staff</b></p> <ul style="list-style-type: none"><li>• Name</li><li>• Class</li><li>• Title</li><li>• e-mail</li><li>• Gender</li><li>• Telephone number</li><li>• DOB</li><li>• School address</li></ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"><li>• Name</li><li>• Year</li><li>• Parent/carer name</li><li>• Title</li><li>• Class</li><li>• Gender</li><li>• DOB</li><li>• Address</li><li>• DOB</li></ul> <p><b>Parent/carer</b></p> <ul style="list-style-type: none"><li>• Name</li><li>• Telephone number</li><li>• email address</li><li>• Title</li><li>• Gender</li><li>• Address</li></ul> |
| <b>Why is it being processed?</b> | To provide access to a range of communication and payment tools  |
| <b>Legal Basis</b>                | <p><b>Consent</b></p> <p>Article 6(1)(a) gives you a lawful basis for processing where: "the data subject has given consent to the processing of their personal data for one or more specific purposes"</p>  |
| <b>Evidence for legal basis</b>   | ICO legal basis tool   |
| <b>Is Consent Required?</b>       | Yes  |
| <b>Data Source</b>                | School   |
|                                   |  |

|                                       |  |
|---------------------------------------|--|
| <b>Where is data stored?</b>          | Parent mail secure servers   |
| <b>Is it secure and/or encrypted?</b> | GDPR requires ParentMail to adhere to a number of key principles with regards to your data and you can be assured that we take these responsibilities extremely seriously. As part of our commitment to GDPR we make the following promises to our customers and partners; • We will only manage data where we have an explicit agreement with the data controller • We will only retain data for as long as we have a processing agreement with the controller or need to do so with the data subject • All data used in our systems is encrypted when at rest (stored) and whilst in transit (when accessed using a browser or the ParentMail app) |
| <b>Who can access data?</b>           | Staff, Parent mail staff for technical support.  |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | Not shared   |
| <b>Legal basis for sharing</b>        | N/A  |
| <b>How is data shared?</b>            | N/A  |
| <b>References</b>                     | <a href="#">Click to download Parentmail Privacy Policy</a>  |

System used: Personnel files

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Information relating to staff employment  |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Telephone number</li> <li>• e-mail address</li> <li>• National Insurance Number</li> <li>• Qualifications</li> <li>• DOB</li> <li>• Contract</li> <li>• Payroll no.</li> <li>• Employment history</li> <li>• References</li> <li>• Leave of absence</li> <li>• DBS checked</li> </ul> |
| <b>Why is it being processed?</b>     | Necessary for employment  |
| <b>Legal Basis</b>                    | <p><b>Contract</b></p> <p>Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”</p>  |
| <b>Evidence for legal basis</b>       | ICO Legal Basis Tool  |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | Secure filing cabinet   |
| <b>Is it secure and/or encrypted?</b> | Yes - secure storage  |
| <b>Who can access data?</b>           | Headteacher and office staff  |
| <b>How long is data kept?</b>         | 1+ year   |
| <b>Who is data shared with?</b>       | NCC and/or HR provider and/or Payroll provider  |
| <b>Legal basis for sharing</b>        | Contract  |
| <b>How is data shared?</b>            | Electronically or secure courier  |

System used: Photographs and videos of staff and pupils.

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

System used: Recruitment information

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Part of the job application process   |
| <b>Personal Data Items</b>            | <p><b>Name</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Address</li> <li>• Educational establishments attended</li> <li>• Qualifications</li> <li>• Disciplinary Records</li> <li>• Appraisal Records</li> <li>• Salary information</li> </ul>   |
| <b>Why is it being processed?</b>     | As part of the recruitment process  |
| <b>Legal Basis</b>                    | <p><b>Consent</b></p> <p>Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| <b>Evidence for legal basis</b>       | Safer recruitment process   |
| <b>Is Consent Required?</b>           | Yes   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | Business Manager's office HT/ DHT   |
| <b>Is it secure and/or encrypted?</b> | Locked storage/ filing cabinet  |
| <b>Who can access data?</b>           | Business Manager/ HT/ DHT/ School Governors   |
| <b>How long is data kept?</b>         | 6+ years  |
| <b>Who is data shared with?</b>       | Governors/ shortlisting panel/ SIP/ HR  |
| <b>Legal basis for sharing</b>        | Safe recruitment Standard procedure   |
| <b>How is data shared?</b>            | Within shortlisting process/ Local Authority/ relevant personnel  |

System used: Registers

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Daily register, after school club registers, lunch register   |
| <b>Personal Data Items</b>            | <p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Date of Birth</li> <li>• Lunch Status</li> <li>• Attendance</li> </ul>  |
| <b>Why is it being processed?</b>     | To monitor children's attendance - legal obligation.  |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| <b>Evidence for legal basis</b>       | ICO lawful basis tool Education acts  |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | Paper registers kept in the school office Electronic registers online   |
| <b>Is it secure and/or encrypted?</b> | During the day, school office is manned. After school, it is locked. Online encrypted.  |
| <b>Who can access data?</b>           | School staff, after school club providers   |
| <b>How long is data kept?</b>         | 5+ years  |
| <b>Who is data shared with?</b>       | School staff, after school club providers   |
| <b>Legal basis for sharing</b>        | All staff required to know numbers of pupils in their care to ensure safeguarding.  |
| <b>How is data shared?</b>            | Through the paper register at the time of completion. Electronically with office/Sims.  |

System used: School360

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Learning platform for Northumberland schools with links to 3rd party educational resource providers.  |
| <b>Personal Data Items</b>            | <b>Pupil</b> <ul style="list-style-type: none"><li>• Name</li><li>• School id</li><li>• Class/Group</li><li>• Year</li><li>• UPN (Unique Pupil Number)</li><li>• Gender</li><li>• Attendance (If School360 used for registration)</li><li>• Pupil concern reports</li><li>• EYFS reflections</li></ul> <b>Staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• Staff Alternative e-mail address</li><li>• Teacher pupil notes</li></ul> |
| <b>Why is it being processed?</b>     | To facilitate setting up and access to the County learning platform - School360   |
| <b>Legal Basis</b>                    | <b>Public task</b><br>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller  |
| <b>Evidence for legal basis</b>       | Guidance from ICO Tool  |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | SIMS  |
| <b>Where is data stored?</b>          | Rackspace London  |
| <b>Is it secure and/or encrypted?</b> | Yes - See Rackspace Privacy Policy  |
| <b>Who can access data?</b>           | School Administrator NCC ICT Team Seven360 development staff Users (own data)   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | SIMs Wonde Frog Learning Just2easy Interactive Resources  |
| <b>Legal basis for sharing</b>        | NCC Contract with School360   |
| <b>How is data shared?</b>            | Electronically, encrypted on transfer and storage.  |
| <b>References</b>                     | <a href="#">Click to download School360 Privacy Policy</a><br><a href="#">Click to download School360 EYFS App Privacy Policy</a><br><a href="#">Click to download School360 Parent App Privacy Policy</a>  |

System used: Send Paper Records

|                                   |  |
|-----------------------------------|--|
| <b>Description</b>                | Records relating to individual pupil's SEND history  |
| <b>Personal Data Items</b>        | <p><b>Pupil</b></p> <ul style="list-style-type: none"><li>• Name</li><li>• Date Of Birth</li><li>• Address</li><li>• Medical Information</li><li>• Health &amp; Social Care</li><li>• Specific Educational Needs</li><li>• Interventions In Place</li></ul> <p><b>Parents</b></p> <ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• Contact Details</li></ul> <p><b>Staff</b></p> <ul style="list-style-type: none"><li>• Name</li><li>• Position</li></ul> <p><b>External Support</b></p> <ul style="list-style-type: none"><li>• Name</li><li>• Organisation</li><li>• Position</li><li>• Address</li><li>• Contact Details</li></ul> |
| <b>Why is it being processed?</b> | To support educational entitlement to meet statutory obligations   |
| <b>Legal Basis</b>                | <p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: "processing is necessary for compliance with a legal obligation to which the controller is subject."</p> <p><b>Legitimate Interest</b></p> <p>Article 6(1)(f) gives you a lawful basis for processing where: "processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child."</p>           |
| <b>Evidence for legal basis</b>   | ICO Legal Basis Tool   |
| <b>Is Consent Required?</b>       | No   |
| <b>Data Source</b>                | School   |
| <b>Where is data stored?</b>      | Secure Cabinet   |

|                                       |   |
|---------------------------------------|---|
| <b>Is it secure and/or encrypted?</b> | Yes   |
| <b>Who can access data?</b>           | Headteacher, Key Worker, Class Teacher, SENDCO and Office Staff |
| <b>How long is data kept?</b>         | 3 years after date closed                                       |
| <b>Who is data shared with?</b>       | Case workers, Parents, local Authority and Receiving Schools    |
| <b>Legal basis for sharing</b>        | Statutory Obligations and Legitimate Interest                   |
| <b>How is data shared?</b>            | Secure Messenger  |

System used: SIMS

**Description**

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

**Personal Data Items**

**Pupil**

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

**Parent/Carer**

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

**Staff**

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

|                                       |  |
|---------------------------------------|--|
|                                       | <ul style="list-style-type: none"> <li>• Religion</li> <li>• Marital status</li> <li>• Language</li> <li>• Passport Information</li> <li>• Dietary requirements</li> <li>• Absences</li> <li>• Car information</li> <li>• Next of Kin</li> <li>• Payroll number</li> <li>• DBS Information</li> </ul>  |
| <b>Why is it being processed?</b>     | Processing of this data is necessary for the completion of a public task and for the school to meet statutory requirements.  |
| <b>Legal Basis</b>                    | <p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| <b>Evidence for legal basis</b>       | Education acts   |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | SIMS   |
| <b>Where is data stored?</b>          | Capita SImS secure servers   |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | Admin staff, teachers in school, NCC SIMs team and Capita SIMs staff for support.  |
| <b>How long is data kept?</b>         | 10+ years  |
| <b>Who is data shared with?</b>       | Different elements of data are shared with different parties - see individual system, for example for DfE School Census, Health Authority, Local Authority, other schools on transfer etc  |
| <b>Legal basis for sharing</b>        | Necessary for completion of statutory tasks.   |
| <b>How is data shared?</b>            | Electronically via secure encrypted communication  |
| <b>References</b>                     | <a href="#">Click to download Capita SIMS Privacy Statement</a>  |

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

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Social Media tool used to inform parents about events in school and celebrate children's achievement.   |
| <b>Personal Data Items</b>            | <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Photos (unnamed)</li> <li>• Videos (unnamed)</li> <li>• School name</li> <li>• Classes</li> </ul>  |
| <b>Why is it being processed?</b>     | Unnamed photos of pupils and their work are used on the site  |
| <b>Legal Basis</b>                    | <p><b>Consent</b></p> <p>Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p> |
| <b>Evidence for legal basis</b>       | N/A   |
| <b>Is Consent Required?</b>           | Yes   |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | Information about where twitter data is stored: <a href="https://help.twitter.com/en/rules-and-policies/global-operations-and-data-transfer">https://help.twitter.com/en/rules-and-policies/global-operations-and-data-transfer</a>   |
| <b>Is it secure and/or encrypted?</b> | Twitter account is password protected. Only parents who have been approved by the school can access or follow the school twitter account  |
| <b>Who can access data?</b>           | Parents of children in school who have requested to follow the school on twitter and who have been approved by the admin team.  |
| <b>How long is data kept?</b>         | 5+ years  |
| <b>Who is data shared with?</b>       | Information shared with parents   |
| <b>Legal basis for sharing</b>        | N/A Consent   |
| <b>How is data shared?</b>            | Through short messages, photos of children and photos of children's work.   |

System used: Tapestry

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

|                                 |   |
|---------------------------------|---|
| <b>How long is data kept?</b>   | 3 years after date closed                                 |
| <b>Who is data shared with?</b> | The child's? new school if it uses Tapestry.              |
| <b>Legal basis for sharing</b>  | Education acts  |
| <b>How is data shared?</b>      | Electronically over secure link.                          |
| <b>References</b>               | <a href="#">Click to download Tapestry Privacy Policy</a> |

System used: Teach your Monster to Read

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Teach Your Monster to Read is an award-winning series of games that's helped millions of children learn to read.  |
| <b>Personal Data Items</b>            | <p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• gender</li> <li>• Age</li> </ul> <p><b>Teacher</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• email address</li> </ul>   |
| <b>Why is it being processed?</b>     | To provide pupil access to the online resources.  |
| <b>Legal Basis</b>                    | <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>  |
| <b>Evidence for legal basis</b>       | ICO lawful basis tool   |
| <b>Is Consent Required?</b>           | No  |
| <b>Data Source</b>                    | School  |
| <b>Where is data stored?</b>          | <p>Saved Data will be stored locally within the App on your device and may be transferred and stored on the Website's servers. Where data is stored on the Website servers it shall be processed by TMG Ltd in accordance with the Website's privacy policy below (or at <a href="http://www.teachyourmonstertoread.com">www.teachyourmonstertoread.com</a>) It is possible that some of the computer systems and companies that process your data on behalf of TMG Ltd may be based in countries outside the European Union ("EU"). Countries outside the EU may not have as well developed data protection laws to protect your information as those inside the EU, but TMG Ltd will contractually require that personal data which is processed on its behalf is treated in compliance with EU laws and the privacy policy on the Website.</p> |
| <b>Is it secure and/or encrypted?</b> | Yes <a href="https://www.teachyourmonstertoread.com/privacy-policy">https://www.teachyourmonstertoread.com/privacy-policy</a>   |
| <b>Who can access data?</b>           | Staff <a href="https://www.teachyourmonstertoread.com/privacy-policy">https://www.teachyourmonstertoread.com/privacy-policy</a>   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | Not shared  |
| <b>Legal basis for sharing</b>        | N/A   |
| <b>How is data shared?</b>            | N/A   |

|                                       |   |
|---------------------------------------|---|
| <b>Description</b>                    | Parent/Staff/Other Text Messaging System  |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Telephone number</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Registration group</li> <li>• Year group</li> </ul> <p><b>Parent/Carer</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Primary telephone number</li> <li>• Secondary telephone number</li> </ul> <p><b>Taxi driver</b></p> <ul style="list-style-type: none"> <li>• Taxi drivers name</li> <li>• Taxi drivers telephone number</li> </ul> <p><b>Taxi escort</b></p> <ul style="list-style-type: none"> <li>• taxi escort name</li> <li>• Taxi escort telephone number</li> </ul> |
| <b>Why is it being processed?</b>     | To provide access to Communication tool for contact between school and parent/carers/staff/other  |
| <b>Legal Basis</b>                    | <p><b>Consent</b></p> <p>Article 6(1)(a) gives you a lawful basis for processing where: “the data subject has given consent to the processing of their personal data for one or more specific purposes”</p>   |
| <b>Evidence for legal basis</b>       | ICO lawful basis tool   |
| <b>Is Consent Required?</b>           | Yes   |
| <b>Data Source</b>                    | Parent  |
| <b>Where is data stored?</b>          | T2P secure servers  |
| <b>Is it secure and/or encrypted?</b> | This site has security measures in place to protect the loss, misuse, and alteration of the information under our control. All instances of unauthorised attempted access to our site are logged and investigated. Where necessary Eduspot will inform law enforcement agencies or other relevant organisations regarding misconduct.   |
| <b>Who can access data?</b>           | Admin staff, teachers to parents staff for support.   |
| <b>How long is data kept?</b>         | 1+ year   |
|                                       |   |

|                                 |  |
|---------------------------------|--|
| <b>Who is data shared with?</b> | Not shared   |
| <b>Legal basis for sharing</b>  | N/A  |
| <b>How is data shared?</b>      | N/A  |
| <b>References</b>               | <a href="#">Click to download T2P Privacy Policy</a> |

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**

**School**

- Name
- Contact Address
- Contact Email
- Contact Telephone Number
- Billing Address

**Staff**

- Name

**Pupil**

- 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:

- 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**

Education Act

|  |   |
|--|---|
| <b>legal basis</b>                                   |   |
| <b>How is the Special Category data shared?</b>      | 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.              |
| <b>Legal basis for sharing Special Category data</b> | Part of a statutory obligation.   |
| <b>Why is it being processed?</b>                    | To provide a service and resources which enables schools to assess pupil attainment and track? progress? of individuals and groups.   |
| <b>Legal Basis</b>                                   | <b>Public task</b><br><br>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller" |
| <b>Evidence for legal basis</b>                      | ICO Legal basis tool  |
| <b>Is Consent Required?</b>                          | No  |
| <b>Data Source</b>                                   | School  |
| <b>Where is data stored?</b>                         | Within the European Economic Area (EEA)   |
| <b>Is it secure and/or encrypted?</b>                | Account is password protected, Store on Doublestruck secure servers.  |
| <b>Who can access data?</b>                          | School; Teastbase (Doublestruck LTD) for technical support.   |
| <b>How long is data kept?</b>                        | 6 years after date closed   |
| <b>Who is data shared with?</b>                      | 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.              |
| <b>Legal basis for sharing</b>                       | legitimate Interest; contract; legal obligation; consent  |
| <b>How is data shared?</b>                           | In a structure, commonly used, machine readable format.   |
| <b>References</b>                                    | <a href="#">Click to download Testbase privacy notice</a>   |

System used: Visitor book

|                                       |  |
|---------------------------------------|--|
| <b>Description</b>                    | Log of all visitors into school / fire regulations   |
| <b>Personal Data Items</b>            | <b>Visitor</b> <ul style="list-style-type: none"><li>• Name</li><li>• Date and time</li><li>• Car registration</li><li>• Purpose of visit</li><li>• Company</li><li>•</li></ul>  |
| <b>Why is it being processed?</b>     | Safeguarding, health and safety, fire regulations  |
| <b>Legal Basis</b>                    | <b>Legal Obligation</b> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <b>Legitimate Interest</b> <p>Article 6(1)(f) gives you a lawful basis for processing where: “processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”</p> |
| <b>Evidence for legal basis</b>       | Safeguarding   |
| <b>Is Consent Required?</b>           | Yes  |
| <b>Data Source</b>                    | Other  |
| <b>Where is data stored?</b>          | Visitor book   |
| <b>Is it secure and/or encrypted?</b> | No   |
| <b>Who can access data?</b>           | School staff   |
| <b>How long is data kept?</b>         | 3 years after date closed  |
| <b>Who is data shared with?</b>       | n/a  |
| <b>Legal basis for sharing</b>        | n/a  |
| <b>How is data shared?</b>            | n/a  |

| System used: Wonde                    |  |
|---------------------------------------|--|
| <b>Description</b>                    | Manages transfer of data from Sims MIS to School360.   |
| <b>Personal Data Items</b>            | <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School id</li> <li>• Class/group</li> <li>• Year</li> <li>• UPN</li> <li>• Gender</li> <li>• Attendance</li> </ul>               |
| <b>Why is it being processed?</b>     | To facilitate the exchange of data to allow the set up of school360 for a school.  |
| <b>Legal Basis</b>                    | <p><b>Contract</b></p> <p>Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”</p> |
| <b>Evidence for legal basis</b>       | ICO lawful basis tool  |
| <b>Is Consent Required?</b>           | No   |
| <b>Data Source</b>                    | SIMS   |
| <b>Where is data stored?</b>          | School360 servers  |
| <b>Is it secure and/or encrypted?</b> | Yes  |
| <b>Who can access data?</b>           | School360 users  |
| <b>How long is data kept?</b>         | 1+ year  |
| <b>Who is data shared with?</b>       | School360  |
| <b>Legal basis for sharing</b>        | Public task  |
| <b>How is data shared?</b>            | Electronically   |
| <b>References</b>                     | <p><a href="#">Click to download Wonde Privacy Policy</a></p> <p><a href="#">Click to download Wonde data protection</a></p>   |

System used: Star Assessment

|                            |  |
|----------------------------|--|
| <b>Description</b>         | An online assessment system for reading & maths  |
| <b>Personal Data Items</b> | <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of Birth</li> <li>• Gender</li> <li>• Pupil Premium Status</li> <li>• Prior attainment groups</li> <li>• Current attainment data</li> <li>• Progress data</li> </ul> |

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

|  |   |
|--|---|
| <b>Special Category Data Legal Basis</b>             | <p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> <p><b>Public</b></p> <p>Processing relates to personal data manifestly made public by the Data Subject.</p> |
| <b>Special Category Evidence for legal basis</b>     | Education Acts  |
| <b>How is the Special Category data shared?</b>      | Internally and externally with parents and involved educational professionals Shared through by paper and with Google Drive   |
| <b>Legal basis for sharing Special Category data</b> | Public Task   |
| <b>Why is it being processed?</b>                    | To analyse pupil professionals and to work collaboratively with parents and education professionals   |
| <b>Legal Basis</b>                                   | <p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p>  |

|                                       |   |
|---------------------------------------|---|
|                                       | Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller" |
| <b>Evidence for legal basis</b>       | Education acts  |
| <b>Is Consent Required?</b>           | No  |
| <b>Where is data stored?</b>          | Online Server with Company which is GDPR compliant - Renaissance Learning UK  |
| <b>Is it secure and/or encrypted?</b> | Yes   |
| <b>Who can access data?</b>           | Staff   |
| <b>How long is data kept?</b>         | 3 years after date closed   |
| <b>Who is data shared with?</b>       | parents and involved educational professionals Anonymised with governors  |
| <b>Legal basis for sharing</b>        | Education Acts  |
| <b>How is data shared?</b>            | Paper & Google Drive  |