



# **Lowick C of E Vol Controlled First School**

## **GDPR Asset Register**

**Date: 18/06/2018**

Data Protection Officer: Lo wick

## Introduction

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

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

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

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

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

## Systems included in this report

System Name	Description	Special Category
Accident book	Log of accidents / minor injuries in school	
Accident Report Form	ACC1 form for reporting accidents to NCC	
Assessment Records	Electronic and paper mark books	
Attendance file	Attendance information about pupils and classes	
Consent for educational visits	Consent information for all educational visits including day trips and residential visits	
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 chidlren 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.	
Examination Boards administration	Pearson/OCR/AQA	
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.	

Lightspeed Internet Filtering	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.	
Local Authority moderation of work	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.	
Medical log	File of medical information for each child: asthma, medication administered, health care plans, risk assessments	yes
National Centre for Excellence in the Teaching of Mathematics (NCETM)	NCETM provides professional development for staff in the teaching of Mathematics Children's chances of succeeding in education and life will be maximised if they develop deep and lasting procedural and conceptual mathematical understanding. The NCETM's teaching for mastery section explains the rationale for this teaching approach, and presents case studies from schools, together with interviews with teachers involved in mastery projects through the Maths Hubs programme.	
NFER	Assessment materials, reading test and pupil progress data	
Nursery (Early Years) files	Early years registration information and funding information for Early Years entitlement, hours taken each week	yes
Office 365	Suite of online tools for staff and pupils, including OneDrive, Word, Powerpoint, Excel, Outlook, Video and Teams.	
Parents Evening Booking System	Online booking system for parents evenings and other school 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.	
PIRA - Rising stars	Reliably assess reading attainment and progress with termly standardised reading tests Progress in Reading Assessment (PiRA) termly tests produce standardised results and age related scores to enable schools to track pupil progress term by term, predict future progress and benchmark performance against national averages.	
Purple Mash		

Recruitment information	Part of the job application process	
Registers	Daily register, after school club registers, lunch register	
School meals identification	Identification of pupils for meals	
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.	
Thrive	Social and Emotional Screening Programme	
Visitor book	Log of all visitors into school / fire regulations	

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> <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>	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

<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>	<b>Legal Obligation</b> 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>	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, electronicall 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: 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: 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> Article 6(1)(e) gives you a lawful basis for processing where: “processing is 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

**References**

[Click to download Diagnostic Questions Privacy Policy](#)

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> Article 6(1)(e) gives you a lawful basis for processing where: "processing is 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

<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

	<p>all Confidential Information and School Data confidential and shall not:-</p> <p>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.</p>
<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 <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>
<b>References</b>	<a href="#">Click to download Evolve eduFOCUS Global Data Privacy</a>

System used: Examination Boards administration

<b>Description</b>	Pearson/OCR/AQA
<b>Personal Data Items</b>	<p><b>Child</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• Gender</li> <li>• Unique Candidate identifier</li> <li>• Unique Learner Number</li> <li>• Legal Name</li> <li>• Coursework marks</li> <li>• Forecast grades</li> </ul>
<b>Why is it being processed?</b>	Exam entry and issuing of qualifications
<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 lawful basis tool
<b>Is Consent Required?</b>	No
<b>Data Source</b>	SIMS
<b>Where is data stored?</b>	Edexcel secure gateway
<b>Is it secure and/or encrypted?</b>	Yes- password protected on secure gateway and sent via EDI
<b>Who can access data?</b>	Edexcel, teachers, exams officer
<b>How long is data kept?</b>	10+ years
<b>Who is data shared with?</b>	Edexcel
<b>Legal basis for sharing</b>	Public Task
<b>How is data shared?</b>	Via secure gateway and EDI
<b>References</b>	<a href="#">Click to download Exam board's Privacy Notices</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>  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>	<b>Name</b> <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>	<b>Public task</b> Article 6(1)(e) gives you a lawful basis for processing where: “processing is 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
<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

<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>	<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 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: 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> 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: 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>
<p>This system has been identified as containing Special Category Information</p> <p>Special category information is data which has the following characteristics:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Political opinions</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetic data for the purpose of identifying a natural person</li> <li>• Sex life and or sexual orientation</li> <li>• Criminal Records information - protected in Article 10</li> </ul>	
<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: National Centre for Excellence in the Teaching of Mathematics (NCETM)

<b>Description</b>	NCETM provides professional development for staff in the teaching of Mathematics Children’s chances of succeeding in education and life will be maximised if they develop deep and lasting procedural and conceptual mathematical understanding. The NCETM’s teaching for mastery section explains the rationale for this teaching approach, and presents case studies from schools, together with interviews with teachers involved in mastery projects through the Maths Hubs programme.
<b>Personal Data Items</b>	<b>Staff</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• email address</li> <li>• School</li> </ul>
<b>Why is it being processed?</b>	To provide access to the wide range of resources available online.
<b>Legal Basis</b>	<b>Consent</b> 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”
<b>Evidence for legal basis</b>	ICO legal basis tool. NCETM policy
<b>Is Consent Required?</b>	Yes
<b>Data Source</b>	School
<b>Where is data stored?</b>	Tribal secure servers
<b>Is it secure and/or encrypted?</b>	Yes. Tribal is committed to protecting your privacy. The personal details collected from you, on this portal, will only be used in the ways listed in the privacy notice.
<b>Who can access data?</b>	Staff, Tribal staff for support.
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Tribal- We may also use your information for research and statistical purposes. Please note that the information produced for these purposes will not include any details that could be used to identify you.
<b>Legal basis for sharing</b>	Consent
<b>How is data shared?</b>	With user details removed.
<b>References</b>	<a href="#">Click to download National Centre for Excellence in the Teaching of Mathematics</a>

System used: NFER	
<b>Description</b>	Assessment materials, reading test and pupil progress data
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• School</li> <li>• Contact details</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Date of birth</li> <li>• School</li> <li>• Performance data</li> </ul>
<b>Why is it being processed?</b>	To assess pupil attainment and help staff track progress and set targets.
<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>	In school NFER servers (analysis and marking)
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	School staff and NFER 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 NFER</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</b>	Internally within school

<b>data shared?</b>	
<b>Legal basis for sharing Special Category data</b>	Public task
<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: Office 365

<b>Description</b>	Suite of online tools for staff and pupils, including OneDrive, Word, Powerpoint, Excel, Outlook, Video and Teams.
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Classes</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul> <p><b>Governor</b></p> <ul style="list-style-type: none"> <li>• Name</li> </ul>
<b>Why is it being processed?</b>	To provide OneDrive for education to staff, pupils and governors.
<b>Legal Basis</b>	<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> <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>	Microsoft Servers based in the EU
<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. ICT Team can access management tool.
<b>How long is data kept?</b>	10+ years
<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 office365 Privacy</a>

System used: Parents Evening Booking System

<b>Description</b>	Online booking system for parents evenings and other school events.
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email</li> <li>• Classes</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Classes</li> <li>• Year</li> </ul> <p><b>Parent</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Email</li> </ul>
<b>Why is it being processed?</b>	To provide parents/carers with an online system for booking parents evening and other school events.
<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>	School
<b>Where is data stored?</b>	PEBS servers
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Staff, parents
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Shared with individual? parents and appropriate staff.
<b>Legal basis for sharing</b>	Contract
<b>How is data shared?</b>	Online
<b>References</b>	<a href="#">Click to download PEBS</a>

System used: Personnel files	
<b>Description</b>	Information relating to staff employment
<b>Personal Data Items</b>	<b>Staff</b> <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>	<b>Contract</b>  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”
<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>	<b>Consent</b> 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”
<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: PIRA - Rising stars

<b>Description</b>	Reliably assess reading attainment and progress with termly standardised reading tests Progress in Reading Assessment (PiRA) termly tests produce standardised results and age related scores to enable schools to track pupil progress term by term, predict future progress and benchmark performance against national averages.
<b>Personal Data Items</b>	<b>School</b> <ul style="list-style-type: none"><li>• Name</li></ul> <b>Staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• Job title</li><li>• email address</li><li>• Telephone number</li></ul> <b>Pupil</b> <ul style="list-style-type: none"><li>• Name</li><li>• Age</li><li>• Date of birth</li><li>• Gender</li><li>• Ethnic origin</li><li>• First Language</li><li>• Unique pupil number</li><li>• Pupil premium information</li><li>• Assessment results</li></ul>
<b>Why is it being processed?</b>	To provide access to a range of Rising stars resources including PIRA for standardised reading tests.
<b>Legal Basis</b>	<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>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Stored on Hodder servers
<b>Is it secure and/or encrypted?</b>	Hodder - We will take all reasonable precautions to ensure that all the personal data that is submitted to us for the purposes above remains secure and have procedures to protect the storage and disclosure of personal data. You must ensure passwords are not shared and are kept securely.

<b>Who can access data?</b>	Staff, Hodder for support
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	<p>We use your information lawfully. We do not sell your information to third parties. However we may share your information as set out in the section 'When We Share Your Information'. The details of how we use your information and the legal bases for our use are set out below: We may use such personal data collected to:</p> <ul style="list-style-type: none"> <li>• process your request, for example, to purchase products or access services and to administer your account</li> <li>• communicate with you and provide information about our products and services</li> <li>• send you marketing communications about products, services, activities, promotions or other matters that we feel may be of interest or use to you</li> <li>• contact you about products you have bought or services you have subscribed to</li> <li>• communicate with you and your school to provide Support services to Digital platform offerings</li> <li>• analyse your use of our websites, our apps and response to our communications and improve the services we offer, including personalising our communications with you.</li> </ul>
<b>Legal basis for sharing</b>	Consent
<b>How is data shared?</b>	Electronically
<b>References</b>	<a href="#">Click to download Rising Stars Privacy Notice</a>

System used: Purple Mash	
<b>Description</b>	
<b>Why is it being processed?</b>	
<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>	
<b>Is Consent Required?</b>	
<b>Data Source</b>	School
<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>	1+ year
<b>Who is data shared with?</b>	
<b>Legal basis for sharing</b>	
<b>How is data shared?</b>	

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>	<b>Child</b> <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>	<b>Public task</b> Article 6(1)(e) gives you a lawful basis for processing where: “processing is 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>	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: School meals identification

<b>Description</b>	Identification of pupils for meals
<b>Personal Data Items</b>	<b>Pupil</b> <ul style="list-style-type: none"> <li>• Name</li> <li>• Photograph</li> <li>• Dietary requirement</li> </ul>
<b>Why is it being processed?</b>	To ensure the pupils receive appropriate dietary requirements, particularly those with food allergies.
<b>Legal Basis</b>	<b>Public task</b>  Article 6(1)(e) gives you a lawful basis for processing where: “processing is 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>	Paper file - held securely within school premises, accessed daily
<b>Is it secure and/or encrypted?</b>	Yes - secure storage
<b>Who can access data?</b>	Kitchen and office 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

System used: School360	
<b>Description</b>	Learning platform for Northumberland schools with links to 3rd party educational resource providers.
<b>Personal Data Items</b>	<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 (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> <p><b>Staff</b></p> <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> Article 6(1)(e) gives you a lawful basis for processing where: “processing is 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>

[Click to download School360 EYFS App Privacy Policy](#)  
[Click to download School360 Parent App Privacy Policy](#)

<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

**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

	<ul style="list-style-type: none"> <li>• Disability &amp; Medical Information</li> <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>	<p><b>School</b></p> <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> <p><b>Pupil</b></p> <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> <p><b>Parent</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• email address</li> </ul> <p><b>Staff</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 access to an online early years journal which records pupil activity and progress throughout the year.
<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 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: Thrive	
<b>Description</b>	Social and Emotional Screening Programme
<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>• Year Group</li> <li>• UPN</li> <li>• Assessment information</li> <li>• LAC</li> </ul> <p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Class</li> </ul>
<b>Why is it being processed?</b>	Social & emotional development tracking
<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
<b>Data Source</b>	School
<b>Where is data stored?</b>	Thrive servers
<b>Is it secure and/or encrypted?</b>	Password protected
<b>Who can access data?</b>	Thrive employees for support, 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: Visitor book	
<b>Description</b>	Log of all visitors into school / fire regulations
<b>Personal Data Items</b>	<p><b>Visitor</b></p> <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>	<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>	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