



Berwick Middle School

GDPR Asset Register

Date: 01/03/2019

Data Protection Officer: Margaret Arksey

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Introduction

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

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

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

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

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

Systems included in this report

System Name	Description	Special Category
Accelerated Reader	Accelerated Reader gives teachers the information they need to monitor students' reading practice and make informed decisions to guide their future learning.	
Accident book	Log of accidents / minor injuries in school	
Accident Report Form	ACC1 form for reporting accidents to NCC	
Assessment Records	Electronic and paper mark books	
Attendance file	Attendance information about pupils and classes	yes
Behaviour Files - Paper (in class)	Information relating to the behaviours of particular pupils	yes
Child Protection Records - Electronic	Records relating to child protection issues for individual pupils	yes
Child Protection Records - Paper	Records relating to child protection issues for individual pupils	yes
Consent for educational visits	Consent information for all educational visits including day trips and residential visits	yes
CPOMS	CPOMS - Safeguarding and Child Protection Software for Schools Secure online monitoring of child protection, safeguarding and wider student pastoral welfare for schools. CPOMS is software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. Working alongside a school's existing safeguarding processes, CPOMS is an intuitive system to help with the management and recording of child protection, behavioural issues, bullying, special educational needs, domestic issues and much much more. Using CPOMS, schools can ensure that students are safe and fully supported, whilst school staff can focus on teaching and providing support, instead of administration.	yes
Data tracking spreadsheets	Spreadhseets (excel) to track progress of children over the course of their school career.	yes
Dietary requirements information sheets	Required documents for specific children with severe allergies / intolerances and religious observations (food)	yes
EVOLVE visits	An online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities.	
Examination Boards	Pearson/OCR/AQA	

administration		
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	
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.	
Looked After Children Records - Electronic	Information relating to children who are in Looked After Care	yes
Looked After Children Records - Paper	Information relating to children who are Looked After	yes
Medical Files - Electronic	Information in respect of specific medical needs of an individual student	yes
Medical Files - Paper	Information in respect of specific medical needs of an individual student	yes
Medical log	File of medical information for each child: asthma, medication administered, health care plans, risk assessments	yes
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.	
RealSmart	Realsmart provides a website that improves communication and makes collaboration easy! Google Apps for Education and your online learning and tracking tools wrapped into one school website bringing your whole school online!	
Recruitment information	Part of the job application process	yes
Registers	Daily register, after school club registers, lunch register	
Safeguarding Records - Electronic	Records relating to safeguarding of children	yes
Safeguarding Records - Paper	Records relating to safeguarding of children	yes
School360	Learning platform for Northumberland schools with links to 3rd party educational resource providers.	yes
SEND electronic records	Records relating to Special Educational Needs and Disability for individual pupils	yes
Send Paper Records	Records relating to individual pupil's SEND history	yes
SIMS	SIMS is a management information system used by maintained schools in the UK. It provides, teachers, senior leaders and support staff with the tools to efficiently manage daily school life and drive improvement in their schools.	yes
Social media sites e.g. Twitter, Facebook	Social Media tool used to inform parents about events in school and celebrate children's achievement.	
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
Times Tables Rock Stars	Online times tables practice and testing.	
Visitor book	Log of all visitors into school / fire regulations	

System used: Accelerated Reader

Description	Accelerated Reader gives teachers the information they need to monitor students' reading practice and make informed decisions to guide their future learning.
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • Class <p>Staff</p> <ul style="list-style-type: none"> • Name
Why is it being processed?	To generate information on the reading abilities of pupils
Legal Basis	<p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller"</p>
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Renaissance Learning servers
Is it secure and/or encrypted?	We have taken certain physical, electronic, contractual and administrative steps to protect the confidentiality, security, and integrity of your personally identifiable information. However, no method of transmission over the Internet or method of electronic storage is completely secure, and we cannot guarantee its absolute security. It is your responsibility to maintain the confidentiality of your Website account information.
Who can access data?	Pupil (own data), staff, technical support staff
How long is data kept?	3 years after date closed
Who is data shared with?	Not shared
Legal basis for sharing	N/A
How is data shared?	N/A
References	Click to download Accelerated Reader Privacy Policy

System used: Accident book

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

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

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

System used: Assessment Records

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

System used: Attendance file

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

Description	Information relating to the behaviours of particular pupils
Personal Data Items	<p>Pupils</p> <ul style="list-style-type: none"> • Name • Date of Birth • Address • Health Needs • Educational Behavioural Needs • Social Care Status • <p>Parents/Carers</p> <ul style="list-style-type: none"> • Name • Address • Contact Details <p>Staff</p> <ul style="list-style-type: none"> • Name • Position <p>External Support Workers</p> <ul style="list-style-type: none"> • Name • Organisation • Position • Address • Contact Details

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

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

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Special Category Data Legal Basis	Obligation
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	Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbally or secure cloud sharing (Google or Office 365 etc)
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Statutory obligations and to support educational entitlement
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	School computer, laptop
Is it secure and/or encrypted?	Yes
Who can access data?	Designated Child Protection Lead & Deputy, Designated Admin Staff
How long is data kept?	3 years after date closed
Who is data shared with?	Social Workers, Parent/Carers as appropriate, some information shared with key workers, health care professionals and Police, receiving school
Legal basis for sharing	Statutory & Legitimate interest
How is data shared?	Verbally or secure cloud sharing (Google or Office 365 etc)

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

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Special Category Data Legal Basis	Obligation
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	Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.
Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbal or secure messenger
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	Statutory obligations and to support educational entitlement
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure cabinet
Is it secure and/or encrypted?	Yes
Who can access data?	Designated Child Protection Lead & Deputy; Designation admin staff
How long is data kept?	3 years after date closed
Who is data shared with?	Social Workers, Parent/Carer as appropriate, some information shared with key workers, health care professionals and Police, receiving school
Legal basis for sharing	Statutory and Legitimate interest
How is data shared?	Verbal or secure messenger

System used: Consent for educational visits

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

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

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

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

System used: CPOMS

Description

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

Personal Data Items

Pupil

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

Main contact

- Name
- Telephone Number

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- Criminal Records information - protected in Article 10

Special Category Data Legal Basis

Obligation

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

Special Category Evidence for legal basis	Article 9
How is the Special Category data shared?	Verbally, secure messenger, online secure servers.
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To comply with statutory obligations regarding safeguarding and child protection. To provide a secure repository for personal data and ensure that records are effectively maintained.
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	Meritec secure servers.
Is it secure and/or encrypted?	Meritec Limited (CPOMS) is an accredited ISO27001 and GCloud supplier. As part of that accreditation, we have annual penetration/ vulnerability test performed by a trusted 3rd party partner. In addition to these tests Meritec Limited (CPOMS) uses a UK based Data Centre supplier who is also also accredited to ISO27001 and thus subject to the same security audits. Meritec is accredited to the latest version of the ISO27001 standard (2013) Accreditation requires annual external audits by the accreditation providers and regular internal audits by the senior management including persons at Director level.
Who can access data?	School staff, subsequent school if using CPOMS, Meritec for support and outside agencies.
How long is data kept?	3 years after date closed
Who is data shared with?	School staff, subsequent school if using CPOMS, Meritec for support, outside agencies, parents.
Legal basis for sharing	Legal obligation & public task
How is data shared?	Secure cloud based systems and secure servers.
References	Click to download CPOMS Cloud Services for Schools

System used: Data tracking spreadsheets

Description	Spreadhseets (excel) to track progress of children over the course of their school career.
Personal Data Items	<p>pupil</p> <ul style="list-style-type: none"> • Name • date of birth • gender • class • year • FSM • SEN • Assessment info

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- Criminal Records information - protected in Article 10

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

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

System used: Dietary requirements information sheets

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

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

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

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

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

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

System used: Examination Boards administration

Description	Pearson/OCR/AQA
Personal Data Items	<p>Child</p> <ul style="list-style-type: none"> • Name • Date of birth • Gender • Unique Candidate identifier • Unique Learner Number • Legal Name • Coursework marks • Forecast grades
Why is it being processed?	Exam entry and issuing of qualifications
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO lawful basis tool
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	Edexcel secure gateway
Is it secure and/or encrypted?	Yes- password protected on secure gateway and sent via EDI
Who can access data?	Edexcel, teachers, exams officer
How long is data kept?	3 years after date closed
Who is data shared with?	Edexcel
Legal basis for sharing	Public Task & legal obligation
How is data shared?	Via secure gateway and EDI
References	Click to download Exam board's Privacy Notices

System used: Google drive for education

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

System used: Governance

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

System used: Health & Safety

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

System used: Lexia

Description

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

Personal Data Items

Staff

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

School

- Name
- Payment details
- Usage data

Pupil

- Name
- Age
- Class
- Group

Why is it being processed?

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

Legal Basis

Public task

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

Evidence for legal basis

ICO Legal Basis Toolkit

Is Consent Required?

No

Data Source

School

Where is data stored?

Lexia secure servers

Is it secure and/or encrypted?

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

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

System used: Lightspeed Internet Filtering

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

System used: Live Kitchen

Description	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
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • Age <p>Parent</p> <ul style="list-style-type: none"> • Name • email address • Payment details if using direct debit
Why is it being processed?	To provide additional functionality and a better service to pupils and parents at lunchtime.
Legal Basis	<p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO Legal basis toolkit
Is Consent Required?	No
Data Source	Parent
Where is data stored?	Secure school server
Is it secure and/or encrypted?	Yes
Who can access data?	School staff, parents and NCC.
How long is data kept?	3 years after date closed
Who is data shared with?	School staff and NCC
Legal basis for sharing	Public task
How is data shared?	Electronically via secure servers.
References	Click to download Live Kitchen Privacy Policy v1.4

System used: Local Authority moderation of work

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

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

How is the Special Category data shared?	Verbally or secure cloud sharing (Google or Office 365 etc)
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To support the education of children who are Looked After
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	School computer, laptop
Is it secure and/or encrypted?	Yes
Who can access data?	Head Teacher, Class Teacher, Designated Key Worker
How long is data kept?	3 years after date closed
Who is data shared with?	Social Workers, Local Authority, Carers, Receiving school
Legal basis for sharing	Legal Obligation, Public Task
How is data shared?	via secure electronic means, Google or Office 365

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Medical Files - Paper

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Medical log

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Parent mail

Description

Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events

Personal Data Items

School

- Name
- School email address

Staff

- Name
- Class
- Title
- e-mail
- Gender
- Telephone number
- DOB
- School address

Pupil

- Name
- Year
- Parent/carer name
- Title
- Class
- Gender
- DOB
- Address
- DOB

Parent/carer

- Name
- Telephone number
- email address
- Title
- Gender
- Address

Why is it being processed?

To provide access to a range of communication and payment tools

Legal Basis

Public task

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

Evidence for legal basis

ICO legal basis toolkit

Is Consent Required?

No

Data Source

Parent

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

System used: Personnel files

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

System used: Photographs and videos of staff and pupils.

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

System used: RealSmart

Description	Realsmart provides a website that improves communication and makes collaboration easy! Google Apps for Education and your online learning and tracking tools wrapped into one school website bringing your whole school online!
Personal Data Items	<p>Staff</p> <ul style="list-style-type: none"> • Name • School • MIS id • Classes <p>Pupil</p> <ul style="list-style-type: none"> • Name • UPN • Classes • Attendance • Achievement and behaviour
Why is it being processed?	To provide staff and pupils with access to an online learning environment with a range of tools including Google drive for education.
Legal Basis	<p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	Realsmart servers and Google Drive for education servers (in Europe).
Is it secure and/or encrypted?	Yes
Who can access data?	Staff with the school, Pupils own resources.
How long is data kept?	3 years after date closed
Who is data shared with?	Staff & Pupils
Legal basis for sharing	Public task
How is data shared?	Secure online servers
References	Click to download RealSmart

System used: Recruitment information

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

System used: Registers

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

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

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

Special Category Data Legal Basis

Obligation

Processing is required for carrying out obligations under employment,

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

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

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

System used: School360

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

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- Criminal Records information - protected in Article 10

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

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

System used: SEND electronic records

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

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- Criminal Records information - protected in Article 10

Special Category Data Legal Basis

Obligation

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

Special Category Evidence for legal basis

Article 9

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

System used: Send Paper Records

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

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

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

System used: SIMS

Description

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

Personal Data Items

Pupil

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

Parent/Carer

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

Staff

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

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

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

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

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

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

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

System used: 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

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- Criminal Records information - protected in Article 10

Special Category Data Legal Basis

Obligation

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

Special Category Evidence for

Article 9

legal basis	
How is the Special Category data shared?	AQA; Doublestruck Service Providers (including internet service platform providers; payment processing providers); Local authorities; Doublestruck advisors and auditors; other approved third parties necessary to provide the service.
Legal basis for sharing Special Category data	Article 9
Why is it being processed?	To provide a service and resources which enables schools to assess pupil attainment and track? progress? of individuals and groups.
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO Legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure server
Is it secure and/or encrypted?	Account is password protected, Store on Doublestruck secure servers.
Who can access data?	School; Teastbase (Doublestruck LTD) for technical support.
How long is data kept?	6 years after date closed
Who is data shared with?	AQA; Doublestruck Service Providers (including internet service platform providers; payment processing providers); Local authorities; Doublestruck advisors and auditors; other approved third parties necessary to provide the service.
Legal basis for sharing	Legal obligation and public task
How is data shared?	In a structure, commonly used, machine readable format.
References	Click to download Testbase privacy notice

System used: Times Tables Rock Stars

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

System used: Visitor book

Description	Log of all visitors into school / fire regulations
Personal Data Items	<p>Visitor</p> <ul style="list-style-type: none"> • Name • Date and time • Car registration • Purpose of visit • Company •
Why is it being processed?	Safeguarding, health and safety, fire regulations
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis toolkit
Is Consent Required?	No
Data Source	School
Where is data stored?	Visitor book (hard copy)
Is it secure and/or encrypted?	Yes
Who can access data?	School staff, visitors
How long is data kept?	3 years after date closed
Who is data shared with?	School staff, visitors
Legal basis for sharing	Public task & legal obligation
How is data shared?	Hard copy or secure online server.