



# **Humshaugh C of E First School**

## **GDPR Asset Register**

**Date: 05/02/2019**

Data Protection Officer: Vicki Evans

## Introduction

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

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

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

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

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

## Systems included in this report

System Name	Description	Special Category
2Build a profile	EYFS email communication & observation system	yes
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
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
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
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.	
Google drive for education	suite of online tools for staff and pupils, including Google drive, docs, slides, sheets, gmail and Google classroom.	
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.	
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 log	File of medical information for each child: asthma, medication administered, health care plans, risk assessments	yes
Nessy - Literacy interventions	Nessy programs are designed to help students of all abilities learn to read, write, spell and type, especially those who learn differently, including: Mainstream EAL Homeschool Students with dyslexia	
Personnel files	Information relating to staff employment	
Photographs and videos of staff and pupils.	Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms.	
Recruitment information	Part of the job application process	
Registers	Daily register, after school club registers, lunch register	
School360	Learning platform for Northumberland schools with links to 3rd party educational resource providers.	
SEND 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	
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.	
Visitor book	Log of all visitors into school / fire regulations	
Going Home Arrangements Emergency Contact Details [Paper records]	Record of names Addresses & Phone numbers of persons who should be contacted if situation requires urgent response	

System used: 2Build a profile

<b>Description</b>	EYFS email communication & observation system
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Age</li> <li>• Class</li> <li>• Assessment Observations</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>• School</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>	Appendix 9
<b>How is the Special Category data shared?</b>	Secure web access
<b>Legal basis for sharing Special Category data</b>	Appendix 9
<b>Why is it being processed?</b>	To provide parental access to childs' development
<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>	Secure Server
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	EYFS Staff & Parents
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Not shared
<b>Legal basis for sharing</b>	N/A
<b>How is data shared?</b>	N/A
<b>References</b>	<a href="#">Click to download 2Simple Privacy Policy</a>

System used: Accident book

<b>Description</b>	Log of accidents / minor injuries in school
<b>Personal Data Items</b>	<b>Pupil</b> <ul style="list-style-type: none"><li>• Name</li><li>• class</li><li>• Injury</li><li>• first aid</li><li>•</li></ul>
<b>Why is it being processed?</b>	To record injuries in school
<b>Legal Basis</b>	<b>Legal Obligation</b> Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<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>	Legal obligation
<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>	Statutory obligations to comply with Health and Safety 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>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 toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School

<b>Where is data stored?</b>	Secure filing cabinet in office
<b>Is it secure and/or encrypted?</b>	Yes
<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>	Public task and legal obligation
<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>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 toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	On-site Secure 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>	3+ years
<b>Who is data shared with?</b>	Parents
<b>Legal basis for sharing</b>	Legal obligation, Public task
<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>

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

<b>Special Category Data Legal Basis</b>	<p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	Verbally, Secure cloud,
<b>Legal basis for sharing Special Category data</b>	Article 9
<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>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: "processing</p>

	is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
<b>Evidence for legal basis</b>	ICO legal basis toolkit
<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>	Yes
<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>	Legal obligation/ Public task
<b>How is data shared?</b>	Electronically

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

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

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

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

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</li> <li>• Dietary requirements</li> <li>• Contact information</li> <li>• Family doctor</li> </ul>

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

<b>Is Consent Required?</b>	No
<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>	3 years after date closed
<b>Who is data shared with?</b>	NCC or medical practitioners / providers
<b>Legal basis for sharing</b>	Public task & Legal obligation
<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>

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<b>Special Category Data Legal Basis</b>	<p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	Secure google drive and paper copies
<b>Legal basis for sharing Special Category data</b>	Article 9
<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>	ICO legal basis toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School

<b>Where is data stored?</b>	Secure Google Drive/cloud based storage.
<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>	3 years after date closed
<b>Who is data shared with?</b>	Different elements of data are shared with different parties including: other staff, Governors and parents
<b>Legal basis for sharing</b>	Public task
<b>How is data shared?</b>	Electronically by secure encrypted communication

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>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• DOB</li> <li>• Dietary information</li> </ul>

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<b>Special Category Data Legal Basis</b>	<p><b>Obligation</b></p> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p>
<b>Special Category Evidence for legal basis</b>	Article 9
<b>How is the Special Category data shared?</b>	Paper records
<b>Legal basis for sharing Special Category data</b>	Article 9
<b>Why is it being processed?</b>	Health and safety - to avoid children coming into contact with specific foods
<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 toolkit
<b>Is Consent Required?</b>	No

<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>	3 years after date closed
<b>Who is data shared with?</b>	n/a
<b>Legal basis for sharing</b>	n/a
<b>How is data shared?</b>	n/a

System used: Eschools Website Provider

<b>Description</b>	On-line school website building tool
<b>Personal Data Items</b>	<p><b>School Information</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Contact information</li> <li>• Class names</li> <li>• Staff names</li> <li>• Governor names</li> <li>• Year group information (planning, homework)</li> <li>• Newsletters</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Photographs</li> <li>•</li> <li>•</li> </ul>
<b>Why is it being processed?</b>	To inform parents and the wider community about the life of the school
<b>Legal Basis</b>	<p><b>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 toolkit
<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 secure server through school 360 platform 4. Transfer of School Data 4.1. The School hereby consents to eSchools accessing School Data held on the Management Information System through Wonde, for the purpose of extracting and transferring such School Data to eSchools. 4.2. Prior to leaving the School premises by electronic means (via HTTPS) the School Data will be encrypted by Wonde and eSchools.
<b>Is it secure and/or encrypted?</b>	Yes 4.2. Prior to leaving the School premises by electronic means (via HTTPS) the School Data will be encrypted by Wonde and eSchools. 5.1. The School Data shall always remain the property of the School. 5.2. eSchools shall have no responsibility to maintain the security of any School Data held or controlled by the School. 5.3. eSchools shall keep all Confidential Information and School Data confidential and shall not:- 5.3.1.1. use any Confidential Information or School Data except for the purpose of performing the services it provides to the School; or 5.3.1.2.

	disclose any Confidential Information in whole or in part to any third party, except as expressly permitted by this Agreement, or as required for the purpose of any services provided by eSchools to the School, or to the extent required by law. 6.1. Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing to be carried out by eSchools, as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, eSchools shall in relation to the School Data implement appropriate technical and organisational measures to ensure a level of security appropriate to that risk. 6.2. In assessing the appropriate level of security, eSchools shall take account in particular of the risks that are presented by processing of the School Data, in particular from a Personal Data Breach.
<b>Who can access data?</b>	Parents and wider community. Information available to the public on the internet. Eschools can access the data. DFE
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	The general public eschools is a public facing website
<b>Legal basis for sharing</b>	Public interest & legal obligation
<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>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 toolkit
<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
<b>Who can access data?</b>	Evolve staff
<b>How long is data kept?</b>	3 years after date closed
<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>	Public task & legal obligation
<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: 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 toolkit.
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School 360
<b>Where is data stored?</b>	Google secure 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>	3 years after date closed
<b>Who is data shared with?</b>	Staff and Pupils
<b>Legal basis for sharing</b>	Public task
<b>How is data shared?</b>	Secure google cloud.
<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: Health & Safety

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

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>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 toolkit.
<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>	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
<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>	<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 toolkit
<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>	3 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>	Public task and legal obligation
<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> <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 toolkit
<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>	3 years after date closed
<b>Who is data shared with?</b>	Other NCC staff
<b>Legal basis for sharing</b>	Public task and legal obligation
<b>How is data shared?</b>	Secure server and hard copies

<b>Description</b>	Information relating to children who are in Looked After Care
<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>• Personal Education Plan</li> <li>• Health Needs</li> <li>• Social Care Needs</li> <li>• Educational Needs</li> <li>• Family Background</li> </ul> <p><b>Parents &amp; Carers</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Contact Details</li> <li>• Address</li> <li>•</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>

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

System used: Medical log

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

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

<b>Why is it being processed?</b>	Health and safety of child
<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 toolkit
<b>Is Consent Required?</b>	No
<b>Data Source</b>	Parent
<b>Where is data stored?</b>	Medical log in secure storage held in the 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>	3 years after date closed
<b>Who is data shared with?</b>	Staff, NCC and NHS professionals
<b>Legal basis for sharing</b>	Public task and legal obligation
<b>How is data shared?</b>	Verbally, written and electronically via secure servers.

System used: Nessy - Literacy interventions

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

System used: Personnel files

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

System used: Photographs and videos of staff and pupils.

<b>Description</b>	Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms.
<b>Personal Data Items</b>	<p><b>Staff</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Photograph</li> <li>• Video</li> </ul> <p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Photograph (unnamed)</li> <li>• Video (unnamed)</li> </ul> <p><b>Governor</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Photograph</li> </ul>
<b>Why is it being processed?</b>	To celebrate the life and work of the school.
<b>Legal Basis</b>	<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: Recruitment information

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

System used: Registers

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

System used: School360

<b>Description</b>	Learning platform for Northumberland schools with links to 3rd party educational resource providers.
<b>Personal Data Items</b>	<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>	<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>	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>	<p><a href="#">Click to download School360 Privacy Policy</a></p> <p><a href="#">Click to download School360 EYFS App Privacy Policy</a></p> <p><a href="#">Click to download School360 Parent App Privacy Policy</a></p>

System used: SEND electronic records

<b>Description</b>	Records relating to Special Educational Needs and Disability for individual pupils
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<b>Personal Data Items</b>	<b>Pupils</b> <ul style="list-style-type: none"><li>• Name</li><li>• Date of Birth</li><li>• Address</li><li>• Health Needs</li><li>• Social Care Status</li><li>• Educational Needs</li><li>• SEND History</li></ul> <b>Parents / Carers</b> <ul style="list-style-type: none"><li>• Name</li><li>• Address</li><li>• Contact details</li></ul> <b>Staff</b> <ul style="list-style-type: none"><li>• Name</li><li>• Position</li></ul> <b>External Support Workers</b> <ul style="list-style-type: none"><li>• Name</li><li>• Organisation</li><li>• Position</li><li>• Address</li><li>• Contact details</li></ul>
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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>	<b>Obligation</b> <p>Processing is required for carrying out obligations under employment, social security or social protection law or a collective agreement.</p> <b>Public Interest / Public Health</b> <p>Processing necessary for reasons of public interest in the area of public</p>
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	health such as protecting against serious cross-border threats to health or guaranteeing high standards of healthcare and of medical products or medical devices.
<b>Special Category Evidence for legal basis</b>	ICO Regs - Article 9
<b>How is the Special Category data shared?</b>	Secure cloud share - Google or Office 365
<b>Legal basis for sharing Special Category data</b>	ICO Regs - Article 9
<b>Why is it being processed?</b>	To ensure appropriate levels of support for the student in relation SEND needs
<b>Legal Basis</b>	<p><b>Legal Obligation</b></p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p><b>Public task</b></p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
<b>Evidence for legal basis</b>	ICO legal basis tool
<b>Is Consent Required?</b>	No
<b>Data Source</b>	School
<b>Where is data stored?</b>	Google Drive or Office 360 secure cloud storage
<b>Is it secure and/or encrypted?</b>	Yes
<b>Who can access data?</b>	Head, SENDCO, Teachers, Key Workers
<b>How long is data kept?</b>	3 years after date closed
<b>Who is data shared with?</b>	Parents/Carers as appropriate; Social Workers; Health Care Professionals; Receiving Schools; Youth Offending Teams (case dependent); LA Workers as appropriate
<b>Legal basis for sharing</b>	Statutory Obligation & Public Task
<b>How is data shared?</b>	Secure cloud share or secure messenger if printed.

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

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

System used: SIMS

**Description**

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

**Personal Data Items**

**Pupil**

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

**Parent/Carer**

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

**Staff**

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

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

System used: 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

System used: Going Home Arrangements Emergency Contact Details [Paper records]

<b>Description</b>	Record of names Addresses & Phone numbers of persons who should be contacted if situation requires urgent response
<b>Personal Data Items</b>	<p><b>Pupil</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Address</li> <li>• Date of Birth</li> <li>• Class</li> <li>• Details of any medical or social circumstance which could necessitate urgent contact</li> </ul> <p><b>Parent/Carer</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Home Phone</li> <li>• Work Phone</li> <li>• Mobile Phone</li> </ul> <p><b>Other Emergency Contact</b></p> <ul style="list-style-type: none"> <li>• Name</li> <li>• Relationship to child</li> <li>• Record of consent from parent/carer to use this contact in emergency</li> <li>• Home Phone</li> <li>• Work Phone</li> <li>• Mobile</li> </ul>
<b>Why is it being processed?</b>	So that in case of emergency an adult can be contacted
<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 Acts
<b>Is Consent Required?</b>	No
<b>Data Source</b>	Parent
<b>Where is data stored?</b>	Paper files School Office
<b>Is it secure and/or encrypted?</b>	yes locked filing cabinet
<b>Who can access data?</b>	School Staff working with Child
<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>	Not Shared
<b>How is data shared?</b>	Not Shared

