



Tritlington C of E First School

GDPR Asset Register

Date: 28/06/2018

Data Protection Officer: Susan Mitchell

01670 787383

admin@tritlington.northumberland.sch.uk

Introduction

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

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

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

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

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

Systems included in this report

System Name	Description	Special Category
Accident book	Log of accidents / minor injuries in school	
Accident Report Form	ACC1 form for reporting accidents to NCC	
Active Learn Pearsons - including Bug Club	Bug Club is a whole-school reading programme that combines an online reading world with print books, and assessment tools.	
Assessment Records	Electronic and paper mark books	
Attendance file	Attendance information about pupils and classes	
Classroom monitor	Classroom Monitor is the most widely used assessment tool in the UK, it specialises in assessment for learning, pupil tracking and formative assessment.	
Consent for educational visits	Consent information for all educational visits including day trips and residential visits	
Data tracking spreadsheets	Spreadhseets (excel) to track progress of children over the course of their school career.	
Dietary requirements information sheets	Required documents for specific chidlren with severe allergies / intolerances and religious observations (food)	
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.	
Governance	Details of all members of the Governing Body	
Health & Safety	Records pertaining to Health & Safety	
Interactive Resources	Pupil / teacher online learning resources for Numeracy.	
Lightspeed Internet Filtering	The Lightspeed Rockets provide DfE compliant Internet Filtering Services for all schools connected to the Internet through NCC.	

Local Authority moderation of work	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.	
Medical log	File of medical information for each child: asthma, medication administered, health care plans, risk assessments	yes
Nursery (Early Years) files	Early years registration information and funding information for Early Years entitlement, hours taken each week	yes
Parent mail	Parent mail provides a number of useful communication tools for the school, including: Text Only Messaging Online Payments Parents' Evening Manager Online Form Collection Meetings & Events	
Personnel files	Information relating to staff employment	
Photographs and videos of staff and pupils.	Permission to display staff and pupil photographs (unnamed) and video on the school website and social media platforms.	
PIRA - Rising stars	Reliably assess reading attainment and progress with termly standardised reading tests Progress in Reading Assessment (PiRA) termly tests produce standardised results and age related scores to enable schools to track pupil progress term by term, predict future progress and benchmark performance against national averages.	
Recruitment information	Part of the job application process	
Registers	Daily register, after school club registers, lunch register	
School meals identification	Identification of pupils for meals	
School360	Learning platform for Northumberland schools with links to 3rd party educational resource providers.	
Schoolcomms	Communication app for parents	
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.	
Smartlog Software	Health and safety records software	

Social media sites e.g. Twitter, Facebook	Social Media tool used to inform parents about events in school and celebrate children's achievement.	
Tapestry	An online journal recording all the learning and fun of children's early years education.	
Thrive	Social and Emotional Screening Programme	
Visitor book	Log of all visitors into school / fire regulations	

System used: Accident book	
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	Health and safety
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	health and safety
How is data shared?	verbally

System used: Accident Report Form

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

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	Health and safety
How is data shared?	Carbon copy

System used: Active Learn Pearsons - including Bug Club

Description	Bug Club is a whole-school reading programme that combines an online reading world with print books, and assessment tools.
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 provide online access to curriculum materials for staff and 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 Education acts
Is Consent Required?	No
Data Source	SIMS
Where is data stored?	Pearsons secure servers
Is it secure and/or encrypted?	<p>Yes Your privacy is extremely important to us. We’re committed to protecting any personal information you’ve given us, and we comply with all relevant data protection laws. This means that: • we take full responsibility for the information we hold about you • we will protect your privacy at all times • we will never sell your personal information</p> <p>Whether you’ve supplied your personal details online, by phone or text, by email or in a letter, we will never use them without a lawful reason to do so. We’ll use them for the purposes for which they were initially requested and as fully explained in this Privacy Notice and Cookie Policy.</p>
Who can access data?	Staff, pupils own data, Pearsons staff for support.
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	<p>Click to download Pearson GDPR readiness</p> <p>Click to download Bug Club Pearson Privacy Notice</p>

System used: Assessment Records	
Description	Electronic and paper mark books
Personal Data Items	Child <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	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	N/A
Is Consent Required?	No
Data Source	School
Where is data stored?	On-site 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?	5+ years
Who is data shared with?	Parents
Legal basis for sharing	To inform parents of progress
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
Why is it being processed?	To regularly check pupil's attendance towards a desired goal
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." Legitimate Interest 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."
Evidence for legal basis	Check on attendance
Is Consent Required?	No
Data Source	School
Where is data stored?	Attendance file and electronically
Is it secure and/or encrypted?	File - no, electronicall on encrypted drive
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	To check attendance
How is data shared?	Electronically

System used: Classroom monitor	
Description	Classroom Monitor is the most widely used assessment tool in the UK, it specialises in assessment for learning, pupil tracking and formative assessment.
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • Age • Year • Class • Assessment data <p>Staff</p> <ul style="list-style-type: none"> • Name • Class
Why is it being processed?	To provide access to comprehensive? online assessment and pupil progress tracking tools.
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p> <p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	ICO legal basis tool Education Acts
Is Consent Required?	No
Data Source	School
Where is data stored?	Yes, Prime Principle secure servers
Is it secure and/or encrypted?	ensure that we have in place appropriate technical and organisational measures to protect against unauthorised or unlawful processing of that personal data and against accidental loss or destruction of, or damage to, that personal data, appropriate to the harm that might result from the unauthorised or unlawful processing or accidental loss, destruction or damage and the nature of the data to be protected, having regard to the state of technological development and the cost of implementing any measures (those measures may include, where appropriate, pseudonymising and encrypting personal data, ensuring confidentiality, integrity, availability and resilience of its systems and services, ensuring that availability of and access to personal data can be restored in a timely manner after an incident, and regularly assessing and evaluating

	the effectiveness of the technical and organisational measures adopted by us);
Who can access data?	Staff, Classroom monitor for support
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 Classroom Monitor Access Terms Click to download Classroom Monitor Terms of Website Use

System used: Consent for educational visits

Description	Consent information for all educational visits including day trips and residential visits
Personal Data Items	Pupil <ul style="list-style-type: none"> • Name • DOB • Health conditions • Medication including consent for staff to administer • Dietary requirements • Contact information • Family doctor
Why is it being processed?	To ensure school has up to date information when taking children off site
Legal Basis	Consent 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”
Evidence for legal basis	Health and safety and safeguarding
Is Consent Required?	Yes
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?	1+ year
Who is data shared with?	NCC or medical practitioners / providers
Legal basis for sharing	Health and safety
How is data shared?	summarised document

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
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	Education acts
Is Consent Required?	No
Data Source	School
Where is data stored?	Encrypted USB / Google drives
Is it secure and/or encrypted?	Yes
Who can access data?	Teachers in school
How long is data kept?	1+ year
Who is data shared with?	Different elemetns of data are shared with different parties including: other staff, Governors and parents
Legal basis for sharing	Necesity for completion of statutory tasks
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	Pupil <ul style="list-style-type: none"> • Name • DOB • Dietary information
Why is it being processed?	Health and safety - to avoid children coming into contact with specific foods
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	Health and safety
Is Consent Required?	Yes
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?	1+ year
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>Contract</p> <p>Article 6(1)(b) gives you a lawful basis for processing where: “processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract”</p>
Evidence for legal basis	ICO tool, website, privacy policy
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, although 'Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect the Customer Data (including your personal data), we cannot guarantee the security of such data transmitted to us over such a public network, and any transmission is at your own risk.'
Who can access data?	Evolve staff
How long is data kept?	1+ year
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	Contract/agreement with school
How is data shared?	See contract/agreement http://edufocus.co.uk/assets/files/gdpr/Data%20Processing%20Details.p df
References	Click to download Evolve eduFOCUS Global Data Privacy

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 tool. Contract with L.A. & School360
Is Consent Required?	No
Data Source	School 360
Where is data stored?	Google 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?	50 years after date closed
Who is data shared with?	N/A
Legal basis for sharing	N/A
How is data shared?	N/A
References	Click to download Google Drive Policy Notice Click to download Google GSuite Privacy Policy

System used: Governance	
Description	Details of all members of the Governing Body
Personal Data Items	Name <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	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 lawful basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	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
Legal basis for sharing	Public task
How is data shared?	Electronically

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

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

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>
Evidence for legal basis	Education Act
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?	50 years after date closed
Who is data shared with?	School leadership, LSCB and police if serious incident occurs
Legal basis for sharing	Statutory requirement
How is data shared?	Secure electron communication
References	Click to download Lightspeed Privacy Notice

System used: Local Authority moderation of work

Description	The Local Authority arranges a number of meetings with groups of schools where pupil work is presented along with grades and cross moderated to ensure consistency of assessment in schools across the County.
Personal Data Items	<p>School</p> <ul style="list-style-type: none"> • Name <p>Staff</p> <ul style="list-style-type: none"> • Initials <p>Pupil</p> <ul style="list-style-type: none"> • Initials • Gender • Unique pupil number (UPN)
Why is it being processed?	As part of the statutory? requires for assessment and moderation in schools
Legal Basis	<p>Legal Obligation</p> <p>Article 6(1)(c) provides a lawful basis for processing where: “processing is necessary for compliance with a legal obligation to which the controller is subject.”</p>
Evidence for legal basis	ICO Legal basis tool Education legislation
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?	10+ years
Who is data shared with?	Not shared
Legal basis for sharing	N/A
How is data shared?	N/A

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
<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>Medical</p> <p>Processing is required for the purposes of preventative or occupational medicine; for evaluating the working capacity of the employee,; medical diagnosis; the provision of health or social care or treatment or management of health or social care systems and services on the basis of Union or Member State law or a contract with a health professional.</p>
Special Category Evidence for legal basis	Education acts / consent

How is the Special Category data shared?	Internally with school / medical staff
Legal basis for sharing Special Category data	Public task
Why is it being processed?	Health and safety of child
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 lawful basis tool
Is Consent Required?	Yes
Data Source	Parent
Where is data stored?	Medical log in school office
Is it secure and/or encrypted?	Yes
Who can access data?	School staff
How long is data kept?	1+ year
Who is data shared with?	Medical personnel
Legal basis for sharing	Health and safety
How is data shared?	Verbal, written

System used: Nursery (Early Years) files

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

This system has been identified as containing Special Category Information

Special category information is data which has the following characteristics:

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

data shared?	
Legal basis for sharing Special Category data	Public task
Why is it being processed?	To ensure registration of children into school and that children receive their entitlements
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	Accurate record of admission
Is Consent Required?	Yes
Data Source	Parent
Where is data stored?	In school office
Is it secure and/or encrypted?	No
Who can access data?	SLT
How long is data kept?	6+ years
Who is data shared with?	School staff, NCC, outside agencies as required
Legal basis for sharing	Safeguarding
How is data shared?	Verbally / electronically

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	<p>School</p> <ul style="list-style-type: none"> • Name • School email address <p>Staff</p> <ul style="list-style-type: none"> • Name • Class • Title • e-mail • Gender • Telephone number • DOB • School address <p>Pupil</p> <ul style="list-style-type: none"> • Name • Year • Parent/carers name • Title • Class • Gender • DOB • Address • DOB <p>Parent/carers</p> <ul style="list-style-type: none"> • 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	<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 tool
Is Consent Required?	Yes

Data Source	School
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?	Not shared
Legal basis for sharing	N/A
How is data shared?	N/A
References	Click to download Parentmail Privacy Policy

System used: Personnel files	
Description	Information relating to staff employment
Personal Data Items	Staff <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	Contract 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”
Evidence for legal basis	ICO Legal Basis Tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Secure filing cabinet
Is it secure and/or encrypted?	Yes - secure storage
Who can access data?	Headteacher and office staff
How long is data kept?	1+ year
Who is data shared with?	NCC and/or HR provider and/or Payroll provider
Legal basis for sharing	Contract
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>
Evidence for legal basis	Parent/Carer consent form for Pupil Staff consent for staff
Is Consent Required?	Yes
Data Source	School
Where is data stored?	School website and social media sites
Is it secure and/or encrypted?	Publically available on WWW
Who can access data?	Publicly available on the www
How long is data kept?	1+ year
Who is data shared with?	The public
Legal basis for sharing	Consent
How is data shared?	On www
References	Click to download Model photograph policy (including consent form)

System used: PIRA - Rising stars

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

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

System used: Recruitment information	
Description	Part of the job application process
Personal Data Items	Name <ul style="list-style-type: none"> • Name • DOB • Address • Educational establishments attended • Qualifications • Disciplinary Records • Appraisal Records • Salary information
Why is it being processed?	As part of the recruitment process
Legal Basis	Consent 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” 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	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?	6+ years
Who is data shared with?	Governors/ shortlisting panel/ SIP/ HR
Legal basis for sharing	Safe recruitment Standard procedure
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	Child <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	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 lawful basis tool Education acts
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?	During the day, school office is manned. After school, it is locked. Online encrypted.
Who can access data?	School staff, after school club providers
How long is data kept?	5+ years
Who is data shared with?	School staff, after school club providers
Legal basis for sharing	All staff required to know numbers of pupils in their care to ensure safeguarding.
How is data shared?	Through the paper register at the time of completion. Electronically with office/Sims.

System used: School meals identification

Description	Identification of pupils for meals
Personal Data Items	Pupil <ul style="list-style-type: none"> • Name • Photograph • Dietary requirement
Why is it being processed?	To ensure the pupils receive appropriate dietary requirements, particularly those with food allergies.
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?	Paper file - held securely within school premises, accessed daily
Is it secure and/or encrypted?	Yes - secure storage
Who can access data?	Kitchen and office staff
How long is data kept?	1+ year
Who is data shared with?	Not shared
Legal basis for sharing	N/A
How is data shared?	N/A

System used: School360	
Description	Learning platform for Northumberland schools with links to 3rd party educational resource providers.
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • School id • Class/Group • Year • UPN (Unique Pupil Number) • Gender • Attendance (If School360 used for registration) • Pupil concern reports • EYFS reflections <p>Staff</p> <ul style="list-style-type: none"> • Name • Staff Alternative e-mail address • Teacher pupil notes
Why is it being processed?	To facilitate setting up and access to the County learning platform - School360
Legal Basis	<p>Public task</p> <p>Article 6(1)(e) gives you a lawful basis for processing where: “processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller</p>
Evidence for legal basis	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	NCC Contract with School360
How is data shared?	Electronically, encrypted on transfer and storage.
References	Click to download School360 Privacy Policy

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

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

Legal basis for sharing	Necessary for the performance of a contract
How is data shared?	'If you apply for a Merchant Account through Schoolcomms, we can set up your payments gateway on your behalf'
References	Click to download Schoolcomms Privacy Notice

System used: Send 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
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 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?	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	Statutory Obligations and Legitimate Interest
How is data shared?	Secure Messenger

Description

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

Personal Data Items

Pupil

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

Parent/Carer

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

Staff

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

	<ul style="list-style-type: none"> • Disability & Medical Information • Religion • Marital status • Language • Passport Information • Dietary requirements • Absences • Car information • Next of Kin • Payroll number • DBS Information
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	Education acts
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?	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
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: Smartlog Software	
Description	Health and safety records software
Personal Data Items	Staff <ul style="list-style-type: none"> • Name • Contact details • Training undertaken • Accident and incident reporting
Why is it being processed?	To help schools to keep detailed records.
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 lawful basis tool
Is Consent Required?	No
Data Source	School
Where is data stored?	Safesmart smart log servers
Is it secure and/or encrypted?	Yes
Who can access data?	School staff
How long is data kept?	1+ year
Who is data shared with?	Not shared
Legal basis for sharing	N/A
How is data shared?	N/A
References	Click to download Smartlog Privacy Notice

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	Pupil <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	Consent 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” 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	N/A
Is Consent Required?	Yes
Data Source	School
Where is data stored?	Information about where twitter data is stored: https://help.twitter.com/en/rules-and-policies/global-operations-and-data-transfer
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?	5+ years
Who is data shared with?	Information shared with parents
Legal basis for sharing	N/A Consent
How is data shared?	Through short messages, photos of children and photos of children's work.

System used: Tapestry	
Description	An online journal recording all the learning and fun of children's early years education.
Personal Data Items	<p>School</p> <ul style="list-style-type: none"> • Name • Address • Email address and name of person who pays for service in school <p>Pupil</p> <ul style="list-style-type: none"> • Name • Date of birth • Notes on progress • Photographs • Videos • Address <p>Parent</p> <ul style="list-style-type: none"> • Name • email address <p>Staff</p> <ul style="list-style-type: none"> • Name • Email address
Why is it being processed?	To provide access to an online early years journal which records pupil activity and progress throughout the year.
Legal Basis	<p>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 Education acts
Is Consent Required?	Yes for parent access element
Data Source	School
Where is data stored?	Tapestry? secure servers

Is it secure and/or encrypted?	Yes
Who can access data?	Staff, parents (own child), other settings if child moves school and new school if it uses Tapestry.
How long is data kept?	3 years after date closed
Who is data shared with?	The child's? new school if it uses Tapestry.
Legal basis for sharing	Education acts
How is data shared?	Electronically over secure link.
References	Click to download Tapestry Privacy Policy

System used: Thrive	
Description	Social and Emotional Screening Programme
Personal Data Items	<p>Pupil</p> <ul style="list-style-type: none"> • Name • DOB • Class • Year Group • UPN • Assessment information • LAC <p>Staff</p> <ul style="list-style-type: none"> • Name • Class
Why is it being processed?	Social & emotional development tracking
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?	Yes
Data Source	School
Where is data stored?	Thrive servers
Is it secure and/or encrypted?	Password protected
Who can access data?	Thrive employees for support, school staff
How long is data kept?	1+ year
Who is data shared with?	N/A
Legal basis for sharing	N/A
How is data shared?	N/A

System used: Visitor book	
Description	Log of all visitors into school / fire regulations
Personal Data Items	Visitor <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	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.” Legitimate Interest 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.”
Evidence for legal basis	Safeguarding
Is Consent Required?	Yes
Data Source	Other
Where is data stored?	Visitor book
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?	n/a
Legal basis for sharing	n/a
How is data shared?	n/a