

Data Asset Audit - Pupils

Data Protection Lead (DPL): named school staff

Data Protection Officer (DPO): e.g. [Amy Brittan](#)

Data Controller: [Herne View Church of England Primar](#)

For further information on data held about pupils, see next sheet

Name of Data Asset
Information held in Management Information System (e.g. SIMS)
Child Protection information e.g. paper files, electronic records
SEN files, reviews and IEPs
Pupil personal folder
Exclusion and behaviour data (may include reports, minutes of meetings and data held in MIS)

Pupil photos on website and social media

Photos on school P Drive (taken in class)

School Meals registers

Pupils' Work

Teacher mark books

Accident records

Emails

Information on school server/network drives (physical server or cloud)

Information on staff laptops

Information in staff Office365 OneDrive

Personal data on encrypted staff memory sticks

Information taken by Wonde (or Groupcall, or other third party data integrator)

Information accessed by school technical support service

Assessment tools e.g. Tapestry,

Remote learning tools e.g. Google Classroom, Class Dojo

Other teaching and learning tools e.g. Bug Club

Last updated: July 22

By: Claire Oaten

y School

What data does it contain?	Purpose
Information management system. Records & holds data about pupils and staff at the school. Safeguarding/Child protection data, SEN, EAL, Exclusion, Reports, Attendance, Photos, Medical data.	Teaching & Learning. Statutory returns. Safeguarding/ Child Protection Business Continuity/ Communication
Log of safeguarding concerns recorded by staff and reports, minutes of meetings - may also include police reports (domestic violence) and assessments from third party specialists	Safeguarding and child protection
Information about SEND learners e.g. assessments, observations, minutes of meetings, education plans - may also include reports from third parties e.g. assessments and reports by specialists	SEND / Teaching and learning
pupil folder - e.g. consent forms, data collection forms, SATs papers, phonics screener etc	Teaching & Learning. Statutory returns. Safeguarding/ Child Protection Business Continuity/
Log of pupil exclusions and behaviour, minutes of meetings with parents, any other data related to exclusions and behaviour	Teaching & learning / Statutory returns

Photos of pupil activities, class photos, individual photos on MIS, photos on website, photos for marketing, photos on social media list any others	Teaching & learning / Communications
Photos of pupil activities, class photos, individual photos on MIS, photos on website, photos for marketing, photos on social media list any others	Teaching & learning / Communications
Records of pupil choices and allergies	School meals management
Pupil exercise books and work on walls	Teaching & learning
Pupil attainment and formative assessment e.g. spelling scores	Teaching and learning
Records of accidents on the school site and actions taken	Health and Safety
Communications between school staff relating to pupils - may also include emails from third parties	Teaching and learning / Child protection
Could include a wide range of information about students (e.g. assessment data, reports, photographs)	Teaching and learning / Child protection
Personal data about students held on staff laptop hard drives should be minimised - all data should be saved to server for business continuity.	Teaching and learning
Personal data about students held on staff laptop hard drives should be minimised - all data should be saved to server for business continuity. Some data may be held temporarily before being transferred to server.	Teaching and learning

<p>If memory sticks are used by staff for personal data, they must be encrypted and only used as a temporary storage facility before being transferred to the school server.</p>	<p>Teaching and learning</p>
<p>Extracts pupil data from MIS to third party tools e.g. FFT Aspire, MyConcern</p>	<p>Teaching & Learning. Safeguarding/ Child Protection</p>
<p>School technical support provider - also have access to school network and systems and admin access to MIS.</p>	<p>School maintenance and technical support</p>
<p>Comms with families and recording assessments including photographs</p>	<p>Teaching & learning</p>
<p>Used as communication and learning tools especially in Blended Learning</p>	<p>Teaching & learning</p>
<p>Online learning sites that offer interactive or virtual resources</p>	<p>Teaching & learning</p>

Data Label - e.g. Personal Data / Special Category Data	Who has role/access to enter information?	Where is the data kept?
Personal and Special category data	Office staff managed by SBM and HT/DHT/AHT; class teachers and HLTA (for attendance)	On MIS server, accessible through password on staff devices
Personal and Special category data	Designated Safeguarding Lead / staff	Locked cupboard DSL office
Personal and Special category data	SENCO / Class teachers / TA	e.g. in classroom or SENCO office, locked at end of day
Personal and Special category data	Office administrators plus HT/DHT/AHT	in school office, in locked cabinet
Personal and Special category data	Staff	Exclusions on MIS, behaviour logs in classroom or SENCO office in locked cupboard.

Personal data	Staff	On server, school website, teacher laptops
Personal data	Staff	On server, school website, teacher laptops
Personal data - if allergies are recorded, this will be Special category	Office administrators	School office and third party BAM
Personal data	Teacher	Classroom or walls
Personal data	Teacher	Classroom - locked storage
Personal and Special category data	Named staff member	EEC, One Drive and accident folder
Personal and Special category data	Email account holder	Staff email accounts and County server
Personal and Special category data	Remote access for key staff	On server or server cloud (One Drive)
Personal and may include Special category data	Staff	On hard drive of laptop
Personal and may include Special category data	Email account holder	Staff email accounts and County server

Personal data - though this should be minimised.	Staff	On encrypted memory stick
Personal and Special category data	Name of staff member / Name of technician / MIS team / Looked After Call for LAC	Wonde data kept on UK servers
Personal and Special category data	On-site technician and remote access support technicians	Tech support will keep your admin passwords on file somewhere - on their server
Personal data	Staff - and parents' to own child's account	Cloud service through Foundation Stage Forum Ltd
Personal data	Staff, learners	Saved in cloud storage
Personal data	Staff, learners	Held in cloud storage

<p>Who do we share with?</p>	<p>Legal Basis for data processing (Article 6 of GDPR) Choose from: Not needed - not personal data / Explicit Consent / Needed for a Contract / Legal Obligation / Protect Vital Interests / Public Task / Legitimate Interests</p>
<p>Local Authority through census; Looked After Call for LAC, tools (e.g. Wonde) which extract data in order to populate third party tools e.g. FFT Aspire</p>	<p>Legal Obligation, Public Task, Explicit Consent</p>
<p>Anyone who requires access for safeguarding purposes</p>	<p>Legal Obligation - statutory legislation</p>
<p>Local Authority, other relevant agencies working with consent with specific children e.g. EPS, CYPTS</p>	<p>Legal Obligation</p>
<p>Staff as necessary</p>	<p>Legal Obligation</p>
<p>Local Authority</p>	<p>Legal Obligation</p>

parents and general public	Legitimate Interests for some photos. Consent for photos used on website, social media, publications
parents and general public	Legitimate Interests for some photos. Consent for photos used on website, social media, publications
parents and third party, BAM	Legitimate Interests
Parents	Public Task, Legitimate Interests
n/a	Public Task, Legitimate Interests
EEC, H&S SSE and HSE as applicable	Legal Obligation
Sender and recipient	Public Task
School staff (access permissions in place)	Legal Obligation for statutory data inc safeguarding and SEND / Public Task for teaching and learning data / Legitimate Interests for photographs
Staff member and technical support	Public Task for teaching and learning data
Staff member and technical support	Public Task for teaching and learning data

Staff member	Public Task for teaching and learning data
Only held by Wonde	Legal Obligation, Public Task
Technicians as required	Contract
no sharing sensitive data with any third parties.	Public Task
not sharing sensitive data with any third parties.	Public Task
not sharing sensitive data with any third parties.	Public Task

<p>Legal Basis for processing Special Category Data (Article 9 of GDPR) Choose from: Not needed - not a special category / Explicit consent / Employment/social security/protection law / Vital interests where consent impossible / Political/philosophical/religious/TUP organisation aim / Personal data manifestly made public by subject / For establishment, exercise/defence of legal claims / Substantial public interest</p>	<p>How do we ensure it is up to date and accurate?</p>	<p>Has consent been sought?</p>
<p>Substantial Public Interest</p>	<p>Annual data collection forms for contact data</p>	<p>No</p>
<p>Substantial Public Interest</p>	<p>Staff ensure that data is accurate and checks made regularly by safeguarding leads</p>	<p>No</p>
<p>Substantial Public Interest</p>	<p>Staff and SENCO ensure that data is accurate</p>	<p>No</p>
<p>Substantial Public Interest</p>	<p>Data Collection forms are replaced annually and old forms shredded. Other information is removed if no longer</p>	<p>Consent forms will be stored</p>
<p>Substantial Public Interest</p>	<p>Staff ensure that data is accurate</p>	<p>No</p>

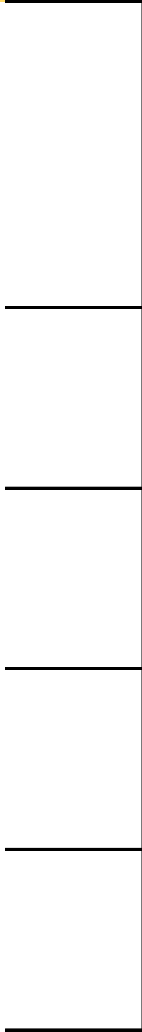
Not needed - not a Special Category	Old photos are deleted on annual basis. School and teachers retain some photos for teaching and learning	Yes
Not needed - not a Special Category	Old photos are deleted on annual basis. School and teachers retain some photos for teaching and learning	Yes
Explicit consent from parents of allergy sufferers	Staff ensure that data is accurate	From parents
Not needed - not a Special Category	N/A	No
Not needed - not a Special Category	Staff ensure that data is accurate	No
Defence of legal claims	N/A	No
Substantial Public Interest	N/A	No
Substantial Public Interest	Staff ensure that data is accurate	No
No Special Category data (e.g. medical, safeguarding data) should be stored on staff hard drives	Staff ensure that data is accurate	No
No Special Category data (e.g. medical, safeguarding data) should be *solely* stored in individual staff Office 365 One Drive	Staff ensure that data is accurate	No

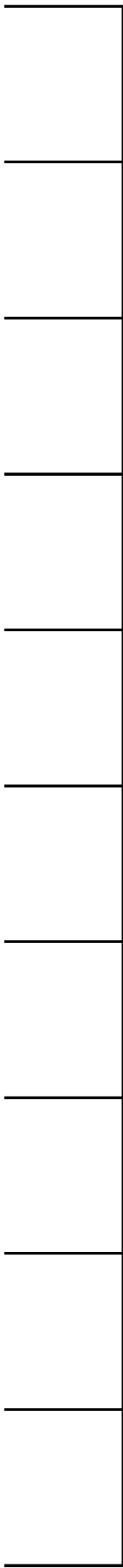
No Special Category data (e.g. medical, safeguarding data) should be stored on a memory stick	Staff ensure that data is accurate	No
Substantial Public Interest	Data is inputted by staff who are reminded of the need for accuracy	Not required
Legitimate activities	N/a	Not required
Not needed - not a Special Category	Staff ensure they input correct data. Old data is deleted when pupils leave.	Consent from parents
Not needed - not a Special Category	May have been set up via Wonde or Groupcall taking data from MIS. If set up was manual (e.g. by spreadsheet) staff	Not required if tool was set up during COVID disruption
Not needed - not a Special Category	May have been set up via Wonde or Groupcall taking data from MIS. If set up was manual (e.g. by spreadsheet) staff	Not required if tool was set up during COVID disruption. If set up before, consent may have been sought

<p>If consent is sought, where is it stored?</p>	<p>Retention of data</p>	<p>Evidence of data destruction (if needed)</p>	
<p>N/A</p>	<p>Most data passed on to next setting via CTF. Historical data may remain, as school are complying with legal hold on data destruction, until IICSA concludes</p>	<p>N/A</p>	
<p>N/A</p>	<p>Securely passed on to next setting. Historical data may remain, as school are complying with legal hold on data</p>	<p>N/A</p>	
<p>N/A</p>	<p>Securely passed on to next setting. Historical data may remain, as school are complying with legal hold on data</p>	<p>N/A</p>	
<p>In pupil personal folder</p>	<p>Securely passed on to next setting / destroyed if not needed. Historical data may remain, as school</p>	<p>N/A</p>	
<p>No</p>	<p>Securely passed on to next setting. Historical data may remain, as school are complying with legal hold on data</p>	<p>N/A</p>	

In pupil personal folder	Deleted when pupils leave setting / photos on website can stay for 3 years as consent will not expire	Staff confirmation
In pupil personal folder	Deleted when pupils leave setting	Staff confirmation
N/A as through meal ordering	Current year +3	Staff confirmation
N/A	Children should take home work at the end of the academic year. If this is not possible, school will retain for no	Staff confirmation
N/A	Destroyed when pupils leave setting	Staff confirmation
N/A	Date of incident +25 years	Staff confirmation
N/A	Deleted when no longer needed or information transferred to other recording tool e.g. safeguarding	Staff confirmation
N/A	Passed on if part of pupil record. Deleted if necessary.	Staff confirmation
N/A	Deleted when no longer needed or information transferred to other recording tool	Staff confirmation
N/A	Transferred to school storage when staff member leaves employment. No staff member will take	Staff confirmation

N/A	Deleted when no longer needed or information transferred to other recording tool	Staff confirmation
N/A	When students leave, data should be deleted from MIS which will delete from Wonde. However, data may	N/A
N/A	Technician will retain access for the duration of the contract	Confirmation from support provider upon termination of contract
In pupil personal folder	Passed on if part of pupil record. Deleted if necessary.	Staff confirmation
N/A	Deleted when child leaves school	Staff confirmation
In pupil personal folder	Deleted when child leaves school	Staff confirmation







Contents of a pupil record

Taken from www.irms.org.uk/SchoolsToolkit (pages 13 and 14)

The table below lists common and potential record types that may form part of the pupil record

Record of transfer from Early Years setting (if held)

Admission form

Data Collection Sheet (current copy)

Annual written report to parents

National Curriculum and Religious Education syllabus record sheets (if held)

Information relating to a **major** incident involving the child

Statements/plans, reports etc for educational support e.g. SEND, Speech and Language

Medical information relevant to the child's ongoing education/behaviour

Child protection reports/disclosures and supporting documentation

Information relating to exclusions (fixed or permanent)

Specific correspondence with parents about **major** issues

Summary details of complaints made by the parents relevant to the pupil's ongoing education or behaviour

Exam results - pupil copy

SATS results

Records not forming part of the pupil record (should be stored separately and not transferred)

Attendance registers and information

Absence (authorised) notes and correspondence

Specific emails about the pupil in relation to safeguarding or their education / behaviour - should be placed in separate folder

General internal emails about the pupil (should be deleted if no longer required)

Parental consent forms for trips and outings

Accident forms (a copy can be placed on the pupil record if it is a major incident)

Medicine consent and administering records

Copies of birth certificates etc

Generic correspondence with parents about **minor** issues (e.g. 'dear parents')

Pupil work, drawings etc including work stored in online platforms - should be returned to pupils at end of year

Previous data collection forms which have been superseded (there is no need to retain these)

Photography / image consents - this is the school's record



d. The pupil record should be securely transferred to the next setting.

Data Asset Audit - Workforce

Name of Data Asset

Information held in Management Information System e.g. SIMS

Information shared with school HR service

Staff personnel file

Staff photos

Performance Management records

Recruitment records - successful candidates

Recruitment records - unsuccessful candidates

Pre-employment vetting information

Proof of identity for DBS

Proof of identity for right to work

Single Central Record

Timesheets

Allegations of child protection nature

Allegations of child protection nature - malicious

Disciplinary proceedings

Accident records - staff

Training records with Support Services for Education

Information in Office 365 - emails

Information in Office 365 - groups or distribution lists

Information in Office 365 - One Drive

What data does it contain?	Purpose
Information management system. Records & holds data about staff at the school e.g. Photos, Medical data, Staff absence data	Teaching & Learning. Statutory returns. Safeguarding/ Child Protection Business Continuity/
Includes data from a number of school sources (emails etc) shared with external HR service to support general inquiries, occupational health provision, grievances, contracts	Operational staff management
In the staff personnel file e.g. job application, proof of ID, contract, references, emergency contact data, signed code of conduct, self-assessments, training records, termination of employment data	Operational staff management
Staff photos on MIS, website, server	Operational staff management
Information about staff progress and targets agreed with SLT (may be within personnel file)	Operational staff management
Information about successful candidates e.g. application forms, references (within personnel file)	Operational staff management
Information about successful candidates e.g. application forms, references	Operational staff management

DBS checks (may be within personnel file)	Operational staff management
Copy of passport collected as part of DBS disclosure and right to work in UK (may be within personnel file)	Operational staff management
e.g. copy of passport (may be within personnel file)	Operational staff management
Identity check; barred list check; 2 x references; enhanced DBS check/certificate; prohibition from teaching check; further checks on people living or working outside the UK; check of professional qualifications; check to establish the person's right to	Safeguarding and child protection
e.g. for lunchtime supervisors	Operational staff management
Records, statements and minutes of meetings relating to child protection concerns	Safeguarding and child protection
Records, statements and minutes of meetings relating to child protection concerns (may be within personnel file)	Safeguarding and child protection
Records, statements and minutes of meetings relating to disciplinary concerns e.g. oral, written and final warnings (may be within personnel file)	Operational staff management
Records relating to accidents at work	Health and Safety
Staff name, any dietary requirements	Operational staff management

Microsoft emails relating to school business and staff.	Communications and school management
Groups of users e.g. staff members set up by administrators or staff for communication	Communications and school management
Microsoft storage space for documents created by teachers, can be shared with colleagues.	Communications and school management

Data Label - e.g. Personal Data / Special Category Data	Who has role/access to enter information?	Where is the data kept?
Personal and Special category data	Admin, HT, DHT, AHT	On MIS server, accessible through password on staff devices
Personal and Special category data	School administrators, HT, DHT, AHT	MIS /personnel file / emails
Personal and Special category data	Office staff / SLT	Locked in filing cabinet in office,
Personal data	Office staff / SLT	Server
Personal and Special category data	Office staff / SLT	appraisals in locked cupboard in HT office and electronically with SLT
Personal and Special category data	Office staff, HT/DHT/AHT	Locked in filing cabinet in office
Personal and Special category data	Office staff, HT/DHT/AHT	Locked in filing cabinet in office

Personal and Special category data	Admin HT/AHT	Locked in filing cabinet in office
Personal and Special category data	Admin HT AHT Office staff to copy	Locked in filing cabinet in office
Personal and Special category data	Admin	Locked in filing cabinet in office
Personal and Special category data	Admin HT/DHT/AHT	SIMs MIS
Personal data	Office staff	Locked in filing cabinet in office
Personal and Special category data	DSL/DDSL	Locked in cabinet in DSL office
Personal and Special category data	DSL/DDSL	Locked in cabinet in DSL office
Personal and Special category data	HT/DHT/AHT	Locked in safeguarding cabinet in office or locked in personnel file in school office
Personal and Special category data	HT/DHT/AHT/Admin	EEC
Personal and Special category data	Office staff	Cloud storage and server in County Hall

Personal and Special category data	School staff and administrators	Cloud storage and server in County Hall
Personal and Special category data	School staff and administrators	Cloud storage and server in County Hall
Personal and Special category data	School staff and administrators	Cloud storage and server in County Hall

<p>Who do we share with?</p>	<p>Legal Basis for data processing (Article 6 of GDPR) Choose from: Not needed - not personal data / Explicit Consent / Needed for a Contract / Legal Obligation / Protect Vital Interests / Public Task Legitimate Interests</p>
Local Authority	Legal Obligation, Explicit Consent
External HR service	Data will have different legal bases - some will be Legal Obligation, others will be Contract or Legitimate Interests
Staff as required legally and in line with GDPR	Legal Obligation, Contract
On website, facebook	Legitimate Interests
Staff member, SLT if appraiser	Legal Obligation
HR team Governors if interviewing	Legal Obligation
Governors if interviewing	Legal Obligation

None	Legal Obligation
None	Legal Obligation
None	Legal Obligation
LA/Ofsted/ Safeguarding Governor	Legal Obligation
HT/DHT/AHT to authorise	Legal Obligation
DSL / LADO / DDSL	Legal Obligation
DSL / LADO / DDSL	Legal Obligation
SLT / Governors	Legal Obligation
EEC, OH	Legal Obligation
Support Services for Education, training venue host, trainer	Legitimate Interests

Recipients	Legitimate Interests
Recipients	Legitimate Interests
Defined by user	Legitimate Interests

<p>Legal Basis for processing Special Category Data (Article 9 of GDPR) Choose from: Not needed - not a special category / Explicit consent / Employment/social security/protection law / Vital interests where consent impossible / Political/philosophically/religious/TUP organisation aim / Personal data manifestly made public by subject / For establishment, exercise/defence of legal claims / Substantial public interest</p>	<p>How do we ensure it is up to date and accurate?</p>	<p>Has consent been sought?</p>
Substantial Public Interest	Annual data collection forms for contact data	No
Substantial Public Interest	Annual data collection forms for contact data and medical issues. School staff ensure that other data is accurate	No
Substantial Public Interest	Annual data collection forms for contact data	No
Not needed - not Special category data	Old photos are removed from system	No - but staff can object
Substantial Public Interest	Annual completion	No
Employment law	N/A	Consent by completion
Employment law	N/A	Consent by completion

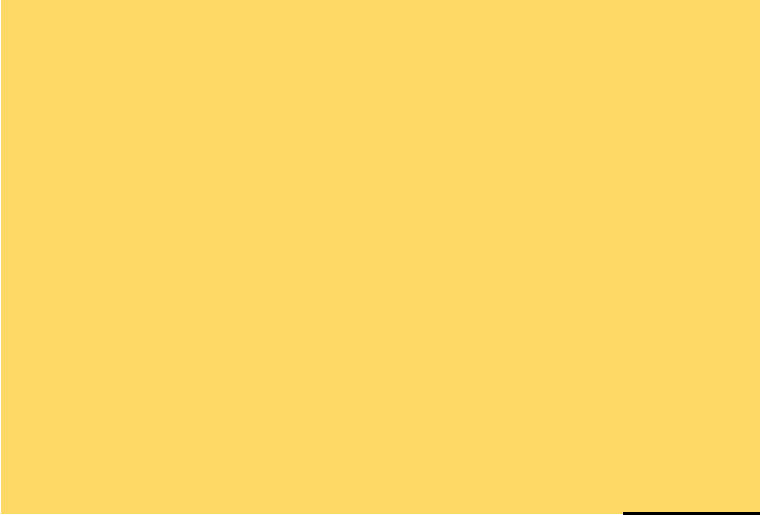
Employment law	N/A	Consent by completion
Employment law	N/A	Consent by completion
Employment law	N/A	Consent by completion
Substantial Public Interest	N/A	Consent by completion
Not needed - not Special category data	Old timesheets removed when necessary	No
Protection law / defence of legal claims	N/A	No
Protection law / defence of legal claims	N/A	No
Defence of legal claims	N/A	No
Defence of legal claims	N/A	No
Substantial Public Interest	Staff are asked about dietary requirements when training is booked	Yes

Substantial Public Interest	N/A	Staff informed of school expectations with Acceptable User Policy
Substantial Public Interest	N/A	Staff informed of school expectations with Acceptable User Policy
Substantial Public Interest	N/A	Staff informed of school expectations with Acceptable User Policy

If consent is sought, where is it stored?	Retention of data	Evidence of data destruction (if needed)	
N/A	Termination of employment	N/A	
N/A	Will depend on nature of data - likely to be at least termination + 6 years	Staff confirmation	
N/A	Termination of employment +6 years	Staff confirmation	
N/A	Removed when staff leave school	Staff confirmation	
N/A	Current year + 6 years	Staff confirmation	
N/A	Date of appointment + 6 years	Staff confirmation	
N/A	Date of appointment of successful candidates + 6 month	Staff confirmation	

N/A	Not retained - number of DBS check can be logged on MIS	Staff confirmation
N/A	Checked and note of what was seen is kept	Staff confirmation
N/A	Termination of employment +2 years	Staff confirmation
N/A	No DfE guidance - but +2 years after termination of employment is advisable	Staff confirmation
N/A	Current year + 6 years	Staff confirmation
N/A	Until retirement age or ten years from allegation (whichever longer)	Staff confirmation
N/A	Securely disposed	Staff confirmation
N/A	Scale from 6 months - 12 months (see IRMS)	Staff confirmation
N/A	Date of incident +6 years	Staff confirmation
Verbal from staff member	Added to staff file and retained for termination of employment + 6 years	Staff confirmation

Signed AUP stored in staff personal file	Emails should be regularly reviewed and housekeeping undertaken. Mailbox removed when staff	Confirmation from Schools IT
Check when staff leave and update lists / groups to ensure that non-school staff do not receive emails	Individual users removed from groups	Staff confirmation
Signed AUP stored in staff personal file	Removed when staff leave school - Schools IT informed	Confirmation from Schools IT



Data Asset Audit - Parents

Name of Data Asset
Information held in Management Information System (e.g. SIMS Bromcom, SchoolPod, ScholarPack, Integris, Arbor)
Parent messaging system
Remote learning videoconferencing with children - where parents emails are used
Parent payment system e.g. SchoolComms
Email distribution lists to parents
Contact data for parents when taken off site

What data does it contain?	Purpose
Parent contact data stored on school MIS server	Teaching & Learning. Safeguarding/ Child Protection
Cloud based enterprise in Dublin. Centrally hosted/located on school MIS server	Teaching & Learning. Safeguarding/ Child Protection
Email invitations are sent to parents so their child can participate in remote sessions	Public Task
Payments for lunches and wrap around care and activities	Financial management
Lists which may have been created by school staff to share information and school news	Communications
Lists which may have been created by school staff to contact parents in case of emergency	Safeguarding/Child Protection

Data Label - e.g. Personal Data / Special Category Data	Who has role/access to enter information?	Where is the data kept?
Personal and Special category data	staff e.g. business manager, office administrator / teaching staff / technician / MIS Support team	On MIS server, accessible through password on staff devices
Personal data	Role of staff member e.g. business manager, office administrator /	On MIS server, accessible through password on staff devices
Personal data	Staff member	Up to date email addresses will be taken from SIMS
Personal data	Staff member / third party	Cloud data processed in EEA
Personal data	School administrators/HT/DHT	In secure individual email accounts and via email@school via MIS system, SIMS, secure County server
Personal data	School administrators	May be in paper file or securely held on tablet device

Who do we share with?	Legal Basis for data processing (Article 6 of GDPR) Choose from: Not needed - not personal data / Explicit Consent / Needed for a Contract / Legal Obligation / Protect Vital Interests / Public Task Legitimate Interests
Local Authority	Legal Obligation
Parents	Legitimate interests or consent
Parents (they will only see their own email address)	Public Task (allowing education to continue)
Parents	Consent
Parents	Legitimate interests or consent - parents inform of current email address on data collection form
N/A	Legitimate interests or consent

<p>Legal Basis for processing Special Category Data (Article 9 of GDPR) Choose from: Not needed - not a special category / Explicit consent / Employment/social security/protection law / Vital interests where consent impossible / Political/philosophicaly/religious/TUP organisation aim / Personal data manifestly made public by subject / For establishment, exercise/defence of legal claims / Substantial public interest</p>	<p>How do we ensure it is up to date and accurate?</p>	<p>Has consent been sought?</p>
<p>Substantial Public Interest</p>	<p>Annual data collection forms for contact data</p>	<p>No</p>
<p>Not needed - not a special category</p>	<p>Annual data collection forms for contact data</p>	<p>no</p>
<p>Not needed - not a special category</p>	<p>Annual data collection forms for contact data</p>	<p>no</p>
<p>Not needed - not a special category</p>	<p>Parents update own information</p>	<p>e.g. consent is indicated by parent sign up</p>
<p>Not needed - not a special category</p>	<p>Annual data collection forms for contact data</p>	<p>Indicate Yes if consent was sought</p>
<p>Not needed - not a special category</p>	<p>Annual data collection forms for contact data</p>	<p>no</p>

If consent is sought, where is it stored?	Retention of data	Evidence of data destruction (if needed)
N/A	Securely passed on to next setting	N/A
n/a	Deleted once pupils leave	Staff confirmation
N/A	Parent email addresses are only ones recorded as current on MIS SIMS	Staff confirmation
On third party server	Deleted once pupils leave	Confirm with third party
e.g. in pupil personal folders	Parents removed from lists when children leave school	Staff confirmation
n/a	Contact data is returned to office when teacher returns to school	Confirmed by staff in office

Data Asset Audit - School Community

Name of Data Asset
School Visitor Book
InVentry sign in system
Single Central Record for governors and volunteers
Governor email distribution lists
Governor reports and minutes containing personal data
Governor training records
Governor record of business interests

What data does it contain?	Purpose
Name, date and reason of visit	Safeguarding and Fire Regulations
Name, time, photograph, position, vehicle, who visiting, company as applicable	Safeguarding and Fire Regulations
Identity check; barred list check; 2 x references; enhanced DBS check/certificate; prohibition from teaching check; further checks on people living or working outside the UK; check of professional qualifications; check to establish the person's right to work in the UK; Childcare Disqualification Regulation	Safeguarding and child protection
Business (e.g. educ.somerset.gov.uk) emails for governors	Governance and communications
This will depend - only personal data identifying living individuals is of concern. Reports may be electronic or paper.	Governance
Records of training attended by governors	Governance
Names, contact details, any business interests	Governance

Data Label - e.g. Personal Data / Special Category Data	Who has role/access to enter information?	Where is the data kept?
Personal Data	Office staff/HT/DHT/AHT view information	In office
Personal Data	Office staff/HT/DHT/AHT view information	Online, cloud system
Personal and Special category data	Named staff	MIS SIMS
Personal Data	Clerk to governors/HT/SBM	email on Office 365
Personal Data	Clerk to governors	Clerk's files and locked in cabinet school office. Secure area One Drive
Personal Data	Clerk to governors	Clerk's files
Personal Data	Clerk to governors	Clerk's files

Who do we share with?	Legal Basis for data processing (Article 6 of GDPR) Choose from: Not needed - not personal data / Explicit Consent / Needed for a Contract / Legal Obligation / Protect Vital Interests / Public Task Legitimate Interests
N/A	Legal Obligation
InVentry cloud	Legal Obligation
LA/Ofsted/ Safeguarding Governor	Legal Obligation
Governors and on County Global list	Legal Obligation
Governors	Legal Obligation
Governors / LA / Diocese	Legal Obligation
DfE/ LA	Legal Obligation

<p>Legal Basis for processing Special Category Data (Article 9 of GDPR) Choose from: Not needed - not a special category / Explicit consent / Employment/social security/protection law / Vital interests where consent impossible / Political/philosophicaly/religious/TUP organisation aim / Personal data manifestly made public by subject / For establishment, exercise/defence of legal claims / Substantial public interest</p>	<p>How do we ensure it is up to date and accurate?</p>	<p>Has consent been sought?</p>
<p>Not needed - not a special category</p>	<p>Only current day is displayed. Old sheets are removed at end of day and kept in office.</p>	<p>N/A</p>
<p>For establishment exercise of duties, substantial public interest</p>	<p>Users reviewed regularly by appointed staff member in office</p>	<p>Consent by completion</p>
	<p>N/A</p>	<p>Consent by completion</p>
<p>Not needed - not a special category</p>	<p>Distribution lists are reviewed when governing body changes. Old accounts are</p>	<p>N/A</p>
<p>Not needed - not a special category</p>	<p>Old accounts are removed. Files are returned to the school.</p>	<p>N/A</p>
<p>Not needed - not a special category</p>	<p>N/A</p>	<p>N/A</p>
<p>Not needed - not a special category</p>	<p>N/A</p>	<p>N/A</p>

If consent is sought, where is it stored?	Retention of data	Evidence of data destruction (if needed)
N/A	Current year +6	Staff confirmation
n/a	ID Badge 24hrs when used on cloud storage; 51 days with new badge.	Staff confirmation
N/A	No DfE guidance - but +2 years after termination of employment is advisable	Staff confirmation
N/A	Removed when no longer needed	Clerk confirmation
N/A	Reports - minimum 6 years; Minutes - permanent	Clerk confirmation
N/A	Date governor steps down + 6 years	Clerk confirmation
N/A	Date of appointment + 6 years	Clerk confirmation

Data Asset Audit - read these notes

This data asset audit is designed to get you started. You will **need to add the data** in your own settings. As much information as possible has been included for you, but **text in red** will need to be amended for your setting.

Consider carefully your legal basis for holding the data. **Personal data** can be held by using one of the legal bases in Column H. If you hold **Special Category data** you will also need to use one of the legal bases in Column I.

Special Category data is explained at <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>

For **statutory and advisory retention periods of data**, you may want to consult the suggestions on page 65 of this guide: <http://irms.org.uk/page/SchoolsToolkit> - also bear in mind the legal hold placed on the destruction of data by the Independent Inquiry into Child Sexual Abuse <https://www.iicsa.org.uk/key-documents/115/view/2018-07-25-guidance-note-retention-instructions-data-protection-requirements-version-2.pdf>

If you need help completing your data asset audit, contact your DPO dposchool@somerset.g

