

**GDPR support from LGfL TRUSTnet for School Information Assets: Data Audit/Lo**

Use this in conjunction with other resources/audits at school/inf

Please read important notes and comments

Senior Information Risk Owner (SIRIO): \_\_\_\_\_  
 Data Protection Officer (DPO): \_\_\_\_\_  
 Data Controller: \_\_\_\_\_  
 Data Processor: \_\_\_\_\_

Last updated: \_\_\_\_\_  
 By: \_\_\_\_\_

Data held or collected by the school	Data label*	Information Asset Owner	Who has role/access to enter information	Where is the data kept?	Purpose	Who do we share with?	Legal basis for collection A* (IMPORTANT - you must be aware of this basis)	Legal basis for collection B* (IMPORTANT - you must be aware of this basis)	If Consent selected in previous column, when is it sought?	If Consent, where is record of consent stored?	How long is data kept / used for?
		(Add your named person)	Enter specific names for dedicated role holders	Enter as appropriate (below are examples ONLY)	Choose from drop-down / change as appropriate	Enter as appropriate - examples are below	Select from dropdown only for any data items that are Personal Data or Special Categories	The column is only relevant for items under "Special Categories", for which it must be completed	E.g. when a student joins the roll / annually, etc.	This might be online or offline but will also be secure and include limitations collected	Enter as appropriate (below are examples ONLY)
<b>Parent data (within MS)</b>											
Child records	Special Categories of Personal Data		SA/Office administrators	In MS system	Teaching and Learning (statutory returns)	Local Authorities					Until child is 25 years old
Subsidiary / Child Protection	Special Categories of Personal Data		Head / Designated Protection Officer	In a locked fire cabinet in a secure room	Teaching and Learning (statutory returns)	Parents					DOB + 25 years
SEN	Special Categories of Personal Data		SENCO/SAD / Class/Subject / Deputy	In a locked fire cabinet in a non-secure room	Teaching and Learning (statutory returns)	Local Authorities					part of pupil record
Evolution behaviour	Special Categories of Personal Data		Class teacher / Pastoral staff / Headteacher	School network drive	Teaching and Learning (statutory returns)	Social Services					part of pupil record
Records	Special Categories of Personal Data		Class teacher / Pastoral staff / Headteacher	School network drive	Teaching and Learning (statutory returns)	Health Professionals					part of pupil record
Examination results / Standard Assessment	Personal Data		Teacher / Pastoral / Designated / Dept	Encrypted / password protected USB drive	Teaching and Learning (statutory returns)	Exams					Current year + 6 years
Attendance registers	Personal Data		Class teachers / Office administrators	Class teachers / Office administrators	Subsidiary / Child Protection	Names Trust Parties					Date of entry + 3 years
Student shooch	Special Categories of Personal Data		SA/Office administrators / Class teachers	Subsidiary / Child Protection							assisted on pupil record
<b>Staff data (within MS)</b>											
Staff Personal File	Special Categories of Personal Data		SA/Office administrators		Teaching and Learning (statutory returns)						Transmission of documents + 6 years
Performance / CPD data	Personal Data		SA/Office administrators		Teaching and Learning (statutory returns)						part of personal file
Staff absence data	Special Categories of Personal Data		SA/Office administrators		Business Continuity / communication						part of personal file
<b>Other Personal Data</b>											
Recruitment records for new headteacher	Special Categories of Personal Data		SA/Office administrators		Business Continuity / communication						
Recruitment of new staff	Special Categories of Personal Data		SA/Office administrators		Business Continuity / communication						
DBS / writing checks	Special Categories of Personal Data		Head / SA/Office administrators		Business Continuity / communication						Current year + 6 years
Annual CPD data	Special Categories of Personal Data		Head / SA/Office administrators		Business Continuity / communication						Date of recruitment of successful candidate + 6 months
Disciplinary and grievance records	Special Categories of Personal Data		Head / SA/Office administrators		Business Continuity / communication						Note of proof on personal file / physical copies + 6 months
Allocation of a child protection matter	Special Categories of Personal Data		Head / SA/Office administrators		Subsidiary / Child Protection						Current year + 6 years
Make-up allegations of a child protection matter	Special Categories of Personal Data		Head / SA/Office administrators		Subsidiary / Child Protection						Date of assembly + 6 months / take advice
Health and safety assessments	Personal Data		Head / SA/Office administrators		Subsidiary / Child Protection						Until review for 10 years from allegation / report / take advice
Health and safety accident reports	Special Categories of Personal Data		Head / SA/Office administrators		Subsidiary / Child Protection						Dispos at end of case / take advice
Admissions papers (successful or unsuccessful)	Personal Data		Head / SA/Office administrators		Teaching and Learning (statutory returns)						Date of meeting + 1 year, then review
Student medical records and reports	Special Categories of Personal Data		Head / SA/Office administrators		Subsidiary / Child Protection						take advice if depends on nature of event
Student social services records and reports	Special Categories of Personal Data		Head / SA/Office administrators		Subsidiary / Child Protection						Date of admissions or case resolution + 1 year
<b>Financial matters</b>											
Annual accounts	Personal / Financial Data		Head / SA/Office administrators		Sound financial management						DOB + 25 years
Purchase Orders, Invoices, Payments	Personal / Financial Data		Head / SA/Office administrators		Sound financial management						DOB + 25 years
Records related to budget management	Personal / Financial Data		Head / SA/Office administrators		Sound financial management						Current year + 6 years
Asset management	Personal / Financial Data		Head / SA/Office administrators		Sound financial management						Current year + 6 years
FIM* - track school meals requests	Personal / Financial Data		Head / SA/Office administrators		Sound financial management						Current year + 3 years
School meals registers	Personal / Financial Data		Head / SA/Office administrators		Sound financial management						Current year + 6 years
Records related to school catering	Personal / Financial Data		Head / SA/Office administrators		Sound financial management						Current year + 6 years
Records relating to school maintenance	Personal / Financial Data		Head / SA/Office administrators		Sound financial management						Current year + 3 years
<b>Access control / passwords* into systems</b>											
Admission data access / Nominated Contacts	Personal Data		Head		Access to systems						Current year + 6 years
Access to PPE or LA systems	Personal Data		Head / SA/Office administrators		Access to systems						Current year + 6 years
Network administration / password data	Personal Data		Network Manager / Support Provider		Access to systems						Least changes in personnel or in line with password policy
USO password information	Personal Data		USO Nominated contacts		Access to systems						Least changes in personnel or in line with password policy
Email management	Personal Data		USO Nominated contacts		Access to systems						Least changes in personnel or in line with password policy
Web filtering management	Personal Data		USO Nominated contacts		Access to systems						Least changes in personnel or in line with password policy
School website administration	Personal Data		Designated staff		Access to systems						Least changes in personnel or in line with password policy
Spelt words/tables, etc. Tables	Personal Data		Designated staff		Access to systems						Least changes in personnel or in line with password policy
Learning Platform password information	Personal Data		USO Non Con / M/E Key teacher		Access to systems						Least changes in personnel or in line with password policy
<b>Communications</b>											
Information added to website	Unrestricted (public)		Designated website administrators		Business Continuity / communication						Least changes in personnel or in line with password policy
Information added to social media	Unrestricted (public)		Designated social media administrators		Business Continuity / communication						Least changes in personnel or in line with password policy
Learning Platform content	Unrestricted (public)		Designated LP lead and deputy		Teaching and Learning (statutory returns)						Least changes in personnel or in line with password policy
Parental messages via email / communication	Unrestricted (public)		Head / SA/Office administrators		Business Continuity / communication						Date of communication + 3 years
USO School Open Checks	Unrestricted (public)		SA/Office administrators / Non Con		Business Continuity / communication						Least school suspension / classes
Back-up media (where on site)	Special Categories of Personal Data		SA/Office administrators / Information		Business Continuity / communication						Only data used with back-ups up to 30 days
Back-up media (where off site)	Special Categories of Personal Data		USO / Network manager / Information		Business Continuity / communication						Check data providers retention and deletion review
Emergency mobile phone loaded with data	Special Categories of Personal Data		Head / Deputy / SA/Office administrators		Business Continuity / communication						Whitey staff in school and numbers list
<b>Governors</b>											
Governors' documents with sensitive content	Special Categories of Personal Data		Head / SA/Office administrators / Chair / SA/Office administrators		Business Continuity / communication						Date of meeting + 10 years
Governors' standard published meeting documents	Unrestricted (public)		Head / SA/Office administrators / Chair / SA/Office administrators		Business Continuity / communication						Date of meeting + 6 years
Reports presented to Governors' meetings	Special Categories of Personal Data		Head / SA/Office administrators / Chair / SA/Office administrators		Business Continuity / communication						Date of meeting + 6 years
Annual Governors reports	Unrestricted (public)		Head / SA/Office administrators / Chair / SA/Office administrators		Business Continuity / communication						Date of meeting + 10 years
Annual reports / meeting reports	Unrestricted (public)		Head / SA/Office administrators / Chair / SA/Office administrators		Business Continuity / communication						Date of meeting + 6 years
Policies and other administered to Governors' body	Unrestricted (public)		Head / SA/Office administrators		Business Continuity / communication						Use of policy + 3 years
<b>Other T&amp;L potentially sensitive material (not necessarily)</b>											
Student photos* (not required for pupil records)	Personal Data		Class teachers		Teaching and Learning (statutory returns)						Relevant life of the photo / annual house-leaving
Staff photos* (not required for Personal records)	Personal Data		SA/Office administrators / staff		Business Continuity / communication						Relevant life of the photo / annual house-leaving
Early Years assessments (not in core MIS)	Special Categories of Personal Data		EYF teachers		Teaching and Learning (statutory returns)						Current year + 6 years
Student reports (not in core MIS)	Special Categories of Personal Data		Class teachers		Teaching and Learning (statutory returns)						Current year + 6 years
Student assessment (not in core MIS)	Special Categories of Personal Data		Class teachers		Teaching and Learning (statutory returns)						Current year + 6 years
Third Party comparative performance data	Unrestricted (public)		Head / SA/Office administrators		Teaching and Learning (statutory returns)						Current year + 6 years
<b>Other operational potentially sensitive material (not necessarily)</b>											
CCTV / shared footage	Special Categories of Personal Data		Third Party support / SA/Office administrators		Subsidiary / Security						90 days
Video surveillance (not management systems)	Special Categories of Personal Data		Third Party support		Subsidiary / Security						Current year + 6 years / review
Biometric system - registration	Special Categories of Personal Data		Students / Third Party support		Subsidiary / Security						Date of entry + 3 years
Biometric system - other	Special Categories of Personal Data		Students / Third Party support		Subsidiary / Security						current year + 1 year
Newsletters and information with a short conservation life	Unrestricted (public)		Designated staff		Business Continuity / communication						

\* See next tab for notes