

Data Asset Audit - Pupils

Data Protection Lead (DPL): named school staff

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

Data Controller: [Greenfylde C of E First School](#)

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:

By:

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

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.	Teaching and learning
Extracts pupil data from MIS to third party tools e.g. FFT Aspire, MyConcern	Teaching & Learning. Safeguarding/ Child Protection
School technical support provider - also have access to school network and systems and admin access to MIS.	School maintenance and technical support
Comms with families and recording assessments including photographs	Teaching & learning
Used as communication and learning tools especially in Blended Learning	Teaching & learning
Online learning sites that offer interactive or virtual resources	Teaching & learning

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; 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	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
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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

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 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	Legal Obligation, Public Task, Explicit Consent
Anyone who requires access for safeguarding purposes	Legal Obligation - statutory legislation
Local Authority, other relevant agencies working with consent with specific children e.g. EPS, CYPTS	Legal Obligation
Staff as necessary	Legal Obligation
Local Authority	Legal Obligation

parents and general public	Legitimate Interests for some photos. Consent for photos used on website, social media, publications
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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>
Substantial Public Interest	Annual data collection forms for contact data	No
Substantial Public Interest	Staff ensure that data is accurate and checks made regularly by safeguarding leads	No
Substantial Public Interest	Staff and SENCO ensure that data is accurate	No
Substantial Public Interest	Data Collection forms are replaced annually and old forms shredded. Other information is removed if no longer	Consent forms will be stored
Substantial Public Interest	Staff ensure that data is accurate	No

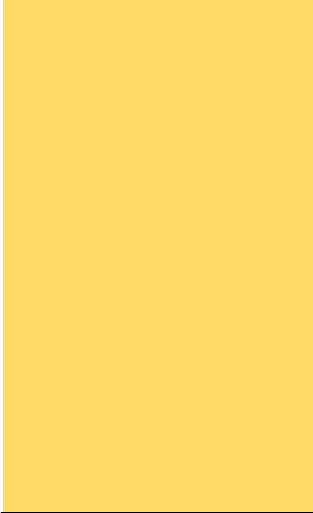
Not needed - not a Special Category	Old photos are deleted on annual basis. School and teachers retain some photos for teaching and learning	Yes
Not needed - not a Special Category	Old photos are deleted on annual basis. School and teachers retain some photos for teaching and learning	Yes
Explicit consent 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
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If consent is sought, where is it stored?	Retention of data	Evidence of data destruction (if needed)	
N/A	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	N/A	
N/A	Securely passed on to next setting. Historical data may remain, as school are complying with legal hold on data	N/A	
N/A	Securely passed on to next setting. Historical data may remain, as school are complying with legal hold on data	N/A	
In pupil personal folder	Securely passed on to next setting / destroyed if not needed. Historical data may remain, as school	N/A	
No	Securely passed on to next setting. Historical data may remain, as school are complying with legal hold on data	N/A	

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	



[illegible]
