

Type of data	What personal data is stored?	How and why was it collected?	Was consent obtained?	Where is the electronic data stored?	Where is the paper data stored?	Is it held by a third party?	Is a GDPR-compliant contract in place with the third party?	What security measures are in place?	Who has access to it?	Is it ever taken off-site?	Where and why is it shared externally, if at all?	How do we ensure it is accurate and up to date?	Retention period	Why was that retention period chosen?	Legal Basis identified	GDPR status	Notes
Pupil files																	
Pupil personal details	Contact details (phone number, address etc)	Provided by parent on admission	Not needed	SIMS	Locked Admin Office (room locked unless Admin team member is present).	Y	Y	Password protected – only authorised personnel have the password	Senior leaders, administrative staff, class teachers, CP Officer, SENCO	N	Department for Education – school census. Local authority – where necessary. Other schools – if/when the pupil moves, as part of the common transfer file School Nurse; School Therapist & social services agencies	Parents are asked to inform us of any changes, and asked to confirm their information regularly	Until the pupil leaves	Not required after leaving	Necessary for a task carried out in the public interest		
	Characteristics (age, ethnicity, religion etc)	Provided by parent on admission	Not needed	SIMS	Locked Admin Office (room locked unless Admin team member is present).	Y	Y	Password protected – only authorised personnel have the password	Senior leaders, administrative staff, class teachers, CP Officer, SENCO	N	Department for Education – school census. Local authority – where necessary. Other schools – if/when the pupil moves, as part of the common transfer file School Nurse; School Therapist & social services agencies	Parents are asked to inform us of any changes, and asked to confirm their information regularly	Until the pupil leaves	Not required after leaving	Necessary for a task carried out in the public interest		
	Medical conditions	Provided by parent on admission	Not needed	SIMS	Locked Admin Office (room locked unless Admin team member is present).	Y	Y	Password protected – only authorised personnel have the password	Senior leaders, administrative staff, class teachers, CP Officer, SENCO	N	Department for Education – school census. Local authority – where necessary. Other schools – if/when the pupil moves, as part of the common transfer file School Nurse; School Therapist & social services agencies; catering staff & midday meals staff	Parents are asked to inform us of any changes, and asked to confirm their information regularly	Until the pupil leaves	Not required after leaving	Necessary for a task carried out in the public interest		
	Special educational needs	Provided by parent on admission or following an assessment	Y	SIMS, Encrypted memory sticks (Head / SENDCo)	Locked Admin Office (room locked unless Admin team member is present).	Y	Y	Password protected – only authorised personnel have the password	Senior leaders, administrative staff, class teachers, CP Officer, SENCO	N	Department for Education – school census. Local authority – where necessary. Other schools – if/when the pupil moves, as part of the common transfer file School Nurse; School Therapist & social services agencies	Updated by SENCO regularly	Until child is 25 years old	Not required after leaving	Necessary for a task carried out in the public interest		
	Dietary requirements	Provided by parent on admission	Not needed	SIMS	Admin Office (room locked unless Admin team member is present).	Y	Y	Password protected – only authorised personnel have the password	Senior leaders, administrative staff, class teachers	N	Kitchen catering staff to ensure appropriate meals are served, midday meals staff to ensure appropriate lunch; other schools if/when the pupil moves, as part of the common transfer file	Parents are asked to inform us of any changes, and asked to confirm their information regularly	Until the pupil leaves	Not required after leaving	Necessary for a task carried out in the public interest		
	Free school meals/pupil premium/whether they are a looked-after child	Provided by parent on admission	Not needed	SIMS	Admin Office (room locked unless Admin team member is present).	Y	Y	Password protected – only authorised personnel have the password	Senior leaders, administrative staff, class teachers	N	Department for Education - school census Local authority funding department; Other schools if/when the pupil moves as part of the common transfer file	Parents are asked to inform us of any changes, and asked to confirm their information regularly LA inform if child in-care	Until the pupil leaves	Not required after leaving	Necessary for a task carried out in the public interest		
	Emergency contact details	Provided by parent on admission	Not needed	SIMS	Admin Office (room locked unless Admin team member is present).	Y	Y	Password protected – only authorised personnel have the password	Senior leaders, administrative staff, class teachers	N	After-School club providers	Parents are asked to inform us of any changes, and asked to confirm their information regularly LA inform if child in-care	Until the pupil leaves	Not required after leaving	Necessary for a task carried out in the public interest		
Pastoral records	Consent forms (photographs, school trips etc)	Provided by parent on admission and prior to event	Y	Not kept	Admin Office (room locked unless Admin team member is present).	N	N	N/A	Senior leaders, administrative staff, class teachers, school visit leader	N	Not shared externally	Consent forms issued for each event	Until the event ends	Not required post-event	Necessary for a task carried out in the public interest	Single Consent form in place	
	Behaviour incidents	Provided by class teacher	Not needed	Head Teacher's PC / Laptop (password protected) & encrypted memory stick (Head)	Folder in HT office (locked)	N	N	Password protected (encrypted memory stick)	Head Teacher	N							
	Attendance issues	Provided by school admin	Not needed	Head Teacher's PC / Laptop (password protected) & encrypted memory stick (Head)	No paper copies stored	Y	Y	Password protected – only authorised personnel have the password	Senior leaders, administrative staff, class teachers	N	Local Authority for attendance advice/penalties Early help service for intervention assistance	Data collected daily by class teachers through SIMS registers	Until the pupil leaves	Not required after leaving	Necessary for a task carried out in the public interest		
	Accident reports	Provided by school staff	Not needed	Not kept	Accident Book First Aid Cupboard	N	N	None	Whole school	N		Staff complete reports for each accident	3 years	Statutory period	Necessary for a task carried out in the public interest		
Admissions	Information about applicants	Provided by parents on admission	Not needed	SIMS	Locked cupboard in admin office, pupils folder in class	Y	Y	Password protected – only authorised personnel have the password	Senior leaders, administrative staff, class teachers	N	Admissions Department for compliance with admissions legislation	Admissions Forms processed immediately	Until the pupil leaves	Not required after leaving	Necessary for a task carried out in the public interest		
Safeguarding																	
The designated safeguarding lead's records	Concerns logged	Reported by staff, recorded discussions with parents	Not needed	Head Teacher's PC / Laptop (password protected) & encrypted memory stick (Head)	Locked drawer in DSL's office	N	N	Password protected, authorised access only	DSL	N	The local authority, police, the child's parents/carers, counsellors, staff members – all on a need-to-know basis to protect the child. Records passed on securely to any new setting.	Reviewed regularly, and updated, by DSL	Until the pupil leaves	Records must be passed on to receiving school	Necessary for a task carried out in the public interest		

	Referrals made	Reported by staff, recorded discussions with parents	Not needed	Head Teacher's PC / Laptop (password protected) & encrypted memory stick (Head)	Locked drawer in DSL's office	N	N		Password protected, authorised access only	DSL	N	The local authority, police, the child's parents/carers, counsellors, staff members – all on a need-to-know basis to protect the child. Records passed on securely to any new setting.	Reviewed regularly, and updated, by DSL	Until the pupil leaves	Records must be passed on to receiving school	Necessary for a task carried out in the public interest	
	Disclosures	Reported by staff, recorded discussions with parents	Not needed	Head Teacher's PC / Laptop (password protected) & encrypted memory stick (Head)	Locked drawer in DSL's office	N	N		Password protected, authorised access only	DSL	N	The local authority, police, the child's parents/carers, counsellors, staff members – all on a need-to-know basis to protect the child. Records passed on securely to any new setting.	Reviewed regularly, and updated, by DSL	Until the pupil leaves	Records must be passed on to receiving school	Necessary for a task carried out in the public interest	
	Action taken	Reported by staff, recorded discussions with parents	Not needed	Head Teacher's PC / Laptop (password protected) & encrypted memory stick (Head)	Locked drawer in DSL's office	N	N		Password protected, authorised access only	DSL	N	The local authority, police, the child's parents/carers, counsellors, staff members – all on a need-to-know basis to protect the child. Records passed on securely to any new setting.	Reviewed regularly, and updated, by DSL	Until the pupil leaves	Records must be passed on to receiving school	Necessary for a task carried out in the public interest	
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Academic information																	
Outcomes of statutory assessment (EYFSP, Phonics check, KS1 & KS2 SATs) & other summative assessment (CATs, PUMA / PIRA tests)	Formative assessment results	Recorded by teachers	Not needed	Teachers' encrypted memory sticks and on the school's assessment tracking system (SPTO)	N/A	Y	Y	USB sticks are encrypted. Only authorised personnel can access the assessment tracking system (password protected)	Senior leaders, Headteacher, class teachers	N	Parents – to meet our statutory requirement to report, DFE / LA - statutory duty to report outcomes of statutory testing.	Updated every time a new result is recorded	Three years from when the pupil leaves the school	New settings and parents often request details of previous assessment outcomes. Data is used by Head for evidencing standards (3 yr cycle)	Necessary for a task carried out in the public interest		
Reports & pupil's academic records	Attainment & progress data. Qualitative comments on learning. Targets for improvement. Attendance %s.	Recorded by teachers	Not needed	Securely on the school server, on encrypted memory sticks or secure cloud storage.	Paper copies disposed of after 1 year	Y	Y	Teachers' files are kept securely in locked cupboards. USB sticks are encrypted. Only authorised personnel can access the assessment tracking system	Senior leaders, Headteacher, class teachers	Y	Parents – to meet our statutory requirement to report to them	New reports issued termly (Autumn / Spring) plus annual report (July)	3 years from date of report	Reports typically requested by receiving schools & secondary schools applied to.	Necessary for a task carried out in the public interest		
HR																	
Recruitment information	Applicants' names and contact details	Provided by applicants during the recruitment process	Not needed	N/A	HR files in locked in filing cabinets in admin office or in SBM office (locked when staff not present)	N		Applicants' details kept in restricted folders	Staff members managing the recruitment round	N	Not shared externally	Information provided by applicants and verified by staff. Staff update information at request of the applicant	Deleted when recruitment round is over	Not required after appointment	Necessary for a task carried out in the public interest		
	Interview notes	Provided by interviewers during the interview process	Not needed	N/A	HR files in locked in filing cabinets in admin office or in SBM office (locked when staff not present)	N		Details kept in restricted HR folders	Senior leaders and staff involved in recruitment	N	Not shared externally	Information provided by recruiters	Transferred to personnel files within 1 month and retained for 6 years after employment ceases	Statutory	Necessary for a task carried out in the public interest		
	References	Provided by referees during recruitment	Y	N/A	HR files in locked in filing cabinets in admin office or in SBM office (locked when staff not present)	N		Details kept in restricted HR folders	Senior leaders	N	Not shared externally	Information provided by referees	Transferred to personnel files within 1 month and retained for 6 years after employment ceases	Statutory	Necessary for a task carried out in the public interest		
Copies of pre-employment checks	DBS checks	Provided by applicants at appointment or direct from DBS after appointment	Y	Password protected document on a restricted access, shared drive.	locked in filing cabinets in admin office or in SBM office (locked when staff not present)	N		Kept in a password protected Excel document on a non-shared hard drive	Admin Assistant School Secretary, SBM & Head Teacher	N	Not shared externally	Information provided by applicant and DBS	Unsuccessful applicants-1 year. Leavers-20 years from leaving date.	Statutory	Necessary for a task carried out in the public interest		
	Verification of right to work in the UK	Provided by applicants at appointment	Y	N/A	locked in filing cabinets in admin office or in SBM office (locked when staff not present)	Y	Y	Details kept in restricted HR folder	Head of School Business	N	Local Authority for contractual purposes	Information provided by applicant and verified by school	6 years after employment ceases	Statutory	Necessary for a task carried out in the public interest		
Staff personnel files	Names and contact details	Provided by applicant at appointment	Y	SIMS	locked in filing cabinets in admin office or in SBM office (locked when staff not present)	Y	Y	Details kept in restricted folders	Headteacher, Head of School Business	N	Local Authority for contractual purposes; Payroll for pay purposes	Staff inform school of changes and records updated	6 years after employment ceases	Statutory	Necessary for a task carried out in the public interest		
	Salary	Provided by payroll monthly to ensure accurate pay	Not needed	SIMS, Head of School Business PC	locked in filing cabinets in admin office or in SBM office (locked when staff not present)	Y	Y	Details kept in restricted folders	Headteacher, Head of School Business	N	Local Authority for contractual purposes; SBM finance for financial support contract; Payroll provider for pay purposes	Headteacher informs Head of School Business	6 years after employment ceases	Statutory	Necessary for a task carried out in the public interest		
	P45 forms	Provided by payroll when an employee leaves	Not needed	N/A	locked in filing cabinets in admin office or in SBM office (locked when staff not present)	Y	Y	P45 kept in restricted folders	Headteacher, Head of School Business	N	Payroll provider sends to school HMRC	Payroll send to school based on contract of employment data	6 years after employment ceases	Statutory	Necessary for a task carried out in the public interest		

Accidents at work	Provided by staff member as and when accidents occur	Not needed	Glos LA SHE Assure site	None-online	Y	Y	Book held by admin with restricted access	Admin staff, Headteacher, Head of School Business	N	Local Authority SHE Assure accident reporting system	Completed at the time of the accident by the staff member	3 years after the date of accident	Statutory	Necessary for a task carried out in the public interest	
Disciplinary action taken	Provided by staff member or governor following conclusion of disciplinary hearing	Not needed	Password protected document on Headteacher's PC	locked in filing cabinets in admin office or in SBM office (locked when staff not present)	N		Details kept in restricted folders	Headteacher, Head of School Business	N	Local Authority as employer; HR provider if advice sought	Report completed immediately. No updating required	6 years after employment ceases	Statutory	Necessary for a task carried out in the public interest	
Grievances	Provided by Headteacher or governor following a grievance being raised	Not needed	N/A	locked in filing cabinets in admin office or in SBM office (locked when staff not present)	N		Details kept in restricted folders	Headteacher, Chair of Governors	N	Local Authority as employer; HR provider if advice sought	Actioned upon receipt. No updating required	6 years after employment ceases	Statutory	Necessary for a task carried out in the public interest	

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Appraisal records	Appraisal notes and reports	Provided by leader or middle manager conducted performance review to allow for future performance reviews and pay increments	Not needed	Head Teacher's PC / Laptop (password protected) & encrypted memory stick (Head)	Locked drawers in Head Teacher's office	N		Password protected PC / laptop, encrypted memory stick (head) password protected documents.	Headteacher; senior/middle managers	N	None	Completed immediately. No updating required	6 years after employment ceases	Statutory	Necessary for a task carried out in the public interest		
	Objectives	Provided by leader or middle manager conducted performance review to allow for future performance reviews and pay increments	Not needed	Head Teacher's PC / Laptop (password protected) & encrypted memory stick (Head)	Locked drawers in Head Teacher's office	N		Password protected PC / laptop, encrypted memory stick (head) password protected documents.	Headteacher; senior/middle managers	N	None	Completed immediately. No updating required	6 years after employment ceases	Statutory	Necessary for a task carried out in the public interest		
	Pay and promotion recommendations	Provided by Headteacher to ensure appropriate pay increment actioned	Not needed	Head Teacher's PC / Laptop (password protected) & encrypted memory stick (Head)	No paper copies retained	N	N	Password protected PC / laptop, encrypted memory stick (head) password protected documents.	Headteacher; Head of School Business	N	SBM finance support to ensure budget details are accurate; Payroll to ensure pay increments are actioned	Completed immediately. No updating required	6 years after employment ceases	Statutory	Necessary for a task carried out in the public interest		
Finance																	
Debt incurred	Parents details; pupil's name; debt incurred	Maintained by admin team to allow school to chase for payment	Not needed	Password protected Admin. PC	N/A	N		Password protected - only authorised personnel have the password	Admin team; SBM; Headteacher	N	None	Parents are asked to inform us of any changes, and asked to confirm their information regularly	Once the pupil leaves the school	Not needed once pupil leaves	Necessary for a task carried out in the public interest		
Free school meals	Parents details; pupil's name; FSM history	Provided by the parent and the Local Authority and imported into SIMS	Y	SIMS	Pupil files in locked cupboard in admin office	Y	Y	Password protected - only authorised personnel have the password	Admin team; Head of School Business; Headteacher	N	Local Authority ensure FSM eligibility is accurate	Parents are asked to inform us of any changes, and asked to confirm their information regularly	Once the pupil leaves the school	Not needed once pupil leaves	Necessary for a task carried out in the public interest		
Staff members' bank details	Name; bank account number; sort code; account name	Provided by the staff member to ensure pay is paid into the correct account	Y	N/A	Shredded after actioning	Y	Y	Once information entered on to the payroll system the paper copy is shredded	SBM	N	Payroll provider to ensure pay is transferred to correct bank account	Staff are asked to update school as soon as there are changes to bank details	Not kept	Destroyed immediately to ensure protection of personal data	Necessary for a task carried out in the public interest		
Parent information																	
Contact details	Name, address, phone number, emergency contact details	Provided by parents on their child's admission – for emergencies, safeguarding reasons and to enable communication	Not needed	SIMS, Contact Folder, After school club register	Admin Office (room locked unless Admin team member is present).	Y	Y	Password protected, authorised access only	Headteacher, SBM, the child's teachers	N	With after-school club providers if applicable to ensure emergency details are available	Parents are asked to inform us of any changes, and asked to confirm their information regularly	Deleted as soon as child leaves the school	Statutory	Necessary for a task carried out in the public interest		
Communication																	
Text Service	Pupil names and parents' mobile phone numbers	Provided by parents on their child's admission, transferred to text system via SIMS	N	Password protected login, used on password protected PC / laptop (Head / Admin Assistant)	N/A	Y	Y	Password login required. Accessed through password protected PCs/ laptop.	Head Admin. Assistant	N		Not re-used, changed twice per year	Deleted immediately after fundraising event	Not needed	Necessary for a task carried out in the public interest		
Governance																	
Governor details	Name and contact details	Provided by governors so the school can contact them	Not needed	In the Governor documents held by the Headteacher (encrypted memory stick / password protected laptop / PC)	Admin Office (room locked unless Admin team member is present).	N		Password protected access to the ICT system	Head, SBM, School Secretary, Admin Assistant & Clerk to Governors	N	Names published on the school website - to meet our statutory requirements. Shared with the local authority - for training or LA-wide communications	Governors email the chair and headteacher when details change	For the duration of their term of office (max 4 years)	Statutory	Necessary for a task carried out in the public interest		

	Register of interests	Provided by governors at each full meeting	Y	Paper copies only	Admin Office (room locked unless Admin team member is present).	N		Restricted access	SBM and Clerk to Governors	N	Updated on the governor's website to meet statutory requirements	Governors sign a new register at each meeting	For the duration of their term of office (max 4 years)	Statutory	Necessary for a task carried out in the public interest		
Minutes	Governors' names	Provided by governors at time of appointment. Recorded on minutes of each meeting	Y	In the Governor files held by the Head (encrypted memory stick / password protected laptop/PC. Clerk to Governors (encrypted memory stick)	Locked drawers in Head Teacher's office	N		Restricted access	Head of School Business	N	Clerk to the governors for governance compliance						
Headteacher recruitment information	Applicants' names and contact details	Provided by application at application	Not needed	No electronic version	In Personnel file kept in SBM office	N		Restricted access	SBM, Head	N	Not shared externally	Not applicable	Deleted once recruitment complete	Not needed	Necessary for a task carried out in the public interest		
	Interview and selection notes																
Information from panels	Complaints	Provided by panel chair	Not needed	In the Governor files held by the Head (encrypted memory stick / password protected laptop/PC.	Locked drawers in Head Teacher's office	N		Restricted access	Headteacher	N	Not shared externally	Not applicable	Date of resolution of complaint + 6 years minimum	Statutory	Necessary for a task carried out in the public interest		
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	Disciplinary appeals	Provided by panel chair	Not needed	Head (encrypted memory stick / password protected laptop/PC	No paper copies	N		Restricted access	Headteacher	N	Local authority for personnel files (maintained schools)	Not applicable	Date of disciplinary outcome + 6-18 Months (see Retention)	Statutory	Necessary for a task carried out in the public interest		
	Exclusions	Provided by Head Teacher or Governor Panel	Not needed	Head (encrypted memory stick / password protected laptop/PC	No paper copies	N		Restricted access	Admin team, Headteacher, Class Teacher	N		Not applicable	Until the pupil transfers to another school				
	Admissions	Provided by LA Admissions Team	Not needed	Head (encrypted memory stick / password protected laptop/PC	Admin Office (room locked unless Admin team member is present).	Y	Y	Restricted access	Admin Team, Headteacher, SBM, Class Teacher	N	Local Authority Admission Team	Not applicable	Date of admission + 1 year (supplementary data transferred to pupil file)	Statutory	Necessary for a task carried out in the public interest		
Photographs																	
CCTV camera (non-recording)	Images of individuals	CCTV camera focussed on school gate for security (non-recording)	N		Not applicable	N		No recording				N/A	N/A	N/A	Necessary for a task carried out in the public interest		
Images of pupils	Images of individuals	Collected annually as part of the school photographs programme. Periodic photos collected for school use and potential publication in newsletters, on website and via Twitter feed.	Y	Shared network	Not applicable	N		Restricted access to school staff only (password protected login)	School staff	N	Shared with parents & stakeholders via the school website,, Twitter feed & distributed newsletter; shared to provide information regarding activities & events to parents & stakeholders.	Photos of pupils who have left are deleted	1 year after pupil leaves the school	Website & promotional images are updated annually - mid-year.	Necessary for a task carried out in the public interest		CD Roms of prospectus photos for years retained. Kept in HT office