

Drumahoe P.S.

Information Asset Register

GDPR support for School Information Assets: Data Audit/Log

Please read important notes and comments

Last updated:
By:

05.01.2025

Terry McMaster

Data Protection Officer (DPO): Caroline Johnston - EA
Data Controller:Principal/Associate Principal
Data Processor:Principal/Associate Principal

Data held or collected by the school	Data label *	Information Asset Owner	Who has role / access to enter information
Information assets			
Pupil data (within MIS)			
Pupil records	Special Categories of Personal Data*		AO - M Currie
Welfare / Safeguarding / Child Protection data	Special Categories of Personal Data*		AO - M Currie & DTCP - Principal/Associate Principal
SEN	Special Categories of Personal Data*		J Brown/AO - M Currie /Class Teachers
EAL	Special Categories of Personal Data*		SENCO-J Brown
Exclusion, behaviour	Special Categories of Personal Data*		Class teacher / DTCP / Principal/Associate Principal - T McMaster & AO -
Reports	Special Categories of Personal Data*		Class teacher / Principal/Associate Associate Principal - T McMaster & AO
Examination results / Statutory Assessments	Special Categories of Personal Data*		Teachers /Associate Principal - T McMaster & AO - M Currie
Exams bodies exports	Personal* Data		N/A
Exams exports for Fisher Family Trust System (FFT)	Personal* Data		N/A
Attendance registers	Personal* Data		Class teachers / M Currie - AO
Student photos	Special Categories of Personal Data*		AO-M Currie/ class teachers
Pupil Admissions	Special Categories of Personal Data*		AO - M Currie
Other Admission data	Personal* Data		AO - M Currie & Associate Principal - T McMaster
Staff data (within MIS)			
Staff Personnel File	Special Categories of Personal Data*		AO - M Currie & Associate Principal - T McMaster
Performance / CPD data	Personal* Data		Teachers; Associate Principal - T McMaster & AO - M Currie
Staff absence data	Special Categories of Personal Data*		AO - M Currie & Associate Principal - T McMaster & BoG
Staff photos	Special Categories of Personal Data*		AO - M Currie & Associate Principal - T McMaster
Employment Data	Special Categories of Personal Data*		AO - M Currie & Associate Principal - T McMaster
Other Personnel Data			
Recruitment records for new Principal/Associate Principal	Special Categories of Personal Data*		Education Authority - HR
Recruitment of new staff	Special Categories of Personal Data*		AO - M Currie & Associate Principal - T McMaster & BoG Recruitment
DBS / vetting checks	Special Categories of Personal Data*		AO - M Currie & Associate Principal - T McMaster
Appraisal / CPD data	Special Categories of Personal Data*		SMT/Associate Principal - T McMaster
Disciplinary and grievance records	Special Categories of Personal Data*		Associate Principal - T McMaster & BoG Panel
Allegation of a child protection matter	Special Categories of Personal Data*		DTCP - Associate Principal - T McMaster, Mrs J Brown & BoG Pan
Malicious allegation of a child protection matter	Special Categories of Personal Data*		DTCP - Associate Principal - T McMaster, Mrs J Brown & BoG Pan
Health and safety assessments	Public data		H&S lead / teachers
Health and safety accident reports	Special Categories of Personal Data*		H&S lead / Principal/Associate Principal / site manager
Admissions papers (successful or unsuccessful)	Personal* Data		Associate Principal / SMT
Student medical records and reports	Special Categories of Personal Data**		Nurse / SMT / class teacher
Student social service records and reports	Special Categories of Personal Data**		SS staff / SMT / class teacher
Financial matters			

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Annual accounts	Personal* / Financial Data		AO/
Purchase Orders, Invoices, Payments	Personal* / Financial Data		Principal/Associate Principal / Deputy
Records around budget management	Personal* / Financial Data		Site manager / AO
Asset management	Personal* / Financial Data		Site manager / AO
School Fund	Personal* / Financial Data		Principal/Associate Principal / AO
MIS Reports	Personal* / Financial Data		Principal/Associate Principal / AO
FSM* - free school meals registers	Personal* / Financial Data		Principal/Associate Principal / AO
School meals registers	Personal* / Financial Data		Principal/Associate Principal / AO
Records relating to school lettings	Personal* / Financial Data		Principal/Associate Principal / AO
Records relating to school maintenance	Personal* / Financial Data		Principal/Associate Principal / AO
Access control / passwords* into systems			
Authorise data access / Nominated Contacts	Personal* Data		Principal/Associate Principal
Network administration / password lists	Personal* Data		Network Manager / Support Provider
Email management	Personal* Data		C2k Manager
Web filtering management - Websense	Personal* Data		C2k Manager
School website administration	Personal* Data		Designated staff
Social media platforms, e.g. Twitter	Personal* Data		Designated staff
Learning Platform password information	Personal* Data		C2k Manager Assoc.Principal - T McMaster
Securus -Online safeguarding software	Personal* Data		C2k Manager
Communications			
Information added to website	Unrestricted (public)		Designated website administrators
Information added to social media	Unrestricted (public)		Designated social media administrators
Learning Platform content	Unrestricted (public)		Designated LP lead and deputy
Parental messaging system correspondence	Unrestricted (public)		Principal/Associate Principal /AO
Back-up media (where on site)	Special Categories of Personal Data*		AO / Network manager / technician
Back-up media in Cloud	Special Categories of Personal Data*		EA / Network manager / technician
Emergency mobile phone loaded with data	Special Categories of Personal Data*		Principal/Associate Principal /AO
Governors			
Governors' documents with sensitive content	Special Categories of Personal Data*		Principal/Associate Principal / AO / Chair / SMT
Governors' standard published meeting documents	Unrestricted (public)		Principal/Associate Principal / AO / Chair / SMT
Reports presented to Governors meeting	Special Categories of Personal Data*		Principal/Associate Principal / AO / Chair / SMT
Annual governors reports	Unrestricted (public)		Principal/Associate Principal / AO / Chair / SMT
Annual parents' meeting papers	Unrestricted (public)		Principal/Associate Principal / AO / Chair / SMT
Policies and plans administered by Governing body	Unrestricted (public)		Principal/Associate Principal / SMT / specialist teachers
Other T&L potentially sensitive material (list not exhaustive)			
Student photos* (not required for pupil record)	Personal* Data		Class teachers
Staff photos* (not required for Personnel record)	Personal* Data		AO/ staff
Early Years assessments (not in core MIS)	Special Categories of Personal Data*		EYFS teachers
Student reports (not in core MIS)	Special Categories of Personal Data*		Class teachers
Student assessments (not in core MIS)	Special Categories of Personal Data*		Class teachers
Third Party comparative performance data	Unrestricted (public)		Principal/Associate Principal / SMT /Governors
Other operational potentially sensitive material (list not exhaustive)			
CCTV saved footage	Special Categories of Personal Data*		Third Party support / SMT
Visitor signing-in book / management system	Special Categories of Personal Data*		Office staff

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Biometric system - registration	Special Categories of Personal Data*		N/A
<i>Biometric system - other</i>	Special Categories of Personal Data*		N/A
<i>Biometric system - Library or Canteen Software</i>	Special Categories of Personal Data*		N/A
Newsletters and information with a short operational life	Unrestricted (public)		<i>Designated staff</i>

* See next tab for notes

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Where is the data kept?	Purpose	Who do we share with?	Legal basis for collection A* (IMPORTANT - you must be aware of this basis)
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
In MIS system	Teaching and Learning /statutory returns	DE	Public interest/official authority
In a locked filing cabinet in a non-secure room	Teaching and Learning /statutory returns	EA	Public interest/official authority
In a locked filing cabinet in a non-secure room	Teaching and Learning /statutory returns	Parents	Public interest/official authority
Staff laptop	Teaching and Learning /statutory returns	EA	Public interest/official authority
School network drive	Teaching and Learning /statutory returns	Social Services	Public interest/official authority
Cloud storage	Teaching and Learning /statutory returns	Health Agencies	Public interest/official authority
Encrypted, password protected USB drive	Teaching and Learning /statutory returns	Police	Public interest/official authority
In MIS system	Teaching and Learning /statutory returns	Awarding Bodies	Needed for a contract
In MIS system	Teaching and Learning /statutory returns	Awarding Bodies	Needed for a contract
	Safeguarding / Child Protection	Named Third Parties	Public interest/official authority
	Safeguarding / Child Protection		
In MIS system	Teaching and Learning /statutory returns		Public interest/official authority
	Teaching and learning /statutory returns		
	Teaching and learning /statutory returns		
	Business Continuity / communication		
	Business Continuity / communication		
	Teaching and learning /statutory returns		
	Business Continuity / communication		
Panel	Business Continuity / communication		
	Business Continuity / communication		
	Teaching and learning /statutory returns		
	Safeguarding / Security		
el	Safeguarding / Child Protection		
el	Safeguarding / Child Protection		
	Safeguarding / Security		
	Safeguarding / Security		
	Teaching and Learning /statutory returns		
	Safeguarding / Child Protection		
	Safeguarding / Child Protection		

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	Sound financial management		
	Sound financial management		
	Sound financial management		
	Sound financial management		
	Sound financial management		
	Sound financial management		
	Sound financial management		
	Sound financial management		
	Sound financial management		
	Access to system(s)		
	Access to system(s)		
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	Business Continuity / communication		
	Business Continuity / communication		
	Teaching and Learning /statutory returns		
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	Safeguarding / Security		
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	Safeguarding / Security		
	Business Continuity / communication		

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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 item kept / used for?*
<i>This column is only needed for items under 'Special Categories', for which it must be completed</i>	<i>E.g. when a student joins the roll / annually, etc.</i>	<i>This might be online or offline but will also be secure and include time/date collected</i>	<i>Enter as appropriate (below are examples ONLY)*</i>
			Until child is 25 years old
Substantial public interest			DOB + 25 years
Substantial public interest			DOB + 25 years
Substantial public interest			<i>part of pupil record</i>
Substantial public interest			<i>part of pupil record</i>
Substantial public interest			<i>part of pupil record</i>
Substantial public interest			Current year + 6 years
			Date of entry + 3 years <i>retained on pupil record</i>
Substantial public interest			
			Termination of employment + 6 years <i>part of personnel file</i>
			<i>part of personnel file</i>
			<i>part of personnel file</i>
			Date of recruitment + 6 years
			Date of recruitment of successful candidate + 6 months
			Note of proof on personal file / physical copies > 6 months
			Current year + 5 years
			Date of warning + 6-18 months / take advice
			Until retirement (or 10 years from allegation if longer) / take advice
			Dispose at end of case / take advice
			Date of meeting + 3 years, then review
			take advice as depends on nature of event
			Date of admissions or case resolution + 1 year
			DOB + 25 years
			DOB + 25 years

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			Current year + 6 years
			Current year + 6 years
			Current year + 3 years
			Current year + 6 years
			Current year + 6 years
			Current year + 6 years
			Current year + 3 years
			Current year + 6 years
			Current year + 6 years
			<i>Until changes in personnel or in-line with password policy</i>
			<i>Until changes in personnel or in-line with password policy</i>
			<i>Until changes in personnel or in-line with password policy</i>
			<i>Until changes in personnel or in-line with password policy</i>
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			<i>Until changes in personnel or in-line with password policy</i>
			<i>Until changes in personnel or in-line with password policy</i>
			<i>Date of correspondence + 3 years</i>
			<i>Daily back-ups with back-ups up to one year</i>
			<i>Check Cloud providers' retention and deletion criteria</i>
			<i>Whilst staff in school and numbers valid</i>
			Date of meeting + 10 years
			Date of meeting + 6 years
			Date of meeting + 6 years
			Date of meeting + 10 years
			Date of meeting + 6 years
			Life of policy + 3 years
			<i>Relevant life of the photo / annual house-keeping</i>
			<i>Relevant life of the photo / annual house-keeping</i>
			<i>Current year + 6 years</i>
			<i>Current year + 6 years</i>
			<i>Current year + 6 years</i>
			<i>Current year + 6 years</i>
			90 days
			Current year + 6 years / review

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			Date of entry + 3 years
			<i>current year + 1 year</i>