



**Data Map - March 2026**

**Compiled by CEO**

**PD =Personal Data SC = Special Category Data.**

**Personal Data:** includes identification of individuals from identifiers – NI numbers, location data

•**Special Category Data:** (was sensitive personal data) now includes biometric data (e.g. fingerprint scanning).

For **personal** data schools are likely to use the following legal basis:

- Performance of a contract with data subject (e.g. for staff data).
- Compliance with a legal obligation (e.g. legally obliged to keep parents contact details).
- Protection of vital interests. (eg. child protection)
- Necessary for performance of public interest tasks. (awaiting guidance) – educating pupils on behalf of DFE
- Consent (only rely on if nothing else applies).

Can only use **Special Category Data (SCD)** if one of following conditions apply:  
(these are conditions most relevant to schools)

- Necessary and authorised by law for employment obligations.
- Protect vital interests and consent not feasible.
- Necessary for establishing, exercising or defence of legal rights.
- Substantial public interest (still subject to change in DP Bill) requires organisation to have a DP policy.
- Explicit consent.



Pupil Data											
Data Subject	Description of Data*	Type of Data		How is it collected?	What is it used for?	What is the legal basis for using it?	Where is it stored?	Does it leave the school?	Who is it shared with?	Who can access it?	How long is data kept?
		PD	SC								
<b>Pupils</b>	Pupil Admission Forms including Pupils name, DOB, Address, telephone numbers, email addresses, contact details, parent details, SEND details, previous education history, medical details, ethnicity, sex, religion	X	X	Paper / Google form completed by parent	To administer pupil education and welfare	Legal Obligation / Public Task	Arbor Paper copy locked away	Yes (residential/trips)	Relevant school personnel and agencies if necessary	. Admin Staff . School Leader . Class Teacher . External IT personnel maintaining IT systems. . Cloud storage	In accordance with retention schedule
<b>Pupils</b>	Pupil Records	X	X	Paper, Google form and on Arbor	To administer pupil education and welfare	Legal Obligation / Public Task	Arbor Paper copy locked away	Yes	Relevant school personnel and agencies if necessary – passed onto new schools when pupil leaves	. Admin Staff . School Leader . Class Teacher . External IT personnel maintaining IT systems. . Cloud storage	In accordance with retention schedule
<b>Pupils</b>	Emergency Contact Details	X		Paper form completed by parent and on Arbor	To administer pupil education and welfare	Public Task	Arbor Paper copy	Yes This would go out on school trips etc.	Relevant school personnel	. Admin Staff . School Leader . Class Teacher . ASC staff	In accordance with retention schedule
<b>Pupils</b>	Permission Slips	X		From parent - paper or electronic	To administer pupil education and welfare	Legal Obligation / Public Task	Paper copy locked away Electronic form	Yes (trip)	Staff	Staff	In accordance with retention schedule
<b>Pupils</b>	Pupil Census	X	X	From Arbor	To administer pupil education on behalf of DfE	Legal Obligation / Public Task	Arbor	Yes	Local Authority DfE	. Admin staff . School leader	In accordance with retention schedule
<b>Pupils</b>	Key Stage Results	X		Paper form and on Arbor	To administer pupil education on behalf of DfE	Legal Obligation / Public Task	Arbor Paper copy locked away Electronic	Yes	Local Authority DfE	. School Leaders . Admin staff . Class teacher	In accordance with retention schedule
<b>Pupils</b>	Assessment Data	X		Paper form and on Arbor	To administer pupil education and welfare	Legal Obligation / Public Task	Arbor Paper copy locked away	Yes	Local Authority DfE	. School Leaders . Admin staff . Class teacher	In accordance with retention schedule



# Schools for Every Child

Pupils	SEND Information		X	Paper form and on Arbor Electronic	To administer pupil education and welfare	Legal Obligation / Public Task	Paper copy locked away Arbor Electronic	Yes	Local Authority and DfE Multi-agencies Including speech and language, family support workers	. School Leaders . Staff . SENCO . Inclusion Manager	In accordance with retention schedule
Pupils	CCTV Images	X		Electronically	Security/Safety measures	Public Task	Electronically System: QVIS	No	Security Company Police if requested via DP2	School Staff with relevant permissions	In accordance with retention schedule. Also system rewrites after 7 days
Pupils	Pictures	X		Schools Digital equipment School photographer	Identification Displays Publications Social Media Website	Consent for publication Public Tasks for identification	Paper Arbor Cloud storage Display boards Electronic	Yes	Public	. School Staff . Public	In accordance with retention schedule
Pupils	Attendance Data	X		Paper registers Arbor & Aquinas Ltd	To administer pupil education and welfare. Emergency evacuation.	Legal Obligation / Public Task	Paper Arbor	No	Local Authority School Staff Ofsted	School Staff Attendance Officers Education Welfare Officers	In accordance with retention schedule
Pupils	Pupil Work	X		Paper Electronically	To administer pupil education and welfare	Public Task	Display boards Paper records Cloud storage	Yes	School Staff Parents	School Staff	In accordance with retention schedule
Pupils	Grant applications including Free School Meals	X		Paper Electronically	To administer pupil education and welfare	Legal Obligation / Public Task	Paper Electronically	No	Local Authority	School Staff	In accordance with retention schedule
Pupils	School Meal registers	X		Paper Electronically	To administer pupil education and welfare	Public Task	Paper Electronically	No	Admin Staff Class teacher Kitchen/Lunchtime Staff	School Staff Kitchen/Lunch time staff	In accordance with retention schedule
Pupils	Pupil Details, Class and Year Group, Behaviour points,	X		Class Dojo	To provide assessment for children to ensure progress	To administer pupil education	Electronically	parent log in	School Staff	School Staff	In accordance with retention schedule
Pupils	EHC Plans		X	Paper Electronically Agencies	To administer pupil education and welfare	Legal Obligation / Public Task	Electronically and paper form. Smoothwall	No	School Staff Local Authority Children's Services	School leaders DSL SENCO Team Class Teacher	In accordance with retention schedule



# Schools for Every Child

<b>Pupils</b>	School Trip Information including name, medical, emergency contact details	X	X (medical)	Paper. Electronically.	To administer pupil education and welfare	Public Task	Paper Electronically	Yes	Agent running trip e.g. PGL School Staff	School Staff	In accordance with retention schedule
<b>Pupils</b>	Child Protection Files		X	Paper Electronically Agencies	To administer pupil education and welfare	Public Task / Vital Interests	Paper Electronically School Database Smoothwall & CPOM	No	Local Authority Police if applicable Feeder schools	School leaders DSL Class teacher Admin staff	In accordance with retention schedule
<b>Pupils</b>	Administration of Medicine	X	X (medical)	Paper record completed by parent/staff Electronically	To administer pupil education and welfare	Public task	Paper records	No	School Staff School nursing	School Staff	In accordance with retention schedule
<b>Pupils</b>	Physical Intervention / Violent Incident / Accident investigation	X		Paper record Electronically	To administer pupil education and welfare	Public task	Paper records Electronically Smoothwall	Yes	School staff Children's Services	School leaders DSL SENCO Team Class Teacher	In accordance with retention schedule
<b>Parents</b>	Any details regarding parents	X		Paper record Electronically	To administer pupil education and welfare	Public task	Paper records Electronically Smoothwall	No	School staff	School staff	In accordance with retention schedule

Visitor / Volunteer / Contractor											
Data Subject	Description of Data*	Type of Data		How is it collected?	What is it used for?	What is the legal basis for using it?	Where is it stored?	Does it leave the school?	Who is it shared with?	Who can access it?	How long is data kept?
		PD	SC								
<b>Visitor</b>	Visitor Signing system - Inventory	X		Electronic	Safeguarding Emergency evacuation	Public Task	Reception	No	Admin Staff	Admin Staff	In accordance with retention schedule
<b>Visitor / Volunteer / Contractor</b>	DBS Checks	X	X	Electronic forms	Safeguarding	Legal obligation / Public Task /vital interests	DBS number stored paper record	Yes	School staff DBS Processor HCC	School leaders Admin staff Site staff	In accordance with retention schedule
<b>Volunteer / Contractor</b>	Contact details	X		Paper form Provided on invoice	To administer pupil education and welfare	Public Task	Paper record SAP Electronic	No	School staff	School staff	In accordance with retention schedule



# Schools for Every Child

Staff											
Data Subject	Description of Data*	Type of Data		How is it collected?	What is it used for?	What is the legal basis for using it?	Where is it stored?	Does it leave the school?	Who is it shared with?	Who can access it?	How long is data kept?
		PD	SC								
Staff	Staff application form including Name, DOB, Address, telephone numbers, email addresses, contact details, next of kin details, bank details, NI numbers, medical details, previous education history, previous employment details, references, ethnicity, sex, religion	X	X	Paper form Electronically	For employment purposes	Performance of a contract	Arbor/Access	No	School Leader SBM Admin with HR responsibility	School Leader SBM Admin with HR responsibility	In accordance with retention schedule
Staff	Absence Data	X	X (if contains Medical)	Paper form Electronically	For employment purposes	Performance of a contract	Arbor/Access-	No	School Leader Occ Health SBM	School Leader SBM Admin with HR responsibility Occ Health	In accordance with retention schedule
Staff	Pre-employment Checks	X		Paper form Electronically	For employment purposes	Performance of a contract	Arbor/Access	No	School Leader SBM Occ Health	School Leader SBM Admin with HR responsibility	In accordance with retention schedule
Staff	DBS Checks		X	Electronic forms	For employment purposes and legal obligation	Legal obligation / Performance of a contract/vital interests	Arbor/Access-	Yes	School leader SBM DBS Processor (Tracey Parrott and Jackie Webber)	School Leader SBM Admin with HR responsibility	In accordance with retention schedule
Staff	DBS Risk assessments		X	Paper form completed by school personnel	For employment purposes and legal obligation	Performance of a contract	Arbor/Access	No	School Leader	School Leader SBM Admin with HR responsibility	In accordance with retention schedule
Staff	Next of kin information	X		Paper form completed by data subject	For employment purposes	Performance of a contract / Public task	Arbor/Access-	No	School Leader SBM Admin with HR responsibility	School Leader SBM Admin with HR responsibility	In accordance with retention schedule
Staff	Medical Information		X	Application form, medical questionnaire	For employment purposes and legal purposes	Performance of a contract	Arbor/Access	Yes	School Leader SBM Admin with HR responsibility	School Leader SBM Admin with HR responsibility	In accordance with retention schedule



# Schools for Every Child

Staff	Occupational checks and health referrals		X	Paper form or electronic form	For employment purposes and legal purposes	Performance of a contract	Arbor/Access	Yes	School Leader SBM Admin with HR responsibility Occ Health	School Leader SBM Admin with HR responsibility Occ Health	In accordance with retention schedule
Staff	Performance management records	X		Paper Electronically	For employment purposes and legal purposes	Public task / Performance of a contract	Arbor/Access & Google drive	No	School Leader SBM Admin with HR responsibility	School Leader SBM Admin with HR responsibility	In accordance with retention schedule
Staff	Lesson observations	X		Paper Electronically	For employment purposes and legal purposes	Public task / Performance of a contract	Cloud storage Staff record file kept in secure location	No	School Leader SBM Admin with HR responsibility	School Leader SBM Admin with HR responsibility	In accordance with retention schedule
Staff	Staff files	X	X (potentially If medical)	Paper Cloud storage Electronically	For employment purposes and legal purposes	Public task / Performance of a contract	Access legacy files locked away	No	School Leader SBM Admin with HR responsibility	School Leader SBM Admin with HR responsibility	In accordance with retention schedule
Staff	Single Central Register	X		Computer file	For employment purposes and legal purposes	Legal obligation / Public task	Cloud storage Paper copy kept in secure location	No	School Leader SBM Admin with HR responsibility Safeguarding governor	School Leader SBM Admin with HR responsibility Safeguarding governor	In accordance with retention schedule
Staff	Absence Data	X		Paper Electronically	For employment purposes and legal purposes	Performance of a contract	Arbor/Access	Yes	School Leader SBM Admin with HR responsibility	School Leader SBM Admin with HR responsibility	In accordance with retention schedule
Staff	Payroll Records and payslips	X		Paper Electronically	For employment purposes and legal purposes	Performance of a contract	Access-	Yes	School Leader SBM Admin with HR responsibility	School Leader SBM Admin with HR responsibility	In accordance with retention schedule
Staff	Staff pictures and images	X		Cloud storage Camera	Employment, promotional	Public task / Consent (depending on how and where used)	Website Arbor Social Media Access	Yes	School Leader Staff Admin	School Leader Staff Admin	In accordance with retention schedule



# Schools for Every Child

Staff	CCTV images	X	X	Digital systems	Safeguarding Security Safety	Public Task	Third party software School server	Yes	School Leader Authorised admin personnel Third party provider Police (official request)	School leader Authorised admin staff Third party provider	In accordance with retention schedule Also system overwrites itself
Staff	Business Interest Forms including conflicts	X		Paper form	Governance	Performance of a contract	School drive, paper copies in file	No	School Leader Governors	School Leaders Clerk of gov's Admin Staff Chair of Gov's	In accordance with retention schedule

Governor											
Data Subject	Description of Data*	Type of Data		How is it collected?	What is it used for?	What is the legal basis for using it?	Where is it stored?	Does it leave the school?	Who is it shared with?	Who can access it?	How long is data kept?
		PD	SC								
Governors	Application Form Name, DOB, contact details,	X		Paper or online form completed by data subject	Governance	Public task / legal obligation	Database within school Clerks computer Paper files in school	No	Relevant school personnel Governor Services Clerk, Chair and Vice	Admin Staff School Leader School governors	In accordance with retention schedule
Governors	DBS Checks		X	Electronic forms	Governance / legal obligation	Public task / legal obligation	DBS number stored on single central register	Yes	DBS Processor (Tracey Parrott and Jackie Webber)	Results shared with school	In accordance with retention schedule
Governors / Parent / Staff / Pupil	Complaints	X		Complaints Procedure – in writing	To deal with complaints	Public Task / legal obligation	Paper file in school	No	School Leader Clerk Governors	Chair of Governors	In accordance with retention schedule
Governors	Business Interest Forms	X		Paper Form	Governance	Public Task	Website School database Clerks computer Paper	Yes	School Leader Clerk Governors	Chair of Governors Clerk School Public	In accordance with retention schedule
Governors	Election papers	X		Paper Form	Governance	Public Task / legal obligation	Paper File	Yes	School Leader Clerk Governors Parents	Chair of Governors Clerk	In accordance with retention schedule



# Schools for Every Child

<b>Governors</b>	Training Records	X		Paper Electronically	Governance	Public Task	Paper File School database Clerk's computer	Yes	School Leader Clerk Governors	Chair of Governors Clerk School	In accordance with retention schedule
<b>Governors</b>	Meeting Attendance	X		Paper Form / Electronic Form	Governance	Public Task / Legal obligation	Paper File staff portal School Database Clerk's computer Website	Yes	School Leader Clerk Governors	Chair of Governors Clerk School Public	In accordance with retention schedule

Third Party Provider											
Data Subject	Description of Data*	Type of Data		How is it collected?	What is it used for?	What is the legal basis for using it?	Where is it stored?	Does it leave the school?	Who is it shared with?	Who can access it?	How long is data kept?
		PD	SC								
<b>Every</b>	Staff name and role Staff CPD ,	X		Spreadsheet annually	Governance / maintain school databases / legal obligation / Employee data and Payroll	Public task / legal obligation	Database within school Every server	Yes Harrap IT	Relevant school personnel Harrap IT personnel	Admin Staff School Leader Harrap IT	In accordance with retention schedule
<b>Parentmail</b>	Parent contact details Inc. Email and telephone numbers Child names and classes Staff names, email and telephone numbers.	X		Parent activation via forms	To communicate to the school community / legal obligation	Public Task / legal obligation	Paper consent file in school. Details stored on Parentmail system	Yes Parentmail Portal	Admin Team	Admin Team	In accordance with retention schedule
<b>Micro Librarian</b>	Child's Name, Class and Year Group	X		Arbor annual update	To administer pupil education	To administer pupil education	Electronically on Micro Librarian	Yes Micro Librarian Portal	School staff	School Staff	In accordance with retention schedule
<b>Mathletics</b>	Names and Class info	X		Spreadsheet annually	Recording children's math progress and to improve Maths	Public Task / Legal obligation	Electronically on Mathletics	Yes Mathletics Portal	School Leader Clerk Governors	Chair of Governors Clerk School Public	In accordance with retention schedule
<b>Arbor</b>	Parent contact details Inc. Email All child data Staff names, email, contact details	X	X	Parent activation via forms	Legal obligation / To administer pupil education / Safeguarding	Public Task / legal obligation / To administer pupil education	Electronically stored on Arbor Server	Yes Arbor portal	All Staff: Levels of access restricted as appropriate Feeder schools	All Staff: Levels of access restricted as appropriate	In accordance with retention schedule



# Schools for Every Child

<b>Inventory Signs</b>	Visitor/Parent/Child basic details	X		Electronic	Safeguarding Emergency evacuation Legal obligation Public Task	Public Task	Electronically on Entry Sign system (on school server)	No	Admin Staff	Admin Staff	In accordance with retention schedule
<b>Smoothwall</b>	Parent contact details Inc. Email Childs full details Staff names, school email	X	X	Parent activation via forms	Legal obligation / To administer pupil education / Safeguarding	Public Task / legal obligation / To administer pupil education	Details imported from Arbor. Stored on Smoothwall Server	Yes Smoothwall portal	All Staff: Levels of access restricted as appropriate Feeder schools	All Staff: Levels of access restricted as appropriate	In accordance with retention schedule
<b>Health Shield</b>	staff contact details Inc. Email Staff names, email, contact details	X	X	activation forms via	Staff benefit	Public Task / legal obligation / To administer pupil education	Electronically stored on HS Server	Yes portal	All Staff: Levels of access restricted as appropriate	All Staff: Levels of access restricted as appropriate	In accordance with retention schedule
<b>Access</b>	staff contact details Inc. Email Staff names, email, contact details	X	X	activation forms via	Legal obligation / To administer pupil education / Safeguarding	Public Task / legal obligation / To administer pupil education	Electronically stored on Access Server	Yes portal	All Staff: Levels of access restricted as appropriate	All Staff: Levels of access restricted as appropriate	In accordance with retention schedule
<b>The Key Inc. Gov hub National College</b>	Staff name and role Staff CPD Gov names and roles Gov CPD	X		Spreadsheet annually	Governance / maintain school databases / legal obligation	Public task / legal obligation	Database within school Keyserver	Yes Harrap IT	Relevant school personnel Harrap IT personnel	Admin Staff School Leader Harrap IT	In accordance with retention schedule

Third Party Provider											
Data Subject	Description of Data*	Type of Data		How is it collected?	What is it used for?	What is the legal basis for using it?	Where is it stored?	Does it leave the school?	Who is it shared with?	Who can access it?	How long is data kept?
		PD	SC								
<b>Micro Librarian</b>	Pupil Details, Class and Year Group	X		Arbor annual update	To administer pupil education	To administer pupil education	Electronically on Micro Librarian	Yes Micro Librarian Portal	School Staff	School Staff	In accordance with retention schedule
<b>Accelerated reader</b>	Pupil Details, Class and Year Group	X		Arbor annual update	To administer pupil education	To administer pupil education	Electronically on AR Server	Yes	School Staff	School Staff	In accordance with retention schedule



# Schools for Every Child

<b>Mathletics</b>	Pupil Details, Class and Year Group	X		Spreadsheet annually	Recording children's math progress and to improve Maths	To administer pupil education	Electronically on Mathletics	Yes Mathletics Portal	School Leader Clerk Governors	Chair of Governors Clerk School Public	In accordance with retention schedule
<b>Curriculum portals</b>	Pupil Details, Class and Year Group	X		Arbor annual update	To administer pupil education	To administer pupil education	Electronically Kpow, Dimensions, Complete PE, white rose, Mastery for number	Yes Micro Librarian Portal	School Staff	School Staff	In accordance with retention schedule
<b>Bug Club</b>	Pupil Details, Class and Year Group	X		Arbor annual update	To administer pupil education	To administer pupil education	Electronically on Bug Club Portal	Yes Bug Club Portal	School Staff	School Staff	In accordance with retention schedule
<b>SPAG.com</b>	Pupil Details, Class and Year Group	X		Arbor annual update	To administer pupil education	To administer pupil education	Electronically on SPAG Portal	Yes SPAG Portal	School Staff	School Staff	In accordance with retention schedule
<b>Code.org (Studio Code)</b>	Pupil Details, Class and Year Group	X		Arbor annual update	To administer pupil education	To administer pupil education	Electronically on Code.org Portal	Yes Code.org Portal	School Staff	School Staff	In accordance with retention schedule
<b>Dojo</b>	Pupil Details, Class and Year Group	X		Arbor annual update	To administer pupil education	To administer pupil education	Electronically on Dojo	No Timetable Rockstars Portal	School Staff	School Staff	In accordance with retention schedule
<b>Timetable RockStars</b>	Pupil Details, Class and Year Group	X		Arbor annual update	To administer pupil education	To administer pupil education	Electronically on Timetable Rockstars Portal	No Timetable Rockstars Portal	School Staff	School Staff	In accordance with retention schedule
<b>Sonar</b>	Pupil Details, Class and Year Group	X		Arbor annual update	To provide assessment and targets for children to ensure progress	To administer pupil education	Electronically on Target Tracker Portal	Yes Target Tracker Portal	School Staff	School Staff	In accordance with retention schedule
<b>Google Classroom</b>	Pupil Details, Class and Year Group	X		Arbor annual update	To administer pupil education	To administer pupil education	Electronically on Google Portal	Yes Google Portal	School Staff	School Staff	In accordance with retention schedule



# Schools for Every Child

<b>Tapestry</b>	Pupil Details, Class and Year Group	X		Arbor annual update	To administer pupil education and record success showing progress.	To administer pupil education	Electronically on Tapestry Portal	Yes Tapestry Portal	School Staff Parents	School Staff Parents	In accordance with retention schedule
<b>Educationcity</b>	Pupil Details, Class and Year Group	X		Arbor annual update	To administer pupil education	To administer pupil education	Electronically on Educationcity Portal	Yes Educationcity Portal	School Staff	School Staff	In accordance with retention schedule
<b>FFT</b>	Pupil Details, Class and Year Group	X		LA annual update	To administer pupil education	To administer pupil education	Electronically on Timetable FFT Portal	No Timetable Rockstars Portal	School Staff	School Staff	In accordance with retention schedule

## Risk management

### 1. Pupil Data

- Description: Name, DOB, Address, SEND details, medical info, ethnicity, sex, religion.
- Type: Personal Data (PD) & Special Category Data (SC).
- Collected via: Paper forms, Google forms, Arbor.
- Vulnerabilities:
  - Data shared with external agencies (e.g., for trips) might not be encrypted.
  - Physical copies of pupil records may be accessed by unauthorized individuals.
  - Emergency contact details on trips could be lost or mishandled.
- Mitigation Actions:
  - Ensure encryption of personal data when shared with external agents (e.g., trip coordinators).
  - Secure physical storage and implement digital record-keeping with encrypted backups.
  - Use secure electronic systems for trip management and avoid carrying physical copies.

### 2. Staff Data

- Description: Application forms including Name, DOB, Address, Bank details, Medical info, NI numbers, ethnicity, religion.
- Type: PD & SC.
- Collected via: Paper forms, electronically via Arbor.
- Vulnerabilities:
  - Unencrypted transmission of sensitive data (e.g., medical info) across systems and external agencies.
  - Potential access to DBS check details by unauthorized users.
- Mitigation Actions:
  - Use encryption for all transmissions of personal and sensitive data (e.g., Arbor, IBC).
  - Implement stronger role-based access controls for handling DBS information.
  - Regular audits of staff access permissions.

### 3. Visitor / Volunteer / Contractor Data



## Schools for Every Child

- Description: Signing system data.
- Type: PD.
- Collected via: Electronic systems.
- Vulnerabilities:
  - Insecure storage of visitor information in outdated systems, leading to unauthorized access.
- Mitigation Actions:
  - Use modern visitor management systems with encrypted data storage.
  - Conduct regular security reviews.

### 4. Third-Party Providers

- Description: Staff name, role, pupil name and class (Harrap IT); parent contact details, child names, class, staff names, email addresses (Parentmail).
- Type: PD.
- Collected via: Spreadsheets, parent activation forms.
- Vulnerabilities:
  - Third-party storage and transfer of pupil data may lead to breaches without adequate security controls.
  - Parent access to sensitive data via outdated systems may be insecure.
- Mitigation Actions:
  - Audit third-party security protocols annually.
  - Ensure third-party providers have signed data protection agreements compliant with GDPR.
  - Implement secure password policies for parent access and encrypt all data transfers.