



## DATA MAPPING TEMPLATE

Please be advised:

**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. (e.g. 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, Date of Birth, Address, telephone numbers, email addresses, contact details, parent details, SEND details, previous education history,	X	X	Paper form completed by parent and inputted into SIMS [and any other system used]	To administer pupil education and welfare	Legal Obligation / Public Task	SIMS Paper copy in locked filing cabinet  Offsite data backup	Yes  Yes (Third party data backup storage)	Relevant school personnel and agencies if necessary  Third Party Providers ( i.e. Parent Mail)	Admin Staff  School Leader  Form Teacher  Cloud storage personnel	In accordance with retention schedule

	medical details, ethnicity, sex, religion									External IT personnel maintaining IT systems.	
<b>Pupils</b>	Pupil Records	X	X	Paper and electronic on SIMS [and any other system used]	To administer pupil education and welfare	Legal Obligation / Public Task	SIMS [any other system used] Paper copy in locked filing cabinet, Cloud storage  Offsite data backup	Yes  Yes (Third party data backup storage)	Relevant school personnel and agencies if necessary – passed onto new schools when pupil leaves	Admin Staff School Leader Form Teacher Cloud storage personnel External IT personnel maintaining IT systems.	In accordance with retention schedule
<b>Pupils</b>	Emergency Contact Details	X		Paper form completed by parent and inputted into SIMS [and any other system used]	To administer pupil education and welfare	Public Task	Kept on pupil record/ SIMS / any other system used] Cloud Storage / Offsite data backup	Yes This would go out on school trips etc.  Yes (Third party data backup storage)	Relevant school personnel  Third Party Providers ( i.e. Parent Mail)	Admin Staff School Leader Form Teacher	In accordance with retention schedule
<b>Pupils</b>	Pupil Email	X		Generated by the school or collected via paper form	To administer pupil education and welfare	Public Task	Schools email and database Offsite data backup	No Yes (Third party data backup storage)	School staff and pupils Third Party Providers ( i.e. Parent Mail)	School staff and pupils	In accordance with retention schedule
<b>Pupils</b>	Permission Slips	X		From parent / Paper or electronic on to school database	To administer pupil education and welfare	Legal Obligation / Public Task	SIMS [any other system used]/ Cloud Storage / Paper copy in locked filing cabinet/ Offsite data backup	Yes (trip) (Third party data backup/cloud storage)	Staff Third Party Providers ( i.e. Parent Mail)	Staff	In accordance with retention schedule
<b>Pupils</b>	Pupil Census	X	X	From SIMS/[any other system used]	To administer pupil education on behalf of DfE	Legal Obligation / Public Task	SIMS	Yes (Third party data backup/cloud storage)	Local Authority DfE	Admin staff	In accordance with retention schedule
<b>Pupils</b>	Exam Results	X		Paper form / Electronic portal	To administer pupil education on behalf of DfE	Legal Obligation / Public Task	Paper copy filed / stored on SIMS [any other system used]	Yes (Third party data backup/cloud storage)	Local Authority DfE	School Leaders Admin staff with pupil access	In accordance with retention schedule
<b>Pupils</b>	Assessment Data	X		Paper form / Pupil Database	To administer pupil education and welfare	Legal Obligation / Public Task	Kept on pupil record/ SIMS / [any other system used] / Cloud Storage	Yes (Third party data backup/cloud storage)	Local Authority DfE	School Leaders Admin staff with pupil access	In accordance with retention schedule

Pupils	SEND Information		X	Paper form and electronic	To administer pupil education and welfare	Legal Obligation / Public Task	Pupil records/ [any data base system used]	Yes (Third party data backup/cloud storage)	Local Authority and DfE Multi-agencies Including speech and language, family support workers	School Leaders Staff SENCO	In accordance with retention schedule
Pupils	Pictures	X		Schools Digital equipment School photographer	Identification Displays Publications	Consent for publication Public Tasks for identification	Paper SIMS [any other system used] Display boards	Yes [with consent] (Third party data backup/cloud storage)	Public	School Staff Public	In accordance with retention schedule
Pupils	Attendance Data	X		Paper Electronically	To administer pupil education and welfare. Emergency evacuation.	Legal Obligation / Public Task	Paper SIMS [any other system used]	No Yes (Third party data backup storage)	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 Electronic records	Yes (Third party data backup/cloud storage)	School Staff Parents Third Party Software providers (i.e. Education City)	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 Kitchen/Lunchtime Staff	School Staff Kitchen/Lunch time staff	In accordance with retention schedule
Pupils	EHC Plans		X	From various Agencies	To administer pupil education and welfare	Legal Obligation / Public Task	Electronically and paper form. CPOMS [any other system used]	No	Local Authority/ Children's Services	Senior Leadership. Designated Safeguarding Officer/ SENCO / Team/ Teacher	In accordance with retention schedule
Pupils	School Trip Information including name, medical, emergency contact details	X	X (medical)	Paper. Electronically.	To administer pupil education and welfare	Public Task	Paper. Electronically School Database	Yes (Third party data backup/cloud storage)	Agent running trip e.g. PGL School Staff Third Party Providers ( i.e. Parent Mail)	School Staff	In accordance with retention schedule
Pupils	Child Protection Files		X	Various Agencies	To administer pupil education and welfare	Public Task / Vital Interests	Paper Electronically School Database CPOMS	No (Third party data backup/cloud storage)	Local Authority	Senior Leadership. Designated Safeguarding Officer. Team/ Teacher	In accordance with retention schedule
Pupils	Administration of Medicine	X	X (medical)	Paper record completed by parent / Staff	To administer pupil education and welfare	Public task	Paper records / [any other system used]	No (Third party data)	School Staff / School nursing service /	Relevant school staff	In accordance with retention schedule

								backup/cloud storage)			
<b>Pupils</b>	Physical Intervention / Violent Incident / Accident investigation	X		Paper record	To administer pupil education and welfare	Public task	Paper records / [any other system used]	Yes (Third party data backup/cloud storage)	School staff / Children's Services /	Senior Leadership. Designated Safeguarding Officer/ SENCO / Team/ Teacher	In accordance with retention schedule
<b>Parents</b>	Any details regarding parents	X		Correspondence	To administer pupil education and welfare	Public task	Stored in filing system / any other system used	No (Third party data backup/cloud storage)	School staff	School staff	In accordance with retention schedule
<b>Visitor / Volunteer / Contractor</b>											
<b>Visitor</b>	Visitor Signing in Books	X		Paper form	Safeguarding Emergency evacuation	Public Task	Reception [any other system used]	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 on SIMS [any other system used])	Yes	DBS Processor (A Reilly)	Results shared with school	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	Stored on paper record / any other system used	No (Third party data backup/cloud storage)	School staff	School staff	In accordance with retention schedule

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, Date of Birth, Address, telephone numbers, email addresses, contact details, next of kin details, bank details, NI numbers, medical details, previous education history, previous employment details, references, medical details, ethnicity, sex, religion	X	X	Paper or online form completed by data subject and stored on SIMS [any other system used]	For employment purposes	Performance of a contract	Employee Database within school (SIMS/[any other system used])	No (Third party data backup/cloud storage)	School Leader Line Manager HR Manager / admin with HR responsibility Relevant admin personnel	School Leader Line Manager HR Manager / admin with HR responsibility	In accordance with retention schedule
Staff	Absence Data	X	X (if contains Medical)	Paper form or via email	For employment purposes	Performance of a contract	Employee Database within school (SIMS/ any other system used)) staff paper file kept in secure location Payroll software	No (Third party data backup/cloud storage)	School Leader Line Manager Payroll Provider Occupational Health	School Leader Line Manager HR Manager / admin with HR responsibility	In accordance with retention schedule
Staff	Pre-employment Checks	X		Paper and electronic	For employment purposes	Performance of a contract	Employee Database within school (SIMS/ any other system used) staff paper file kept in secure location	No (Third party data backup/cloud storage)	Line Manager School Leader Occupational Health provider	School Leader Line Manager HR Manager / 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	DBS number stored on SIMS [any other system used])	Yes	DBS Processor (A Reilly)	Results shared with school School Leader Line Manager HR Manager / 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	Staff record file kept in secure location	No (Third party data backup/cloud storage)	School Leader Line Manager	School Leader Line Manager HR Manager / 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	Employee Database within school (SIMS/ any other system used) staff paper file kept in secure location	No (Third party data backup/cloud storage)	School Leader Line Manager HR Manager / admin with HR responsibility Relevant admin personnel	School Leader Line Manager HR Manager / admin with HR responsibility	In accordance with retention schedule

Staff	Car details	X		Paper form or email completed by data subject	For employment purposes	Performance of a contract / public task	Employee Database within school (SIMS/ any other system used)) staff paper file kept in secure location	No (Third party data backup/cloud storage)	School Leader Line Manager HR Manager / admin with HR responsibility Relevant admin personnel	School Leader Line Manager HR Manager / 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	Employee Database within school (SIMS/ any other system used)) staff paper file kept in secure location	Yes (Third party data backup/cloud storage)	School Leader Line Manager HR Manager / admin with HR responsibility Relevant admin personnel	School Leader Line Manager HR Manager / admin with HR responsibility	In accordance with retention schedule
Staff	Occupational checks and health referrals		X	Paper form or electronic form	For employment purposes and legal purposes	Performance of a contract	Staff paper file kept in a secure location / any other system used	Yes (Third party data backup/cloud storage)	School Leader Line Manager HR Manager / admin with HR responsibility HET	School Leader Line Manager HR Manager / admin with HR responsibility	In accordance with retention schedule
Staff	Performance management records	X		Paper or electronic form	For employment purposes and legal purposes	Public task / Performance of a contract	Employee Database within school (SIMS/ any other system used)) staff paper file kept in secure location	No (Third party data backup/cloud storage)	School Leader Line Manager HR Manager / admin with HR responsibility HET	School Leader Line Manager HR Manager / admin with HR responsibility	In accordance with retention schedule
Staff	CPD records	X		Paper or electronic form	For employment purposes and legal purposes	Public task / Performance of a contract	Employee Database within school (SIMS / any other system used) staff paper file kept in secure location	No (Third party data backup/cloud storage)	School Leader Line Manager HR Manager / admin with HR responsibility	School Leader Line Manager HR Manager / admin with HR responsibility	In accordance with retention schedule
Staff	Lesson observations	X		Paper or electronic form	For employment purposes and legal purposes	Public task / Performance of a contract	Paper records kept in a secure location Staff paper file in a secure location	No (Third party data backup/cloud storage)	School Leader Line Manager HR Manager / admin with HR responsibility	School Leader Line Manager HR Manager / admin with HR responsibility	In accordance with retention schedule
Staff	Staff files	X	X (potentially If medical)	Paper or electronic information management system	For employment purposes and legal purposes	Public task / Performance of a contract	Employee Database within school (SIMS/ any other system used)) staff paper file kept in secure location	No (Third party data backup/cloud storage)	School Leader Line Manager HR Manager / admin with HR responsibility Relevant admin personnel	School Leader Line Manager HR Manager / 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	School drive Cloud	No (Third party data backup/cloud storage)	School Leader Line Manager HR Manager / admin with HR responsibility	School Leader Line Manager HR Manager / admin with HR responsibility /	In accordance with retention schedule

									Relevant admin personnel	safeguarding governor	
<b>Staff</b>	Absence Data	X		Paper or electronic form	For employment purposes and legal purposes	Performance of a contract	Employee Database within school (SIMS/ any other system used) staff paper file kept in secure location	Yes (Third party data backup/cloud storage)	School Leader Line Manager HR Manager / admin with HR responsibility Relevant admin personnel Payroll Provider (HCC)	School Leader Line Manager HR Manager / admin with HR responsibility	In accordance with retention schedule
<b>Staff</b>	Payroll Records and payslips	X		Paper and electronic forms	For employment purposes and legal purposes	Performance of a contract	Employee Database within school (SIMS/ any other system used)	Yes (Third party data backup/cloud storage)	School Leader Line Manager HR Manager / admin with HR responsibility Relevant admin personnel Payroll Provider (HCC)	School Leader Line Manager HR Manager / admin with HR responsibility	In accordance with retention schedule
<b>Staff</b>	Pension forms	X		Paper and electronic forms	For employment purposes and legal purposes	Performance of a contract	Staff paper file kept in a secure location  (any other system used)	Yes (Third party data backup/cloud storage)	School Leader Line Manager HR Manager / admin with HR responsibility Relevant admin personnel Pension provider Payroll (HCC)	School Leader Line Manager HR Manager / admin with HR responsibility	In accordance with retention schedule
<b>Staff</b>	Staff pictures and images	X		Digital pictures, camera	Employment, promotional	Public task / Consent (depending on how and where used)	School drive Cloud Website ( any other system used)	Yes (Third party data backup/cloud storage)	School Leader Line Manager HR Manager / admin with HR responsibility IT admin / Manager Admin staff	School Leader Line Manager HR Manager / admin with HR responsibility IT admin / Manager Admin staff	In accordance with retention schedule
<b>Staff</b>	Pecuniary Interest forms	X		Paper form	Governance	Performance of a contract	School drive, paper copies in file	No (Third party – Electronic sign in provider)	Governors / School Leader	School Leaders / Clerk / Admin Staff / Chair of Governors	In accordance with retention schedule



<b>Governor</b>											
<b>Data Subject</b>	<b>Description of Data*</b>	<b>Type of Data</b>		<b>How is it collected?</b>	<b>What is it used for?</b>	<b>What is the legal basis for using it?</b>	<b>Where is it stored?</b>	<b>Does it leave the school?</b>	<b>Who is it shared with?</b>	<b>Who can access it?</b>	<b>How long is data kept?</b>
		<b>PD</b>	<b>SC</b>								
<b>Governors</b>	<b>Application Form</b> name, Date of Birth, contact details,	X		Paper or online form completed by data subject and stored on (system used)	Governance	Public task / legal obligation	Database within school (any other system used)	No	Relevant school personnel	Admin Staff School Leader	In accordance with retention schedule
<b>Governors</b>	DBS Checks		X	Electronic forms	Governance / legal obligation	Public task / legal obligation	DBS number stored on SIMS (any other system used)	Yes	DBS Processor (A Reilly)	Results shared with school	In accordance with retention schedule
<b>Governors / Parent / Staff / Pupil</b>	Complaints	X		Complaints Procedure – Paper form or in writing	To deal with complaints	Public Task / legal obligation	Paper file in school (any other system used)	No	School Leader Clerk Governors Trust	Chair of Governors	In accordance with retention schedule
<b>Governors</b>	Pecuniary Interest Forms	X		Paper Form	Governance	Public Task	Website / School database / Clerks computer	Yes	School Leader Clerk Governors Trust	Chair of Governors / Clerk School / Public	In accordance with retention schedule
<b>Governors</b>	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
<b>Governors</b>	Training Records	X		Paper / Electronic Form	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 / School Database/ Clerk's computer	Yes	School Leader Clerk Governors Trust	Chair of Governors / Clerk School / Public	In accordance with retention schedule