



**GDPR
INFORMATION
AUDIT**

Reviewed :
11/11/2025

Personal Information	Who needs to be informed that it is being held? (parent's, staff)	Sources	Physical, electronic or both	Does it move between your Trust and other organisations/people outside the school	If yes, external organisations or people (i.e. parents)	Why is it kept? Why is it shared with the organisation or individuals?	Is it Accurate?	Should it be kept?	If kept, how long for?	Does anyone need informing that it has been corrected?	Legal basis for holding the information
Specific											
E-Mails	Parent, Staff, Pupils, Parents, Contractors	IT Server	Electronic	Yes	Various external sources	Contractual Reasons	Yes	Yes	12 Months, unless for there is a reasonable explanation	No	
Photos	Parent, Staff, Pupils, Parents, Contractor, Visitors	IT Server, Website Newsletters	Electronic	Yes	Only internally, through this schools, if externally used the schools would have gained permission	Use of website / Newsletters	Yes	Yes, for publicity and information purposes about the school's achievements and records	Review Periodically	No	Public Task
Staff											
Name	Employee	Arbor, Staff personnel File, Email, Trust Website, Course Certificates, Newsletters, Business Continuity Plan, Accident Forms, SCR	Electronic	Yes	Public (website), HR Provider (EPM), Occupational Health (Heales), Contractors (i.e. Plumsun,Arbor), Emails	Contractual reasons	Yes	Yes	Ongoing	No (unless changes of name)	Public Task

Contracts	Employee	Personnel File	Electronic	No	HR Provider - EPM	Contractual Reasons	Yes	Yes	Ongoing	Yes, employee	
Gender	Employee	Arbor, Staff personnel File, Email, Trust Website, Course Certificates, Newsletters, Business Continuity Plan, Accident Forms, SCR	Electronic	Yes	Public (website), HR Provider (EPM), Occupational Health (Heales), Contractors (i.e. Plumsun,Arbor), Local Authority (LGSS)Emails	Contractual reasons	Yes	Yes	Ongoing	No (unless changes of title)	Public Task
D.O.B	Employee	Arbor, Personnel File, Email	Electronic	Yes	Occupational Health (Heales Medical), HR Services (EPM)	Contractual Reasons	Yes	Yes	Ongoing	No	Public Task
National Insurance	Employee	Arbor, Personnel File	Electronic	Yes	HR Payroll (EPM)	Contractual Reasons	Yes	Yes	Ongoing	No	Public Task
Job application	Employee	Personnel File, Email, on-line received from potential employee	Electronic	Yes	HR Services (EPM)	Contractual Reasons	Yes	Yes	6 months after date of leaving	No	Public Task
References	Employee	Personnel File, Emails received from previous employers	Electronic	No	N/A	N/A	Yes	Yes	6 months after date of leaving	No	Public Task
Pension Info	Employee	Email - HR provider, Pension provider	Electronic	Yes	HR Payroll (EPM) Pension Provide (LGSS)	Contractual Reasons	Yes	Yes	Ongoing	No	Public Task
Bank account	Employee	Personnel File	Electronic	Yes	HR Payroll (EPM)	Contractual Reasons	Yes	Yes	Ongoing (for pay)	No	Public Task
Next of Kin / Emergency Contact	Employee	Personnel File	Both	No	N/A	N/A	Yes	Yes	Ongoing (for emergency contact)	No	Public Task
Performance Management Review	Employee	Personnel File, Nomadesk (Cloud server)	Electronic	No	no	Advice on Employment, CPD, Performance monitoring	Yes	Yes	Two years (for record of consistency)	No	Public Task
Personal Phone Numbers	Employee	Personnel file, Emails	Both	Yes	HR Services (EPM)	Contractual Reasons	Yes	Yes	Ongoing	No	Public Task
Email address	Employee	Personnel File, IT company	Both	Yes	IT Company	Contractual Reasons	Yes	Yes	Ongoing	No	Public Task
Salary	Employee	Personnel File	Electronic	Yes	HR Payroll (EPM)	Contractual Reasons	Yes	Yes	Ongoing (for pay)	No	Public Task

Sick absence / other absence	Employee	Personnel File	Electronic	Yes	HR Services and Occupational Health	Advice on Employment	Yes	Yes	Two years (for record of consistency)	No	Public Task
DBS Reference	Employee	Personnel File, [See single central record]Number recorded	Electronic	Yes	DBS Website for Update Service (EPM Portal)	Check DBS - New Employee	Yes	Yes	Ongoing	N/A	Public Task
Passport / ID info.	Employee	Personnel File and SCR	Electronic	No	N/A	N/A	Yes	Yes	6 months	No	Public Task
Single Central record	Employee	Single Central Record [information collected is included on this form]	Electronic	Yes	Schools	Shared with Ofsted for inspection purposes	Yes	Yes	Ongoing	Yes	Public Task
Training record	Employee	Personnel File, or Wall - First Aid	Electronic	No	N/A	Shared with Ofsted for inspection purposes, business continuity plan and for medical	Yes	Yes	Ongoing, until the training is no longer valid	Yes	Public Task
Copy of qualifications	Employee	Personnel File,	Electronic	No	N/A	N/A	Yes	Yes	6 months	No	Public Task
Photos for ID	Employee	Personnel File - DL/Passport/Badges	Electronic	No	N/A	N/A	Yes	Yes	Ongoing (i.e. used on staff badges)	No	Public Task
Medical	Employee	Personnel File	Electronic	Yes	HR Services (EPM) Occupational Health	Advice on employment	Yes	Yes	Two years (for record of	No	Public Task
Sickness / absence	Employee	Personnel File	Electronic	Yes	HR Services (EPM)Occupational Health (Heales)	Advice on employment	Yes	Yes	Two years (for record of consistency)	No	Public Task
Disciplinary	Employee	Personnel File	Electronic	Yes	HR Services (EPM)	Advice on employment	Yes	Yes	Two years (for record of consistency)	No	Public Task
Interview notes	Employee	Personnel File	Electronic	Yes	HR Services (EPM)	Contractual Reasons	Yes	Yes	6 months	No	Public Task
Disabilities	Employee	Personnel File	Electronic	Yes	HR Services (EPM)Occupational Health (Heales)	Contractual Reasons	Yes	Yes	6 months or if an ongoing requirement for	No	Public Task
Sexual Preference	Employee	Personnel File	Electronic	Yes	HR Services (EPM) Occupational Health (Heales)	Contractual Reasons	Yes	Yes	6 months	No	Public Task

Previous work Experience	Employee	Personnel File	Electronic	No	N/A	N/A	Yes	Yes	6 months from date of leaving employment	No	Public Task
Teacher status check	Employee	Personnel File, SCR	Electronic	Yes	DBS Website for Update Service	Check DBS for New Employee	Yes	Yes	6 Months from date of leaving, the DBS number is kept ongoing	N/A	public Task
Section 128 check	Employee	Personnel File, [See single central record]	Electronic	Yes	SCR Trust Tab into schools		Yes	Yes	6 Months, the record that the check was undertaken is stored	N/A	Public Task
Disqualification by Association	Employee	Personnel File, SCR	Electronic	Yes	DBS Website for Update Service	Check DBS for New Employee	Yes	Yes	6 Months, the record that the check was undertaken is stored	N/A	Public Task

Pupils

Name	Parent and pupil	SIMS, Pupil File, Email, School Website, Pupil Progress, Registers, 'Signing In System', Newsletters, Accident Returns, absence recording line [deleted each day]	Both	Yes	Public (i.e. if included on the website), Contractors (i.e. Plumsun, educational visit sign off), Local Authority (i.e. safeguarding report), Email	Contractual reasons	Yes	Yes	Ongoing	No (unless changes of name)	4
Photos	Parent and pupil	Locations in the school (medical and publicity purposes), newsletters, school events	Electronic	No (unless taken by an external company)	Yes, photographic company	Contractual arrangement for providing the photo	Yes	Yes, for medical reasons, publicity and information purposes about the school's achievements and records	School photo events - 5 years, newsletters - 2 years	No	4

Gender	Parent	SIMS, Pupil File, Email, School Website, Pupil Progress, Registers, 'Signing In System', Newsletters, Accident Returns	Electronic	Yes	Public (i.e. if included on the website), Contractors (i.e. Plumsun, educational visit sign off), Local Authority (i.e. safeguarding report), Email	Contractual reasons	Yes	Yes	Ongoing	No (unless changes of name)	4
Parents names	Parent	SIMS, Pupil File, Email, Accident Returns, safeguarding reports, contractual document (such as permission slips), absence recording line [deleted each day]	Electronic	Yes	Local Authority (i.e. safeguarding report), Email	Contractual reasons	Yes	Yes	Ongoing, whilst the pupil is attending school, and for 6 months following attendance	No (unless changes of name)	4
Address	Parent	SIMS, Pupil File, Email, Accident Returns, safeguarding reports, contractual document (such as permission slips), absence recording line [deleted each day]	Electronic	Yes	Local Authority, NHS, Email	Contractual reasons	Yes	Yes	Ongoing, whilst the pupil is attending school, and for 6 months following attendance	No (unless changes of name)	4
SEN	Parent	SIMS, Pupil File, Email, Accident Returns, safeguarding reports, contractual document (such as permission slips), absence recording line [deleted each day]	Both	Yes	Local Authority (i.e. safeguarding report), Email, Change of School	Contractual reasons	Yes	Yes	Ongoing, whilst the pupil is attending school, and for 6 months following attendance	No (unless changes of name)	4

Medical	Parent	SIMS, Pupil File, Staff Room/ Medical Room (in order to respond to emergencies), Email, Accident Returns, safeguarding reports, contractual document (such as permission slips), absence recording line [deleted each day]	Both	Yes	Local Authority (i.e. safeguarding report), Email, Plumsun (emergency response on school visits)	Contractual reasons	Yes	Yes	Ongoing, whilst the pupil is attending school, and for 6 months following attendance	No (unless changes of name)	4
Allergies	Parent	SIMS, Pupil File, Staff Room/ Medical Room (in order to respond to emergencies), Email, Accident Returns, safeguarding reports, contractual document (such as permission slips), absence recording line [deleted each day]	Both	Yes	Local Authority (i.e. safeguarding report), Email, Plumsun (emergency response on school visits)	To respond to pupils needs	Yes	Yes	Ongoing, whilst the pupil is attending school, and for 6 months following attendance	No (unless changes of name)	4
Ethnicity and Religion	Parent	SIMS, Pupil File	Electronic	Yes	Local Authority, Plumsun (emergency response on school visits)	To respond to pupils needs	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes, parents if needs change	4
Behaviour Records and Risk Assessments	Parent	SIMS, Progress Reports	Both	Yes	Local Authority, Ofsted, parents, Plasmon (electronic school visit form)	Safeguarding, contractual arrangements - pupil attendance at school	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes	4
Teacher reports	Parent	SIMS, Progress Reports	Electronic	Yes	Local Authority, Ofsted, parents	Contractual arrangements - pupil attendance at school	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes	4
Academic achievement	Parent	SIMS, Progress Reports	Electronic	Yes	Local Authority, Ofsted, parents	Contractual arrangements - pupil attendance at school, parents	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes	4

Siblings	Parent	SIMS	Electronic	Yes	Local Authority, Ofsted	Safeguarding, safeguarding audits, contractual arrangements - pupil attendance at school	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes	4
Family info	Parent	SIMS	Electronic	Yes	Local Authority, Ofsted, parents	Safeguarding, safeguarding audits, contractual arrangements - pupil attendance at school	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes	4
SATS results	Parent	SIMS, Progress Reports, School Intranet	Electronic	Yes	Local Authority, Ofsted, parents	Contractual arrangements	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes	4
Assessments	Parent	SIMS, Progress Reports, School Intranet	Electronic	Yes	Local Authority, Ofsted, parents	Contractual arrangements	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes	4
Tracking data	Parent	SIMS, Progress Reports, School Intranet	Electronic	Yes	Local Authority, Ofsted, parents	Contractual arrangements	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes	4
First aid record	Parent	SIMS, Paper located in Staff Room, Office, Medical Room	Both	Yes	Local Authority, Ofsted, parents	Contractual arrangements	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes	4
Exam certificates	Parent	SIMS, Progress Reports, IT Server, School Intranet	Electronic	Yes	Local Authority, Ofsted, parents	Contractual arrangements	Yes	Yes	Ongoing, whilst the pupil is attending school, and for 6 months following attendance	Yes	4
LAC / Court Orders	Parent	SIMS, Staff Office, IT Server, Intranet	Electronic	Yes	Local Authority, Ofsted, parents	Contractual arrangements	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes	4
Free School meals	Parent	SIMS, Staff Office, IT Server, Intranet	Electronic	Yes	Catering Provider, Ofsted, parents	Contractual arrangements	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes	4
Emergency Contacts	Parent	SIMS, Staff Office, IT Server, Intranet	Both	Yes	N/A	N/A	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes	4
Email	Parent	SIMS, Pupil File, IT Server, Intranet	Electronic	Yes	IT Company	Contractual Reasons	Yes	Yes	Ongoing	No	4

Physical Intervention	Parent	SIMS, Paper located in Staff Room, Office, Medical Room	Electronic	Yes	Local Authority, Ofsted, parents	Contractual arrangements	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes	4
Doctors details	Parent	SIMS, Paper located in Staff Room, Office, Medical Room	Electronic	Yes	Local Authority, Ofsted, parents,	Contractual arrangements	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes	4
First language	Parent	SIMS, Pupil File	Electronic	Yes	Local Authority	To respond to pupils needs	Yes	Yes	Ongoing, whilst the pupil is attending school	Yes, parents if needs change	4
Birth Certificates	Parent	Paper	Physical	No	N/A	Check for school visits abroad, examination board check	Yes	No	Only during a visit	No	
Passport details	Parent	Paper (taken on and off site) and Electronic documents	Electronic	Yes	Plasmon Ltd, Education Centre and other Venues	Check for school visits abroad, examination board check	Yes	No	Only during a visit	No	
European Health card	Parent	Paper (taken on and off site) and Electronic documents	Electronic	Yes	Plumsun Ltd, Education Centre and other Venues	Check for school visits abroad	Yes	No	Only during a visit	No	

Parental

Name	Parent	SIMS, Pupil File, Email, Accident Returns, safeguarding reports, contractual document (such as permission slips), absence recording line [deleted each day]	Electronic	Yes	Local Authority (i.e. <i>safeguarding report</i>), Email	Contractual reasons	Yes	Yes	Ongoing, whilst the pupil is attending school, and for 6 months following attendance	No (unless changes of name)	4
Address	Parent	SIMS, Pupil File, Email, Accident Returns, safeguarding reports, contractual document (such as permission slips), absence recording line [deleted each day]	Electronic	Yes	Local Authority (i.e. <i>safeguarding report</i>), Email	Contractual reasons	Yes	Yes	Ongoing, whilst the pupil is attending school, and for 6 months following attendance	No	4

Gender	Parent	SIMS, Pupil File, Email, safeguarding reports,	Electronic	Yes	Local Authority (i.e. safeguarding report), Email	Contractual reasons	Yes	Yes	Ongoing, whilst the pupil is attending school, and for 6 months following attendance	No	4
Phone No.	Parent	SIMS, Pupil File, Email	Both	Yes	Local Authority (i.e. safeguarding report), Service providers [school meals, Payment Arrangements]Email,	Contractual reasons	Yes	Yes	Ongoing, whilst the pupil is attending school, and for 6 months following attendance	No	4
Call History	Parent	Absence recording line [deleted each day]	Electronic	Yes	No	N/A	Yes	Yes	One day	No	4
Letters	Parent	SIMS, Pupil File, Email	Electronic	Yes	Local Authority (i.e. safeguarding report), Service providers [school meals, Payment Arrangements], Email,	Contractual reasons	Yes	Yes	Ongoing, whilst the pupil is attending school, and for 6 months following attendance	No	4
Marital status	Parent	SIMS, Pupil File, Email, safeguarding reports	Electronic	Yes	Local Authority (i.e. safeguarding report), Email	Contractual reasons	Yes	Yes	Ongoing, whilst the pupil is attending school, and for 6 months following attendance	No	4
Relationship to pupil	Parent	SIMS, Pupil File, Email,	Electronic	Yes	Local Authority (i.e.	Contractual reasons	Yes	Yes	Ongoing, whilst the	No	4
Trustees											
Name	Trustees	Trustee file, Email, School and Trust Websites, Course Certificates, Registers, 'Signing In System', Newsletters, Business Continuity Plan and single central record	Both	Yes	Public (i.e. if included on the website), HR Provider (name the provider), Contractors (i.e. Plumsun, training providers), Local Authority (i.e. safeguarding report), Email	Contractual reasons	Yes	Yes	Ongoing	No (unless changes of name)	Public Task

DBS	Trustees and School	Single Central Record, Governor Hub	Electronic	Yes	DBS Website for Update Service	Safeguarding purposes. It is shared because Trustees visit schools.	Yes	Yes	The DBS number is kept ongoing	N/A	Public Task
Gender	Trustees	Trustee File, Email, safeguarding reports, DBS, Governor Hub	Both	Yes	Statutory reporting (i.e. safeguarding, financial, charity law), Email,	Contractual reasons	Yes	Yes	Ongoing, whilst the person is a Trustee	No	Public Task
Personal Contact details	Trustees	Trustee File, internal Trust directory, Email, safeguarding reports, Governor Hub	Both	Yes	Statutory reporting (i.e. safeguarding, financial, charity law), Email,	Contractual reasons	Yes	Yes	Ongoing, whilst the person is a Trustee	Yes; Companies House will need informing	
Email	Trustees	Trustee file, internal trust directory, IT Server, Intranet, Governor Hub	Both	Yes	IT Company	Contractual Reasons	Yes	Yes	Ongoing, whilst the person is a Trustee	No	Public Task
Address	Trustees	Trustee file, Governor Hub	Both	Yes	Companies House, Department for Education	Contractual reasons	Yes	Yes	Ongoing, whilst the person is a Trustee	Yes; Companies House will need informing	
Telephone Number	Trustees	Trustee File, internal Trust directory, Governor Hub	Both	No	N/A	To contact Trustees	Yes	Yes	Ongoing, whilst the person is a Trustee	No	
Conflict of interest / Register of interest	Trustees	Trustee File	Both	Yes	Website	Statutory requirement	Yes	Yes	Ongoing, whilst the person is a Trustee	No	
Profile	Trustees	Trust Website, IT Server, Governor Hub	Both	Yes	Website	Statutory requirement	Yes	Yes	Ongoing, whilst the person is a Trustee	No	
Attendance at meetings	Trustees	Trust website, minutes	Both	Yes	Website	Statutory requirement	Yes	Yes	Ongoing, whilst the person is a Trustee	No	
Section 128 check	Trustees	Single Central Record	Electronic	Yes	N/A	N/A	Yes	Yes	Ongoing, whilst the person is a Trustee	No	
Photos	Trustees	Newsletters, electronic signing in system, website	Electronic	No (unless taken by an external company)	Yes, photographic company	Contractual arrangement for providing the photo	Yes	Yes, for publicity and information purposes about the Trust's successes	Ongoing, whilst the person is a Trustee	No	Public Task

Contractors / Suppliers											
Name	Contractor	Sage, Email, Invoices, Business Continuity Plan, SCR - contractors Contract Register	Both	Yes	Contractors (i.e. Plumsun for educational visits, accident reporting), Emails	Contractual reasons	Yes	Yes	Ongoing	No (unless changes of name)	Public Task
Address	Contractor	Sage, Email, Invoices, Business Continuity Plan, SCR - contractors Contract Register	Electronic	Yes	Public (i.e. if included on the website), Other contractors (i.e. Plumsun for educational visits, accident reporting), Email	Contractual reasons	Yes	Yes	Ongoing	No (unless changes of name)	Public Task
Mobile phone / Contact Number	Contractor	Sage Email, Business Continuity Plan, SCR - Contractors. Contract Register	Electronic	Yes	Public (i.e. if included on the website), Other contractors (i.e. Plumsun for educational visits, accident reporting), Email	Contractual reasons	Yes	Yes	Ongoing	No (unless changes of name)	Public Task
DBS Reference	Contractor	SCR - number held	Electronic	Yes	DBS Website if registered for Update Service	Check DBS for New Employee	Yes	Yes	6 Months, the DBS number is kept ongoing	N/A	Public Task
Organisation	Contractor	Companies House	Electronic	Yes	Schools	Contractual reasons	Yes	Yes	Kept as long as the current contract lasts	N/A	Public Task
VAT Info	Contractor	Sage / Invoices	Electronic	No	N/A	N/A	Yes	Yes	Kept as long as the current contract lasts	No	Public Task

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