

## CHI Information Asset Audit - September 2024

**Data Protection Manager (DPM): Alison Reid** - areid49.314@lgflmail.org

**Data Protection Officer (DPO): Satswana Ltd**

We process and store many different forms of data, relating to staff, parents and carers, and pupils. See our Privacy Policy for more information. The table below contains a list of the data we process and the reasons and security measures related to these items.

Why are you processing the personal data in the asset?	Parental data – Contact details for sending important information and to contact in case of emergency. Pupil data – Contact details of emergency contact and parents/carers. Personal details for safeguarding; SEN; medical conditions; transition to next school; database and permissions returns for funding plus Staff data – Payroll, contracts, contacts, right to work in UK, references.
Who is the asset owner?	Coombe Hill Infant School
Are you the controller/processor or joint controller/processor?	Controller
Whose personal data are you processing?	Parents, pupils, staff, Governors, volunteers, applicants for places.
Are you processing sensitive personal data?	Yes, within SEN and trip data, PPG data.
What are your grounds for processing sensitive data?	SEN pupils' requirements, medical and dietary information required for school trips.
What permissions do you have for the processing of the data? Are there any Privacy Notices associated with the collection of the data?	Privacy notices for parents and staff on admission/employment. Legal requirement to collect sensitive information for certain purposes.
Have you carried out a Privacy Impact Assessment (PIA) for this data?	Satswana Ltd has been instructed to carry this out.
Where is the personal data stored?	Computers, locally and on the secure serve. Paper files Phone records CCTV recordings
Who has access to the information asset?	Staff – depending on need. Current parents and pupils can make a Subject Access Request whilst at the school. Processors such as auditors, legal advisors, IT support etc. may have access (must be subject to a processor agreement).
How is the information asset kept safe?	Locked cabinets, locked offices, password protected IT. Data managed within London Grid for Learning, which has a robust security in place.

How long do you keep the personal data in the asset? It? Is it up to date?	Staff information kept for six years and other assets as per legal requirements.
What will happen if something goes wrong and there is a data breach? Is there a process?	Yes, the process is that the DPM would notify Satswana Ltd, (the DPO), in the first instance. They would advise on next steps.
Do you need the data? Why? What is your retention schedule for the data?	Data required for DofE funding. Contact details, contracts including pay. Safeguarding. Retention schedule according to legal requirements.
Do you share the data with anyone?	DofE, local authority, SEN professionals, payroll contractor, Schools information management systems, exam authorities, lawyer, accountant.
Is any of the data collected data from third parties? Do you have the necessary permissions from them to process the data?	Admissions documents. SEN shared data. All permissions in place and conditions of receipt met.