Data Management

St James Infants and Pre School

General Data Protection Regulations Audit

Ruth Hawker
Company Director
BSc (Hons), MBA, MSc HRM (Open), CMIOSH, SIIRSM, FCMI, Chartered FCIPD

Becky Clark
Director
MAAT, Cert IOSH, MInstLM, AIIRSM

Molly O'Donnell
Assistant Director
BA (Hons), HND

Copyright © Plumsun Ltd 2013

Contents

1.0 Overall Summary 3
1.1 Date of Audit and Key Information 3
1.2 Summary of the Audit 3
2.0 School Details 4
3.0 Explanation of the Audit 5
3.1 Audit Purpose 5
3.2 Audit Remit 5
3.3 Audit Owner 5
3.4 Audit Distribution 5
3.5 Audit Review Schedule 5
4.0 Audit Process 6
Main Report and Evidence 7

1.0 Overall Summary

1.1 Date of Audit and Key Information

Date	19th March 2026
Auditor	Ruth Hawker

1.2 Summary of the Audit

A data protection audit is a way of finding out if data management is taking place in line with the standards required by the General Data Protection Regulations. It lets organisations know where suitable and sufficient controls are in place, where improvements are required and areas of non-compliance.

The aim is; to allow quality improvement in systems and processes to reduce the likelihood of a data breach involving personal identifiable information; to ensure that in the event of a breach the organization can show that it has taken appropriate practical steps outlined as necessary by the Information Commissioners Office.

2.0 School Details

School Name	St James Infants and Pre-School
School Address	90 St James Street, Daventry, NN11 4AQ
Telephone Number	01327 702783
Headteacher	Ms Sarah O'Shea
Chair of Governors / Trustees	Mr Andrew Dunkley
Type of School	Infants
School Category	Academy
Age Range of Pupils	4 – 7

3.0 Explanation of the Audit

This audit does not supersede existing procedures or arrangements associated with GDPR.

3.1 Audit Purpose

The audit provides an assessment of whether your organisation is following good data protection practice. The audit plays a key role in assisting organisations in understanding and meeting their data protection obligations. The audit looks at whether you have effective controls in place alongside fit for purpose policies and procedures to support your data protection obligations. We check if you are following data protection legislation as it applies to your organisation and will report with recommendations on how to approve.

3.2 Audit Remit

The audit must be perceived as a positive management tool for the employer. It should have unrestricted access to both external and internal auditors, keeping cost-effectiveness, independence and objectivity under review.

The audit will ensure the undertaking of the employer's responsibilities outlined in section 1.1.

3.3 Audit Owner

The Headteacher is the owner of the audit and is responsible for its distribution and action. The Governors have the responsibility to consider and act upon the findings in accordance with the General Data Protection policy and other related school policies.

3.4 Audit Distribution

The audit will be distributed to staff (teachers and support staff) and governors if applicable. New staff and governors will be informed of the actions of the audit during their induction as a positive management communication tool to embed the importance of GDPR into the schools culture.

3.5 Audit Review Schedule

The audit will be conducted on a annual basis, unless the audit has been activated or changes occur which then require a review.



4.0 Audit Process

The audit reflects ICO guidance for leading GDPR at work. It also audits the employer's performance of legal duties placed on the employer under the General Data Protection Regulation which was introduced in May 2018.

Main Report and Evidence

	Plumsun Observations
What steps have been taken to raise awareness of data protection with staff? Please provide examples if necessary.	GDPR Policy Staff Handbook GDPR annual training Privacy Notices in place Staff Briefings Posters in staff room Clear desk policy Documentation left around Supply email to use in class – no access to the school
What steps have been taken to raise awareness of data protection with parents? Please provide examples if necessary.	Privacy notice in place for parents and pupils, Admission forms online include privacy notice and signpost to website Internet safety information to parents Revisit data collect information Review face to face – e.g. parents evening GDPR statement for premium Reminding them that they cannot share information Assembly – parent information provided
What steps have been taken to raise awareness of data protection with children? Please provide examples if necessary.	Pupils are taught through ICT, not sharing information, passwords, security codes etc. PSHE curriculum Examples of children stating what they know about data protection
What steps have been taken to raise awareness of data protection with governors? Please provide examples if necessary.	Current privacy notice in place, Review policies and audit reports, Governors have training and an item on the agenda, regular catch ups. Governor Agenda item – data breaches FOI requests and SARS.
Data protection policy	In place On the website Accessible Includes subject access request procedure
Does the information audit reflect the retention document?	Recently updated it.
IT / security policy(s) **Are other data policies in place?**	Acceptable Use Policies ICT Policy Remote Learning Policies Filter monitoring system Instant email and full break down report
How are cookies managed on the School website?	Yes – managed by website provider
Admissions/ pupil registration forms	Completed paper – data transferred onto Arbour – then shredded Confidential bag waste - previously

Have any new technologies been introduced since the last audit?	6 new ipads – set up by easi pc
Were DPIAs carried out before introducing these new systems?	No new systems introduced
Are staff aware of the need to carry out DPIAs on new technologies/systems?	Yes
Privacy notice for parents and pupils?	On the website In place
Shared with new parents / pupils?	Privacy notice for staff In place
On the website / accessible?	In packs for new staff and part of the induction staff Shared with current staff
Privacy notice for job applicants?	Yes – my new term templates
Privacy notice for governors?	In place – on the Trust Website. Shared
Privacy notice for visitors?	In place – on the website
Have any subject access requests (SARs) or freedom of information requests (FOIs) been received since the date of the last audit?	No
Have you received any SARS? Do Staff understand people can make verbal SARS? If so, were they dealt with in accordance with legal timeframes? Have requests been recorded?	No
What data related training has taken place with staff? Have records been kept of training?	Online training module - Judiciam Annual training/ Team meetings
Do new staff receive training as part of induction?	Yes
Are there systems in place for refresher training for staff?	Yes
What type of paper records are kept and how are they secured?	HR records – on teams Safeguarding records - Online SEN / ALN records – Arbour and Teams Finance records – Online SEN – locked filing cabinet for some.

Is there a system in place for reviewing files to remove content no longer required (to comply with the principle of data minimisation)?	Yes – retention document Online files have destroy dates Paper files – do not have any paper files Emails cleared
Have any of the following security settings been put in place for sending emails?	Yes – encryption, access egress Training for staff
Have retention procedures been put in place for emails?	School has an automatic deletion setting of 90 days, prior to deletion all emails are filed accordingly. Can be retrieved if necessary.
What are the School's procedures for reporting a data breach?	This is documented in the school's policy. No data breaches.
Have any breaches been referred to the ICO?	No
Do the School keep a data breach record?	N/A
Have staff have recent training/awareness on data breaches?	Yes
What steps are taken to ensure staff personal data is kept accurate and up to date?	Send reminders termly Data collection sheet for staff.
What steps are taken to ensure pupil/parent personal data is kept accurate and up to date?	Self access to change own personal details Regular reminders are sent parents eve Newsetter.
When were the last reminders sent?	Sent termly
Does the School gain consent for use of the following? Photos Social media Fundraising Marketing	To check.
How is personal data displayed throughout the School and are there safeguards in place?	The school ensure that displayed data is appropriately limited, to reduce the likelihood that it could be used to identify an individual. First name, initials or photos. Personal data lock data away.
Does the School have a record of processing activities or data map in place?	Yes – policies and flowcharts are included

Does the School have a data sharing register/record of third parties that they share data with?	Yes
How is security dealt with/monitored for building access?	Perimeter fence Intercom / buzzer access to reception Limited access to building Limited access to rooms within the building Visitors accompanied around or have lanyards
How is security dealt with/monitored for signing in?	Use of electronic system Retention period for how long data is kept on system
How is security dealt with/monitored for system and network access?	Each user has their own account Complex passwords required Automatically locked screens Clear desk policy
How is security dealt with/monitored for back ups?	The school's databases and network is regularly backed up, these backups are appropriately secured. No server – cloud based
How is security dealt with/monitored for printer and copier access?	Use of pin coded Regular checks of areas are done to ensure printing and copying isn't left lying around
How is security dealt with/monitored in classrooms?	Sensitive data locked away Automatically locked computers Regular checks of areas to ensure sensitive data is not left lying around
Does the School use CCTV? Where is it used?	No
How long/where is it stored? Do you have a policy on CCTV use?	N/A
Is there appropriate signage on display?	N/A
Can the CCTV do any of the following to help edit third parties from footage?	N/A
Have the School done a DPIA prior to its use?	N/A
What does the School use for confidential waste disposal (for personal data)?	Shredders used on site
What security is in place to ensure disposal takes place correctly?	N/A
Does the school use a data destruction log?	Not required

Do staff sign acceptable use agreements?	Yes
Does the School keep an asset register?	Yes
How are devices (and the data stored on them) disposed of when no longer needed?	Cloud based data, data is not stored on laptops, if data is stored easi-pc wipe before disposal, and dispose of the items and certificate is issued. Locked in secure unit until collected.