



**RAINHILL
HIGH SCHOOL**



RainhillSixth

DOCUMENT RETENTION POLICY





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HIGH SCHOOL**



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STATUS	NON-STATUTORY
RESPONSIBLE COMMITTEE	BOARD OF TRUSTEES
APPROVAL DATE	14/07/2023
RENEWAL DATE	14/07/2024



SCHOOLS IN PARTNERSHIP

STEPHENSON

MULTI ACADEMY TRUST

1. Introduction

- 1.1. The main aim of this policy is to enable the Academy Trust to manage our records effectively and in compliance with data protection and other regulation. As an organisation we collect, hold, store and create significant amounts of data and information and this policy provides a framework of retention and disposal of categories of information and documents.
- 1.2. The Academy Trust is committed to the principles of data protection including the principle that information is only to be retained for as long as necessary for the purpose concerned.

2. Legal framework

2.1. This policy has due regard to legislation including, but not limited to, the following:

- Data Protection Act (2018)
- General Data Protection Regulation (2016)
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)

2.2. This policy also has due regard to the following guidance:

- Information Records Management Society 'Information Management Toolkit for Schools' 2019

3. Responsibilities

- 3.1. The school as a whole has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.
- 3.2. The **Chief Operating Officer** and **Headteacher** hold overall responsibility for this policy and for ensuring it is implemented correctly.
- 3.3. The **DPO** is responsible for the management of records within school.
- 3.4. The **DPO & Compliance Officer** are responsible for promoting compliance with this policy and reviewing the policy on an annual basis, in conjunction with the **Headteacher**.
- 3.5. The **DPO** is responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy and are disposed of correctly.
- 3.6. All staff members are responsible for ensuring that any records for which they are responsible are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

4. Retention of pupil records and other pupil-related information

4.1. The table below outlines the school's retention periods for individual pupil records and the action that will be taken after the retention period, in line with any requirements.

4.2. Electronic copies of any information and files will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Admissions		
All records relating to the creation and implementation of the School Admissions Policy	Life of policy plus 3 years then review	Securely disposed of
Admissions - if the admission is successful	Date of admission plus 1 year	Securely disposed of
Admissions - if the appeal is unsuccessful	Resolution of case plus 1 year	Securely disposed of
Register of admissions	Three years after the date on which the entry was made	Information is reviewed and the register may be kept permanently as an archive record
Proof of address (supplied as part of the admissions process)	Current academic year plus 1 year	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was successful)	Added to the pupil file	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was not successful)	Until the appeals process has been completed	Securely disposed of
Pupil's Educational Record		
<p>Please note: any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own Local Authority or take independent legal advice.</p>		
Secondary Pupil educational record	25 years after the pupil's date of birth	Review then securely disposed of
Public examination results – pupil copy	Added to the pupil's record	Any uncollected certificates should be returned to the examination board after reasonable attempts to contact the pupil have failed

Internal examination results – pupil copy	Added to the pupil's record	Securely disposed of
Child protection information held on a pupil's record	Stored in a sealed envelope for the same length of time as the pupil's record. Note: These records will be subject to any instruction given by IICSA	Transferred to next school. Any records not transferred should be securely disposed of – must be shredded
Child protection records held in a separate file	25 years after the pupil's date of birth then review. This is provided a principal copy can be found on the LA Social Services record. Note: These records will be subject to any instruction given by IICSA	Transferred to next school. If copies are retained, review in line with retention period then securely dispose of – must be shredded
Attendance		
Attendance registers	Last date of entry on to the register plus 3 years	Securely disposed of
Letters authorising absence	Current academic year plus 2 years	Securely disposed of
SEND		
SEND files, reviews and Education, Health and Care plans, including advice and information provided to parents regarding educational needs and accessibility strategy	31 years after the pupil's date of birth (Education, Health and Care plan is valid until the individual reaches the age of 25 years the retention period adds an additional 6 years from the end of the plan in line with the Limitation Act)	Information is reviewed and the file may be kept for no longer than necessary if it is required for the school to defend themselves in a 'failure to provide sufficient education' case
Curriculum management		
Curriculum returns	Current year plus 3 years	Securely disposed of
Examination Results (school's copy)	Current year plus 6 years	Securely disposed of
Examination papers	Until the appeals/validation process has been completed	Securely disposed of

Published Admission Number (PAN) reports	Current academic year plus 6 years	Securely disposed of
Valued Added and Contextual data	Current academic year plus 6 years	Securely disposed of
Self-evaluation forms	Current academic year plus 6 years	Securely disposed of
Internal moderation	Current academic year plus 1 year	Securely disposed of
External moderation	Until superseded	Securely disposed of
Schemes of work	Current year plus 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period then securely dispose of
Timetable	Current year plus 1 year	
Class record books	Current year plus 1 year	
Mark books	Current year plus 1 year	
Record of homework set	Current year plus 1 year	
Pupils' work	Returned to pupils at the end of the academic year or retained for the current academic year plus 1 year	Securely disposed of
Extra-curricular activities		
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip or end of the academic year depending on school policy	Securely disposed of
Parental consent forms for school trips where a major incident occurred	25 years after the date of birth of the pupil involved in the incident (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils)	Securely disposed of

Family Liaison Officers and Home-school Liaison Assistants		
Day books	Current academic year, plus two years	Reviewed and securely disposed of if no longer required
Reports for outside agencies (- where the report has been included on the case file created by the outside agency)	Duration of the pupil's time at school	Securely disposed of
Referral forms	Whilst the referral is current	Securely disposed of
Contact data sheets	Current academic year	Reviewed and securely disposed of if no longer active
Contact database entries	Current academic year	Reviewed and securely disposed of if no longer required
Group registers	Current academic year plus two years	Securely disposed of

5. Retention of staff records

- 5.1. The table below outlines the school's retention period for staff records and the action that will be taken after the retention period, in line with any requirements.
- 5.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Operational		
Staff personnel file	Termination of employment, plus six years unless staff member is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete	Securely disposed of
Timesheets	Current academic year, plus six years	Securely disposed of
Annual appraisal and assessment records	Current academic year, plus six years	Securely disposed of
Sickness absence monitoring Note: Sickness records are categorised as sensitive data	Current academic year, plus six years. There is a legal obligation under statutory sickness pay to keep records for sickness monitoring. Sickness records should be kept separate from accident records.	Securely disposed of

Staff training - where the training leads to continuing professional development	This should be retained on the personnel file	Securely disposed of
Staff training - except where dealing with children, e.g. first aid or health and safety	This should be retained on the personnel file	Securely disposed of
Staff training - where the training relates to children (e.g., safeguarding or other child related training)	Date of the training plus 40 years [This retention period reflects that the IICSA may wish to see training records as part of an investigation]	Securely disposed of
Recruitment		
Records relating to the appointment of a new Headteacher (unsuccessful candidates)	Date of appointment plus 6 months.	Securely disposed of
Records relating to the appointment of a new Headteacher (successful candidate)	Add to personnel file and retain until end of appointment plus six years, except in cases of negligence or claims of child abuse then at least 15 years	Reviewed and securely disposed of
Records relating to the appointment of new members of staff (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	Securely disposed of
Records relating to the appointment of new members of staff (successful candidates)	Relevant information added to the member of staff's personnel file retain for duration of employment plus 6 years (other information retained for six months)	Securely disposed of
DBS certificates	Up to six months	Securely disposed of
Proof of identify as part of the enhanced DBS check	After identity has been proven	Reviewed and a note kept of what was seen and what has been checked – if it is necessary to keep a copy this will be placed on the staff member's personnel file, if not, <u>securely disposed of</u>
Evidence of right to work in the UK	Added to staff personnel file or, if kept separately, termination of employment, plus at least two years	Securely disposed of

Disciplinary and grievance procedures

Where schools are in any doubt as to which categories disciplinary records fall under, then HR or legal advice should be sought from the Local Authority.

<p>Child protection allegations, including where the allegation is unproven</p> <p>Note: allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned UNLESS the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete</p>	<p>Added to staff personnel file, and until the individual's normal retirement age, or 10 years from the date of the allegation (whichever is longer)</p> <p>If allegations are malicious, they should be removed from personnel files</p>	<p>Reviewed and securely disposed of – must be shredded</p>
<p>Note:</p> <p>The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period.</p> <p>Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct five years down the line, and them defend him or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim.</p> <p>Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.</p>		
Oral warnings	Date of warning, plus 6 months	Securely disposed of – if placed on staff personnel file, removed from file
Written warning – level 1	Date of warning, plus 6 months	Securely disposed of – if placed on staff personnel file, removed from file
Written warning – level 2	Date of warning, plus 12 months	Securely disposed of – if placed on staff personnel file, removed from file
Final warning	Date of warning, plus 18 months	Securely disposed of – if placed on staff personnel file, removed from file

Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related and is then disposed of as above	Securely disposed of
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6. Retention of senior leadership and management records

6.1. The table below outlines the school's retention periods for senior leadership and management records, and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Governing Body		
Register of attendance at Full governing board meetings	Date of last meeting in the book plus 6 years	Securely disposed of
Original, signed copies of the minutes of governing board meetings	Permanent	If unable to store, these will be provided to the <u>local authority archive service</u>
Reports presented to the governing board	Minimum of six years, unless they refer to individual reports – these are kept permanently	Securely disposed of or, if they refer to individual reports, retained with the signed, original copy of minutes
Instruments of government, including articles of association	Permanent	If unable to store, these will be provided to the <u>local authority archive service</u>
Trusts and endowments managed by the governing board	Permanent	Retained in the school whilst it remains open, then provided to the <u>local authority archive service</u> when the school closes
Records relating to the election of parent and staff governors not appointed by the governors	Date of election plus 6 months	Securely disposed of
Records relating to the appointment of co-opted governors	If decision has been recorded in the minutes, records relating to the appointment can be destroyed once the co-opted governor has finished their term (except if there have been allegations concerning children). In this case retain for 25 years	Securely disposed of

Records relating to the terms of office of serving governors, including evidence of appointment	Date appointment ceases plus 6 years	Securely disposed of
Records relating to the appointment of a clerk to the governing body	Date on which clerk appointment ceases plus 6 years	Securely disposed of
Records relating to governor declaration against disqualification criteria	Date appointment ceases plus 6 years	Securely disposed of
Register of business interests	Date appointment ceases plus 6 years	Securely disposed of
Records relating to the training required and received by Governors	Date appointment ceases plus 6 years	Securely disposed of
Records relating to the induction programme for new governors	Date appointment ceases plus 6 years	Securely disposed of
Governor personnel files	Date appointment ceases plus 6 years	Securely disposed of
Action plans created and administered by the governing board	Duration of the action plan plus three years	Securely disposed of
Policy documents created and administered by the governing board	Duration of the policy, plus three years	Securely disposed of
Records relating to Governor Monitoring Visits	Date of the visit plus 3 years	Securely disposed of
Records relating to complaints dealt with by the governing board or Headteacher	Date of the resolution of the complaint, plus a minimum of 6 years, for negligence plus 15 years, if child protection or safeguarding issues involved then plus 40 years	Reviewed for further retention in case of contentious disputes, then securely disposed of
Annual reports created under the requirements of The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002	Date of report, plus 10 years	Securely disposed of
Proposals concerning changing the status of the school	Date proposal accepted or declined, plus three years	Securely disposed of
All records relating to the conversion of schools to Academy status	Permanent	If unable to store, these will be provided to the local authority archive service

Headteacher and Senior Leadership Team (SLT)		
Logbooks of activity in the school maintained by the Headteacher	Date of last entry, plus a minimum of six years	Reviewed and offered to the <u>local authority archive service</u> if appropriate
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus three years	Reviewed annually or as required and securely disposed of
Reports created by the Headteacher or SLT	Date of the report, plus a minimum of three years	Reviewed annually or as required and securely disposed of
Records created by the Headteacher, deputy Headteacher, heads of year and other members of staff with administrative responsibilities	Current academic year, plus six years	Reviewed annually or as required and securely disposed of
Correspondence created by the Headteacher, deputy Headteacher, heads of year and other members of staff with administrative responsibilities	Date of correspondence, plus three years	Reviewed and securely disposed of
Professional development plan	Duration of the plan, plus six years	Securely disposed of
School development plan	Duration of the plan, plus three years	Securely disposed of

7. Retention of health and safety records

7.1. The table below outlines the school's retention periods for health and safety records, and the action that will be taken after the retention period, in line with any requirements.

7.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Health and Safety		
Health and safety policy statements	Duration of policy, plus three years	Securely disposed of
Health and safety risk assessments	Duration of risk assessment, plus three years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred	Securely disposed of

Records relating to accidents and injuries at work	Date of incident, plus 12 years. In the case of serious accidents, a retention period of 15 years is applied	Securely disposed of
Accident reporting – adults	Date of the incident, plus six years	Securely disposed of
Accident reporting – pupils	25 years after the pupil's date of birth, on the pupil's record	Securely disposed of
Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR).	Date of incident plus 3 years provided that all records relating to the incident are held on personnel file (see Health and Safety risk assessments above)	Securely disposed of
Control of substances hazardous to health (COSHH)	Date of incident, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with asbestos	Date of last action, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with radiation	Date of last action, plus 50 years	Securely disposed of
Fire precautions log books	Current academic year, plus 3 years	Securely disposed of

8. Retention of financial records

- 8.1. The table below outlines the school's retention periods for financial records and the action that will be taken after the retention period, in line with any requirements.
- 8.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Payroll and Pensions		
Payroll – gross/net weekly or monthly, Payroll reports, Pay slips (copies). Pension payroll.	Current year plus 6 years	Securely disposed of
Payroll awards	Current year plus 6 years	Securely disposed of

Absence records	Current year plus 6 years	Securely disposed of
Maternity pay records	Current year plus 3 years	Securely disposed of
Staff returns	Current year plus 3 years	Securely disposed of
Time sheets/clock cards/flexitime	Current year plus 3 years	Securely disposed of
Overtime	Current year plus 3 years	Securely disposed of
Part time fee claims	Current year plus 6 years	Securely disposed of
Superannuation adjustments and reports	Current year plus 6 years	Securely disposed of
National Insurance - schedule of payments	Current year plus 6 years	Securely disposed of
Income tax form P60	Current year plus 6 years	Securely disposed of
Tax forms: P6, P11, P11D, P35, P45, P46, P48	Minimum = current year plus 3 years, recommended = current plus 6. Employees should retain for current year plus 2 years.	Securely disposed of
Personal bank details	Until superseded plus 3 years or if employment ceases, end of employment plus 6 years	Securely disposed of
Insurance	Current year plus 6 years	Securely disposed of
Members allowance register	Current year plus 6 years	Securely disposed of
Risk management and insurance		
Employer's liability insurance certificate	Closure of the school, plus 40 years (can be kept electronically)	Securely disposed of, passed to LA if school closes
Asset management		
Inventories of furniture and equipment	Current academic year, plus six years	Securely disposed of
Burglary, theft and vandalism report forms	Current academic year, plus six years	Securely disposed of

Accounts and statements including budget management		
Annual accounts	Current academic year, plus six years	Disposed of against common standards
Loans and grants managed by the school	Date of last payment, plus 12 years	Information is reviewed then securely disposed of
All records relating to the creation and management of budgets, including the annual budget statement and back- ground papers	Duration of the budget, plus three years	Securely disposed of
Invoices, receipts, order books, requisitions and delivery notices	Current financial year, plus six years	Securely disposed of
Records relating to the collection and banking of monies	Current financial year, plus six years	Securely disposed of
Records relating to the identification and collection of debt	Current financial year, plus six years	Securely disposed of
Pupil Finance		
Student Grant applications	Current year plus 3 years	Securely disposed of
Pupil Premium Fund records	Date pupil leaves the provision plus 6 years	Securely disposed of
Contract management		
All records relating to the management of contracts under seal	Last payment on the contract, plus 12 years	Securely disposed of
All records relating to the management of contracts under signature	Last payment on the contract, plus six years	Securely disposed of
All records relating to the monitoring of contracts	Life of contract plus 6 or 12 years	Securely disposed of
School fund		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Securely disposed of
School meals		
Free school meals registers	Current academic year, plus six years	Securely disposed of
School meals registers	Current academic year, plus three years	Securely disposed of

School meals summary sheets	Current academic year, plus three years	Securely disposed of
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9. Retention of other school records

9.1. The table below outlines the school's retention periods for any other records held by the school, and the action that will be taken after the retention period, in line with any requirements.

9.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
Property management		
Title deeds of properties belonging to the school	Permanent	Transferred to new owners if the building is leased or sold
Plans of property belonging to the school	For as long as the building belongs to the school	Transferred to new owners if the building is leased or sold
Leases of property leased by or to the school	Expiry of lease, plus six years	Securely disposed of
Records relating to the letting of school premises	Current financial year, plus six years	Securely disposed of
Maintenance		
All records relating to the maintenance of the school carried out by contractors	These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold.	Securely disposed of
All records relating to the maintenance of the school carried out by school employees, including maintenance logbooks	These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold.	Securely disposed of
Operational administration		
General file series which do not fit under any other category	Current academic year, plus five years	Reviewed then securely disposed of

Records relating to the creation and publication of the school brochure and/or prospectus	Current academic year, plus three years	Disposed of against common standards, a copy could be archived
Records relating to the creation and distribution of circulars to staff, parents or pupils	Current academic year, plus one year	Disposed of against common standards
Newsletters and other items with short operational use	Current academic year plus one year	Disposed of against common standards
Visitor management systems (including electronic systems, visitors' books and signing-in sheets)	Last entry in visitors' book plus six years or current academic year plus six years whichever is greater	Reviewed then securely disposed of
Records relating to the creation and management of Parent Teacher Associations and/or Old Pupil Associations	Current academic year, plus six years	Reviewed then securely disposed of
Walking bus registers	Date of register plus 6 years	Securely disposed of
Subject Access Request	Date of request plus one year	Reviewed then securely disposed of
Local Authority		
Secondary Transfer Sheets (primary)	Current year + 2 years	Securely disposed of
Attendance returns	Current year + 1 year	Securely disposed of
School census returns	Current year + 5 years	Securely disposed of
Circulars and other information sent from the local authority	Whilst current and relevant	Securely disposed of
Central Government		
OFSTED reports and papers where a physical copy is held	Life of the report then review	Securely disposed of
Returns made to central government	Current year plus 6 years	Securely disposed of
Circulars and other information sent from central government	Whilst current and relevant	Securely disposed of

10. Storing and protecting information

- 10.1. The **DPO** will undertake a risk analysis to identify which records are vital to school management and these records will be stored in the most secure manner.
- 10.2. The **Data Lead** will ensure a back-up of information on at least a **half termly** basis to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and to prevent any loss or theft of data.
- 10.3. Where possible, backed-up information will be stored off the school premises, using a central back-up service.
- 10.4. Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access.
- 10.5. Confidential paper records are not left unattended or in clear view when held in a location with general access.
- 10.6. Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed-up off-site.
- 10.7. Where data is saved on removable storage or a portable device, the device is kept in a locked and fireproof filing cabinet, drawer or safe when not in use.
- 10.8. Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.
- 10.9. All electronic devices are password-protected to protect the information on the device in case of theft.
- 10.10. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- 10.11. Staff and governors do not use their personal laptops or computers for school purposes.
- 10.12. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.
- 10.13. Emails containing sensitive or confidential information are at least password-protected to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email.
- 10.14. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.
- 10.15. When sending confidential information by fax, members of staff always check that the recipient is correct before sending.

10.16. Where personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with the GDPR and DPA 2018, either in an electronic or paper format, staff take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.

10.17. Before sharing data, staff always ensure that:

- They have consent from data subjects to share it.
- Adequate security is in place to protect it.
- The data recipient has been outlined in a privacy notice.

10.18. All staff members will implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information will be stored in a securely locked filing cabinet, drawer, cupboard or safe with restricted access.

10.19. Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times.

10.20. The physical security of the school's buildings and storage systems, and access to them, is reviewed **termly** by the **Site Manager** in conjunction with **the Data Lead**. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the **Headteacher** and extra measures to secure data storage will be put in place.

10.21. The school takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action.

10.22. The **Data Lead** is responsible for continuity and recovery of data and measures are in place to ensure the security of protected data.

10.23. Any damage to or theft of data will be managed in accordance with the school's **Security Breach Management Plan**.

10.24. The following should be transferred to the next school within 15 school days of receipt of confirmation that a pupil is registered at another school:

- Common Transfer File (CTF) from the School Information Management System via the **school2school** system when used.
- Any elements of the Pupil Record, held in any format, not transferred as part of the CTF.
- SEN or other support service information, including behaviour, as only limited information may be included in the CTF.
- Child Protection information; this must be sent as soon as possible by the Designated Safeguarding Lead (DSL) or a member of their team to their equivalent at the new school.

11. Accessing information

11.1. The school is transparent with its data subjects, the information we hold and how it can be accessed.

11.2. All members of staff, parents of registered pupils and other users of the school, e.g. visitors and third-party clubs, are entitled to:

- Know what information the school holds and processes about them or their child and why.
- Understand how to gain access to it.
- Understand how to provide and withdraw consent to information being held.
- Understand what the school is doing to comply with its obligations under the GDPR and DPA 2018.

11.3. All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the GDPR and DPA 2018, to access certain personal data being held about them or their child.

11.4. Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents.

11.5. Pupils who are considered to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.

11.6. The school will adhere to the provisions outlined in the school's **Data Protection Policy** when responding to requests seeking access to personal information.

12. DELETION OF DOCUMENTS

12.1. When a document is at the end of its retention period, it should be dealt with in accordance with this policy.

Confidential waste

12.2. This should be made available for collection in the confidential waste bins or sacks located in the Main Office and Finance Office.

12.3. Anything that contains personal information should be treated as confidential.

12.4. Where deleting electronically, please refer to the Data Protection Officer to ensure that this is carried out effectively.

Other documentation

12.2. Other documentation can be deleted or placed in recycling bins where appropriate.

Automatic deletion

12.3. Certain information will be automatically archived by the computer systems, details of which are set out below. Should you want to retrieve any information, or prevent this happening in a particular circumstance, please contact the Data Protection Officer.

Individual responsibility

12.4. Much of the retention and deletion of documents will be automatic, but when faced with a decision about an individual document, you should ask yourself the following:

12.4.1. Has the information come to the end of its useful life?

12.4.2. Is there a legal requirement to keep this information or document for a set period? (Refer to Appendix 1 for more information)

12.4.3. Would the information be likely to be needed in the case of any legal proceedings? In particular, is it potentially relevant to an historic child abuse enquiry? (Is the information contentious, does it relate to an incident that could potentially give rise to proceedings?)

12.4.4. Would the document be useful for the organisation as a precedent, learning document, or for performance management processes?

12.4.5. Is the document of historic or statistical significance?

12.5. If the decision is made to keep the document, this should be referred to the Data Protection Officer and reasons given.

13. Execution of this Policy

13.1. **The DPO** will support the school in conducting an information audit on an **annual** basis against all information held by the school to evaluate the information the school is holding, receiving and using, and to ensure that this is correctly managed in accordance with the GDPR and DPA 2018. This includes the following information:

- Paper documents and records
- Electronic documents and records
- Databases
- Microfilm or microfiche
- Sound recordings
- Video and photographic records
- Hybrid files, containing both paper and electronic information

13.2. The information audit may be completed in a number of ways, including, but not limited to:

- Interviews with staff members with key responsibilities – to identify information and information flows, etc.
- Questionnaires to key staff members to identify information and information flows, etc.

- A mixture of the above

13.3. The **DPO** is responsible for validation of the information audit. The information audit will include the following:

- The school's data needs
- The information needed to meet those needs
- The format in which data is stored
- How long data needs to be kept for
- Vital records status and any protective marking
- Who is responsible for maintaining the original document

13.4. The **DPO** will consult with staff members involved in the information audit process to ensure that the information is accurate.

Internal Data Protection Officer (also known as Data Protection Lead) - Rob Owens

External Data Protection Officer – Nexus Protect