



Collective
Vision Trust

Records Management Policy

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Statement of intent

Collective Vision Trust, and all of its schools, is committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible by the appropriate individuals. In line with the requirements of the GDPR, the trust schools also have a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

We have created this policy to outline how records are stored, accessed, monitored, retained and disposed of, in order to meet the school's statutory requirements.

This document complies with the requirements set out in the GDPR, which is effective of 25 May 2018.

Signed by:

L Jackson CEO

Date: 25th May 18

M Dolman Chair of Board

Date: 25th May 18

1. Legal framework

- 1.1. This policy has due regard to legislation including, but not limited to, the following:
 - General Data Protection Regulation
 - Freedom of Information Act 2000
 - Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
- 1.2. This policy also has due regard to the following guidance:
 - Information Records Management Society (2016) 'Information Management Toolkit for Schools'
 - DfE (2018) 'Data protection: a toolkit for schools'
- 1.3. This policy will be implemented in accordance with the following school policies and procedures:
 - Data Protection Policy
 - Freedom of Information Policy
 - E-security Policy

2. Responsibilities

- 2.1. The school as a whole has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.
- 2.2. The headteacher of the school holds overall responsibility for this policy and for ensuring it is implemented correctly.
- 2.3. The headteacher is responsible for the management of records at each school in the trust
- 2.4. The Data Protection Officer, DPO, is responsible for promoting compliance with this policy and reviewing the policy on an annual basis, in conjunction with the CEO and headteachers
- 2.5. The headteacher 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.
- 2.6. All staff members are responsible for ensuring that any records for which they are responsible for are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy
- 2.7. The DPO is responsible for monitoring the school's compliance with this policy.

3. Management of pupil records

- 3.1. Pupil records are specific documents that are either contained in 'brown' folders or electronic versions on the schools MIS systems. They are used throughout a pupil's time in the education system – they are passed to each school that a pupil attends and includes all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievement.
- 3.2. The following information is stored on the front of a pupil record, and will be easily accessible:
 - Forename, surname, gender and date of birth
 - Unique pupil number
 - Note of the date when the file was opened
 - Note of the date when the file was closed, if appropriate
- 3.3. The following information is stored securely on the schools MIS system, and will be easily accessible:
 - Ethnic origin, religion and first language (if not English)
 - Any preferred names
 - Position in their family, e.g. eldest sibling
 - Emergency contact details and the name of the pupil's doctor
 - Any allergies or other medical conditions that are important to be aware of
 - Names of parents, including their home address(es) and telephone number(s)
 - Name of the school, admission number, the date of admission and the date of leaving, where appropriate
 - Any other agency involvement, e.g. speech and language therapist
- 3.4. The following information is stored in a pupil record, and will be easily accessible:
 - Admissions form
 - Details of any SEND
 - If the pupil has attended an early years setting, the record of transfer
 - Fair processing notice – only the most recent notice will be included
 - Annual written reports to parents
 - National curriculum and agreed syllabus record sheets
 - Notes relating to major incidents and accidents involving the pupil

- Any information about an education and healthcare (EHC) plan and support offered in relation to the EHC plan
 - Any notes indicating child protection disclosures and reports are held
 - Any information relating to exclusions
 - Any correspondence with parents or external agencies relating to major issues, e.g. mental health
 - Notes indicating that records of complaints made by parents or the pupil are held
- 3.5. The following information is subject to shorter retention periods and, therefore, will be stored separately in a personal file for the pupil in the school office or securely on the school server:
- Absence notes
 - Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.
 - Correspondence with parents about minor issues, e.g. behaviour
- 3.6. Hard copies of disclosures and reports relating to child protection are stored in a sealed envelope, in a securely locked filing cabinet in the Designated Safeguarding Lead's office – a note indicating this is marked on the pupil's file.
- 3.7. Hard copies of complaints made by parents or pupils are stored in a file in the School Business Manager's/headteacher's office – a note indicating this is marked on the pupil's file.
- 3.8. Actual copies of accident and incident information are stored separately on the school's management information system and held in line with the retention periods outlined in this policy – a note indicating this is marked on the pupil's file. An additional copy may be placed in the pupil's file in the event of a major accident or incident.
- 3.9. The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend.
- 3.10. The only exception to the above is if any records placed on the pupil's file have a shorter retention period and may need to be removed. In such cases, the member of staff responsible for disposing records, will remove these records – this will be monitored by the DPO.
- 3.11. Electronic records relating to a pupil's record will also be transferred to the pupils' next school. [Section 11](#) of this policy outlines how electronic records will be transferred.
- 3.12. **Primary Schools** The school will not keep any copies of information stored within a pupil's record, unless there is ongoing legal action at the time during

which the pupil leaves the school. The responsibility for these records will then transfer to the next school that the pupil attends.

3.13. **Secondary Schools** If any pupil attends the school until statutory school leaving age, the school will keep the pupil's records until the pupil reaches the age of 25 years.

3.14. The school will, wherever possible, avoid sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The school it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to the school.

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 |
|--|--|--|
| Personal identifiers, contacts and personal characteristics | | |
| Images used for identification purposes | For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month | Securely disposed of |
| Images used in displays in schools | Whilst the pupil is at school | Securely disposed of |
| Images used for marketing purposes, or other | In line with the consent period | Securely disposed of |
| Biometric data | For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month | Securely disposed of |
| Postcodes, names and characteristics | Whilst the pupil is at school, plus five years | Securely disposed of |
| House number and road | For the duration of the event/activity, plus one month | Securely disposed of |

| Admissions | | |
|--|--|--|
| Register of admissions | Whilst the pupil remains at the school, plus one year | Information is reviewed and the register may be kept permanently |
| Admissions appeals | Whilst the pupil remains at school, plus five years | Securely disposed of |
| [Secondary schools only] Secondary school admissions | Whilst the pupil remains at the school, plus one year | Securely disposed of |
| Proof of address (supplied as part of the admissions process) | Whilst the pupil remains at the school, plus one year | Securely disposed of |
| Supplementary information submitted, including religious and medical information etc. (where the admission was successful) | Whilst the pupil remains at the school, plus one year | Securely disposed of |
| Supplementary information submitted, including religious and medical information etc. (where the admission was not successful) | Whilst the pupil remains at the school, plus five years | Securely disposed of |
| Pupils' educational records | | |
| [Primary schools only] Pupils' educational records | Whilst the pupil remains at the school | Transferred to the next destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory period |
| [Secondary schools only] Pupils' educational records | 25 years after the pupil's date of birth, with their personal data removed | Securely disposed of |
| Public examination results | Added to the pupil's record and transferred to next school Copies with pupils' names are held whilst the pupil is at school, plus five years Copies with pupils' names removed are held for 25 years after the pupil's date of birth | Returned to the examination board |

| | | |
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| Internal examination results | <p>Added to the pupil's record and transferred to next school</p> <p>Copies with the pupil's personal data are held whilst the pupil is at school, plus five years</p> <p>Copies with personal data removed are held for 25 years after the pupil's date of birth</p> | Securely disposed of |
| Behaviour records | <p>Added to the pupil's record and transferred to the next school</p> <p>Copies are held whilst the pupil is at school, plus one year</p> | Securely disposed of |
| Exclusion records | <p>Added to the pupil's record and transferred to the next school</p> <p>Copies are held whilst the pupil is at school, plus one year</p> | 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 | Securely disposed of – shredded |
| Child protection records held in a separate file | 25 years after the pupil's date of birth | Securely disposed of – shredded |
| Attendance | | |
| Attendance registers | <p>Whilst the pupil remains at school, plus one year</p> <p>Non-identifiable summary statistics are held after the initial retention period for 25 years after the pupil's date of birth</p> | Securely disposed of |

| | | |
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| Letters authorising absence | <p>Whilst the pupil remains at school, plus one year</p> <p>Non-identifiable summary statistics are held after the initial retention period for 25 years after the pupil's date of birth</p> | Securely disposed of |
| Medical information and administration | | |
| Permission slips | For the duration of the period that medication is given, plus one month | Securely disposed of |
| Medical conditions – ongoing management | <p>Added to the pupil's record and transferred to the next school</p> <p>Copies held whilst the pupil is at school, plus one year</p> | Securely disposed of |
| Medical incidents that have a behavioural or safeguarding influence | <p>Added to the pupil's record and transferred to the next school</p> <p>Copies held whilst the pupil is at school, plus 25 years</p> | Securely disposed of |
| SEND | | |
| SEND files, reviews and individual education plans | 25 years after the pupil's date of birth (as stated on the pupil's record) | Information is reviewed and the file may be kept for longer than necessary if it is required for the school to defend themselves in a 'failure to provide sufficient education' case |
| An EHC plan maintained under section 37 of the Children and Families Act 2014 (and any amendments to the statement or plan) | 25 years after the pupil's date of birth (as stated on the pupil's record) | Securely disposed of, unless it is subject to a legal hold |
| Information and advice provided to parents regarding SEND | 25 years after the pupil's date of birth (as stated on the pupil's record) | Securely disposed of, unless it is subject to a legal hold |

| | | |
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| Accessibility strategy | 25 years after the pupil's date of birth (as stated on the pupil's record) | Securely disposed of, unless it is subject to a legal hold |
| Curriculum management | | |
| SATs results | 25 years after the pupil's date of birth (as stated on the pupil's record) | 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 six years | Securely disposed of |
| Valued added and contextual data | Current academic year, plus six years | Securely disposed of |
| Self-evaluation forms | Current academic year, plus six years | Securely disposed of |
| Pupils' work | Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year | Securely disposed of |
| Extra-curricular activities | | |
| Field file – information taken on school trips | Until the conclusion of the trip, plus one month Where a minor incident occurs, field files are added to the core system as appropriate | Securely disposed of |
| Financial information relating to school trips | Whilst the pupil remains at school, plus one year | Securely disposed of |
| Parental consent forms for school trips where no major incident occurred | Until the conclusion of the trip | Securely disposed of |

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| Parental consent forms for school trips where a major incident occurred | 25 years after the pupil's date of birth on the pupil's record (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 |
| Walking bus registers | Three years from the date of the register being taken | Securely disposed of |
| Educational visitors in school – sharing of personal information | Until the conclusion of the visit, plus one month | Securely disposed of |
| Family liaison officers and home-school liaison assistants | | |
| Day books | Current academic year, plus two years | Reviewed and destroyed if no longer required |
| Reports for outside agencies | 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 destroyed if no longer active |
| Contact database entries | Current academic year | Reviewed and destroyed if no longer required |
| Group registers | Current academic year, plus two years | Securely disposed of |
| Catering and free school meal management | | |
| Meal administration | Whilst the pupil is at school, plus one year | Securely disposed of |
| Meal eligibility | Whilst the pupil is at school, plus five 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.

5.3.

| Type of file | Retention period | Action taken after retention period ends |
|---|---|---|
| Operational | | |
| Staff members' personal file | Termination of employment, plus six years | Securely disposed of |
| Timesheets | Current academic year, plus six years | Securely disposed of |
| Annual appraisal and assessment records | Current academic year, plus five years | Securely disposed of |
| Recruitment | | |
| Records relating to the appointment of a new headteacher | Date of appointment, plus six years | 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 personal file and 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 personal file, if not, securely disposed of |
| Evidence of right to work in the UK | Added to staff personal file or, if kept separately, termination of employment, plus no longer than two years | Securely disposed of |

| Disciplinary and grievance procedures | | |
|--|---|--|
| Child protection allegations, including where the allegation is unproven | Added to staff personal file, and until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer If allegations are malicious, they are removed from personal files | Reviewed and securely disposed of – shredded |
| Oral warnings | Date of warning, plus six months | Securely disposed of – if placed on staff personal file, removed from file |
| Written warning – level 1 | Date of warning, plus six months | Securely disposed of – if placed on staff personal file, removed from file |
| Written warning – level 2 | Date of warning, plus 12 months | Securely disposed of – if placed on staff personal file, removed from file |
| Final warning | Date of warning, plus 18 months | Securely disposed of – if placed on staff personal file, removed from file |
| Records relating to unproven incidents | Conclusion of the case, unless the incident is child protection related and is disposed of as above | Securely disposed of |

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.
- 6.2. 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 |
|--------------------------------------|---|--|
| Governing board | | |
| Agendas for governing board meetings | One copy alongside the original set of minutes – all others disposed of without retention | Securely disposed of |

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| Original, signed copies of the minutes of governing board meetings | Permanent | |
| Inspection copies of the minutes of governing board meetings | Date of meeting, plus three years | Shredded if they contain any sensitive and personal information |
| 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 | |
| Trusts and endowments managed by the governing board | Permanent | Retained in the school whilst it remains open, then provided to the county archives service when the school closes |
| 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 complaints dealt with by the governing board | Date of the resolution of the complaint, plus a minimum of six 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 |
| Headteacher and senior leadership team (SLT) | | |
| Log books of activity in the school maintained by the headteacher | Date of last entry, plus a minimum of six years | Reviewed and offered to the county archives service if appropriate |
| Minutes of SLT meetings and the meetings of other internal administrative bodies | Date of the meeting, plus three years | Reviewed and securely disposed of |
| Reports created by the headteacher or SLT | Date of the report, plus a minimum of three years | Reviewed and securely disposed of |

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|--|--|-----------------------------------|
| 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 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 | 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 |

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|--|---------------------------------------|----------------------|
| Control of substances hazardous to health | Current academic year, 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 six 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 pensions | | |
| Maternity pay records | Current academic year, plus three years | Securely disposed of |
| Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 | Current academic year, plus six years | Securely disposed of |
| Risk management and insurance | | |
| Employer's liability insurance certificate | Closure of the school, plus 40 years | Securely disposed of |
| 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 |

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|---|--|---|
| 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 | 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 |
| 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 | Current academic year, plus two 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 |

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 | Current academic year, plus six years | Securely disposed of |
| All records relating to the maintenance of the school carried out by school employees | Current academic year, plus six years | Securely disposed of |
| Operational administration | | |
| General file series | Current academic year, plus five years | Reviewed and 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 |
| 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 |
| Visitors' books and signing-in sheets | Current academic year, plus six years | 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 |

10. Identifying information

- 10.1. Under the GDPR, all individuals have the right to data minimisation and data protection by design and default – as the data controller, the school ensures appropriate measures are in place in order for individuals to exercise this right.
- 10.2. Wherever possible, the school uses pseudonymisation, also known as the 'blurring technique', to reduce risk of identification.
- 10.3. Once an individual has left the school, if identifiers such as names and dates of birth are no longer required, these are removed or less specific personal data is used, e.g. the month of birth rather than specific date – the data is blurred slightly.
- 10.4. Where data is required to be retained over time, e.g. attendance data, the school removes any personal data not required and keeps only the data needed – in this example, the statistics of attendance rather than personal information.

11. Storing and protecting information

- 11.1. The DPO will ensure that a risk analysis is undertaken to identify which records are vital to school management and these records will be stored in the most secure manner.
- 11.2. The DPO will ensure that the school conduct a back-up of information on a termly basis to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data.
- 11.3. Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access.
- 11.4. Confidential paper records are not left unattended or in clear view when held in a location with general access.
- 11.5. Digital data is coded, encrypted and devices password-protected, both on a local hard drive and on a network drive that is regularly backed-up off-site.
- 11.6. 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.
- 11.7. Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.
- 11.8. All electronic devices are password-protected to protect the information on the device in case of theft.
- 11.9. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.

- 11.10. Staff and governors do not use their personal laptops or computers for school purposes.
- 11.11. All members of staff are provided with their own secure login and password.
- 11.12. Emails sent externally containing sensitive or confidential information are 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.
- 11.13. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.
- 11.14. When sending confidential information by fax, members of staff always check that the recipient is correct before sending.
- 11.15. 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, 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.
- 11.16. 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.
- 11.17. All staff members will implement a 'clear desk policy' with respect to documents containing sensitive or personal information. All confidential information will be stored in a securely locked filing cabinet, drawer or safe with restricted access.
- 11.18. 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.
- 11.19. 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 DPO. 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.
- 11.20. The school takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action.
- 11.21. The DPO is responsible for continuity and recovery measures are in place to ensure the security of protected data.

12. Accessing information

- 12.1. All schools are transparent with data subjects, the information we hold and how it can be accessed.
- 12.2. 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.
- 12.3. All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the GDPR, to access certain personal data being held about them or their child.
- 12.4. 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.
- 12.5. 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.
- 12.6. The school will adhere to the provisions outlined in the school's Data Protection Policy when responding to requests seeking access to personal information.

13. Digital continuity statement

- 13.1. Digital data that is retained for longer than six years will be named as part of a digital continuity statement.
- 13.2. The DPO will identify any digital data that will need to be named as part of a digital continuity statement.
- 13.3. The data will be archived to dedicated files on the school's server, which are password-protected – this will be backed-up in accordance with [section 11](#) of this policy.
- 13.4. Memory sticks will never be used to store digital data, subject to a digital continuity statement.
- 13.5. The IT technician will review new and existing storage methods annually and, where appropriate add them to the digital continuity statement.

13.6. The following information will be included within the digital continuity statement:

- A statement of purpose and requirements for keeping the records
- The names of the individuals responsible for long term data preservation
- A description of the information assets to be covered by the digital preservation statement
- A description of when the record needs to be captured into the approved file formats
- A description of the appropriate supported file formats for long-term preservation
- A description of the retention of all software specification information and licence information
- A description of how access to the information asset register is to be managed in accordance with the GDPR

14. Information audit

14.1. The school conducts information audits 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. 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

14.2. 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

14.3. The DPO is responsible for completing 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
- 14.4. The DPO will consult with staff members involved in the information audit process to ensure that the information is accurate.
 - 14.5. Once it has been confirmed that the information is accurate, the DPO will record all details on the school's Information Asset Register.
 - 14.6. The information displayed on the Information Asset Register will be shared with the headteacher to gain their approval.

15. Disposal of data

- 15.1. Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.
- 15.2. Where disposal of information is outlined as secure disposal, this will be shredded or pulped and electronic information will be scrubbed clean and, where possible, cut. The DPO will check all files that have been destroyed.
- 15.3. Where the disposal action is indicated as reviewed before it is disposed, the DPO will review the information against its administrative value – if the information should be kept for administrative value, the DPO will keep a record of this.
- 15.4. If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.
- 15.5. Where information has been kept for administrative purposes, the DPO will review the information again after three years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every three subsequent years.
- 15.6. Where information must be kept permanently, this information is exempt from the normal review procedures

16. Monitoring and review

- 16.1. This policy will be reviewed every 2 years by the DPO in conjunction with the headteacher & CEO – the next scheduled review date for this policy is May 2020.
- 16.2. Any changes made to this policy will be communicated to all members of staff and the governing board.