**Kimberworth Primary School**



**UK GDPR**

**Compliant Records Management / Data Protection Policy**





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| --- | --- | --- | --- | --- |
|  |  |  |  |  |
|  | **Approved by:** |  | Alison Stothard - Headteacher | **Date:**  September 2022 |
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|  | **Last reviewed on:** |  | 01.09.2022 |  |
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|  |  |  |  |  |
|  | **Next review due by:** |  | September 2023 |  |
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|  | |  |  |  |
|  | **DPO:** |  | Tim Pinto – tpinto@esafetyoffice.co.uk |  |
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**Statement of intent**

Kimberworth Primary School 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 General Data Protection Regulation (GDPR), the school also has 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.

The school has 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 will come into effect on 25 May 2018. The government has confirmed that the UK’s decision to leave the EU will not affect the commencement of the GDPR.

Signed by:

Headteacher

Date:

Chair of governors

Date:

**1. Legal framework**

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

* General Data Protection Regulation (2016)
* 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 ‘Information Management Toolkit for Schools’ 2016

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
  + Security Breach Management Plan

1. **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 holds overall responsibility for this policy and for ensuring it is implemented correctly.

2.3. The data protection officer (DPO) is responsible for the management of records at Bramley Sunnyside Junior School.

2.4. The DPO is responsible for promoting compliance with this policy and reviewing the policy on an annual basis, in conjunction with the headteacher.

2.5. 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.

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.

**3. Management of pupil records**

3.1. Pupil records are specific documents that 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 personnel file, and will be easily accessible:

* Forename and surname

3.3. The following information is stored inside the front cover of the pupil personnel file, 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 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 (either hard copy or electronically), 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:

* 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 headteacher’s office

– a note indicating this is marked on the pupil’s file.

3.7. Hard copies of formal complaints made by parents or pupils are stored in a file in the headteacher’s office.

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 DPO responsible for disposing records, will remove these records.

3.11. Electronic records relating to a pupil’s record will also be transferred to the pupils’ next school. [Section 10](#page16) of this policy outlines how electronic records will be transferred.

3.12. 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. 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** |  |
|  |  |  |  |  |  |  |  |
|  |  | **Admissions** | | | |  |  |  |
|  |  |  |  | Three years after the | |  | Information is reviewed and |  |
|  | Register of admissions |  |  | date on which the entry | |  | the register may be kept |  |
|  |  |  |  | was made | |  | permanently |  |
|  |  |  |  |  | |  |  |  |
|  | Proof of address (supplied as part of the |  |  | The current academic | |  | Securely disposed of |  |
|  | admissions process) |  |  | year, plus one year | |  |  |
|  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  | Supplementary information submitted, |  |  | Added to the pupil’s | |  |  |  |
|  | including religious and medical information |  |  |  | Securely disposed of |  |
|  |  |  | record | |  |  |
|  | etc. (where the admission was successful) |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  | Supplementary information submitted, |  |  | Until the appeals | |  |  |  |
|  | including religious and medical information |  |  |  |  |  |
|  |  |  | process has been | |  | Securely disposed of |  |
|  | etc. (where the admission was not |  |  |  |  |
|  |  |  | completed | |  |  |  |
|  | successful) |  |  |  |  |  |
|  |  |  |  |  |  |  |  |
|  |  | |  | | |  |  |  |
|  | **Pupils’ educational records** | | | | |  |  |  |
|  |  |  |  |  |  |  | Transferred to the next |  |
|  |  |  |  |  |  |  | destination – if this is an |  |
|  |  |  |  | Whilst the pupil | |  | independent school, home- |  |
|  | Pupils’ educational records |  |  |  | schooling or outside of the |  |
|  |  |  | remains at the school | |  |  |
|  |  |  |  |  | UK, the file will be kept by |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  | the LA and retained for the |  |
|  |  |  |  |  |  |  | statutory period |  |
|  |  |  |  |  | |  |  |  |
|  | Public examination results |  |  | Added to the pupil’s | |  | Returned to the examination |  |
|  |  |  | record | |  | board |  |
|  |  |  |  |  |  |
|  |  |  |  |  | |  |  |  |
|  | Internal examination results |  |  | Added to the pupil’s | |  | Securely disposed of |  |
|  |  |  | record | |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  | |  |  |  |
|  |  |  |  | Stored in a sealed | |  |  |  |
|  | Child protection information held on a |  |  | envelope for the same | |  | Securely disposed of – |  |
|  | pupil’s record |  |  | length of time as the | |  | shredded |  |
|  |  |  |  | pupil’s record | |  |  |  |
|  |  |  |  |  | |  |  |  |
|  | Child protection records held in a separate |  |  | 25 years after the | |  | Securely disposed of – |  |
|  | file |  |  | pupil’s date of birth | |  | shredded |  |
|  |  |  |  | | |  |  |  |
|  |  | **Attendance** | | | |  |  |  |
|  |  |  |  | Last date of entry on to | |  |  |  |
|  | Attendance registers |  |  | the register, plus three | |  | Securely disposed of |  |
|  |  |  |  | years | |  |  |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Letters authorising absence | Current academic year, | Securely disposed of |  |
|  | plus two years |  |
|  |  |  |  |
|  |  |  |  |  |
|  |  | **SEND** |  |  |
|  |  |  | Information is reviewed and |  |
|  |  | 25 years after the | the file may be kept for |  |
|  |  | longer than necessary if it is |  |
|  | SEND files, reviews and individual | pupil’s date of birth (as |  |
|  | required for the school to |  |
|  | education plans | stated on the pupil’s |  |
|  | defend themselves in a |  |
|  |  | record) |  |
|  |  | ‘failure to provide sufficient |  |
|  |  |  |  |
|  |  |  | education’ case |  |
|  |  |  |  |  |
|  | Statement of SEN maintained under | 25 years after the |  |  |
|  | section 324 of the Education Act 1996 or | Securely disposed of, |  |
|  | pupil’s date of birth (as |  |
|  | an EHC plan maintained under section 37 | unless it is subject to a legal |  |
|  | stated on the pupil’s |  |
|  | of the Children and Families Act 2014 (and | hold |  |
|  | record) |  |
|  | any amendments to the statement or plan) |  |  |
|  |  |  |  |
|  |  |  |  |  |
|  |  | 25 years after the | Securely disposed of, |  |
|  | Information and advice provided to parents | pupil’s date of birth (as |  |
|  | unless it is subject to a legal |  |
|  | regarding SEND | stated on the pupil’s |  |
|  | hold |  |
|  |  | record) |  |
|  |  |  |  |
|  |  |  |  |  |
|  |  | 25 years after the | Securely disposed of, |  |
|  |  | pupil’s date of birth (as |  |
|  | Accessibility strategy | unless it is subject to a legal |  |
|  | stated on the pupil’s |  |
|  |  | hold |  |
|  |  | record) |  |
|  |  |  |  |
|  |  |  |  |  |
|  | **Curriculum management** | |  |  |
|  |  | 25 years after the |  |  |
|  | SATs results | pupil’s date of birth (as | Securely disposed of |  |
|  | stated on the pupil’s |  |
|  |  |  |  |
|  |  | record) |  |  |
|  |  |  |  |  |
|  |  | Until the |  |  |
|  | Examination papers | appeals/validation | Securely disposed of |  |
|  | process has been |  |
|  |  |  |  |
|  |  | completed |  |  |
|  |  |  |  |  |
|  | Published Admission Number (PAN) | Current academic year, | Securely disposed of |  |
|  | reports | plus six years |  |
|  |  |  |
|  |  |  |  |  |
|  | Valued added and contextual data | Current academic year, | Securely disposed of |  |
|  | plus six years |  |
|  |  |  |  |
|  |  |  |  |  |
|  | Self-evaluation forms | Current academic year, | Securely disposed of |  |
|  | plus six years |  |
|  |  |  |  |
|  |  |  |  |  |
|  |  | Returned to pupils at |  |  |
|  |  | the end of the |  |  |
|  | Pupils’ work | academic year, or | Securely disposed of |  |
|  | retained for the current |  |
|  |  |  |  |
|  |  | academic year, plus |  |  |
|  |  | one year |  |  |

|  |  |  |
| --- | --- | --- |
| **Early Years/Daycare** | | |
| The name, home address and date of birth of each child who is looked after on the premises | Three years after the date on which the entry was made | Securely disposed of |
| The name, home address and telephone number of a  parent of each child who is looked after on the premises | Once the child has left the setting | Securely disposed of |
| A daily record of the names of children looked after on the premises, their hours of attendance and the names of the persons who looked after them | 2 years |  |
| A record of accidents occurring on the premises and incident books relating to other incidents | DOB of the child involved in the accident or the incident + 25 years | Securely disposed of |
| A record of any medicinal product administered to any child on the premises, including the date and  circumstances of its administration, by whom it was administered, | DOB of the child being given/taking the  medicine + 25 years | Securely disposed of |
| Records of transfer | One copy is to be given to the parents, one copy transferred to the Primary School where the child is going | Securely disposed of |
|  |
| Portfolio of work, observations and so on | To be sent home with the child | Securely disposed of |
| Birth certificates | Once the setting has had sight of the birth  certificate and recorded the necessary information the original can be returned to the parents. There is no requirement to keep a  copy of the birth certificate. | Securely disposed of |
|  |
| A statement of the procedure to be followed in the event of a child  being lost or not collected | Procedure superseded + 7 years | Securely disposed of |

|  |  |  |
| --- | --- | --- |
| **Extra-curricular activities** | | |
| Parental consent forms for school trips | Until the conclusion of | Up to 22 years after the |
| where no major incident occurred | the trip | pupil’s date of birth |
|  |  |  |
|  | 25 years after the |  |
|  | pupil’s date of birth on |  |
|  | the pupil’s record |  |
| Parental consent forms for school trips | (permission slips of all | Securely disposed of |
| where a major incident occurred | pupils on the trip will |
|  |
|  | also be held to show |  |
|  | that the rules had been |  |
|  | followed for all pupils) |  |
|  |  |  |
|  | Three years from the |  |
| Walking bus registers | date of the register | Securely disposed of |
|  | being taken |  |
|  |  |  |

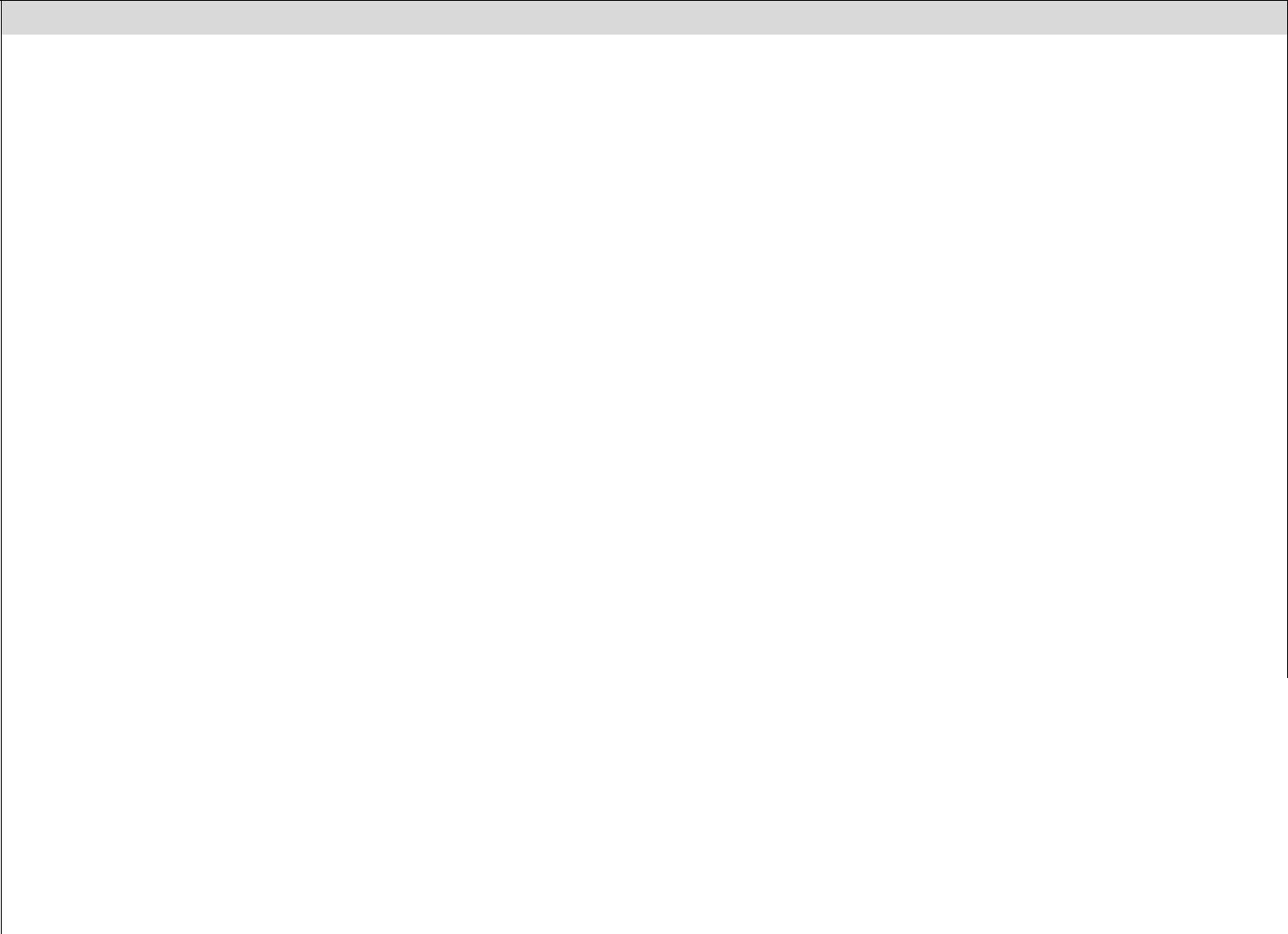
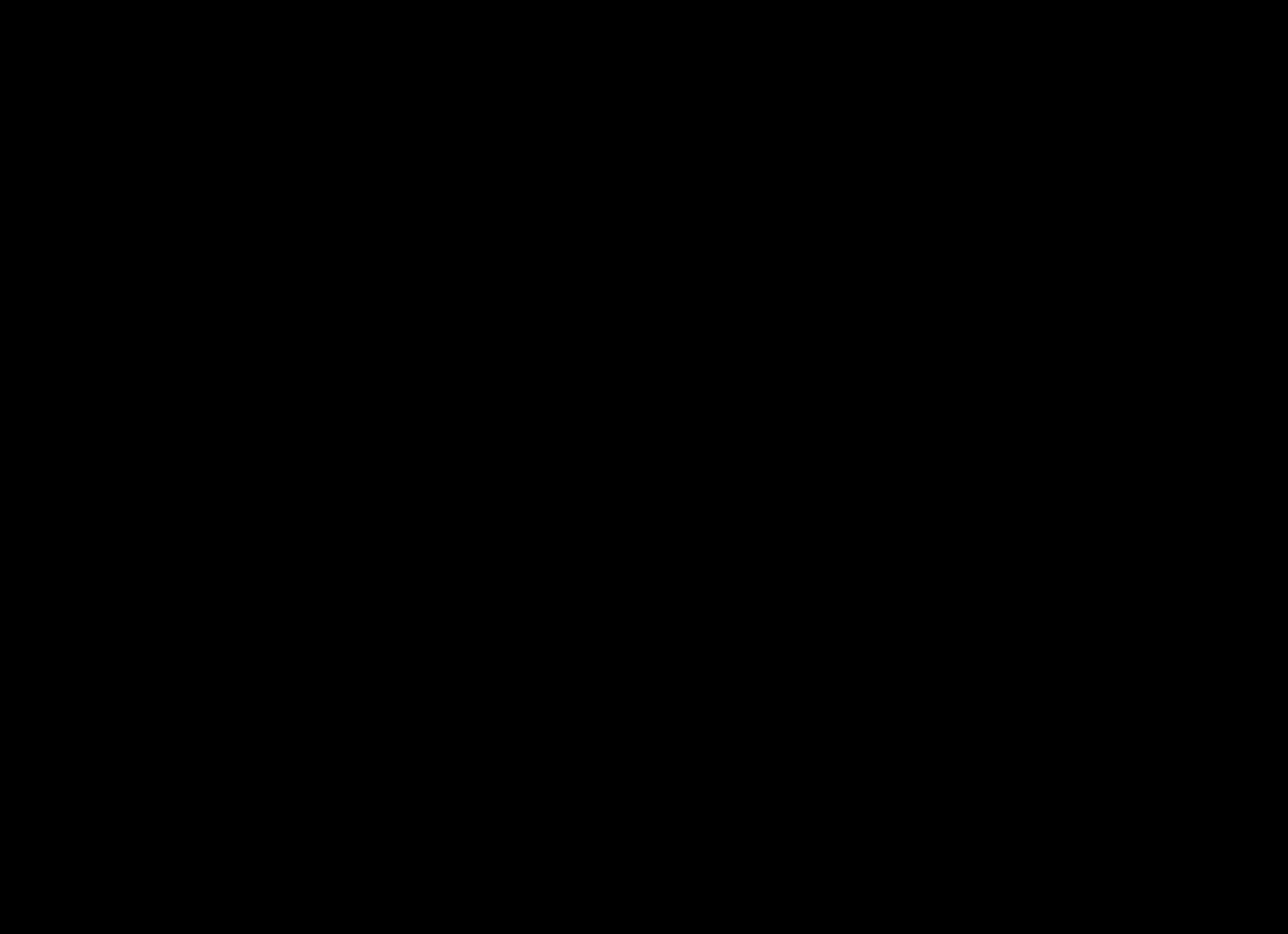
**5. Retention of staff records**

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 members’ personal file | |  | Termination of employment, | |  | Securely disposed of |  |
|  |  | plus six years | |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  | |  |  |  |
|  | Timesheets | |  | Current academic year, plus | |  | Securely disposed of |  |
|  |  | six years | |  |  |
|  |  |  |  |  |  |  |
|  |  | |  |  | |  |  |  |
|  | Annual appraisal and | |  | Current academic year, plus | |  | Securely disposed of |  |
|  | assessment records | |  | five years | |  |  |
|  |  |  |  |  |
|  |  |  |  |  | |  |  |  |
|  |  |  |  | **Recruitment** | |  |  |  |
|  | Records relating to the | |  | Date of appointment, plus | |  |  |  |
|  | appointment of a new | |  |  | Securely disposed of |  |
|  |  | six years | |  |  |
|  | headteacher | |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  | |  |  | |  |  |  |
|  | Records relating to the | |  | Date of appointment of | |  |  |  |
|  | appointment of new members of | |  | successful candidate, plus | |  | Securely disposed of |  |
|  | staff (unsuccessful candidates) | |  | six months | |  |  |  |
|  |  |  |  |  |  |  |  |  |

|  |  |  |
| --- | --- | --- |
|  | Relevant information added |  |
| Records relating to the | to the member of staff’s |  |
| appointment of new members of | personal file and other | Securely disposed of |
| staff (successful candidates) | information retained for six |  |
|  | months |  |
|  |  |  |
| DBS certificates | Up to six months | Securely disposed of |
|  |  |  |
|  |  | Reviewed and a note kept of |
|  |  | what was seen and what has |
| Proof of identify as part of the | After identity has been | been checked – if it is necessary |
| enhanced DBS check | proven | to keep a copy this will be placed |
|  |  | on the staff member’s personal |
|  |  | file, if not, securely disposed of |
|  |  |  |
|  | Added to staff personal file |  |
| Evidence of right to work in the | or, if kept separately, |  |
| termination of employment, | Securely disposed of |
| UK |
| plus no longer than two |  |
|  |  |
|  | years |  |
|  |  |  |



**Disciplinary and grievance procedures**

|  |  |  |  |
| --- | --- | --- | --- |
|  |  | Added to staff personal file, |  |
|  |  | and until the individual’s |  |
|  |  | normal retirement age, or 10 |  |
|  | Child protection allegations, | years from the date of the |  |
|  | allegation – whichever is | Reviewed and securely disposed |
|  | including where the allegation is |
|  | longer | of – shredded |
|  | unproven |
|  |  |  |
|  |  | If allegations are malicious, |  |
|  |  | they are removed from |  |
|  |  | personal files |  |
|  |  |  |  |
|  |  | Date of warning, plus six | Securely disposed of – if placed |
|  | Oral warnings | on staff personal file, removed |
|  | months |
|  |  | from file |
|  |  |  |
|  |  |  |  |
|  |  | Date of warning, plus six | Securely disposed of – if placed |
|  | Written warning – level 1 | on staff personal file, removed |
|  | months |
|  |  | from file |
|  |  |  |
|  |  |  |  |
|  |  | Date of warning, plus 12 | Securely disposed of – if placed |
|  | Written warning – level 2 | on staff personal file, removed |
|  | months |
|  |  | from file |
|  |  |  |
|  |  |  |  |
|  |  | Date of warning, plus 18 | Securely disposed of – if placed |
|  | Final warning | on staff personal file, removed |
|  | months |
|  |  | from file |
|  |  |  |
|  |  |  |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Conclusion of the case, | | |  |
| Records relating to unproven | unless the incident is child | | | Securely disposed of |
| incidents | protection related and is | | |
|  |
|  | disposed of as [above](#page10) | | |  |
|  |  |  |  |  |

**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 board** | |  |  |  |
|  |  |  |  | One copy alongside the | |  |  |  |
|  | Agendas for governing board | |  | original set of minutes – all | |  | Securely disposed of |  |
|  | meetings | |  | others disposed of without | |  |  |
|  |  |  |  |  |
|  |  |  |  | retention | |  |  |  |
|  |  | |  |  |  |  |  |  |
|  | Original, signed copies of the | |  |  |  |  | If unable to store, these will be |  |
|  | minutes of governing board | |  | Permanent | |  | provided to the county archives |  |
|  | meetings | |  |  |  |  | service |  |
|  |  |  |  |  |  |  |  |  |
|  | Inspection copies of the minutes | |  | Date of meeting, plus three | |  | Shredded if they contain any |  |
|  |  |  | sensitive and personal |  |
|  | of governing board meetings | |  | years | |  |  |
|  |  |  | information |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  | |  |  |  |
|  |  |  |  | Minimum of six years, | |  | Securely disposed of or, if they |  |
|  | Reports presented to the | |  | unless they refer to | |  | refer to individual reports, |  |
|  | governing board | |  | individual reports – these | |  | retained with the signed, original |  |
|  |  |  |  | are kept permanently | |  | copy of minutes |  |
|  |  | |  |  | |  |  |  |
|  | Instruments of government, | |  |  |  |  | If unable to store, these will be |  |
|  |  | Permanent | |  | provided to the county archives |  |
|  | including articles of association | |  |  |  |
|  |  |  |  |  | service |  |
|  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  | Trusts and endowments | |  |  |  |  | Retained in the school whilst it |  |
|  |  |  |  |  | remains open, then provided to |  |
|  | managed by the governing | |  | Permanent | |  |  |
|  |  |  | the county archives service when |  |
|  | board | |  |  |  |  |  |
|  |  |  |  |  | the school closes |  |
|  |  |  |  |  |  |  |  |
|  |  | |  |  |  |  |  |  |
|  | Action plans created and | |  | Duration of the action plan, | |  |  |  |
|  | administered by the governing | |  |  | Securely disposed of |  |
|  |  | plus three years | |  |  |
|  | board | |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
|  | Policy documents created and | Duration of the policy, plus |  |
|  | administered by the governing | Securely disposed of |
|  | three years |
|  | board |  |
|  |  |  |
|  |  |  |  |
|  | Records relating to complaints | Date of the resolution of the | Reviewed for further retention in |
|  | dealt with by the governing | complaint, plus a minimum | case of contentious disputes, |
|  | board | of six years | then securely disposed of |
|  |  |  |  |
|  | Annual reports created under the |  |  |
|  | requirements of The Education |  |  |
|  | (Governors’ Annual Reports) | Date of report, plus 10 years | Securely disposed of |
|  | (England) (Amendment) |  |  |
|  | Regulations 2002 |  |  |
|  |  |  |  |
|  | Proposals concerning changing | Date proposal accepted or | Securely disposed of |
|  | the status of the school | declined, plus three years |
|  |  |
|  |  |  |  |
|  | **Headteacher and senior leadership team (SLT)** | | |
|  | Minutes of SLT meetings and | Date of the meeting, plus | Reviewed and securely disposed |
|  | the meetings of other internal |
|  | three years | of |
|  | administrative bodies |
|  |  |  |
|  |  |  |  |
|  | Reports created by the | Date of the report, plus a | Reviewed and securely disposed |
|  | headteacher or SLT | minimum of three years | of |
|  |  |  |  |
|  | Records created by the |  |  |
|  | headteacher, deputy | Current academic year, plus | Reviewed and securely disposed |
|  | headteacher, heads of year and |
|  | six years | of |
|  | other members of staff with |
|  |  |  |
|  | administrative responsibilities |  |  |
|  |  |  |  |
|  | Correspondence created by the |  |  |
|  | headteacher, deputy | Date of correspondence, | Reviewed and securely disposed |
|  | headteacher, heads of year and |
|  | plus three years | of |
|  | other members of staff with |
|  |  |  |
|  | administrative responsibilities |  |  |
|  |  |  |  |
|  | Professional development plan | Duration of the plan, plus six | Securely disposed of |
|  | years |
|  |  |  |
|  |  |  |  |
|  | School development plan | Duration of the plan, plus | Securely disposed of |
|  | three years |
|  |  |  |
|  |  |  |  |

**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 | |  | Duration of policy, plus three | |  | Securely disposed of |  |
|  | statements | |  | years | |  |  |
|  |  |  |  |  |
|  |  | |  |  | |  |  |  |
|  | Health and safety risk | |  | Duration of risk assessment, | |  | Securely disposed of |  |
|  | assessments | |  | plus three years | |  |  |
|  |  |  |  |  |
|  |  |  |  |  | |  |  |  |
|  |  |  |  | Date of incident, plus 12 | |  |  |  |
|  | Records relating to accidents | |  | years. In the case of serious | |  | Securely disposed of |  |
|  | and injuries at work | |  | accidents, a retention period | |  |  |
|  |  |  |  |  |
|  |  |  |  | of 15 years is applied | |  |  |  |
|  |  |  |  |  | |  |  |  |
|  | Accident reporting – adults | |  | Date of the incident, plus six | |  | Securely disposed of |  |
|  |  | years | |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  | |  |  |  |
|  |  |  |  | 25 years after the pupil’s | |  |  |  |
|  | Accident reporting – pupils | |  | date of birth, on the pupil’s | |  | Securely disposed of |  |
|  |  |  |  | record | |  |  |  |
|  |  | |  |  | |  |  |  |
|  | Control of substances hazardous | |  | Current academic year, plus | |  | Securely disposed of |  |
|  | to health | |  | 40 years | |  |  |
|  |  |  |  |  |
|  |  | |  |  |  |  |  |  |
|  | Information relating to areas | |  |  |  |  |  |  |
|  | where employees and persons | |  | Date of last action, plus 40 | |  | Securely disposed of |  |
|  | are likely to come into contact | |  | years | |  |  |
|  |  |  |  |  |
|  | with asbestos | |  |  |  |  |  |  |
|  |  | |  |  |  |  |  |  |
|  | Information relating to areas | |  |  |  |  |  |  |
|  | where employees and persons | |  | Date of last action, plus 50 | |  | Securely disposed of |  |
|  | are likely to come into contact | |  | years | |  |  |
|  |  |  |  |  |
|  | with radiation | |  |  |  |  |  |  |
|  |  |  |  |  | |  |  |  |
|  | Fire precautions log books | |  | Current academic year, plus | |  | Securely disposed of |  |
|  |  | six years -PFI | |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

**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, | |  | Securely disposed of |  |
|  |  | plus three years | |  |  |
|  |  |  |  |  |  |  |
|  |  | |  |  |  |  |  |  |
|  | Records held under Retirement | |  | Current academic year, | |  |  |  |
|  | Benefits Schemes (Information | |  |  | Securely disposed of |  |
|  |  | plus six years | |  |  |
|  | Powers) Regulations 1995 | |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  | |  | | |  | |  |
|  | **Risk management and insurance** | | | | | | |  |
|  | Employer’s liability insurance | |  | Closure of the school, plus | |  | Securely disposed of |  |
|  | certificate | |  | 40 years | |  |  |
|  |  |  |  |  |
|  |  |  |  |  | |  |  |  |
|  |  |  |  | **Asset management** | |  |  |  |
|  | Inventories of furniture and | |  | Current academic year, | |  | Securely disposed of |  |
|  | equipment | |  | plus six years | |  |  |
|  |  |  |  |  |
|  |  | |  |  | |  |  |  |
|  | Burglary, theft and vandalism | |  | Current academic year, | |  | Securely disposed of |  |
|  | report forms | |  | plus six years | |  |  |
|  |  |  |  |  |
|  |  | |  | | |  | |  |
|  | **Accounts and statements including budget management** | | | | | | |  |
|  | Annual accounts | |  | Current academic year, | |  | Disposed of against common |  |
|  |  | plus six years | |  | standards |  |
|  |  |  |  |  |  |
|  |  | |  |  | |  |  |  |
|  | Loans and grants managed by | |  | Date of last payment, plus | |  | Information is reviewed then |  |
|  | the school | |  | 12 years | |  | securely disposed of |  |
|  |  | |  |  | |  |  |  |
|  | All records relating to the creation | |  | Duration of the budget, plus | |  | Securely disposed of |  |
|  | and management of budgets | |  | three years | |  |  |
|  |  |  |  |  |
|  |  | |  |  | |  |  |  |
|  | Invoices, receipts, order books, | |  | Current financial year, plus | |  | Securely disposed of |  |
|  | requisitions and delivery notices | |  | six years | |  |  |
|  |  |  |  |  |
|  |  | |  |  | |  |  |  |
|  | Records relating to the collection | |  | Current financial year, plus | |  | Securely disposed of |  |
|  | and banking of monies | |  | six years | |  |  |
|  |  |  |  |  |
|  |  | |  |  |  |  |  |  |
|  | Records relating to the | |  | Current financial year, plus | |  |  |  |
|  | identification and collection of | |  |  | Securely disposed of |  |
|  |  | six years | |  |  |
|  | debt | |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  | |  |  |  |
|  |  |  |  | **Contract management** | |  |  |  |
|  | All records relating to the | |  | Last payment on the | |  |  |  |
|  | management of contracts under | |  |  | Securely disposed of |  |
|  |  | contract, plus 12 years | |  |  |
|  | seal | |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
|  | All records relating to the | Last payment on the |  |
|  | management of contracts under | Securely disposed of |
|  | contract, plus six years |
|  | signature |  |
|  |  |  |
|  |  |  |  |
|  | All records relating to the | Current academic year, | Securely disposed of |
|  | monitoring of contracts | plus two years |
|  |  |
|  |  |  |  |
|  |  | **School fund** |  |
|  | Cheque books, paying in books, | Current academic year, |  |
|  | ledgers, invoices, receipts, bank | Securely disposed of |
|  | plus six years |
|  | statements and journey books |  |
|  |  |  |
|  |  |  |  |
|  |  | **School meals** |  |
|  | Free school meals registers | Current academic year, | Securely disposed of |
|  | (electronically on Sims MIS) | plus six years |
|  |  |
|  |  |  |  |
|  | School meals registers | Current academic year, | Securely disposed of |
|  | (electronically on Sims MIS) | plus three years |
|  |  |
|  |  |  |  |
|  | School meals summary sheets | Current academic year, | Securely disposed of |
|  | (electronically on Sims MIS) | plus three years |
|  |  |
|  |  |  |  |

**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 | |  | Permanent – PFI BUILDING | |  | Transferred to new owners if |  |
|  | belonging to the school  (PFI contract) | |  |  | the building is leased or sold |  |
|  |  |  |  |  |  |
|  |  | |  |  | |  |  |  |
|  | Plans of property belonging to | |  | PFI BUILDING | |  | Transferred to new owners if |  |
|  | the school  (PFI contract) | |  |  | |  | the building is leased or sold |  |
|  |  | |  |  | |  |  |  |
|  | Leases of property leased by | |  | Expiry of lease, plus six | |  | Securely disposed of |  |
|  | or to the school | |  | years | |  |  |
|  |  |  |  |  |
|  |  | |  |  | |  |  |  |
|  | Records relating to the letting | |  | Current financial year, plus | |  | Securely disposed of |  |
|  | of school premises | |  | six years | |  |  |
|  |  |  |  |  |
|  |  |  |  |  | |  |  |  |
|  |  |  |  | **Maintenance** | |  |  |  |
|  | All records relating to the | |  | Current academic year, plus | |  |  |  |
|  | maintenance of the school | |  |  | Securely disposed of |  |
|  |  | six years \_PFI – small works | |  |  |
|  | carried out by contractors | |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |

|  |  |  |  |
| --- | --- | --- | --- |
|  | All records relating to the |  |  |
|  | maintenance of the school | Current academic year, plus | Securely disposed of |
|  | carried out by school | six years –PFI BUILDING |
|  |  |
|  | employees |  |  |
|  |  |  |  |
|  |  | **Operational administration** |  |
|  | General file series | Current academic year, plus | Reviewed and securely |
|  | five years | disposed of |
|  |  |
|  |  |  |  |
|  | Records relating to the creation | Current academic year, plus | Disposed of against common |
|  | and distribution of circulars to |
|  | one year | standards |
|  | staff, parents or pupils |
|  |  |  |
|  |  |  |  |
|  | Newsletters and other items | Current academic year plus | Disposed of against common |
|  | with short operational use | one year | standards |
|  |  |  |  |
|  | Visitors’ books and signing-in | Current academic year, plus | Reviewed then securely |
|  | sheets | six years | disposed of |
|  |  |  |  |
|  | Records relating to the creation |  |  |
|  | and management of parent- | Current academic year, plus | Reviewed then securely |
|  | teacher associations and/or old | six years | disposed of |
|  | pupil associations |  |  |
|  |  |  |  |

1. **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 DPO will conduct a back-up of information on a scheduled 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.

10.3. Where possible, backed-up information will be stored off the school premises, using a central back-up service operated by the LA.

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. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.

10.12. Where emails containing sensitive or confidential information are sent to a non-secure email address (e.g. not .gov .rgfl etc), they 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.

10.13. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

10.14. 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.

10.15. 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.

10.16. 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 or safe with restricted access.

10.17. 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.

10.18. The physical security of the school’s buildings and storage systems, and access to them, is reviewed on a scheduled basis 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.

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

10.20. The DPO is responsible for continuity and recovery measures are in place to ensure the security of protected data.

10.21. Any damage to or theft of data will be managed in accordance with the school’s disaster plan.

1. **Accessing information**

11.1. Kimberworth Primary School is transparent with 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.

11.3. All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the UK GDPR, 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 (this would be ex-pupils over the age of 13); although, this information can still be shared with parents.

11.5. Ex 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 UK GDPR Data Protection Policy when responding to requests seeking access to personal information.

1. **Digital continuity statement**

12.1. Digital data that is retained for longer than six years will be named as part of a digital continuity statement.

12.2. The DPO will identify any digital data that will need to be named as part of a digital continuity statement.

12.3. 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 10](#page16) of this policy.

12.4. Memory sticks will never be used to store digital data, subject to a digital continuity statement.

12.5. The IT technician will review new and existing storage methods annually and, where appropriate add them to the digital continuity statement.

12.6. 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

1. **Information audit**

13.1. 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 UK GDPR. This includes the following information:

* Paper documents and records
* Electronic documents and records
* Databases
* Sound recordings
* Video and photographic records

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 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

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

13.5. Once it has been confirmed that the information is accurate, the DPO will record all details on the school’s Information Asset Register.

13.6. The information displayed on the Information Asset Register will be shared with the headteacher to gain their approval.

1. **Disposal of data**

14.1. 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.

14.2. 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 keep a record of all files that have been destroyed.

14.3. 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.

14.4. 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.

14.5. 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.

14.6. Where information must be kept permanently, this information is exempt from the normal review procedures

1. **Monitoring and review**

15.1. This policy will be reviewed on an annual basis by the DPO in conjunction with the headteacher – the next scheduled review date for this policy is September 2023.

15.2. Any changes made to this policy will be communicated to all members of staff and the governing board.