

Sheffield
Catholic
Schools
Partnership



Data Protection Policy

Reviewed and updated **May 2018**



Vision and Mission

Our vision is that every single member of our community will love, learn and grow together. This is achieved by:

- Celebrating what we are good at
- Challenging ourselves and doing our very best in our work
- Loving and respecting ourselves and each other
- Knowing that we are loved for being just how God made us
- Accepting that everyone is special



Introduction

This policy should be read in conjunction with the following documents:

- ✓ Privacy Notice for Pupils
- ✓ Privacy Notice for Contacts
- ✓ Privacy Notice for Governors
- ✓ Privacy Notice for Visitors
- ✓ Privacy Notice for Parents
- ✓ Privacy Notice for Volunteers
- ✓ Privacy Notice for the School Workforce
- ✓ Images Policy for Pupils
- ✓ Images Policy for the School Workforce

St John Fisher is a Data Controller and is registered with the Information Commissioner's Office (ICO). The registration number is **ZA054769**. The Data Protection Officer (DPO) for the school is Sarah Vintin. The DPO can be contacted via enquiries@st-johnfisher.org or (0114) 2485009.

Roles and Responsibilities

Data Controller determines the purposes and means of processing personal data. The Data Controller has an obligation to ensure that contracts with Data Processors comply with the General Data Protection Regulation.

Data Processor responsible for processing personal data on behalf of a Data Controller. The Data Processor is required to maintain records of personal data and processing activities, and will have legal liability if the Data Processor is responsible for a breach.

General Data Protection Regulation (GDPR) May 2018

The GDPR is European-wide legislation is an update to the 1998 Data Protection Act. As a Public Organisation, the School has a statutory duty to adhere to the GDPR.

The GDPR applies to '**personal data**' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

This definition provides for a wide range of personal identifiers to constitute personal data, including name,



identification number, location data or online identifier, reflecting changes in technology and the way we collect information about people.

The GDPR applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria. This could include chronologically ordered sets of manual records containing personal data. The GDPR refers to sensitive personal data, including genetic data, and biometric data where processed to uniquely identify an individual.

The principles of the GDPR state that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

With regards to e) above, although our privacy statements draw specific attention to the storage of particular types of personal data, unless stated otherwise in a privacy statement, the school will adhere to the Information Records Management Society Retention Schedule, which is included in Appendix A.

Data Protection Officer (DPO)

The Headteacher will appoint a Data Protection Officer. As per Article 39 of the GDPR, the DPO must:

- inform and advise the organisation and its employees about their obligations to comply with the GDPR and other data protection laws;
- monitor compliance with the GDPR and other data protection laws, including managing internal data protection activities, advise on data protection impact assessments, train staff, and conduct internal audits;
- be the first point of contact for supervisory authorities and for individuals whose data is processed (employees, customers etc)
- the DPO keeps a record of those staff who have attended Data Protection training.
- the DPO reports to the Headteacher.
- the DPO operates independently and will not be dismissed or penalised for implementing the obligations associated with the role of DPO, as set out in the regulations or any guidance.
- adequate resources are provided to enable the DPO to meet their GDPR obligations



Privacy Notices

The school has a Privacy Notice for the following groups of Data Subject:

- pupils
- school workforce
- contacts
- governors
- visitors
- volunteers
- parents

Outlining:

- the legal basis on which we collect and process personal data, and what we use the data for
- the categories of personal data that we collect and process
- details of who we share personal data with
- the length of time that we retain personal data

The Privacy Notice makes explicit an individual's rights under the GDPR. The Privacy Notice provides contact details for all enquiries relating to Data Protection in school. Any documentation where we collect personal data from individuals will contain a reference that clearly signposts the Privacy Notice.

Sharing Personal Data

The School will share personal data with other Data Controllers where required to do so by law, only to the extent required by the relevant law. The School will only do so if there is a legal basis for the data sharing, and will include details of such data sharing in its Privacy Notices.

A Data Processor is an individual or organisation (a third party) who processes personal data on our behalf. Whenever a Data Controller uses a Data Processor, it needs to have a written contract in place, so that both parties understand their obligations, responsibilities and liabilities. The school will only appoint Data Processors who can provide 'sufficient guarantees' that the requirements of the GDPR will be met and the rights of data subjects will be protected.

Where the data sharing is not undertaken on a statutory basis, (for example pupil images for school photographs, passport details with travel companies for students on a foreign school trip), we will ensure that we have either:

- A contractual agreement for the sharing of data with the company concerned demonstrating compliance to GDPR; or
- A copy of an up-to-date privacy statement from the company that satisfactorily demonstrates their compliance to GDPR for the purposes of the data sharing concerned

As a matter of good practice, our contracts:

- State that nothing within the contract relieves the Data Processor of its own direct responsibilities and liabilities under the GDPR; and
- Reflect any indemnity that has been agreed

Data Breaches

The DPO will maintain a register of data breaches. The template for recording data breaches is provided in Appendix D.



Where a data breach is likely to result in a risk to the rights and freedoms of individuals (for example if un-addressed the breach is likely to result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage) the DPO will report the breach to the supervisory authority (currently the Information Commissioner's Office) within 72 hours of the breach.

Where a breach is likely to result in a high risk to the rights and freedoms of individuals, the DPO will notify those concerned directly. A 'high risk' means the threshold for notifying individuals is higher than for notifying the relevant supervisory authority.

Data Retention

The school will adhere to statutory guidance relating to the retention of personal data. The school will adhere to the operational guidance provided by the Information Records Management Society.

The School's Data Retention Schedule is contained in **Appendix A**.

Data destruction involves the disposal of paper copies of the personal data, and deletion of electronic files from the school system. All staff will ensure that they are not retaining paper records or electronic files containing personal data for longer than the period indicated in the School's Data Retention Schedule.

The School keeps an electronic back up of the computer systems. Back-up data may be retained in a back-up format for a longer period than recommended by the Information Records Management Society. This is unavoidable, given the finite resources of the organisation.

Data Protection Impact Assessment (DPIA)

A Data Protection Impact Assessment will be carried out whenever an individual or group of individuals within the organisation is considering a project that:

- involves sharing personal data with a company or organisation that is not listed in a Privacy Notice, or for a purpose different to that stated in a Privacy Notice
- alters a school system in such a way as to involve a substantial change to the way in which personal data is processed

This includes sharing data with companies that are not explicitly named in a Privacy Notice (e.g. a travel company who are providing a school trip).

The first stage of the Data Protection Impact Assessment is the project leader considering the questions listed in Appendix E (DPIA Part 1).

If the answer to any of the questions in Appendix E is 'yes', the project leader will complete Appendix F (DPIA Part 2).

| | |
|---|---|
| Reason for version change: GDPR | Version number: 1.0 |
| Document owner: Sheffield Catholic Schools Partnership | Date of SCSP Authorisation: 07-03-18 |
| Approval required: Governing Body | Date of School Approval: 00-00-18 |
| Target Audience: All | Date issued: 25-05-18 |

MANAGEMENT OF THE SCHOOL - This section contains retention periods connected to the general management of the school. This covers the work of the Governing Body, the Headteacher and the senior management team, the admissions process and operational administration.

1.1 Governing Body

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|--|--|--------------------------------|---|---|----------------|-------|
| 1.1.1 | Agendas for Governing Body meetings | There may be data protection issues if the meeting is dealing with confidential issues relating to staff | | One copy should be retained with the master set of minutes. All other copies can be disposed of | SECURE DISPOSAL ¹ | Yes | |
| 1.1.2 | Minutes of Governing Body meetings | There may be data protection issues if the meeting is dealing with confidential issues relating to staff | | | | Yes | |
| | Principal Set (signed) | | | PERMANENT | If the school is unable to store these then they should be offered to the County Archives Service | | |
| | Inspection Copies ² | | | Date of meeting + 3 years | If these minutes contain any sensitive, personal information they must be shredded. | | |
| 1.1.3 | Reports presented to the Governing Body | There may be data protection issues if the report deals with confidential issues relating to staff | | Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently | SECURE DISPOSAL or retain with the signed set of the minutes | Yes | |
| 1.1.4 | Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002 | No | Education Act 2002, Section 33 | Date of the meeting + a minimum of 6 years | SECURE DISPOSAL | No | |

¹ In this context SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross cut shredder.

² These are the copies which the clerk to the Governor may wish to retain so that requestors can view all the appropriate information without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

1.1 Governing Body

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|---|------------------------|---|--|--|----------------|-------|
| 1.1.5 | Instruments of Government including Articles of Association | No | | PERMANENT | These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes. | No | |
| 1.1.6 | Trusts and Endowments managed by the Governing Body | No | | PERMANENT | These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes. | No | |
| 1.1.7 | Action plans created and administered by the Governing Body | No | | Life of the action plan + 3 years | SECURE DISPOSAL | No | |
| 1.1.8 | Policy documents created and administered by the Governing Body | No | | Life of the policy + 3 years | SECURE DISPOSAL | No | |
| 1.1.9 | Records relating to complaints dealt with by the Governing Body | Yes | | Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes | SECURE DISPOSAL | Yes | |
| 1.1.10 | Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 | No | Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI No 1171 | Date of report + 10 years | SECURE DISPOSAL | No | |
| 1.1.11 | Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies | No | | Date proposal accepted or declined + 3 years | SECURE DISPOSAL | No | |

Please note that all information about the retention of records concerning the recruitment of Head Teachers can be found in the Human Resources section below.

1.2 Headteacher and Leadership & Management Team

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|--|---|----------------------|---|--|----------------|-------|
| 1.2.1 | Log books of activity in the school maintained by the Head Teacher | There may be data protection issues if the log book refers to individual pupils or members of staff | | Date of last entry in the book + a minimum of 6 years then review | These could be of permanent historical value and should be offered to the County Archives Service if appropriate | Yes | |
| 1.2.2 | Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies | There may be data protection issues if the minutes refers to individual pupils or members of staff | | Date of the meeting + 3 years then review | SECURE DISPOSAL | Yes | |
| 1.2.3 | Reports created by the Head Teacher or the Management Team | There may be data protection issues if the report refers to individual pupils or members of staff | | Date of the report + a minimum of 3 years then review | SECURE DISPOSAL | Yes | |
| 1.2.4 | Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities | There may be data protection issues if the records refer to individual pupils or members of staff | | Current academic year + 6 years then review | SECURE DISPOSAL | Yes | |
| 1.2.5 | Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities | There may be data protection issues if the correspondence refers to individual pupils or members of staff | | Date of correspondence + 3 years then review | SECURE DISPOSAL | Yes | |
| 1.2.6 | Professional Development Plans | Yes | | Life of the plan + 6 years | SECURE DISPOSAL | Yes | |
| 1.2.7 | School Development Plans | No | | Life of the plan + 3 years | SECURE DISPOSAL | No | |

1.3 Admissions Process

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|--|------------------------|---|--|--|----------------|-------|
| 1.3.1 | All records relating to the creation and implementation of the School Admissions' Policy | No | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Life of the policy + 3 years then review | SECURE DISPOSAL | No | |
| 1.3.2 | Admissions – if the admission is successful | Yes | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Date of admission + 1 year | SECURE DISPOSAL | Yes | |
| 1.3.3 | Admissions – if the appeal is unsuccessful | Yes | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Resolution of case + 1 year | SECURE DISPOSAL | Yes | |
| 1.3.4 | Register of Admissions | Yes | School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014 | Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made. ³ | REVIEW Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school. | Yes | |
| 1.3.5 | Admissions – Secondary Schools – Casual | Yes | | Current year + 1 year | SECURE DISPOSAL | Yes | |
| 1.3.6 | Proofs of address supplied by parents as part of the admissions process | Yes | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Current year + 1 year | SECURE DISPOSAL | Yes | |

³ School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014 p6.

1.3 Admissions Process

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|--|------------------------|----------------------|--|--|----------------|-------|
| 1.3.7 | Supplementary Information form including additional information such as religion, medical conditions etc | Yes | | | | Yes | |
| | For successful admissions | | | This information should be added to the pupil file | SECURE DISPOSAL | | |
| | For unsuccessful admissions | | | Until appeals process completed | SECURE DISPOSAL | | |

1.4 Operational Administration

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|---|------------------------|----------------------|------------------------------------|--|----------------|-------|
| 1.4.1 | General file series | No | | Current year + 5 years then REVIEW | SECURE DISPOSAL | No | |
| 1.4.2 | Records relating to the creation and publication of the school brochure or prospectus | No | | Current year + 3 years | STANDARD DISPOSAL | No | |
| 1.4.3 | Records relating to the creation and distribution of circulars to staff, parents or pupils | No | | Current year + 1 year | STANDARD DISPOSAL | No | |
| 1.4.4 | Newsletters and other items with a short operational use | No | | Current year + 1 year | STANDARD DISPOSAL | No | |
| 1.4.5 | Visitors' Books and Signing in Sheets | Yes | | Current year + 6 years then REVIEW | SECURE DISPOSAL | Yes | |
| 1.4.6 | Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations | No | | Current year + 6 years then REVIEW | SECURE DISPOSAL | Yes | |

HUMAN RESOURCES - This section deals with all matters of Human Resources management within the school.**2.1 Recruitment**

| Basic file description | | Data Protec- tion Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administra- tive life of the record | Personal Data? | Owner |
|------------------------|---|-----------------------------|--|---|---|-------------------|-------|
| 2.1.1 | All records leading up to the ap- pointment of a new headteacher | Yes | | Date of appointment + 6 years | SECURE DISPOSAL | Yes | |
| 2.1.2 | All records leading up to the ap- pointment of a new member of staff – unsuccessful candidates | Yes | | Date of appointment of successful candidate + 6 months | SECURE DISPOSAL | Yes | |
| 2.1.3 | All records leading up to the ap- pointment of a new member of staff – successful candidate | Yes | | All the relevant information should be added to the staff personal file (see below) and all other information re- tained for 6 months | SECURE DISPOSAL | Yes | |
| 2.1.4 | Pre-employment vetting infor- mation – DBS Checks | No | DBS Update Ser- vice Employer Guide June 2014: Keeping children safe in education. July 2015 (Statu- tory Guidance from Dept. of Edu- cation) Sections 73, 74 | The school does not have to keep copies of DBS certifi- cates. If the school does so the copy must NOT be re- tained for more than 6 months | | Yes | |
| 2.1.5 | Proofs of identity collected as part of the process of check- ing “portable” enhanced DBS disclo- sure | Yes | | Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff's per- sonal file | | Yes | |
| 2.1.6 | Pre-employment vetting infor- mation – Evidence proving the right to work in the United King- dom ⁴ | Yes | An employer's guide to right to work checks [Home Office May 2015] | Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the doc- uments are kept for termination of Employment plus not less than two years | | Yes | |

⁴ Employers are required to take a “clear copy” of the documents which they are shown as part of this process.

2.2 Operational Staff Management

| Basic file description | | Data Protec- tion Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|---|-----------------------------|---------------------------------|-------------------------------------|---|-------------------|-------|
| 2.2.1 | Staff Personal File | Yes | Limitation Act 1980 (Section 2) | Termination of Employment + 6 years | SECURE DISPOSAL | Yes | |
| 2.2.2 | Timesheets | Yes | | Current year + 6 years | SECURE DISPOSAL | Yes | |
| 2.2.3 | Annual appraisal/ assess- ment records | Yes | | Current year + 5 years | SECURE DISPOSAL | Yes | |

2.3 Management of Disciplinary and Grievance Processes

| Basic file description | | Data Protec- tion Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|--|-----------------------------|---|--|--|-------------------|-------|
| 2.3.1 | Allegation of a child pro- tection nature against a member of staff includ- ing where the allegation is unfounded ⁵ | Yes | “Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working to- gether to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of chil- dren March 2015” | Until the person’s normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allega- tions 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 | SECURE DISPOSAL These records must be shredded | Yes | |
| 2.3.2 | Disciplinary Proceedings | Yes | | | | Yes | |
| | oral warning | | | Date of warning ⁶ + 6 months | | | |
| | written warning – level 1 | | | Date of warning + 6 months | SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file] | | |
| | written warning – level 2 | | | Date of warning + 12 months | | | |
| | final warning | | | Date of warning + 18 months | | | |
| | case not found | | | If the incident is child protection re- lated then see above otherwise dis- pose of at the conclusion of the case | SECURE DISPOSAL | | |

⁵ This review took place as the Independent Inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention.

⁶ Where the warning relates to child protection issues see above. If the disciplinary proceedings relate to a child protection matter please contact your Safeguarding Children Officer for further advice.

2.4 Health and Safety

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|--|------------------------|--|--|--|----------------|-------|
| 2.4.1 | Health and Safety Policy Statements | No | | Life of policy + 3 years | SECURE DISPOSAL | No | |
| 2.4.2 | Health and Safety Risk Assessments | No | | Life of risk assessment + 3 years | SECURE DISPOSAL | No | |
| 2.4.3 | Records relating to accident/ injury at work | Yes | | Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied | SECURE DISPOSAL | Yes | |
| 2.4.4 | Accident Reporting | Yes | Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 | | | Yes | |
| | Adults | | | Date of the incident + 6 years | SECURE DISPOSAL | | |
| | Children | | | DOB of the child + 25 years | SECURE DISPOSAL | | |
| 2.4.5 | Control of Substances Hazardous to Health (COSHH) | No | Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2) | Current year + 40 years | SECURE DISPOSAL | No | |
| 2.4.6 | Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos | No | Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19 | Last action + 40 years | SECURE DISPOSAL | No | |
| 2.4.7 | Process of monitoring of areas where employees and persons are likely to have become in contact with radiation | No | | Last action + 50 years | SECURE DISPOSAL | No | |
| 2.4.8 | Fire Precautions log books | No | | Current year + 6 years | SECURE DISPOSAL | No | |

FINANCIAL MANAGEMENT This section deals with all aspects of the financial management including the administration of school meals.**2.5 Payroll and Pensions**

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|--|------------------------|---|--------------------------------|--|----------------|-------|
| 2.5.1 | Maternity pay records | Yes | Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567) | Current year + 3 years | SECURE DISPOSAL | Yes | |
| 2.5.2 | Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 | Yes | | Current year + 6 years | SECURE DISPOSAL | Yes | |

3.1 Risk Management and Insurance

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|--|------------------------|----------------------|----------------------------------|--|----------------|-------|
| 3.1.1 | Employer's Liability Insurance Certificate | No | | Closure of the school + 40 years | SECURE DISPOSAL | No | |

3.2 Asset Management

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|--|------------------------|----------------------|--------------------------------|--|----------------|-------|
| 3.2.1 | Inventories of furniture and equipment | No | | Current year + 6 years | SECURE DISPOSAL | No | |
| 3.2.2 | Burglary, theft and vandalism report forms | No | | Current year + 6 years | SECURE DISPOSAL | Yes | |

3.3 Accounts and Statements including Budget Management

| Basic file description | | Data Protec- tion Issues | Statutory Pro- visions | Retention Period [Operational] | Action at the end of the administra- tive life of the record | Personal Data? | Owner |
|------------------------|--|-----------------------------|---------------------------|---|---|-------------------|-------|
| 3.3.1 | Annual Accounts | No | | Current year + 6 years | STANDARD DISPOSAL | Yes | |
| 3.3.2 | Loans and grants managed by the school | No | | Date of last payment on the loan + 12 years then REVIEW | SECURE DISPOSAL | Yes | |
| 3.3.3 | Student Grant applications | Yes | | Current year + 3 years | SECURE DISPOSAL | Yes | |
| 3.3.4 | All records relating to the creation and management of budgets including the Annual Budget statement and background papers | No | | Life of the budget + 3 years | SECURE DISPOSAL | Yes | |
| 3.3.5 | Invoices, receipts, order books and requisitions, delivery notices | No | | Current financial year + 6 years | SECURE DISPOSAL | Yes | |
| 3.3.6 | Records relating to the collection and banking of monies | No | | Current financial year + 6 years | SECURE DISPOSAL | Yes | |
| 3.3.7 | Records relating to the identification and collection of debt | No | | Current financial year + 6 years | SECURE DISPOSAL | Yes | |

3.4 Contract Management

| Basic file description | | Data Protec- tion Issues | Statutory Pro- visions | Retention Period [Operational] | Action at the end of the administra- tive life of the record | Personal Data? | Owner |
|------------------------|---|-----------------------------|---------------------------|---|---|-------------------|-------|
| 3.4.1 | All records relating to the management of contracts under seal | No | Limitation Act 1980 | Last payment on the contract + 12 years | SECURE DISPOSAL | Yes | |
| 3.4.2 | All records relating to the management of contracts under signature | No | Limitation Act 1980 | Last payment on the contract + 6 years | SECURE DISPOSAL | Yes | |
| 3.4.3 | Records relating to the monitoring of contracts | No | | Current year + 2 years | SECURE DISPOSAL | Yes | |

3.5 School Fund

| Basic file description | | Data Protec- tion Issues | Statutory Pro- visions | Retention Period [Operational] | Action at the end of the administra- tive life of the record | Personal Data? | Owner |
|------------------------|-------------------------------|-----------------------------|---------------------------|--------------------------------|---|-------------------|-------|
| 3.5.1 | School Fund - Cheque books | No | | Current year + 6 years | SECURE DISPOSAL | No | |
| 3.5.2 | School Fund - Paying in books | No | | Current year + 6 years | SECURE DISPOSAL | No | |
| 3.5.3 | School Fund – Ledger | No | | Current year + 6 years | SECURE DISPOSAL | Yes | |
| 3.5.4 | School Fund – Invoices | No | | Current year + 6 years | SECURE DISPOSAL | Yes | |
| 3.5.5 | School Fund – Receipts | No | | Current year + 6 years | SECURE DISPOSAL | Yes | |
| 3.5.6 | School Fund - Bank statements | No | | Current year + 6 years | SECURE DISPOSAL | Yes | |
| 3.5.7 | School Fund – Journey Books | No | | Current year + 6 years | SECURE DISPOSAL | Yes | |

3.6 School Meals Management

| Basic file description | | Data Protec- tion Issues | Statutory Pro- visions | Retention Period [Operational] | Action at the end of the administra- tive life of the record | Personal Data? | Owner |
|------------------------|-----------------------------|-----------------------------|---------------------------|--------------------------------|---|-------------------|-------|
| 3.6.1 | Free School Meals Registers | Yes | | Current year + 6 years | SECURE DISPOSAL | Yes | |
| 3.6.2 | School Meals Registers | Yes | | Current year + 3 years | SECURE DISPOSAL | Yes | |
| 3.6.3 | School Meals Summary Sheets | No | | Current year + 3 years | SECURE DISPOSAL | No | |

PROPERTY MANAGEMENT - This section covers the management of buildings and property.

4.1 Property Management

| Basic file description | | Data Protec- tion Issues | Statutory Pro- visions | Retention Period [Operational] | Action at the end of the administra- tive life of the record | Personal Data? | Owner |
|------------------------|---|-----------------------------|---------------------------|--|---|-------------------|-------|
| 4.1.1 | Title deeds of properties belonging to the school | No | | PERMANENT These should follow the property unless the prop- erty has been registered with the Land Registry | | No | |
| 4.1.2 | Plans of property belong to the school | No | | These should be retained whilst the building be- longs to the school and should be passed onto any new owners if the building is leased or sold. | | No | |
| 4.1.3 | Leases of property leased by or to the school | No | | Expiry of lease + 6 years | SECURE DISPOSAL | Yes | |
| 4.1.4 | Records relating to the letting of school prem- ises | No | | Current financial year + 6 years | SECURE DISPOSAL | Yes | |

4.2 Maintenance

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|---|------------------------|----------------------|--------------------------------|--|----------------|-------|
| 4.2.1 | All records relating to the maintenance of the school carried out by contractors | No | | Current year + 6 years | SECURE DISPOSAL | Yes | |
| 4.2.2 | All records relating to the maintenance of the school carried out by school employees including maintenance log books | No | | Current year + 6 years | SECURE DISPOSAL | Yes | |

PUPIL MAMAGEMENT Includes all records created during the time a pupil is at the school. Info about accident reporting is with Health and Safety above.

5.1 Pupil's Educational Record

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|---|------------------------|---|---|---|----------------|-------|
| 5.1.1 | Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 | Yes | The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 | | | Yes | |
| | Primary | | | Retain whilst the child remains at the primary school | <p>The file should follow the pupil when he/she leaves the primary school. This will include:</p> <ul style="list-style-type: none"> to another primary school to a secondary school to a pupil referral unit If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. <p>If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention period. Primary Schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the Local Authority as it is more likely that the pupil will request the record from the Local Authority</p> | | |
| | Secondary | | Limitation Act 1980 (Section 2) | Date of Birth of the pupil + 25 years | SECURE DISPOSAL | | |

| | | | | | | | |
|-------|------------------------------------|-----|--|--|---|-----|--|
| 5.1.2 | Examination Results – Pupil Copies | Yes | | | | Yes | |
| | Public | | | This information should be added to the pupil file | All uncollected certificates should be returned to the examination board. | | |
| | Internal | | | This information should be added to the pupil file | | | |

5.1 Pupil’s Educational Record

| Basic file description | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner | |
|--|---|----------------------|--|---|--|-------|--|
| This review took place as the Independent Inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry makes concerning record retention | | | | | | | |
| 5.1.3 | Child Protection information held on pupil file | Yes | “Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015” | If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file. | SECURE DISPOSAL – these records MUST be shredded | Yes | |
| 5.1.4 | Child protection information held in separate files | Yes | “Keeping children safe in education Statutory guidance for schools and colleges March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015” | DOB of the child + 25 years then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record | SECURE DISPOSAL – these records MUST be shredded | Yes | |

Retention periods relating to allegations made against adults can be found in the Human Resources section of this retention schedule.

5.2 Attendance

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|---|------------------------|--|--|--|----------------|-------|
| 5.2.1 | Attendance Registers | Yes | School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014 | Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made. | SECURE DISPOSAL | Yes | |
| 5.2.2 | Correspondence relating to authorized absence | | Education Act 1996 Section 7 | Current academic year + 2 years | SECURE DISPOSAL | Yes | |

5.3 Special Educational Needs

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|---|------------------------|--|---|--|----------------|-------|
| 5.3.1 | Special Educational Needs files, reviews and Individual Education Plans | Yes | Limitation Act 1980 (Section 2) | Date of Birth of the pupil + 25 years | NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented. | Yes | |
| 5.3.2 | Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement | Yes | Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1 | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold | Yes | |
| 5.3.3 | Advice and information provided to parents regarding educational needs | Yes | Special Educational Needs and Disability Act 2001 Section 2 | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold | Yes | |
| 5.3.4 | Accessibility Strategy | Yes | Special Educational Needs and Disability Act 2001 Section 14 | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold | Yes | |

CURRICULUM MANAGEMENT

6.1 Statistics and Management Information

| Basic file description | | Data Protec- tion Issues | Statutory Pro- visions | Retention Period [Operational] | Action at the end of the administra- tive life of the record | Personal Data? | Owner |
|------------------------|---|-----------------------------|---------------------------|---|---|-------------------|-------|
| 6.1.1 | Curriculum returns | No | | Current year + 3 years | SECURE DISPOSAL | Yes | |
| 6.1.2 | Examination Results (Schools Copy) | Yes | | Current year + 6 years | SECURE DISPOSAL | Yes | |
| | SATS records – Results | | | The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs re- sults. These could be kept for current year + 6 years to allow suitable compari- son | SECURE DISPOSAL | | |
| | Examination Papers | | | The examination papers should be kept until any appeals/validation process is complete | SECURE DISPOSAL | | |
| 6.1.3 | Published Admission Number PAN Reports | Yes | | Current year + 6 years | SECURE DISPOSAL | No | |
| 6.1.4 | Value Added and Contextual Data | Yes | | Current year + 6 years | SECURE DISPOSAL | Yes | |
| 6.1.5 | Self-Evaluation Forms | Yes | | Current year + 6 years | SECURE DISPOSAL | Yes | |

6.2 Implementation of Curriculum

| Basic file description | | Data Protec- tion Issues | Statutory Pro- visions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|---------------------------|-----------------------------|---------------------------|---|--|-------------------|-------|
| 6.2.1 | Schemes of Work | No | | Current year + 1 year | It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL | No | |
| 6.2.2 | Timetable | No | | Current year + 1 year | | Yes | |
| 6.2.3 | Class Record Books | No | | Current year + 1 year | | Yes | |
| 6.2.4 | Mark Books | No | | Current year + 1 year | | Yes | |
| 6.2.5 | Record of homework set | No | | Current year + 1 year | | Yes | |
| 6.2.6 | Pupils' Work | No | | Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not the school's policy then current year + 1 year | | SECURE DISPOSAL | Yes |

EXTRA-CURRICULAR ACTIVITIES

7.1 Educational Visits Outside the Classroom

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|---|------------------------|--|---|---|----------------|-------|
| 7.1.1 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools | No | Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice". | Date of visit + 14 years | SECURE DISPOSAL | Yes | |
| 7.1.2 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools | No | Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice". | Date of visit + 10 years | SECURE DISPOSAL | Yes | |
| 7.1.3 | Parental consent forms for school trips where there has been no major incident | Yes | | Conclusion of the trip | Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time. | Yes | |
| 7.1.4 | Parental permission slips for school trips – where there has been a major incident | Yes | Limitation Act 1980 (Section 2) | DOB of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils | | Yes | |

7.2 Walking Bus

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|-----------------------|------------------------|----------------------|--|---|----------------|-------|
| 7.2.1 | Walking Bus Registers | Yes | | Date of register + 3 years This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting | SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time] | Yes | |

7.3 Family Liaison Officers and Home School Liaison Assistants

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|--|------------------------|----------------------|---|--|----------------|-------|
| 7.3.1 | Day Books | Yes | | Current year + 2 years then review | | Yes | |
| 7.3.2 | Reports for outside agencies - where the report has been included on the case file created by the outside agency | Yes | | Whilst child is attending school and then destroy | | Yes | |
| 7.3.3 | Referral forms | Yes | | While the referral is current | | Yes | |
| 7.3.4 | Contact data sheets | Yes | | Current year then review, if contact is no longer active then destroy | | Yes | |
| 7.3.5 | Contact database entries | Yes | | Current year then review, if contact is no longer active then destroy | | Yes | |
| 7.3.6 | Group Registers | Yes | | Current year + 2 years | | Yes | |

CENTRAL GOVERNMENT & LOCAL AUTHORITY - This section covers records created in the course of interaction between the school and the local authority.

8.1 Local Authority

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|---|------------------------|----------------------|--------------------------------|--|----------------|-------|
| 8.1.1 | Secondary Transfer Sheets (Primary) | Yes | | Current year + 2 years | SECURE DISPOSAL | Yes | |
| 8.1.2 | Attendance Returns | Yes | | Current year + 1 year | SECURE DISPOSAL | Yes | |
| 8.1.3 | School Census Returns | No | | Current year + 5 years | SECURE DISPOSAL | Yes | |
| 8.1.4 | Circulars and other information sent from the Local Authority | No | | Operational use | SECURE DISPOSAL | Yes | |

8.2 Central Government

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|------------------------|--|------------------------|----------------------|--------------------------------|--|----------------|-------|
| 8.2.1 | OFSTED reports and papers | No | | Life of the report then REVIEW | SECURE DISPOSAL | Yes | |
| 8.2.2 | Returns made to central government | No | | Current year + 6 years | SECURE DISPOSAL | Yes | |
| 8.2.3 | Circulars and other information sent from central government | No | | Operational use | SECURE DISPOSAL | Yes | |

This section lists those personnel who have been assigned a role within this document.

| Role | Name of Personnel | Location |
|-------------------------------|-------------------|---|
| Headteacher (HT) | Frank Barratt | St John Fisher Primary – A Catholic Voluntary Academy |
| Data Protection Officer (DPO) | Sarah Vintin | St Theresa's Catholic Primary School |
| [owner in Appendix A] | | |
| [owner in Appendix A] | | |
| | | |
| | | |
| | | |

Our contracts include the following compulsory details:

- The subject matter and duration of the processing
- The nature and purpose of the processing
- The type of personal data and categories of data subject; and
- The obligations and rights of the Data Controller

Our contracts include the following compulsory terms:

- The Processor must only act on the written instructions of the Controller (unless required by law to act without such instructions)
- The Processor must ensure that people processing the data are subject to a duty of confidence
- The Processor must take appropriate measures to ensure the security of processing
- The Processor must only engage a sub-processor with the prior consent of the Data Controller and a written contract
- The Processor must assist the Data Controller in providing subject access and allowing data subjects to exercise their rights under the GDPR
- The Processor must assist the Data Controller in meeting its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessments
- The Processor must delete or return all personal data to the Controller as requested at the end of the contract
- The Processor must submit to audits and inspections, provide the Controller with whatever information it needs to ensure that they are both meeting their Article 28 obligations, and tell the Controller immediately if it is asked to do something infringing the GDPR or other data protection law of the EU or a member state

As a matter of good practice, our contracts:

- State that nothing within the contract relieves the Processor of its own direct responsibilities and liabilities under the GDPR
- Reflect any indemnity that has been agreed

| Details of the Data Protection Breach | |
|---|--|
| Date of incident: | |
| Please describe the incident in as much detail as possible. | |
| | |
| What measures did the school have in place to prevent an incident of this nature occurring? | |
| | |
| Please provide extracts of any policies & procedures the school has in place that you consider to be relevant to this incident, and explain which of these were in existence at the time this incident occurred. Please provide the dates on which they were implemented. | |
| | |

| Personal data placed at risk | |
|---|--|
| What personal data has been placed at risk? | |
| | |
| How many individuals were affected? | |
| Are the affected individuals aware that the incident has occurred? | |
| | |
| Has the data placed at risk now been recovered? If so please provide details of how and when. | |
| | |
| What steps has the school taken to prevent a recurrence of this incident? | |
| | |

| Training and Guidance | |
|---|--|
| Does the school provide its staff with training on the requirements of Data Protection legislation? If so, please provide any extracts relevant to this incident. | |
| | |
| Please confirm if training is mandatory for all staff. Had the staff members involved in this incident received training and if so when? | |
| | |
| Does the school provide any detailed guidance to staff on the handling of personal data in relation to the incident you are reporting? If so, please provide any extracts relevant to this incident here. | |
| | |

| Previous contact with the Information Commissioner's Office (ICO) | |
|---|--|
| Have you reported any previous incidents to the ICO in the last two years? | |
| If the answer to the above question is yes, please provide brief details, including the date that it was reported and the ICO reference number. | |
| | |

| Miscellaneous | |
|--|--|
| Have you notified any other data protection authorities about this incident? | |
| If the answer to the above question is yes, please provide details. | |
| | |
| Have you informed the police about this incident? | |
| If the answer to the above question is yes, please provide details. | |
| | |
| Have you informed any other regulatory authorities about this incident? | |
| If the answer to the above question is yes, please provide details. | |
| | |
| Has there been any media coverage about this incident? | |
| If the answer to the above question is yes, please provide details. | |
| | |

These questions will help you to decide whether a more detailed Data Protection Impact Assessment is necessary.

If the answer to any of the following questions is 'yes' then you **must** complete the Data Protection Impact Assessment Part 2 outlined in Appendix F, and lodge the completed Part 2 form with the Data Protection Officer.

| | |
|--|--|
| Brief outline of the project | |
| | |
| Name of the person completing this form: | |
| Date: | |

1. Will the project involve the collection of new personal data about individuals?
2. Will the project compel individuals to provide personal data about themselves?
3. Will personal data about individuals be disclosed to organisations or people who have not previously had routine access to the data? This includes different departments and other schools (including Teaching Schools).
4. Will you be using personal data about individuals for a purpose it was not originally collected for?
5. Does the project involve you using new technology which might be perceived as being privacy intrusive?
6. Will the project result in you making decisions or taking action against individuals in ways which can have a significant impact on them?
7. Is the personal data of a kind particularly likely to raise privacy concerns or expectations? For example employees' records or pupils' educational records.
8. Will the project require you to contact individuals in ways which they may find intrusive?

If you answered 'yes' to any of the questions in Appendix E, then you must complete the table below.

If you are unsure of the process, you must speak to the Data Protection Officer.

Step one: Identify the need for a DPIA

Explain what the project aims to achieve.
What are the benefits to the School, to individuals and to other parties?

Summarise why the need for a DPIA was identified.

Step two: Describe the information flows

Summarise how personal data will be collected, used, stored, secured and deleted during the project.

Summarise which employees/departments/external organisations will have access to personal data during the project that would not usually be able to access the personal data.

| Step three: Identify the privacy and related risks | | | | | |
|---|--|------------------------------------|-------------------------------------|--|--------------------------|
| Identify the key privacy risks and the associated compliance and corporate risks. | | | | | |
| Privacy issue | Risk to individuals / Compliance Risk ⁷ | Consultation / Actions to be taken | Detail Privacy Solutions identified | Evaluate Privacy Solutions Is the final impact on individuals a justified, compliant and proportionate response to the aims of the project? | Detail Approved Solution |
| | | | | | |
| | | | | | |

⁷ The following are possible risks to individuals that should be considered:

- Information being shared inappropriately through inadequate disclosure controls.
- Information being used for a new purpose without the individual's knowledge.
- New surveillance methods creating an unjustified intrusion on privacy.
- Intrusive measures being taken against individuals as a result of collecting the information.
- The sharing or merging of data sets can allow organisations to collect a much wider set of information than individuals might expect.
- Enabling identifiers to be linked to anonymised data may mean it is no longer safely anonymised.

Step four: Integrate the DPIA outcomes into the project plan

Detail who is responsible for integrating the DPIA outcomes back into the project plan.

| Action to be taken | Responsibility | Date for completion |
|--------------------|----------------|---------------------|
| | | |

Step eight: Post project review

Detail the results of the post project review.

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