

**Holly Grove School**

Records Management Policy

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**Statement of intent**

Holly Grove School is committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible to the appropriate individuals. In line with the requirements of the UK 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 to meet the school’s statutory requirements.

This document complies with the requirements set out in the UK GDPR and Data Protection Act 2018.

# Legal framework

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

* UK General Data Protection Regulation (GDPR)
* EU GDPR
* Freedom of Information Act 2000
* Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
* Data Protection Act 2018

This policy also has due regard to the following guidance:

* DfE (2023) 'Data protection in schools’
* DfE (2018) ‘Data protection: a toolkit for schools’
* DfE (2023) ‘Careers guidance and access for education and training providers’
* Information Records Management Society (IRMS) (2019) ‘Information Management Toolkit for Schools’
* ICO (2023) ‘How do we document our processing activities?
* ICO (2023) ‘Controllers checklist’

This policy will be implemented in accordance with the following school policies and procedures:

* Data Protection Policy
* Freedom of Information Policy
* Cyber-security Policy
* Data Asset Register

# Roles and responsibilities

The whole school has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.

The Headteacher will hold the overall responsibility for this policy and for ensuring it is implemented correctly.

The DPO will be responsible for:

* The management of records at the school.
* Promoting compliance with this policy and reviewing the policy on an annual basis, in conjunction with the Headteacher.
* Ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of safely and correctly.

All staff members will be responsible for ensuring that any records they are responsible for (including emails) are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

Staff will be responsible for ensuring that when pupils use personal data for projects or coursework, they do so appropriately. This includes being compliant when storing personal data.

# Management of pupil records

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 include all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievements.

The following information is stored electronically on SIMS and/or the pupil file and can be easily accessible:

* Forename, surname, and date of birth
* Unique pupil number
* Any preferred names
* Emergency contact details
* Name of GP if provided
* Any allergies or other medical conditions that are important to be aware of
* Names of people with parental responsibility, including their home address(es) and telephone number(s)
* Any other agency involvement, e.g. speech and language therapist
* Reference to any other linked files
* Admissions form
* Details of any SEND
* If the pupil has attended an early years setting, the record of transfer
* Data collection or data checking form
* Annual written reports to parents
* Any information about an EHC plan and support offered in relation to the EHC plan
* Medical information relevant to the pupil’s on-going education and behaviour
* 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
* Examination results – pupil copy
* SATs results
* Absence notes and correspondence
* Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.
* Consent to administer medication and administration records
* Copies of pupil birth certificates, passports etc.
* Correspondence with parents about minor issues, e.g. behaviour
* Pupil work
* Previous data collection forms that have been superseded

Additional Information not included on the pupil file is stored as follows:

Disclosures and reports relating to child protection are stored on CPOMS.

Complaints made by parents or pupils are stored in a file on the network.

Major accident reports are stored on the school network under Health & Safety and held in line with the retention periods outlined in this policy

The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend.

Electronic records relating to a pupil’s record will also be transferred to the pupils’ next school.

Pupils’ educational records will follow them when they leave the school; however, the school may keep hold of information about pupils for a short period to allow for any queries or reports to be completed or where linked records in the school information management system have not yet reached the end of their retention period and deleting the records would cause problems.

Certain elements of pupils’ records may be retained for longer, e.g. if litigation is pending, or for transfer to the Local Record Office, in accordance with the retention schedule.

In circumstances where an Independent Inquiry into Child Sexual Abuse (IICSA) is ongoing, any records relating to the IICSA will be subject to a separate indication of the appropriate retention periods. The school will never destroy any records relating to an IICSA whilst the inquiry is ongoing and will abide by the appropriate retention periods.

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.

# Retention of pupil records and other pupil-related information

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.

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

|  |  |  |
| --- | --- | --- |
| **Type of file** | **Retention period** | **Action taken after retention period ends** |
| **Personal identifiers, contacts and personal characteristics** |
| Images used for identification purposes | For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month | Securely disposed of |
| Images used in displays  | Whilst the pupil is at school | Securely disposed of |
| Images used for marketing purposes | In line with the consent period | Securely disposed of |
| Postcodes, names and characteristics | Whilst the pupil is at school.  | Securely disposed of  |
| House number and road | Whilst the pupil is at school. | Securely disposed of |
| **Admissions** |
| Admissions appeals (where the appeal is unsuccessful) | Resolution of the case, plus one year | Securely disposed of |
| Supplementary information submitted, including religious and medical information etc. (where the admission was successful) | Information added to the pupil file and retained whilst the pupil is at school  | Securely disposed of |
| Supplementary information submitted, including religious and medical information etc. (where the admission was not successful) | Retained until the appeals process is complete | Securely disposed of |
| All records relating to the creation and implementation of the Admissions Policy | Life of the policy, plus three years and then review  | Securely disposed of |
| **Pupils’ educational records** |
| Pupils’ educational records | Whilst the pupil remains at the school | Transferred to the next destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory periodThe IRMS advises that information can be retained for a short period to allow for any queries or reports to be completed or where linked records in the school information management system have not yet reached the end of their retention period and deleting would cause problems |
| Public examination results | Added to the pupil’s record and transferred to next school | All uncollected certificates returned to the examination board |
| Internal examination results | Added to the pupil’s record and transferred to next school | Reviewed and securely disposed of if no longer needed  |
| Behaviour records | Added to the pupil’s record and transferred to the next school | Securely disposed of |
| Exclusion records | Added to the pupil’s record and transferred to the next school | Securely disposed of |
| Child protection records held on CPOMS | 25 years after the pupil’s date of birthRecords also subject to any instruction given by the IICSA  | Securely disposed of – shredded |
| Pupils’ work  | Returned to pupil at the end of current academic yearIf this is not possible, hold for the current academic year, plus one year | Review at the end of each year and allocate a further retention period or securely dispose of |
| **Attendance** |
| Attendance registers | Every entry is retained for a period of three years after the date on which the entry was made | Securely disposed of |
| Correspondence relating to any absence (authorised or unauthorised)  | Added to the pupil’s record and transferred to the next school | Securely disposed of |
| **Medical information and administration** |
| Permission slips | For the duration of the period that medication is given, plus one month | Securely disposed of |
| Medical conditions – ongoing management | Added to the pupil’s record and transferred to the next school | Securely disposed of |
| Medical incidents that have a behavioural or safeguarding influence | Added to the pupil’s record and transferred to the next schoolCopies held whilst the pupil is at school, plus 25 years | Securely disposed of |
| **SEND** |
| SEND files, reviews and EHC plans, including advice and information provided to parents regarding educational needs and accessibility strategy | Whilst the pupil is at school then transferred to secondary school | Securely disposed of |
| **Curriculum management** |
| SATs results | 25 years after the pupil’s date of birth (as stated on the pupil’s record)A composite of the whole year’s results may be held for the current year plus six years, for comparative purposes | Securely disposed of |
| Self-evaluation forms (internal moderation) | Current academic year, plus one year | Securely disposed of |
| Self-evaluation forms (external moderation)  | Retained until superseded | Securely disposed of  |
| **Extra-curricular activities** |
| Field file – information taken on school trips | Until the conclusion of the trip, plus one monthWhere a minor incident occurs, field files are added to the core system as appropriate  | Securely disposed of |
| Trip packs – information taken on school trips | Until the end of the visitWhere a minor incident occurs, files are added to the core system as appropriate | Shredded upon return to school |
| Financial information relating to school trips | Current year plus six years | Securely disposed of |
| Parental consent forms for school trips where no major incident occurred | Until the conclusion of the trip, unless a school risk assessment decides the forms are likely to be required for any reason, in which case they should be retained for 22 years after the pupil’s date of birth | Securely disposed of – shredded  |
| Parental consent forms for school trips where a major incident occurred | 25 years after the pupil’s date of birth on the pupil’s record (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils) | Securely disposed of – shredded  |
| Educational visitors in school – sharing of personal information | Until the conclusion of the visit, plus one month | Securely disposed of |
| **Family liaison officers and home-school liaison assistants** |
| Reports for outside agencies | Duration of the pupil’s time at school then passed to secondary school | Securely disposed of |
| Referral forms | Whilst the referral is current | Securely disposed of |
| Contact data sheets | Current academic year | Reviewed and securely destroyed if no longer active |
| Contact database entries | Current academic year | Reviewed and securely destroyed if no longer required |
| Group registers | Current academic year, plus two years | Securely disposed of |
| **Catering and free school meal management**  |
| Meal eligibility | Whilst the pupil is at school, plus six years | Securely disposed of |
| School meal registers | Current year plus six years | Securely disposed of |
| Free school meal registers (where used as a basis for funding) | Current year plus six years | Securely disposed of |
| School meals summary sheets | One term | Securely disposed of |

# Retention of staff records

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.

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’ personnel file | Termination of employment, plus six years, unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file will be retained until the IICSA enquiries are complete | Securely disposed of |
| Annual appraisal and assessment records | Current academic year, plus six years | Securely disposed of |
| Sickness absence monitoring (where sickness pay is not paid) | Current academic year, plus three years  | Securely disposed of |
| Sickness absence monitoring (where sickness pay is paid) | Current academic year, plus three years | Securely disposed of  |
| Staff training (where training leads to CPD)  | Length of time required by the CPD professional body  | Securely disposed of  |
| Staff training (except where the training relates to dealing with pupils, e.g. first aid or health and safety) | Retained in the personnel file  | Securely disposed of  |
| Staff training (where the training relates to pupils, e.g. safeguarding or other pupil-related training) | Date of the training, plus 40 years  | Securely disposed of |
| **Recruitment** |
| Records relating to the appointment of a new Headteacher (unsuccessful attempts)  | Date of interview plus 12 months.  | Securely disposed of |
| Records relating to the appointment of a new Headteacher (successful appointments) | Added to personnel file and retained until the end of appointment, plus six years, except in cases of negligence or claims of child abuse, then records are retained for at least 15 years | Securely disposed of  |
| Records relating to the appointment of new members of staff or governors (unsuccessful candidates) | Date of interview of successful candidate, plus 12 months | Securely disposed of |
| Pre-employment vetting information (successful candidates) | For the duration of the employee’s employment, plus six years | Securely disposed of |
| DBS certificates | Not retained by school – checked and verified then returned  | Securely disposed of |
| Proof of identify as part of the enhanced DBS check | For the duration of the employee’s employment, plus six years | Securely disposed of |
| Evidence of right to work in the UK | For the duration of the employee’s employment, plus six years | Securely disposed of |
| **Disciplinary and grievance procedures** |
| Child protection allegations, including where the allegation is unproven | Added to staff personnel file, and until the individual’s normal retirement age, or 10 years from the date of the allegation – whichever is longerIf allegations are malicious, they are removed from personal filesIf allegations are found, they are kept on the personnel file and a copy is provided to the person concerned unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file is retained until IICSA enquiries are complete | Reviewed and securely disposed of – shredded |
| Oral warnings | Date of warning, plus six months | Securely disposed of – if placed on staff personnel file, removed from file  |
| Written warning – level 1 | Date of warning, plus 12 months | Securely disposed of – if placed on staff personnel file, removed from file |
| Written warning – level 2 | Date of warning, plus 12 months | Securely disposed of – if placed on staff personnel file, removed from file |
| Final warning | Date of warning, plus 18 months | Securely disposed of – if placed on staff personnel file, removed from file |
| Records relating to unproven incidents | Conclusion of the case, unless the incident is child protection related, then it is disposed of as [above](#A) | Securely disposed of  |

# Retention of governance records

The table below outlines the school’s retention periods for governance 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** |
| **Governance** |
| Agendas for governing board meetings | One copy alongside the original set of minutes – all others disposed of without retention | Securely disposed of  |
| Original, signed copies of the minutes of governing board meetings  | Current year plus 6 years  | Securely disposed of |
| Reports presented to the governing board that are referred to in the minutes | Current year plus 6 years  | Securely disposed of  |
| Instruments of government | Permanent  |  |
| Trusts and endowments managed by the governing board | Permanent |  |
| Action plans created and administered by the governing board | Until superseded or whilst relevant | Securely disposed of |
| Policy documents created and administered by the governing board | Until superseded or whilst relevant  | Securely disposed of |
| Records relating to complaints dealt with by the governing board or Headteacher | Date of resolution of complaint, plus six yearsIf negligence is involved, records are retained for the current academic year, plus 15 yearsIf child protection or safeguarding issues are involved, the records are retained for the current academic year, plus 40 years  | Reviewed for further retention in case of contentious disputes, then securely disposed of |
| Annual reports required by the DfE | Date of report, plus 6 years | Securely disposed of |
| Proposals concerning changing the status of the school | Date proposal accepted or declined, plus 6 years | Securely disposed of  |
| Records relating to the appointment of co-opted governors  | Date of election, plus the period of the term of office  | Securely disposed of  |
| Records relating to the election of the chair of the governing board and the vice chair  | Destroyed after the decision has been recorded in the minutes | Securely disposed of  |
| Scheme of delegation and terms of reference for committees  | Until superseded or whilst relevant  | Reviewed and offered to the local archives if appropriate  |
| Meeting schedule  | Current academic year | Standard disposal  |
| Register of attendance at full governing board meetings  | Current year plus 6 years | Securely disposed of  |
| Records relating to governor monitoring visits  | Current year plus 6 years | Securely disposed of  |
| Correspondence sent and received by the governing board or Headteacher  | Current academic year, plus three years  | Securely disposed of |
| Records relating to the appointment of the clerk to the governing board  | Date on which the clerk’s appointment ends, plus six years | Securely disposed of  |
| Records relating to the terms of office of serving governors, including evidence of appointment  | Date on which the governor’s appointment ends, plus 6 years  | Securely disposed of  |
| Records relating to governor declaration against disqualification criteria  | Date on which the governor’s appointment ends, plus six years | Securely disposed of  |
| Register of business interests | Date the governor’s appointment ends, plus six years | Securely disposed of  |
| Governor code of conduct | Dynamic document – kept permanently  | Securely disposed of  |
| Records relating to the training required and received by governors  | Date the governor steps down, plus six years | Securely disposed of  |
| Records relating to the induction programme for new governors | Date on which the governor’s appointment ends, plus six years | Securely disposed of  |
| Records relating to DBS checks carried out on members of the governing board | Date of the DBS check, ID documents retained for the term of office  | Securely disposed of  |

# Retention of senior leadership and management records

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** |
| **Headteacher and SLT** |
| Minutes of SLT meetings and the meetings of other internal administrative bodies | Date of the meeting, plus three years | Reviewed annually and securely disposed of if not needed |
| Reports created by the Headteacher or SLT | Date of the report, plus a minimum of three years | Reviewed annually and securely disposed of if not needed |
| Records created by the Headteacher, deputy Headteacher, heads of year and other members of staff with administrative responsibilities | Current academic year, plus three years | Reviewed annually and securely disposed of if not needed |
| Correspondence created by the Headteacher, deputy Headteacher, heads of year and other members of staff with administrative responsibilities  | Date of correspondence, plus three years | Securely disposed of |
| Professional development plan | Held on the individual’s personnel record. If not, then it is retained for the duration of the plan, plus three years | Securely disposed of |
| SDP | Duration of the plan, plus three years | Securely disposed of |

# Retention of health and safety records

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.

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

|  |  |  |
| --- | --- | --- |
| **Type of file** | **Retention period** | **Action taken after retention period ends** |
| **Health and safety** |
| Health and safety policy statements | Duration of policy, plus three years | Securely disposed of |
| Health and safety risk assessments | Duration of risk assessment, plus three years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred  | Securely disposed of |
| Records relating to any reportable death, injury, disease or dangerous occurrence under RIDDOR | Date of incident, plus three years provided that all records relating to the incident are held on the personnel file  | Securely disposed of |
| Accident reporting – adults | Three years after the last entry in the accident reporting book | Securely disposed of |
| Accident reporting – pupils | Three years after the last entry in the accident reporting book | Securely disposed of |
| Records kept under the Control of Substances Hazardous to Health Regulations | Date of incident, plus 40 years | Securely disposed of |
| Information relating to areas where employees and persons are likely to come into contact with radiation (dose assessment and recording)  | Until the person to whom the record relates would have reached 75-years-old, but in any event for at least 30 years from when the record was made  | Securely disposed of  |

# Retention of financial records

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.

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

|  |  |  |
| --- | --- | --- |
| **Type of file** | **Retention period** | **Action taken after retention period ends** |
| **Payroll and pensions** |
| Maternity pay records | Kept by LCC payroll/Pensions | Securely disposed of |
| Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995  | Kept by LCC payroll/Pensions | Securely disposed of |
| Timesheets / Oracle pay claims  | Current academic year, plus six years  | Securely disposed of |
| Absence record  | Current academic year, plus three years  | Securely disposed of  |
| Batches | Current academic year, plus six years | Securely disposed of  |
| Car allowance claims  | Current academic year, plus three years | Securely disposed of  |
| Income tax form P60  | Where provided at recruitment retained on personnel file for the term of the contract plus 6 years  | Securely disposed of  |
| Insurance  | Current academic year, plus six years | Securely disposed of  |
| Members allowance register | Current academic year, plus six years | Securely disposed of  |
| National insurance – schedule of payments  | N/A - Kept by LCC payroll/Pensions | N/A  |
| Payroll awards  | Current academic year, plus six years | Securely disposed of  |
| Payroll reports  | Current academic year, plus six years | Securely disposed of  |
| Payslips (copies)  | Current academic year, plus six years | Securely disposed of  |
| Personal bank details  | N/A - Kept by LCC payroll/Pensions | N/A  |
| Sickness records  | Current academic year, plus three years | Securely disposed of  |
| Staff returns  | Current academic year, plus three years | Securely disposed of  |
| Superannuation adjustments  | N/A - Kept by LCC payroll/Pensions | N/A  |
| Superannuation reports  | Current academic year, plus six years | Securely disposed of  |
| Tax forms  | Where provided at recruitment retained on personnel file for the term of the contract plus 6 years | Securely disposed of  |
| **Risk management and insurance** |
| Employer’s liability insurance certificate | Closure of the school, plus 40 years | Securely disposed ofPassed to the LA if the school closes  |
| **Asset management** |
| Inventories of equipment (this excludes furniture or items belonging to Equans) | Current academic year, plus six years | Securely disposed of |
| Burglary, theft and vandalism report forms | Current academic year, plus six years | Securely disposed of |
| **Accounts and statements including budget management** |
| Annual accounts | Current academic year, plus six years | Disposed of against common standards |
| Loans and grants managed by the school | Date of last payment, plus 12 years | Information is reviewed then securely disposed of |
| All records relating to the creation and management of budgets | Current financial year, plus six years | Securely disposed of |
| Invoices, receipts, order books, requisitions and delivery notices | Current financial year, plus six years | Securely disposed of |
| Records relating to the collection and banking of monies | Current financial year, plus six years | Securely disposed of |
| Records relating to the identification and collection of debt | Final payment, plus six years | Securely disposed of |
| **Contract management** |
| All records relating to the management of contracts under seal | Last payment on the contract, plus 12 years | Securely disposed of |
| All records relating to the management of contracts under signature | Last payment on the contract, plus six years | Securely disposed of |
| All records relating to the monitoring of contracts | Current financial year, plus six years | Securely disposed of |
| **School fund** |
| Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books | Current academic year, plus six years | Securely disposed of |
| **School meals** |
| FSM registers (where the register is used as a basis for funding) | Current academic year, plus six years | Securely disposed of |
| School meals registers | Current academic year, plus three years | Securely disposed of |
| School meals summary sheets | Current academic year, plus three years | Securely disposed of |
|  **Pupil finance**  |
| Pupil premium fund records  | Date the pupil leaves the school, plus six years | Securely disposed of  |

# Retention of other school records

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.

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

|  |  |  |
| --- | --- | --- |
| **Type of file** | **Retention period** | **Action taken after retention period ends** |
| **Property management** |
| Title deeds of properties belonging to the school | N/A – This is a PFI building  | N/A |
| Plans of property belonging to the school but excluding anything owned by the PFI | For as long as the building belongs to the school | Transferred to new owners if the building is leased or sold |
| Leases of property leased by or to the school | N/A – This is a PFI building  | N/A |
| Records relating to the letting of school premises | Current financial year, plus six years | Securely disposed of |
| **Maintenance** |
| All records relating to the maintenance of the school carried out by contractors | N/A – This is the responsibility of Equans  | N/A |
| All records relating to the maintenance of the school carried out by school employees | N/A – This is the responsibility of Equans  | N/A |
| **Operational administration** |
| General file series | Current academic year, plus three years | Reviewed and securely disposed of |
| Records relating to the creation and publication of the school brochure and/or prospectus | Current academic year, plus three years | If a copy is not preserved by the school, standard disposal |
| Records relating to the creation and distribution of circulars to staff, parents or pupils | Current academic year, plus one year | Disposed of against common standards |
| Newsletters and other items with short operational use | Current academic year, plus one year | One copy archived, other copies standard disposal  |
| Visitors’ books and signing-in sheets | Last entry in the logbook, plus six years | Reviewed then securely disposed of |
| Records relating to the creation and management of parent-teacher associations and/or old pupil associations | Current academic year, plus six years | Reviewed then securely disposed of |
| Walking bus registers | Date of register, plus six years  | Securely disposed of |
| School privacy notice which is sent to parents  | Until superseded, plus six years  | Standard disposal  |
| Consents relating to school activities  | While pupil attends the school  | Secure disposal  |

# Retention of emails

Group email addresses will have an assigned member of staff who takes responsibility for managing the account and ensuring the correct disposal of all sent and received emails. All staff members with an email account will be responsible for managing their inbox.

Emails can act as evidence of the school’s activities, i.e. in business and fulfilling statutory duties, so all relevant emails, e.g. invoices, will be retained for at least 12 months. Invoices received and sent in emails will be printed off and retained in accordance with Section 8 of this policy.

The school’s expectations of staff members in relation to their overall conduct when sending and receiving emails is addressed in the school’s Online Safety Policy. All emails will be automatically deleted after 12 months, unless stated otherwise.

Correspondence created by the SLT and other members of staff with administrative responsibilities will be retained for three years before being reviewed and, if necessary, securely disposed of.

Personal emails, i.e. emails that do not relate to work matters or are from family members, will be deleted as soon as they are no longer needed. Staff members will review and delete any emails they no longer require at the end of every term.

Staff members will not, under any circumstances, create their own email archives, e.g. saving emails on to personal hard drives. Staff members will be aware that the emails they send could be required to fulfil a SAR or freedom of information (FOI) request. Emails will be drafted carefully, and staff members will review the content before sending.

Individuals, including children, have the right to submit an SAR to gain access to their personal data to verify the lawfulness of the processing – this includes accessing emails.

All SARs will be handled in accordance with the school’s Data Protection Policy. FOI requests will be handled in accordance with the school’s Freedom of Information Policy.

When handling a request for information, the DPO will speak to the requestor to clarify the scope of the request and whether emails will be required to fulfil the SAR or FOI request. Where an SAR has been made electronically, the information will be provided in a commonly used electronic format. All requests will be responded to without delay and at the latest, within one month of receipt.

If a request is manifestly unfounded, excessive or repetitive, a fee will be charged. All fees will be based on the administrative cost of providing the information.

Where a request is manifestly unfounded or excessive, the school holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the supervisory authority and to a judicial remedy, within one month of the refusal.

Staff members will discuss any queries regarding email retention with the DPO.

# Identifying information

Under the UK GDPR, all individuals have the right to data minimisation and data protection by design and default – as the data controller, the school ensures appropriate measures are in place for individuals to exercise this right.

Wherever possible, the school uses pseudonymisation, also known as the ‘blurring technique’, to reduce the risk of identification.

Once an individual has left the school, if identifiers such as names and dates of birth are no longer required, these are removed or less specific personal data is used, e.g. the month of birth rather than specific date – the data is blurred slightly.

Where data is required to be retained over time, e.g. attendance data, the school removes any personal data not required and keeps only the data needed – in this example, the statistics of attendance rather than personal information.

# Storing and protecting information

The School will ensure that information on the school network is backed up on a daily 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. The back up service (RBUSS) is provided and managed by Lancashire Education Digital Services.

Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access. Any room or area where personal or sensitive data is stored will be locked when unattended. Confidential paper records are not left unattended or in clear view when held in a location with general access.

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. 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. Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.

All electronic devices are password-protected to protect the information on the device in case of theft. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft. Staff and governors do not use their personal laptops or computers for school purposes. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.

Emails containing sensitive or confidential information are password-protected or sent via a secure encrypted or data transfer system to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email. Personal information is never put in the subject line of an email. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

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 UK 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.

If documents that have been taken off the school premises will be left unattended, the staff member will leave the documents in the locked boot of a car or keep them on their person. A record will be kept of any document that is taken off the school premises that logs the location of the document and when it is returned to the school site, this includes records that are digitally remotely accessed.

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.

The school has data sharing agreements with all data processors and third parties with whom data is shared. These agreements are developed by the DPO and cover information about issues such as access controls and permissions.

A record is kept of what level of access each staff member has to data. This record details information including:

* What level of access each staff member has.
* Limits on how staff members access data.
* What actions staff members can perform.
* What level of access is changed or retained when a staff member changes role within the school.
* Who is able to authorise requests to change permissions and access.

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

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.

Staff are required to use their school login details to use photocopiers and printers.

The physical security of the school’s buildings and storage systems, and access to them, is reviewed annually by the Online Safety Groupin 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.

All systems that allow staff and pupils to remotely access information from the school’s network whilst they are not physically at the school have strong security controls in place which are reviewed termly by the DPO.

The DPO decides what restrictions are necessary to prevent information or records being downloaded, transferred or printed while the user is not on the school site.

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

The DPO is responsible for ensuring continuity and recovery measures are in place to ensure the security of protected data. Any damage to or theft of data will be managed in accordance with the school’s Data and Cyber-security Breach Prevention and Management Plan.

As a result of the UK’s exit of the EU data controllers and processors follow the UK GDPR, and the Data Protection Act 2018, where:

* As UK data controllers, they collect, store or process the personal data of individuals residing in the UK.
* As non-UK data controllers, they offer goods or services to, or monitor the behaviour of, UK residents.

Data controllers and processors follow the EU GDPR where:

* They collect, store or process the personal data of individuals residing in the EU.
* As non-EU data controllers, they offer goods or services to, or monitor the behaviour of, EU residents.

# Accessing information

We are transparent with data subjects, the information we hold and how it can be accessed.

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 UK GDPR.

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.

Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents. Pupils who are considered by the school to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.

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

# Record of processing activities

The school will maintain a record of processing activities (Article 30), to capture all the important information about data processing activities.

The school will adopt the following procedure when developing and maintaining its record:

* Identify personal data assets, locating all the personal data the school has received
* Compile the personal data assets into a list
* Add extra information about the school’s personal data assets in the list, developed to suit the school’s individual needs

The school’s record of processing activities will contain the following mandatory information as a minimum:

* Name and contact details of the school
* Name and contact details of the school’s data protection officer
* Name and contact details of any joint controllers
* Purposes of carrying out personal data processing
* Categories of personal data which the school processes
* Categories of individuals whose personal data the school process
* Categories of organisations with which the school shares personal data
* Schedule for retaining each category of personal data
* General description of the school’s technical and organisational security

More details about further information that the record of processing activities will be included via the following prompts:

* Source of personal data
* Category of personal data
* Whether the school is a data controller, data processor, a joint controller, or has a controller-processor contract in place
* Access and use
* Data retention and destruction
* Comments, rights, and subject access requests
* Security and personal data breaches
* Automated decision-making

# Digital continuity statement

Digital data that is retained for longer than six years will be identified by the DPO and named as part of a Digital Continuity Statement. 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 12 of this policy.

Memory sticks are never used to store digital data, subject to a Digital Continuity Statement.

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

The following information will be included within the Digital Continuity Statement:

* A statement of the business purposes and statutory 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 UK GDPR

# Information audit

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
* Hybrid files, containing both paper and electronic information
* Knowledge
* Apps and portals

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.

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

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

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

An information asset owner is assigned to each asset or group of assets. They will be responsible for managing the asset appropriately, ensuring it meets the school’s requirements, and for monitoring risks and opportunities.

The information displayed on the Data Asset Register will be shared with the Headteacher to gain their approval.

# Disposal of data

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.

All records containing personal or sensitive information will be made either unreadable or unreconstructable.

Where disposal of information is outlined as secure disposal, this will be shredded or pulped. Electronic information will be scrubbed clean and, where possible, cut, archived or digitalised.

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.

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.

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.

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

Records and information that might be of relevant to the Independent Inquiry into Child Sexual Abuse (IICSA) will not be disposed of or destroyed.

# School closures and record keeping

**Academy conversion**

If the school closes and subsequently becomes an academy, all records relating to pupils who are transferring to the academy will be transferred.

If the school will retain the existing building when it converts to an academy, all records relating to the management of the buildings will be transferred.

All other records created and managed when the school was part of the LA will become the responsibility of the LA.

**Sale or re-use of the site**

If the school site is being sold or re-allocated to another use, the LA will take responsibility for the records from the date the school closes.

**Merger of schools**

If the school merges with another school to create one school, the new school will be responsible for retaining all current records originating from the former schools.

The DPO will determine the outcome of each group of records; these outcomes are as follows:

* Securely destroy all records that are expired and due for disposal, in accordance with the retention periods outlined in this policy.
* Transfer to the successor school or academy all records that are current and that will be required by the new school or academy.
* Transfer to the LA all records that are dormant but still need to be retained to comply with legal and business retention requirements.
* Transfer to the local record office any records with historical value.

**Managing records**

The DPO will identify which records need to be destroyed or transferred to the relevant body – they will allocate personnel as necessary to sort through records.

The DPO will notify the other organisations as soon as possible so that necessary disposal, storage and transfer arrangements can be made. The school’s ICT provider will also be notified so that arrangements can be made to ensure the safe transfer or deletion of electronic records, including all back-up copies.

When sorting records, the DPO and their team will:

* Review all records held within the school as soon as notification of closure is received, including paper and electronic records.
* Use the retention periods outlined in this policy to categorise the records into those to be destroyed and those that need to be transferred.
* Contact the relevant body to make arrangements for the safe and secure transfer of records.
* Sort, list and box the records in preparation for the transfer, ensuring records are stored in a safe environment whilst awaiting collection.
* Plan how the disposal of records will be undertaken.
* Sort expired records in readiness for confidential disposal, ensuring they are stored securely whilst awaiting disposal.

All forms of storage will be completely emptied before the building is vacated or before disposal. Records awaiting transfer will be held in a secure area. The identity of any third parties collecting or disposing of records will be checked and a collection receipt will be obtained.

Records will be disposed of in line with the ‘[Disposal of data](#_[Updated]_Disposal_of)’ section of this policy. Electronic records will be either transferred to the new body or deleted. All ICT equipment will be decommissioned in accordance with the school’s ICT Acceptable Use Policy.

No records will be left behind once the school building is vacated.

# Monitoring and review

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 Summer Term 2026.

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