



DATA PROTECTION POLICY

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1 POLICY STATEMENT

- 1.1 Barnes Primary School ('the School', 'we', 'us' and 'our') is committed to upholding individuals' rights to have their Personal Data protected. This policy is designed to take into account the General Data Protection Regulation.
- 1.2 While carrying out its functions, the School will collect, store and process Personal Data about students, parents, employees and other third parties. Proper treatment of these data is essential and in line with the School's values.
- 1.3 School staff are obliged to comply with this Policy when processing Personal Data on our behalf. Any breach of this Policy by School staff may result in disciplinary or other action.

2 ABOUT THIS POLICY

- 2.1 The School holds Personal Data about current, past and prospective students, parents, employees and others with whom the School communicates. Personal data may be recorded on paper or stored electronically.
- 2.2 This Policy and other documents referred to in it set out the basis on which the School will process any Personal Data it collects from individuals, whether those data are provided to us by individuals or obtained from other sources. It sets out the rules on data protection and the legal conditions that must be satisfied when we obtain, handle, process, transfer and store Personal Data.
- 2.3 This Policy does not form part of any employee's contract of employment and may be amended at any time.
- 2.4 The Data Protection Officer is responsible for ensuring compliance with the Relevant Data Protection Laws and with this Policy. That post is held by Antonia Lord, Finance Department, 020 8876 7358 Ext 203, alord@barnes.richmond.sch.uk. Any questions about the operation of this Policy or any concerns that the Policy has not been followed should be referred in the first instance to the Data Protection Officer.

3 DEFINITION OF DATA PROTECTION TERMS

- 3.1 In this Policy, the functions of the School are the provision of education and any pastoral, business, administrative, community or similar activities associated with that provision. References to the School 'carrying out its functions' or similar are references to these activities.
- 3.2 References to 'we' are references to the School.
- 3.3 Criminal Convictions and Offences means the commission of, or proceedings for, any offence committed or alleged to have been committed by a person, the disposal of such proceedings or the sentence of any court in such proceedings.
- 3.4 Data Subjects means identified or identifiable natural persons whose Personal Data the School holds. This Policy also refers to Data Subjects as 'individuals.'
- 3.5 Data Controllers are the people who, or organisations which, determine the purposes for which any Personal Data are processed, including the means of the processing. The School is the Data Controller of all Personal Data used for carrying out its functions.
- 3.6 Data Users are, for the purposes of this Policy, those of our employees whose work involves processing Personal Data. Data Users must protect the data they handle in accordance with this Policy and any applicable data security procedures at all times. This Policy also refers to Data Users as 'School staff' or simply 'staff'.
- 3.7 Data Processors include any person or organisation, who is not a member of School staff, which processes Personal Data on our behalf. Employees of Data Controllers are excluded from this definition but it could include suppliers that handle Personal Data on the School's behalf.
- 3.8 Fair Processing Notices are documents explaining to Data Subjects how their data will be used by the School.
- 3.9 Personal Data means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- 3.10 Personal Data Breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed.
- 3.11 Pseudonymisation means the processing of Personal Data so that it can no longer be attributed to a specific person without the use of additional information, provided that such additional information is kept separately and is subject to measures to ensure that the Personal Data are not attributed to an identified or identifiable natural person.
- 3.12 Relevant Data Protection Law means the General Data Protection Regulation ((EU) 2016/679), the Data Protection Act 1998, the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2003/2426) and all applicable laws and regulations relating to the processing of Personal Data and privacy as amended, re-enacted, replaced or superseded from time to time and where applicable the guidance and codes of practice issued by the United Kingdom's Information Commissioner.
- 3.13 Special Categories of Personal Data (formerly known as 'sensitive Personal Data') include information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition, sexual life and genetic or biological traits. Special Categories of Personal Data can only be processed under strict conditions.

4 DATA PROTECTION PRINCIPLES

- 4.1 Anyone processing Personal Data for or on behalf of the School must comply with the principles of good practice contained in Relevant Data Protection Law. These principles state that Personal Data must be:
- 4.1.1 processed fairly, lawfully and transparently;
 - 4.1.2 processed for specified, limited and legitimate purposes and in an appropriate way;
 - 4.1.3 adequate, relevant and not excessive for the purposes for which they are processed;
 - 4.1.4 accurate and, where necessary, kept up to date;
 - 4.1.5 not kept longer than necessary for the intended purpose of processing; and
 - 4.1.6 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.

The School will keep a record of all data processing activities and must be able to demonstrate its compliance with these principles and with the wider requirements of Relevant Data Protection Law.

5 FAIR, LAWFUL AND TRANSPARENT PROCESSING

- 5.1 For Personal Data to be processed lawfully, they must be processed on the basis of one of the legal grounds set out in Relevant Data Protection Law. These include, but are not limited to:
- 5.1.1 the individual's explicit consent to the processing for one or more specified purposes;
 - 5.1.2 that the processing is necessary for the performance of a contract with the individual or for the compliance with a legal obligation to which the School is subject;
 - 5.1.3 that the processing is in the public interest; or
 - 5.1.4 that the processing is in the legitimate interest of the School or relevant third parties to which the data are disclosed, so long as this is balanced with the rights and freedoms of the individual.

- 5.2 Where a type of Data Processing is likely to pose a high risk to individuals' rights and freedoms, the School will carry out an appropriate Privacy Impact Assessment.
- 5.3 Special Categories of Personal Data
- 5.3.1 When Special Categories of Personal Data are being processed, the individual's explicit consent to processing of those data must be obtained unless the processing:
- is necessary for the purposes of carrying out the obligations and exercising specific rights of the School or of the individual in the field of employment and social security and social protection law;
 - is necessary for the assessment of the working capacity of an individual where the individual is an employee or for the provision of health or social care;
 - relates to Personal Data which are manifestly made public by the individual;
 - is necessary for reasons of substantial public interest; or
 - is necessary to protect the vital interests of the individual.
- 5.4 Processing of data relating to Criminal Convictions and Offences can only take place under control of an official authority, such as instructions from the police or an order of the court, or where UK or EU law states that processing must take place.
- 5.5 Consent of adults and organisations
- 5.5.1 Where an individual gives consent to Data Processing, that consent must be freely given, specific, informed and unambiguous and should be either in the form of a statement (whether or not prepared by the School) or a positive action demonstrating consent. Any requests that the School makes for consent must be in clear language.
- 5.5.1 An individual has the right to withdraw consent at any time and will be informed of this right and how to exercise it when the School requests consent.
- 5.6 Consent of children and young people
- 5.6.1 Parental consent to Data Processing must be obtained for pupils or other children younger than 13 years of age.
- 5.6.2 A young person aged 13 or over is, except where there are issues over mental capacity, able to give valid consent. Where a pupil reaches his or her 13th birthday while a pupil of an academy within the School, his or her consent should be obtained with reference to the requirements of 5.5 above.

6 PROCESSING FOR SPECIFIED, LIMITED AND LEGITIMATE PURPOSES

- 6.1 In the course of carrying out its functions, the School may collect and process the Personal Data set out in the Schedule. This may include data we receive directly from an individual (for example, by completing forms or by corresponding with us by post, phone, email or otherwise) and data we receive from other sources (including, for example, the local authority or other public bodies, business suppliers or service providers, professional advisers and others).
- 6.2 The School will only process Personal Data for the specific purposes set out in the Schedule or for any other purposes specifically permitted by Relevant Data Protection Law. We will explain those purposes to the Data Subject.

7 ADEQUATE, RELEVANT AND NON-EXCESSIVE PROCESSING

- 7.1 We will only collect Personal Data to the extent that it is required for the specific purpose notified to the individual;
- 7.2 If a member of staff has any doubt as to whether any processing exceeds the purposes for which that data were originally collected, he or she should notify the Data Protection Officer.

8 ACCURATE AND UP-TO-DATE DATA

- 8.1 We will ensure that Personal Data we hold are accurate and kept up to date. We will check the accuracy of any Personal Data at the point of collection and at regular intervals afterwards. We will take all reasonable steps to destroy or amend inaccurate or out-of-date data.
- 8.2 It is the responsibility of staff to ensure that Personal Data is accurate and kept up to date. Further, parents and anyone who provides Personal Data should also inform the School as soon as possible if there is any change to their Personal Data.

9 TIMELY PROCESSING

- 9.1 We will not keep Personal Data longer than is necessary for the purpose or purposes for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all data which are no longer required. We will be guided by the Information Records Management Society guidance in respect of decision making concerning the retention of Personal Data.
- 9.2 If a member of staff has any doubt as to whether any Personal Data has been or will be kept longer than is necessary for the purpose or purposes for which they were collected, he or she should notify the Data Protection Officer.

10 PROCESSING SECURELY AND IN LINE WITH RIGHTS OF DATA SUBJECTS

- 10.1 We are committed to upholding the rights of individuals to access Personal Data the School holds on them.
- 10.2 We will process all Personal Data in line with individuals' rights, in particular their rights to:
- 10.2.1 be informed, in a manner which is concise, transparent, intelligible and easily accessible and written in clear and plain language, of the purpose, use, recipients and other processing issues relating to data;
 - 10.2.2 receive confirmation as to whether your Personal Data is being processed by us;
 - 10.2.3 access your Personal Data which we are processing only by formal written request. We may charge you for exercising this right if we are allowed to do so by Relevant Data Protection Law. School employees who receive a written request should forward it to their line managers and the Data Protection Officer immediately;
 - 10.2.4 have data amended or deleted under certain circumstances where data is inaccurate or to have data completed where data is incomplete by providing a supplementary statement to the School (see also Clause 8);
 - 10.2.5 restrict processing of data if one of the following circumstances applies:
 - a. the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
 - b. the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
 - c. the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
 - d. the data subject has objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.
 - 10.2.6 Where processing has been restricted, as above, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of

another natural or legal person or for reasons of important public interest of the Union or of a Member State and the data subject shall be informed.

- 10.2.7 where processing is restricted under one of the grounds in Clause 10.2.5, the data shall only be processed with the individual's consent or in relation to the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or the United Kingdom;
 - 10.2.8 an individual who has obtained restriction of processing under Clause 10.2.5 shall be informed by the School before the restriction of processing is lifted;
 - 10.2.9 receive data concerning the individual, which he or she has provided to the School and is processed by automated means, in a structured, commonly used and machine-readable format and to transmit those data to another controller without hindrance from the School;
 - 10.2.10 object to data processing on grounds relating to his or her particular situation unless the School demonstrates compelling legitimate grounds for processing which overrides the interests, rights and freedoms of the individual or for to the establishment, exercise or defence of legal claims; and
 - 10.2.11 not to be subject to a decision based solely on automated decision-making and profiling which produces legal effects concerning him or her or similarly significantly affects him or her unless the decision is based on the individual's explicit consent.
- 10.3 It is the responsibility of all staff to ensure that any request by an individual under Clause 10.1 is brought to the attention of the Data Protection Officer without undue delay.
 - 10.4 The School may refuse a request by an individual wishing to exercise one of the above rights in accordance with Relevant Data Protection Law.
 - 10.5 The School shall provide information on action taken on a request under Clause 10.1 to the individual within one month of receipt of the request unless the School deems it necessary to extend this period by two further months where the request is complex and informs the individual of such extension with reasons within one month of receipt of the request.
 - 10.6 If a request under Clause 10.2 is unfounded or excessive, the School may charge a reasonable fee for providing the information or refuse the request.
 - 10.7 When receiving telephone enquiries, we will only disclose Personal Data we hold on our systems if the following conditions are met:
 - 10.7.1 We will check the caller's identity to make sure that information is only given to a person who is entitled to it.
 - 10.7.2 We will suggest that the caller put his or her request in writing if we are not sure about the caller's identity and where their identity cannot be checked.
 - 10.8 Our employees will refer a request to their line manager and the Data Protection Officer for assistance in difficult situations. Employees should not be bullied into disclosing personal information.

11 NOTIFYING DATA SUBJECTS

- 11.1 If we collect Personal Data directly from individuals, we will at the time of collection inform them about the processing including:
 - 11.1.1 the identity and contact details for the School and its Data Protection Officer;
 - 11.1.2 the purpose or purposes for which we intend to process those Personal Data;
 - 11.1.3 the types of third parties, if any, with which we will share or to which we will disclose those Personal Data; and
 - 11.1.4 the means, if any, by which individuals can limit our use and sharing of their Personal Data.
- 11.2 If we receive Personal Data from a source other than the individual we will, except in certain circumstances, provide the individual with the information in Clause 11.1 above at the following times:
 - 11.2.1 within one month of receiving the Personal Data;
 - 11.2.2 if the Personal Data are to be used for communication with the individual, at the time of the first communication to the individual;
 - 11.2.3 if a disclosure to another recipient is envisaged by us, at the time of the disclosure to that recipient.
- 11.3 A notification in the form of a Fair Processing Notice will be in writing or via a link to our website, unless the individual requests an oral notification.
- 11.4 We will also inform individuals whose Personal Data we process that the School is the Data Controller with regard to those data and who the Data Protection Officer is.

12 DATA SECURITY

- 12.1 We will take appropriate security measures against unlawful or unauthorised processing of Personal Data, and against the accidental loss of, or damage to, Personal Data.
- 12.2 We will put in place procedures and technologies to maintain the security of all Personal Data from the point of collection to the point of destruction. Personal Data will only be transferred to a Data Processor if he or she agrees to comply with those procedures and policies, or if he or she puts in place adequate measures.
- 12.3 School staff can find details of their obligations in relation to security of Personal Data in the Fair Processing Notice, staff policies and code of conduct.
- 12.4 All School staff must:
 - 12.4.1 assist the School in upholding individuals' data protection rights;
 - 12.4.2 only act in accordance with the School's instructions and authorisation;
 - 12.4.3 notify the Data Protection Officer immediately of any Personal Data Breaches, allegations of Personal Data Breaches or suspicions of Personal Data Breaches in accordance with Clause 12.5;
 - 12.4.4 comply at all times with the terms of any agreements with the School and with their responsibilities under Relevant Data Protection Law;
 - 12.4.5 satisfy the School, within a reasonable period following request, of their compliance with the provisions of Clause 12.4.4.
- 12.5 The School will notify the Information Commissioner's Office of any Personal Data Breaches without undue delay.

- 12.6 We will maintain data security by protecting the confidentiality, integrity and availability of the Personal Data, defined as follows:
- 12.6.1 Confidentiality: only people who are authorised to use the data can access them;
 - 12.6.2 Integrity: Personal Data should be accurate and suitable for the purpose for which they are processed;
 - 12.6.3 Availability: authorised users should be able to access the data if they need it for authorised purposes. Personal Data should therefore be stored on the School's central computer system instead of on individual computers, tablets or other media.
- 12.7 Security procedures include:
- 12.7.1 Entry controls: any stranger seen in entry-controlled areas should be reported.
 - 12.7.2 Secure lockable desks and cupboards: desks and cupboards should be kept locked if they hold confidential information of any kind (personal information is always considered confidential.)
 - 12.7.3 Methods of disposal: paper documents should be sent for destruction in sealed confidential waste bags or shredded. Digital storage devices should be professionally processed and physically destroyed when they are no longer required.
 - 12.7.4 Equipment: School staff must ensure that individual monitors do not show confidential information to passers-by and that they log off from their computers, tablets or other devices when left unattended.
 - 12.7.5 Data storage methods: measures to store data securely, such as Pseudonymisation or key-coding, will be implemented where appropriate.
- 12.8 The School shall, both at the time of the determination of the means for processing and at the time of the processing itself, implement appropriate technical and organisational measures designed to implement data-protection principles and to integrate the necessary safeguards into processing activities.
- 12.9 The School shall implement appropriate technical and organisational measures for ensuring that, by default, only Personal Data which are necessary for each specific purpose of the processing are processed.

13 REGISTER OF BREACHES

- 13.1 The School must maintain an accurate and up-to-date register of all Personal Data Breaches. If anyone becomes aware of a data protection breach they must inform the School immediately.

14 DATA PROTECTION OFFICER

- 14.1 The Data Protection Officer is responsible for ensuring compliance with Relevant Data Protection Law and with this Policy. That post is held by:

Antonia Lord, Business Manager.

Contact details are:

Telephone: 020 8876 7358 extension 203

Email: dataprotection@barnes.richmond.sch.uk

The Data Protection Officer reports to the School's Headteacher and Chair of Governors but fulfils data protection functions independently.

- 14.3 Any questions about the operation of this Policy or any concerns that the Policy has not been followed should be referred in the first instance to the Data Protection Officer.

- 14.4 Where a Personal Data Breach has occurred, it will be for the Data Protection Officer to decide whether, under the circumstances and in accordance with Relevant Data Protection Law, the individual concerned must be informed of the breach.

15 USING DATA PROCESSORS

- 15.1 The School retains the right to engage by written contract any person or organisation, who is not a member of School staff, to process Personal Data on our behalf.
- 15.2 Data Processors must:
- 15.2.1 assist the School in upholding individuals' data protection rights;
 - 15.2.2 only act in accordance with the School's instructions and authorisation;
 - 15.2.3 maintain a written record of processing activities carried out on behalf of the School and provide this to the School within fourteen days following request;
 - 15.2.4 notify the School of Personal Data Breaches without undue delay and maintain a register of breaches in accordance with Clause 13;
 - 15.2.5 comply at all times with the terms of any agreements with the School and with their responsibilities under Relevant Data Protection Law;
 - 15.2.6 satisfy the School, within a reasonable period following request, of their compliance with the provisions of Clause 12.4.4.

16 TRANSFERRING PERSONAL DATA TO A COUNTRY OUTSIDE THE EEA

- 16.1 Individuals have particular rights with regard to transfers of their Personal Data outside the European Economic Area ('EEA'). Circumstances in which the School may need to transfer data outside the EEA might include use of IT services hosted overseas, arrangement and administration of school trips and cultural exchange projects.
- 16.2 Subject to the requirements in Clause 12.1 above, Personal Data we hold may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Those staff may be engaged, among other things, in the processing of payment details and the provision of support services.
- 16.3 We may transfer any Personal Data we hold to a country outside the EEA provided that:
- 16.3.1 the transfer to the country or countries in question is permitted by Relevant Data Protection Law; and
 - 16.3.2 any transfer to a country or countries outside the EEA is subject the escalation procedure under Clause 17.4.
- 16.4 Before a transfer of Personal Data is made outside the EEA, the following safeguards must be provided to ensure that the rights of Data Subjects and effective legal remedies for Data Subjects are available:
- 16.4.1 confirmation by implementing act by the European Commission of the adequacy of the level of protection afforded by the relevant third country
 - 16.4.2 standard data protection Clauses adopted by the European Commission in accordance with Relevant Data Protection Law must be included in relevant documentation;
 - 16.4.3 ensuring explicit consent is given by the Data Subject to the proposed transfer after having been informed of the possible risks of such transfer;
 - 16.4.4 confirmation that the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the Data Subject;

16.4.5 confirmation that the transfer is necessary for important reasons of public interest

16.4.6 the Data Protection Officer must authorise the transfer.

17 DISCLOSURE AND SHARING OF PERSONAL INFORMATION

17.1 We may share Personal Data we hold with staff at any academy within the School.

17.2 We may also disclose Personal Data we hold to third parties:

17.2.1 if we are under a duty to disclose or share an individual's Personal Data in order to comply with any legal obligation;

17.2.2 in order to enforce or apply any contract with the individual or other agreements; or

17.2.3 to protect our rights, property, or safety of our employees, customers, or others. This includes exchanging information with other companies and organisations for the purposes of child welfare and fraud protection.

17.3 We may also share Personal Data we hold with selected third parties for the purposes set out in the Schedule.

18 REQUESTS FOR INFORMATION

18.1 Requests for information may take the following forms:

18.1.1 Requests for education records.

18.1.2 Freedom of information requests.

18.1.3 Subject access requests.

18.2 Where a person with parental responsibility requests information about a child's educational records then they should be provided.

18.3 If a person makes a request for information under the Freedom of Information Act then the information should usually be provided unless there are some specific concerns about disclosing the information. Common concerns in the school context may be that information relates to other people, is confidential or legally privileged. There is extensive guidance on the ICO website. If a freedom of information request is made and there are any concerns about disclosing information then the Data Protection Officer should be contacted.

18.4 If a person makes a subject access request then they are requesting the personal information that the School has about them. There are exemptions to disclosing some information but these are more limited as a person has a right to know what information is held on them. If a subject access request is made then the Data Protection Officer should be contacted immediately.

19 CHANGES TO THIS POLICY

We reserve the right to change this Policy at any time. A copy of the current Policy will be available on our website.

Status

- Last reviewed: September 2019
- Next Review: September 2020

PUPIL DATA

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Applications from pupils	Paper storage	Administration related to provision of education and pupil welfare	Vital Interests Public Interest Legal Obligation	Local Authority (LA) and other state bodies	Within 1 year of enrolment (after adding to the electronic pupil file)	DfE Data Protection toolkit for schools (April 2018)	Secure disposal
Applications that did not enrol	Paper storage	Administration related to provision of education	Legal Obligation Public Interest	NA	Date of application +1 year	N/A	Secure disposal
Appeals	Electronic storage Paper storage	Administration related to provision of education	Legal Obligation Public Interest	Local Authority (LA) and other state bodies	Resolution +2 years	Schools Admissions Appeals Code (2012)	Erasure Secure disposal
<p>Pupil records: personal data, which include the following (but this may not be an exhaustive list):</p> <ul style="list-style-type: none"> • contact details • gender • date of birth • date of enrolment • family information • date of leaving • destination after leaving 	Electronic storage Paper storage	<p>Administration related to provision of education and pupil welfare</p> <p>Providing appropriate pastoral care</p>	Vital Interests Public Interest Legal Obligation	<p>Leadership, teaching, support and administrative staff ('L, T, S & A staff')</p> <p>Local Authority (LA) and other state bodies</p> <p>Department for Education (DfE)</p> <p>Third parties designated by the DfE</p> <p>Appropriate community services</p>	<p>Date of Birth (DOB) +25 years ^[note]</p> <p>Note: we are working with our MIS provider to be able to partially delete certain items of personal data (whilst leaving other data in the record) after a shorter period and may update this policy accordingly.</p>	<p>Limitation Act 1980 (Section 2)*</p> <p>* There is no formal, up-to-date guidance on the retention of a pupil's record in primary schools. A pupil's file will follow the pupil when they transfer to secondary school, however independent schools do not require such files. So that a file is available in the event that a pupil requires it at a later date, we currently therefore follow secondary school retention period guidance in this regard.</p>	Erasure Secure disposal

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
<p>Pupil records: sensitive personal data, which include the following (but this may not be an exhaustive list):</p> <ul style="list-style-type: none"> • ethnicity • nationality • religion • first language 	<p>Electronic storage</p> <p>Paper storage</p>	<p>Administration related to provision of education and pupil welfare</p> <p>Providing appropriate pastoral care</p> <p>For the purposes of PREVENT</p>	<p>Vital Interests</p> <p>Public Interest</p> <p>Legal Obligation</p>	<p>L, T, S & A staff</p> <p>Local Authority (LA) and other state bodies</p> <p>Department for Education (DfE)</p> <p>Third parties designated by the DfE</p> <p>Appropriate community services</p>	<p>Date of leaving +5 years ^[note]</p> <p>Note: we are working with our MIS provider to be able to partially delete certain items of personal data (whilst leaving other data in the record) after a shorter period and may update this policy accordingly.</p>	<p>DfE Data Protection toolkit for schools (April 2018)</p>	<p>Erasure</p> <p>Secure disposal</p>
<p>Pupil records: educational data, which include the following (but this may not be an exhaustive list):</p> <ul style="list-style-type: none"> • progress reports • internal test results • record of academic achievement • behaviour records • school reports • reports from external professionals and agencies (excluding child protection) • letters and communication with parent/guardian 	<p>Electronic storage</p> <p>Paper storage</p>	<p>Administration related to provision of education and pupil welfare</p> <p>Supporting learning</p> <p>Monitoring and reporting on pupils' progress</p> <p>Providing appropriate pastoral care</p>	<p>Vital Interests</p> <p>Public Interest</p> <p>Legal Obligation</p> <p>Contractual Performance</p>	<p>L, T, S & A staff</p> <p>DfE</p> <p>Third parties designated by the DfE</p> <p>LA</p> <p>Appropriate community services</p> <p>Youth Support services</p> <p>Assessment and exam boards</p> <p>Third parties appropriately chosen by the School</p>	<p>Date of leaving +5 years</p>	<p>None available</p> <p>We have taken the view that this type of data should be available to future educational establishments in the event that a pupil requires it at a later date but that such data holds little validity beyond 5 years after leaving</p>	<p>Erasure</p> <p>Secure disposal</p>
<p>Pupil records: educational data</p> <ul style="list-style-type: none"> • external examination results 	<p>Electronic storage</p> <p>Paper storage</p>	<p>Administration related to provision of education and pupil welfare</p> <p>Monitoring and reporting on pupils' progress</p>	<p>Legal Obligation</p> <p>Public Interest</p>	<p>L, T, S & A staff</p> <p>DfE</p> <p>Third parties designated by the DfE</p> <p>LA</p> <p>Assessment and exam boards</p> <p>Third parties appropriately chosen by the School</p>	<p>DOB +25 years</p>	<p>IMRS Toolkit for schools ('This information should be added to the pupil file')</p> <p>Limitation Act 1980 (Section 2) and *</p>	<p>Erasure</p> <p>Secure disposal</p>

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Exclusions	Electronic storage Paper storage	Administration related to provision of education and pupil welfare	Legal Obligation Public Interest	L, T, S & A staff DfE Third parties designated by the DfE LA Appropriate community services	DOB +25 years unless written notice from the Local Authority (LA) confirms that they hold the exclusion data, in which event date of leaving +5 years	Limitation Act 1980 (Section 2) and * DfE Data Protection toolkit for schools (April 2018)	Erasure Secure disposal
Medical information	Electronic storage Paper storage	Administration related to provision of education and pupil welfare Providing appropriate pastoral care Promoting and protecting health and safety School trips and activities management	Vital Interests Public Interest Legal Obligation	L, T, S & A staff LA NHS Appropriate medical persons Third parties appropriately chosen by the school	Date of leaving +5 years ^[note] unless medical incidents have a behavioural or safeguarding implication, in which event DOB +25 years Note: we are working with our MIS provider to be able to partially delete certain items of personal data (whilst leaving other data in the record) after a shorter period and may update this policy accordingly.	DfE Data Protection toolkit for schools (April 2018) Limitation Act 1980 (Section 2)	Erasure Shredding
Special Educational Needs	Electronic storage Paper storage	Administration related to provision of education and pupil welfare Providing appropriate pastoral care Health and safety School trips and activities management Supporting learning	Vital Interests Public Interest Legal Obligation	L, T, S & A staff LA NHS Third parties appropriately chosen by the school Appropriate community services Appropriate youth support services Appropriate medical persons	DOB +25 years unless subject to a 'failure to provide a sufficient education' case has been brought against the LA, in which event the file will be retained until DOB +25 years or judgement in the case +6 years, whichever is the later	Limitation Act 1980 (Section 2) Education Act 1996 Special Educational Needs and Disability Act 2001: <ul style="list-style-type: none">• Section 1• Section 2• Section 14	Erasure Shredding

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Looked After Children (LAC) and children Adopted from Care	Electronic storage Paper storage	Administration related to provision of education and pupil welfare Providing appropriate pastoral care	Vital Interests Public Interest Legal Obligation	L, T, S & A staff LA NHS Third parties appropriately chosen by the school Appropriate community services	DOB +25 years	Limitation Act 1980 (Section 2) and *	Erasure Shredding
Child Protection and Safeguarding	Electronic storage Paper storage NOTE: Child Protection information must be held in a file separate to the pupil file	Administration related to provision of education and pupil welfare Providing appropriate pastoral care Protecting health and safety	Vital Interests Public Interest	L, T, S & A staff Police LA NHS	Minimum of DOB +25 years but case specific	Keeping Children Safe in Education Statutory guidance for schools and colleges (2016)	Erasure Shredding
Accidents or injury at school	Electronic storage Paper storage	Administration related to provision of education and pupil welfare Providing appropriate pastoral care Health and safety	Vital Interests Public Interest Legal Obligation	L, T, S & A staff LA NHS Appropriate community services Appropriate medical persons Third parties appropriately chosen by the school	DOB +25 years unless the injury was asbestos related, in which event date of record +40 years	Limitation Act 1980 (Section 2) Control of Substances Hazardous to Health Regulations 2002	Erasure Secure disposal

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Free School Meals eligibility	Electronic storage Paper storage	Administration related to provision of education and pupil welfare	Public Interest Legal Obligation	L, T, S & A staff LA DfE Third parties designated by the DfE	Current year +6	DfE Data Protection toolkit for schools (April 2018)	Erasure Secure disposal
Attendance records	Electronic storage	Administration related to provision of education and pupil welfare	Public Interest Legal Obligation	L, T, S & A staff LA DfE Third parties designated by the DfE	Date that the child leaves the school +5 years ^[note] Note: we are working with our MIS provider to be able to partially delete certain items of personal data (whilst leaving other data in the record) after a shorter period and may update this policy accordingly.	School Attendance: Departmental advice for maintained schools ... and local authorities (2014)	Erasure
Parental permission slips	Electronic storage Paper storage	Administration related to provision of education and pupil welfare School trips and activities management	Vital Interests Public Interest Legal Obligation Consent	L, T, S & A staff Volunteers LA	If no incident occurs, at the end of the current year If an incident occurs, case specific in line with other appropriate Types of Data entries in this schedule	Limitation Act 1980 (Section 2)	Erasure Secure disposal
School administered before, during and after school clubs	Electronic storage Paper storage	Administration related to provision of education and pupil welfare Promoting and protecting health and safety Ensuring proper management of clubs	Vital Interests Public Interest Consent	L, T, S & A staff Third parties appropriately chosen by the school NHS Appropriate community services	At the end of the current year	NA	Erasure Secure disposal

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
School administered before, during and after school clubs	Electronic storage Paper storage	Administration related to provision of education and pupil welfare Promoting and protecting health and safety Ensuring proper management of clubs	Vital Interests Public Interest Consent	L, T, S & A staff Third parties appropriately chosen by the school NHS Appropriate community services	At the end of the current year	NA	Erasure Secure disposal
Photographs, videos and digital images	Electronic storage Physical displays	Administration related to provision of education and pupil welfare Identification of pupils Marketing	Vital Interests Public Interest Consent	L, T, S & A staff Third parties appropriately chosen by the school LA and other state bodies Appropriate community services Youth support services Members of the public viewing marketing materials Other schools and educators viewing training materials Police NHS	Identity photo (MIS): upon leaving the school Otherwise, generally until consent is withdrawn, however it may not be possible to remove images once published under prior consent	NA	Where in the control of the school: Erasure Secure disposal

STAFF DATA

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Recruitment process							
Application forms (unsuccessful candidate)	Digital storage Paper storage	Employment application process Administration related to provision of education and pupil welfare	Public Interest Legal Obligation	Leadership and administrative staff	Date of appointment of successful candidate +6 months	Information Records Management Society ('IRMS') Toolkit for schools	Erasure Secure disposal
Application forms (successful candidate)	Digital storage Paper storage	Employment application process Administration related to provision of education and pupil welfare	Public Interest Legal Obligation	Leadership and administrative staff Governors	Date of appointment +6 months (moved to HR file)	IRMS Toolkit for schools	Erasure Secure disposal
Records leading up to the appointment of new Headteacher	Digital storage Paper storage	Employment application process Administration related to provision of education and pupil welfare	Public Interest Legal Obligation	Leadership and administrative staff Governors Third parties appropriately chosen by the school LA and other state bodies	Date of appointment +6 years	IRMS Toolkit for schools	Erasure Secure disposal
Vetting process							
DBS checks	Digital storage Paper storage	Employment application process Administration related to provision of education and pupil welfare	Public Interest Legal Obligation	Leadership and administrative staff Third parties appropriately chosen by the school LA and other state bodies Police	Original/copy: upon receipt Details of date of issue, type of certificate, unique reference number, countersigning body: date of leaving +6 years Details of convictions not precluding employment: upon receipt	Disclosure & Barring Service: Handling of DBS certificate information DfE: Keeping children safe in education September 2016	Erasure Secure disposal

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Rehabilitation of offenders information	Digital storage Paper storage	Employment application process Administration related to provision of education and pupil welfare	Public Interest Legal Obligation	Leadership and administrative staff Third parties appropriately chosen by the school LA and other state bodies	Termination of employment +6 years	Rehabilitation of Offenders Act 1974 and subsequent Exceptions and Amendments	Erase Secure disposal
Evidence proving right to work	Digital storage Paper storage	Employment application process Administration related to provision of education and pupil welfare	Public Interest Legal Obligation	Leadership and administrative staff Third parties appropriately chosen by the school LA and other state bodies	Termination of employment +6 years	Home Office: Employer's guide to right to work checks 2017	Erase Secure disposal
Evidence proving right to teach	Digital storage Paper storage	Employment application process Administration related to provision of education and pupil welfare	Public Interest Legal Obligation	Leadership and administrative staff Third parties appropriately chosen by the school LA and other state bodies	Termination of employment +6 years	Teaching Regulation Agency: Teacher status checks 2014	Erase Secure disposal
Third party references	Digital storage Paper storage	Employment application process Administration related to provision of education and pupil welfare	Public Interest Legal Obligation	Leadership and administrative staff Third parties appropriately chosen by the school LA and other state bodies	Termination of employment +6 years	None available We have taken the view that these form part of an employee's HR file and should be retained in line with other content	Erase Secure disposal

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Staff personnel file							
Staff records: personal data, which include the following (but this may not be an exhaustive list): <ul style="list-style-type: none"> • contact details • gender • date of birth • ethnicity • nationality • first language • religion ^[note] • sexual orientation ^[note] • qualifications • next of kin • employment start date • date of leaving • destination after leaving Note: not collected from 2017	Digital storage Paper storage	Employment application process Administration related to provision of education and pupil welfare Developing understanding of the workforce Providing appropriate pastoral care	Public Interest Legal Obligation Contractual performance	Leadership and administrative staff Third parties appropriately chosen by the school LA and other state bodies DfE Third parties designated by the DfE	Termination of employment +6 years	Limitation Act 1980 (Section 2)	Erasure Secure disposal
Staff records: training, appraisal, assessment and progression	Digital storage Paper storage	Administration related to provision of education and pupil welfare Enabling employees to be paid Developing our understanding of our workforce	Contractual performance	Leadership and administrative staff Third parties appropriately chosen by the school LA and other state bodies DfE Third parties designated by the DfE	Termination of employment +6 years	None available We have taken the view that these form part of an employee's HR file and should be retained in line with other content	Erasure Secure disposal
Medical, disability, health and absence data	Digital storage Paper storage	Administration related to provision of education and pupil welfare Developing understanding of the workforce Providing appropriate pastoral care	Public Interest Legal Obligation Contractual performance	Leadership and administrative staff Third parties appropriately chosen by the school LA and other state bodies DfE Third parties designated by the DfE NHS	Termination of employment +6 years	None available We have taken the view that these form part of an employee's HR file and should be retained in line with other content	Erasure Secure disposal

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Accidents or injury at work	Digital storage Paper storage	Providing appropriate pastoral care Health and safety	Public Interest Vital Interests Legal Obligation	Teaching and administrative staff Third parties appropriately chosen by the school LA and other state bodies	Date of incident +6 years	Social Security (Claims and Payments) Regulations 1979 (Regulation 25) Social Security Administration Act 1992 (Section 8) Limitation Act 1980	Erasure Secure disposal
Proceedings							
Disciplinary (excluding Child Protection)	Digital storage Paper storage NOTE: Warning documentation must be held in a file separate to the staff personnel file	Administration related to provision of education and pupil welfare Providing appropriate pastoral care Health and safety Developing our understanding of the workforce	Public Interest Contractual Performance	L, T, S & A staff Third parties appropriately chosen by the school LA and other state bodies DfE Third parties designated by the DfE	Oral warning: date of warning +6 months Level 1: date of warning +6 months Level 2: date of warning +12 months Final warning: date of warning +18 months Case not found: at the conclusion of the case	IRMS Toolkit for schools	Erasure Secure disposal
Child Protection (including where the allegation is unfounded)	Digital storage Paper storage	Administration related to provision of education and pupil welfare Providing appropriate pastoral care Health and safety	Public Interest Legal Obligation Vital Interests	Leadership and administrative staff Third parties appropriately chosen by the school LA and other state bodies DfE Police Appropriate community services	Normal retirement age or date of allegation +10 years, whichever is the longer; except in cases where the allegation is found to be 'malicious', in which event data is to be disposed of immediately upon the finding	DfE: Keeping children safe in education September 2016	Erasure Shredding

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Payroll							
Salary, variation payments, tax, NI, parental leave payments and pension records	Digital storage Paper storage	Enabling employees to be paid Developing understanding of the workforce	Public Interest Legal Obligation Contractual Performance	Leadership and administrative staff Third parties appropriately chosen by the school LA and other state bodies HMRC DfE Third parties designated by the DfE	Current year +6 years	Taxes Management Act 1970 Income Tax (Employments) Regulations 1993 (and amendments) The Statutory Maternity Pay (General) Regulations 1986 Pensions Regulator: Detailed guidance for employers – keeping records 2017 Note: we have taken the view that all such Types of Data are generally included in a single report and that such reports should therefore be retained for the maximum period quoted in the relevant statutes and guidance.	Erasure Secure disposal

PARENT/GUARDIAN DATA

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
<p>Personal data, which includes the following (but this may not be an exhaustive list):</p> <ul style="list-style-type: none"> • relationship to child • contact details • gender • date of birth • occupation • NI number • allowances/entitlements eligibility • Parental Responsibility 	<p>Electronic storage Paper storage</p>	<p>Administration related to provision of education and pupil welfare</p> <p>Providing appropriate pastoral care</p>	<p>Vital Interests Public Interest Legal Obligation</p>	<p>Leadership, teaching, support and administrative staff ('L, T, S & A staff')</p> <p>Local Authority (LA) and other state bodies</p> <p>Department for Education (DfE)</p> <p>Third parties designated by the DfE</p> <p>Appropriate community services</p> <p>Third parties appropriately chosen by the school</p>	<p>Child's DOB +25 years ^[note]</p> <p>Note: we are working with our MIS provider to be able to partially delete certain items of personal data (whilst leaving other data in the record) after a shorter period and may update this policy accordingly.</p>	<p>Limitation Act 1980 (Section 2)*</p> <p>* There is no formal, up-to-date guidance on the retention of a pupil's (and, by extension, their parents') record in primary schools. A pupil's file will follow the pupil when they transfer to secondary school, however independent schools do not require such files. So that a file is available in the event that a pupil requires it at a later date, we currently therefore follow secondary school retention period guidance in this regard.</p>	<p>Erasure Secure disposal</p>
<p>Proof of address (for admissions)</p>	<p>Paper storage</p>	<p>Administration related to provision of education and pupil welfare</p>	<p>Public Interest</p>	<p>Leadership and administrative staff</p>	<p>Within 1 year of the pupil's enrolment (not added to the electronic pupil file)</p>	<p>Schools Admissions Code 2014</p>	<p>Secure disposal</p>

SIBLING DATA

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Personal data, which includes the following (but this may not be an exhaustive list): <ul style="list-style-type: none"> • contact details • date of birth • school attended 	Paper storage	Administration related to provision of education and pupil welfare Providing appropriate pastoral care	Vital Interests Public Interest	Leadership, teaching, support and administrative staff ('L, T, S & A staff')	Within 1 year of the pupil's enrolment (not added to the electronic pupil file)	None available	Secure disposal

EMERGENCY CONTACT DATA

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Personal data, which includes the following (but this may not be an exhaustive list): <ul style="list-style-type: none"> • contact details 	Electronic storage Paper storage	Administration related to provision of education and pupil welfare Providing appropriate pastoral care	Vital Interests Public Interest	Leadership, teaching, support and administrative staff ('L, T, S & A staff')	Date of leaving +5 years ^[note] Note: we are working with our MIS provider to be able to partially delete certain items of personal data (whilst leaving other data in the record) after a shorter period and may update this policy accordingly.	None available	Erasure Secure disposal

HEALTH AND SAFETY DATA

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Risk assessments, personal evacuation plans	Digital storage Paper storage	Providing appropriate pastoral care Health and safety	Public Interest Vital Interests	Leadership and administrative staff Third parties appropriately chosen by the school LA and other state bodies Appropriate community services	Life of risk +3 years	IRMS Toolkit for schools	Erasure Secure disposal
Pupil evacuation lists	Paper storage	Providing appropriate pastoral care Health and safety	Public Interest Vital Interests	Leadership, teaching, support and administrative staff ('L, T, S & A staff') LA and other state bodies Appropriate community services	End of the week that includes the date of the list	None available We have taken the view that these are only valid for the relevant day but that disposal is a weekly administrative task	Secure disposal
Records relating to accidents/ Injuries at work	Digital storage Paper storage	Providing appropriate pastoral care Health and safety	Public Interest Vital Interests	Leadership and administrative staff Third parties appropriately chosen by the school LA and other state bodies Appropriate community services	Minimum of date of incident +12 years but case specific	Social Security (Claims and Payments) Regulations 1979 (Regulation 25) Social Security Administration Act 1992 (Section 8) Limitation Act 1980	Erasure Secure disposal
Records of incidents relating to Control of Substances Hazardous to Health (COSHH)	Digital storage Paper storage	Providing appropriate pastoral care Health and safety	Public Interest Vital Interests	Leadership and administrative staff Third parties appropriately chosen by the school LA and other state bodies Appropriate community services	Date of incident +40 years	Control of Substances Hazardous to Health Regulations 2002	Erasure Secure disposal

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Records of incidents relating to asbestos	Digital storage Paper storage	Providing appropriate pastoral care Health and safety	Public Interest Vital Interests	Leadership and administrative staff Third parties appropriately chosen by the school LA and other state bodies Appropriate community services	Date of last action or record +40 years	Control of Asbestos at Work Regulations 2012	Erasure Secure disposal

FINANCIAL DATA

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Reports containing detail on payments made to the school by parents/guardians	Digital storage Paper storage	Administration related to provision of education and pupil welfare	Public Interest Legal Obligation	Leadership and administrative staff Third parties appropriately chosen by the school	Financial year payment received +6 years	LBRuT Scheme for Financing Schools 2017	Erasure Secure disposal

MANAGEMENT DATA

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Governing Body documentation that hasn't been designated as 'Confidential', for example if dealing with confidential issues relating to staff	Digital storage Paper storage	Administration related to provision of education and pupil welfare	Public Interest Legal Obligation Vital Interests Contractual Obligation	Accessible to the public	Permanent (with the master set) but all copies disposed of	Governance handbook and competency framework Ref: DFE-00022-2017	Where appropriate: Erasure Secure disposal

Type of Data	Type of Processing	Purpose of Processing	Lawful Basis for Processing	Type of recipient to whom Personal Data is transferred	Retention period	Statute or Guidance	Disposal methodology
Reports presented to the Governing Body that haven't been designated as 'Confidential', for example if dealing with confidential issues relating to staff	Digital storage Paper storage	Administration related to provision of education and pupil welfare	Public Interest Legal Obligation Vital Interests Contractual Obligation	Accessible to the public	Minimum of meeting +6 years unless minutes refer directly to a report, in which event it becomes permanent	Governance handbook and competency framework Ref: DFE-00022-2017	Where appropriate: Erasure Secure disposal
Professional development plans	Digital storage Paper storage	Administration related to provision of education and pupil welfare Developing our understanding of our workforce	Public Interest Contractual Obligation	L, T, S & A staff Third parties appropriately chosen by the school LA and other state bodies	Life of the plan +6 years	IRMS Toolkit for schools	Erasure Secure disposal
Visitors' signing in sheets	Paper storage	Administration related to provision of education and pupil welfare Health and safety	Public Interest Vital Interests	Leadership and administrative staff	Current year +6 years then review	IRMS Toolkit for schools	Erasure Secure disposal
Census returns to central government	Digital storage Paper storage	Administration related to provision of education and pupil welfare Developing our understanding of our workforce	Public Interest Legal Obligation		Date of return +6 years	IRMS Toolkit for schools	Erasure Secure disposal