

TMPF Privacy Notice 2018

1. Privacy notice for parents/carers

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data. This privacy notice explains how we collect, store and use personal data about **pupils**.

We, The Moorlands Primary Federation are the 'data controller' for the purposes of data protection law.

Our data protection officer is: (see 'Contact us' below).

The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about pupils includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school (if applicable)

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

Why we use this data

We use this data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare
- Assess the quality of our services
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing

Our legal basis for using this data

We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

Less commonly, we may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn. Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds which justify our use of this data.

Collecting this information

While the majority of information we collect about pupils is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

How we store this data

We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Our TMPF Records Management Policy and TMPF Records Retention Schedule sets out how long we keep information about pupils.

To obtain a copy of our TMPF Records Management Policy or TMPF Records Retention Schedule please see www.tmpf.staffs.sch.uk

Data sharing

We do not share information about pupils with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about pupils with:

- Our local authority (also Entrust) – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- The Department for Education – underpins school funding and educational attainment policy and monitoring
- The pupil's family and representatives
- Educators and examining bodies
- Our regulators (e.g. Ofsted, Diocese)

- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities, voluntary organisations, other schools
- Police forces, courts, tribunals
- Professional bodies
- Media

National Pupil Database

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census.

Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research. The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on [how it collects and shares research data](#). You can also [contact the Department for Education](#) with any further questions about the NPD.

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Parents and pupils' rights regarding personal data

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

If you make a subject access request, and if we do hold information about you or your child, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact our data protection officer.

Parents/carers also have a legal right to access to their child's **educational record**. To request access, to this, or any other information, please contact each School Office.

Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. Please contact your School Leader, TMPF Principal or Executive Principal or TMPF Chair of Trustees.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office online at <https://ico.org.uk/concerns/>

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact us.

2. Privacy notice for staff

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data. This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school.

We, The Moorlands Primary Federation, are the 'data controller' for the purposes of data protection law.

Our data protection officer is: Entrust

The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, DBS data, including work history, job titles, working hours, teacher number, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Photographs
- CCTV footage (if applicable)
- Data about your use of the school's information and communications system

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, and sickness records

Why we use this data

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils

- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body
- Health and safety reasons

Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests) or for health and safety reasons

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

How we store this data

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our TMPF Records Management Policy (see www.tmpf.staffs.sch.uk)

Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Our local authority (or Entrust) – to meet our legal obligations to share certain information with it, such as safeguarding concerns and [maintained schools only] information about Executive Principal/Principal performance and staff dismissals
- The Department for Education
- Your family or representatives
- Educators and examining bodies
- Our regulators (e.g. Ofsted, Diocese)
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll or HR provider
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Trade unions and associations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies
- Employment and recruitment agencies
- Other schools
- Other employers (in response to reference requests)

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Your rights

How to access personal information we hold about you

Individuals have a right to make a **'subject access request'** to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us for referral to our data protection officer.

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. Please contact your School Leader, TMPF Principal or Executive Principal or TMPF Chair of Trustees.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office online at

<https://ico.org.uk/concerns/>

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact us for details of our **data protection officer**:

This notice is based on the [Department for Education's model privacy notice](#) for pupils, amended for parents and to reflect the way we use data in this school.

Subject Access Request Form (for staff)

This form must be fully completed and returned to:

By completing this form, you are making a request under the General Data Protection Regulation (GDPR) for information held about you by the organisation that you are eligible to receive.

| | |
|--|--|
| Name: | |
| Job Title: | |
| Contact Telephone No: | |
| Email Address: | |
| Home Address: | |
| Details of requested information, including dates: | |
| | |

The Moorlands Primary Federation has one month to respond to your request or write to you requesting an extension, which may be applicable if your request is excessive or unfounded. A reasonable fee may also be applicable in these circumstances. If we intend to refuse to respond to your request, we will write to you within one month to inform you and explain why.

By signing below, you indicate that you are the individual named above. Requests cannot be accepted regarding your personal data from anyone else, including family members. We may need to contact you to verify your identity or for further identifying information before responding to your request.

Declaration

I am the individual named above and I will fully indemnify The Moorlands Primary Federation for all losses, costs and expenses if I am not the above named.

The Moorlands Primary Federation



Registered Office: St. Werburgh's C. E. (A) Primary School, Kingsley, Staffordshire. ST10 2BA. Telephone: 01538 702355.

| | |
|--|--|
| Signature of data subject named above: | |
| Print Name: | |
| Date: | |

For internal use only

| | |
|---------------------|-----------------|
| Date form received: | Received by: |
| Passed to: | Date passed on: |

Subject Access Request Form (for pupils)

This form must be fully completed and returned to TMPF Executive Principal

By completing this form, you are making a request under the General Data Protection Regulation (GDPR) for information held about you by the organisation that you are eligible to receive.

| | | | |
|--|-----|--|----|
| Name of pupil: | | | |
| Name of person requesting data: | | | |
| Relationship to pupil: | | | |
| Legal parental responsibility | Yes | | No |
| Contact Telephone No: | | | |
| Email Address: | | | |
| Home Address: | | | |
| Details of requested information, including dates: | | | |
| | | | |

The Moorlands Primary Federation has one month to respond to your request or write to you requesting an extension, which may be applicable if your request is excessive or unfounded. A reasonable fee may also be applicable in these circumstances. If we intend to refuse to respond to your request, we will write to you within one month to inform you and explain why.

By signing below, you indicate that you are the individual named above. Requests cannot be accepted regarding your personal data from anyone else, including family members. We may need to contact you to verify your identity or for further identifying information before responding to your request.

Declaration

I am the individual named above and I will fully indemnify The Moorlands Primary Federation for all losses, costs and expenses if I am not the above named.

| | |
|--|--|
| Signature of name of person requesting data: | |
|--|--|

The Moorlands Primary Federation



Registered Office: St. Werburgh's C. E. (A) Primary School, Kingsley, Staffordshire. ST10 2BA. Telephone: 01538 702355.

| | |
|-------------|--|
| Print Name: | |
| Date: | |

For internal use only

| | |
|---------------------|-----------------|
| Date form received: | Received by: |
| Passed to: | Date passed on: |

TMPF Records Management Policy 2018

Introduction

The Moorlands Primary Federation recognises that by efficiently managing our records, we are able to comply with our legal and regulatory obligations and to contribute to the effective overall management of our schools.

Rationale

Records provide evidence for protecting the legal rights and interests of the school, and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management is achieved and can be audited.

1 Aims and Objectives of the Policy

- 1.1. This policy applies to all records created, received or maintained by staff of the school in the course of carrying out its functions.
- 1.2. Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained for a set period to provide evidence of its transactions or activities. These records may be created or received, and then stored, in hard copy or electronically.
- 1.3. A small percentage of the school's records may be selected for permanent preservation as part of the institution's archives and for historical research. This will be done in liaison with Staffordshire County Council.

2 Responsibility

- 2.1. The school has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Business Manager (BM).
- 2.2. A copy of the Information Management Toolkit for Schools (IRMS) is very comprehensive and is located in the policy folder for ease of access. However, should there still be some uncertainty, the SBM will give guidance about good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy by surveying at least annually to check if records are stored securely and can be accessed appropriately.
- 2.3. Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of securely and safely.

3 Relationship with existing policies

This policy has been drawn up within the context of:

- Information Management Toolkit for Schools (IRMS)
- Freedom of Information Policy

- Data Protection Policy
- Acceptable Use of ICT Policy
- and with other legislation or regulations (including audit, equal opportunities and ethics) affecting the school

Monitoring and Review

The effectiveness of this policy will be monitored and evaluated by the Executive Principal/Principal and Business Manager and will be reviewed on a biennial basis.

Date Policy Ratified: April 2018

Date policy to be reviewed: April 2020

TMPF Records Retention Schedule 2018

Trust Board

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

The Moorlands Primary Federation

Registered Office: St. Werburgh's C. E. (A) Primary School, Kingsley, Staffordshire. ST10 2BA. Telephone: 01538 702355.

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

Federation Leadership Team

| 1.2 Head Teacher and Senior Management Team | | | | |
|--|---|----------------------|---|--|
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 1.2.1 Log books of activity in the school maintained by the Head Teacher | There may be data protection issues if the log book refers to individual pupils or members of staff | | Date of last entry in the book + a minimum of 6 years then review | These could be of permanent historical value and should be offered to the County Archives Service if appropriate |
| 1.2.2 Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies | There may be data protection issues if the minutes refers to individual pupils or members of staff | | Date of the meeting + 3 years then review | SECURE DISPOSAL |
| 1.2.3 Reports created by the Head Teacher or the Management Team | There may be data protection issues if the report refers to individual pupils or members of staff | | Date of the report + a minimum of 3 years then review | SECURE DISPOSAL |
| 1.2.4 Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities | There may be data protection issues if the records refer to individual pupils or members of staff | | Current academic year + 6 years then review | SECURE DISPOSAL |
| 1.2.5 Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities | There may be data protection issues if the correspondence refers to individual pupils or members of staff | | Date of correspondence + 3 years then review | SECURE DISPOSAL |
| 1.2.6 Professional Development Plans | Yes | | Life of the plan + 6 years | SECURE DISPOSAL |
| 1.2.7 School Development Plans | No | | Life of the plan + 3 years | SECURE DISPOSAL |

Admissions Process

| 1.3 Admissions Process | | | | |
|--|------------------|--|--|--|
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 1.3.1 All records relating to the creation and implementation of the School Admissions' Policy | No | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Life of the policy + 3 years then review | SECURE DISPOSAL |
| 1.3.2 Admissions – if the admission is successful | Yes | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Date of admission + 1 year | SECURE DISPOSAL |
| 1.3.3 Admissions – if the appeal is unsuccessful | Yes | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Resolution of case + 1 year | SECURE DISPOSAL |
| 1.3.4 Register of Admissions | Yes | School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014 | Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made. ³ | REVIEW Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school. |
| 1.3.5 Admissions – Secondary Schools – Casual | Yes | | Current year + 1 year | SECURE DISPOSAL |
| 1.3.6 Proofs of address supplied by parents as part of the admissions process | Yes | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Current year + 1 year | SECURE DISPOSAL |
| 1.3 Admissions Process | | | | |
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 1.3.7 Supplementary Information form including additional information such as religion, medical conditions etc | Yes | | | |
| For successful admissions | | | This information should be added to the pupil file | SECURE DISPOSAL |
| For unsuccessful admissions | | | Until appeals process completed | SECURE DISPOSAL |

Operational Administration

| 1.4 Operational Administration | | | | | |
|--------------------------------|---|------------------|----------------------|------------------------------------|--|
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 1.4.1 | General file series | No | | Current year + 5 years then REVIEW | SECURE DISPOSAL |
| 1.4.2 | Records relating to the creation and publication of the school brochure or prospectus | No | | Current year + 3 years | STANDARD DISPOSAL |
| 1.4.3 | Records relating to the creation and distribution of circulars to staff, parents or pupils | No | | Current year + 1 year | STANDARD DISPOSAL |
| 1.4.4 | Newsletters and other items with a short operational use | No | | Current year + 1 year | STANDARD DISPOSAL |
| 1.4.5 | Visitors' Books and Signing in Sheets | Yes | | Current year + 6 years then REVIEW | SECURE DISPOSAL |
| 1.4.6 | Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations | No | | Current year + 6 years then REVIEW | SECURE DISPOSAL |

Recruitment

| 2.1 Recruitment | | | | | |
|-----------------|--|------------------|---|---|--|
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 2.1.1 | All records leading up to the appointment of a new headteacher | Yes | | Date of appointment + 6 years | SECURE DISPOSAL |
| 2.1.2 | All records leading up to the appointment of a new member of staff – unsuccessful candidates | Yes | | Date of appointment of successful candidate + 6 months | SECURE DISPOSAL |
| 2.1.3 | All records leading up to the appointment of a new member of staff – successful candidate | Yes | | All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months | SECURE DISPOSAL |
| 2.1.4 | Pre-employment vetting information – DBS Checks | No | DBS Update Service Employer Guide June 2014: Keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 73, 74 | The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months | |
| 2.1.5 | Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure | Yes | | Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff's personal file | |
| 2.1.6 | Pre-employment vetting information – Evidence proving the right to work in the United Kingdom* | Yes | An employer's guide to right to work checks [Home Office May 2015] | Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years | |

Operational Staff Management

| 2.2 Operational Staff Management | | | | |
|--|------------------|---------------------------------|-------------------------------------|--|
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 2.2.1 Staff Personal File | Yes | Limitation Act 1980 (Section 2) | Termination of Employment + 6 years | SECURE DISPOSAL |
| 2.2.2 Timesheets | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.2.3 Annual appraisal/ assessment records | Yes | | Current year + 5 years | SECURE DISPOSAL |

Management of Disciplinary and Grievance Processes

| 2.3 Management of Disciplinary and Grievance Processes | | | | |
|--|------------------|--|--|---|
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 2.3.1 Allegation of a child protection nature against a member of staff including where the allegation is unfounded ⁵ | Yes | "Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015" | Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned | SECURE DISPOSAL These records must be shredded |
| 2.3.2 Disciplinary Proceedings | Yes | | | |
| oral warning | | | Date of warning ⁶ + 6 months | |
| written warning – level 1 | | | Date of warning + 6 months | SECURE DISPOSAL |
| written warning – level 2 | | | Date of warning + 12 months | [If warnings are placed on personal files then they must be weeded from the file] |
| final warning | | | Date of warning + 18 months | |
| case not found | | | If the incident is child protection related then see above otherwise dispose of at the conclusion of the case | SECURE DISPOSAL |

Health and Safety

| 2.4 Health and Safety | | | | |
|--|------------------|--|--|--|
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 2.4.1 Health and Safety Policy Statements | No | | Life of policy + 3 years | SECURE DISPOSAL |
| 2.4.2 Health and Safety Risk Assessments | No | | Life of risk assessment + 3 years | SECURE DISPOSAL |
| 2.4.3 Records relating to accident/injury at work | Yes | | Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied | SECURE DISPOSAL |
| 2.4.4 Accident Reporting | Yes | Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 | | |
| Adults | | | Date of the incident + 6 years | SECURE DISPOSAL |
| Children | | | DOB of the child + 25 years | SECURE DISPOSAL |
| 2.4.5 Control of Substances Hazardous to Health (COSHH) | No | Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2) | Current year + 40 years | SECURE DISPOSAL |
| 2.4.6 Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos | No | Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19 | Last action + 40 years | SECURE DISPOSAL |
| 2.4.7 Process of monitoring of areas where employees and persons are likely to have become in contact with radiation | No | | Last action + 50 years | SECURE DISPOSAL |
| 2.4.8 Fire Precautions log books | No | | Current year + 6 years | SECURE DISPOSAL |

Payroll and Pensions

| 2.5 Payroll and Pensions | | | | |
|--|------------------|---|--------------------------------|--|
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 2.5.1 Maternity pay records | Yes | Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567) | Current year + 3 years | SECURE DISPOSAL |
| 2.5.2 Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995 | Yes | | Current year + 6 years | SECURE DISPOSAL |

Risk Management and Insurance

| 3.1 Risk Management and Insurance | | | | | |
|--|------------------|----------------------|----------------------------------|--|--|
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | |
| 3.1.1 Employer's Liability Insurance Certificate | No | | Closure of the school + 40 years | SECURE DISPOSAL | |

Asset Management

| 3.2 Asset Management | | | | | |
|--|------------------|----------------------|--------------------------------|--|--|
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | |
| 3.2.1 Inventories of furniture and equipment | No | | Current year + 6 years | SECURE DISPOSAL | |
| 3.2.2 Burglary, theft and vandalism report forms | No | | Current year + 6 years | SECURE DISPOSAL | |

Accounts and Statements including Budget Management

| 3.3 Accounts and Statements including Budget Management | | | | | |
|--|------------------|----------------------|---|--|--|
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | |
| 3.3.1 Annual Accounts | No | | Current year + 6 years | STANDARD DISPOSAL | |
| 3.3.2 Loans and grants managed by the school | No | | Date of last payment on the loan + 12 years then REVIEW | SECURE DISPOSAL | |
| 3.3.3 Student Grant applications | Yes | | Current year + 3 years | SECURE DISPOSAL | |
| 3.3.4 All records relating to the creation and management of budgets including the Annual Budget statement and background papers | No | | Life of the budget + 3 years | SECURE DISPOSAL | |
| 3.3.5 Invoices, receipts, order books and requisitions, delivery notices | No | | Current financial year + 6 years | SECURE DISPOSAL | |
| 3.3.6 Records relating to the collection and banking of monies | No | | Current financial year + 6 years | SECURE DISPOSAL | |
| 3.3.7 Records relating to the identification and collection of debt | No | | Current financial year + 6 years | SECURE DISPOSAL | |

Contract Management

| 3.4 Contract Management | | | | | |
|---|------------------|----------------------|---|--|--|
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | |
| 3.4.1 All records relating to the management of contracts under seal | No | Limitation Act 1980 | Last payment on the contract + 12 years | SECURE DISPOSAL | |
| 3.4.2 All records relating to the management of contracts under signature | No | Limitation Act 1980 | Last payment on the contract + 6 years | SECURE DISPOSAL | |
| 3.4.3 Records relating to the monitoring of contracts | No | | Current year + 2 years | SECURE DISPOSAL | |

School Fund

| 3.5 School Fund | | | | |
|-------------------------------------|------------------|----------------------|--------------------------------|--|
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 3.5.1 School Fund - Cheque books | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.2 School Fund - Paying in books | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.3 School Fund - Ledger | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.4 School Fund - Invoices | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.5 School Fund - Receipts | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.6 School Fund - Bank statements | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.7 School Fund - Journey Books | No | | Current year + 6 years | SECURE DISPOSAL |

School Meals Management

| 3.6 School Meals Management | | | | |
|-----------------------------------|------------------|----------------------|--------------------------------|--|
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 3.6.1 Free School Meals Registers | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 3.6.2 School Meals Registers | Yes | | Current year + 3 years | SECURE DISPOSAL |
| 3.6.3 School Meals Summary Sheets | No | | Current year + 3 years | SECURE DISPOSAL |

Property Management

| 4.1 Property Management | | | | |
|--|------------------|----------------------|--|--|
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 4.1.1 Title deeds of properties belonging to the school | No | | PERMANENT These should follow the property unless the property has been registered with the Land Registry | |
| 4.1.2 Plans of property belong to the school | No | | These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold. | |
| 4.1.3 Leases of property leased by or to the school | No | | Expiry of lease + 6 years | SECURE DISPOSAL |
| 4.1.4 Records relating to the letting of school premises | No | | Current financial year + 6 years | SECURE DISPOSAL |

Maintenance

| 4.2 Maintenance | | | | | |
|---|------------------|----------------------|--------------------------------|--|--|
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | |
| 4.2.1 All records relating to the maintenance of the school carried out by contractors | No | | Current year + 6 years | SECURE DISPOSAL | |
| 4.2.2 All records relating to the maintenance of the school carried out by school employees including maintenance log books | No | | Current year + 6 years | SECURE DISPOSAL | |

Pupil Management

| 5.1 Pupil's Educational Record | | | | | |
|---|------------------|---|---|---|--|
| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | |
| 5.1.1 Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 | Yes | The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 | | | |
| Primary | | | Retain whilst the child remains at the primary school | <p>The file should follow the pupil when he/she leaves the primary school. This will include:</p> <ul style="list-style-type: none"> to another primary school to a secondary school to a pupil referral unit <p>If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period.</p> <p>If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention period. Primary Schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the Local Authority as it is more likely that the pupil will request the record from the Local Authority</p> | |
| Secondary | | Limitation Act 1980 (Section 2) | Date of Birth of the pupil + 25 years | SECURE DISPOSAL | |
| 5.1.2 Examination Results – Pupil Copies | Yes | | | | |
| Public | | | This information should be added to the pupil file | All uncollected certificates should be returned to the examination board. | |
| Internal | | | This information should be added to the pupil file | | |

5.1 Pupil's Educational Record

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

5.2 Attendance

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

| 5.3 Special Educational Needs | | | | | |
|-------------------------------|---|------------------|---|---|--|
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 5.3.1 | Special Educational Needs files, reviews and Individual Education Plans | Yes | Limitation Act 1980 (Section 2) | Date of Birth of the pupil + 25 years | REVIEW NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented. |
| 5.3.2 | Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement | Yes | Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1 | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold |
| 5.3.3 | Advice and information provided to parents regarding educational needs | Yes | Special Educational Needs and Disability Act 2001 Section 2 | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold |
| 5.3.4 | Accessibility Strategy | Yes | Special Educational Needs and Disability Act 2001 Section 14 | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold |

Curriculum Management

| 6.1 Statistics and Management Information | | | | | |
|---|--|------------------|----------------------|---|--|
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 6.1.1 | Curriculum returns | No | | Current year + 3 years | SECURE DISPOSAL |
| 6.1.2 | Examination Results (Schools Copy) | Yes | | Current year + 6 years | SECURE DISPOSAL |
| | SATS records – Results | Yes | | The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison | SECURE DISPOSAL |
| | Examination Papers | | | The examination papers should be kept until any appeals/validation process is complete | SECURE DISPOSAL |
| 6.1.3 | Published Admission Number (PAN) Reports | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 6.1.4 | Value Added and Contextual Data | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 6.1.5 | Self Evaluation Forms | Yes | | Current year + 6 years | SECURE DISPOSAL |

| 6.2 Implementation of Curriculum | | | | | |
|----------------------------------|------------------------|------------------|----------------------|---|--|
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 6.2.1 | Schemes of Work | No | | Current year + 1 year | It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL |
| 6.2.2 | Timetable | No | | Current year + 1 year | |
| 6.2.3 | Class Record Books | No | | Current year + 1 year | |
| 6.2.4 | Mark Books | No | | Current year + 1 year | |
| 6.2.5 | Record of homework set | No | | Current year + 1 year | |
| 6.2.6 | Pupils' Work | No | | Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not the school's policy then current year + 1 year | SECURE DISPOSAL |

Extra-curricular Activities

| 7.1 Educational Visits outside the Classroom | | | | | |
|--|---|------------------|--|---|---|
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 7.1.1 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools | No | Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice". | Date of visit + 14 years | SECURE DISPOSAL |
| 7.1.2 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools | No | Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice". | Date of visit + 10 years | SECURE DISPOSAL |
| 7.1.3 | Parental consent forms for school trips where there has been no major incident | Yes | | Conclusion of the trip | Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time. |
| 7.1.4 | Parental permission slips for school trips – where there has been a major incident | Yes | Limitation Act 1980 (Section 2) | DOB of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils | |

Walking Bus (if appropriate)

| 7.2 Walking Bus | | | | | |
|-----------------|------------------------|------------------|----------------------|--|---|
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 7.2.1 | Walking Bus Registers | Yes | | Date of register + 3 years This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting | SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time] |

Home School Link Worker

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

Local Authority and Central Government

| 8.1 Local Authority | | | | | |
|---------------------|---|------------------|----------------------|--------------------------------|--|
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 8.1.1 | Secondary Transfer Sheets (Primary) | Yes | | Current year + 2 years | SECURE DISPOSAL |
| 8.1.2 | Attendance Returns | Yes | | Current year + 1 year | SECURE DISPOSAL |
| 8.1.3 | School Census Returns | No | | Current year + 5 years | SECURE DISPOSAL |
| 8.1.4 | Circulars and other information sent from the Local Authority | No | | Operational use | SECURE DISPOSAL |

| 8.2 Central Government | | | | | |
|------------------------|--|------------------|----------------------|--------------------------------|--|
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 8.2.1 | OFSTED reports and papers | No | | Life of the report then REVIEW | SECURE DISPOSAL |
| 8.2.2 | Returns made to central government | No | | Current year + 6 years | SECURE DISPOSAL |
| 8.2.3 | Circulars and other information sent from central government | No | | Operational use | SECURE DISPOSAL |