

# KING EDWARD VI SCHOOL INFORMATION MANAGEMENT POLICY

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## **This is the Information & Data Protection Policy for King Edward VI School**

<b>Date of Governor Approval:</b>		<b>Date for Next Review:</b>	
<b>Signed by:</b>	<i>(Chair of Governors)</i>		

### **THE DATA PROTECTION ACT 1998**

The Data Protection Act 1998 (DPA) came into force on 1 March 2000 to bring the UK in line with a European Community Data Protection Directive and achieve a common standard of protection across Europe.

The purpose of the DPA is to protect the individual rights and freedoms of individuals, especially their right to privacy with respect to the processing of personal data.

The DPA applies to personal data (information that identifies a living person) whether it is held on a computer system or on paper.

There are particularly stringent rules surrounding 'sensitive' data such as pupil identifiers, pupil characteristics, special educational needs, health, religious beliefs, ethnic background, home address and criminal offences.

King Edward VI School is registered under the Data Protection Act 1998 as a Data Controller and aims to fulfil its obligations to the fullest extent and to comply with the eight data protection principles.

Data will be:

1. Fairly and lawfully processed
2. Processed for limited purposes
3. Adequate, relevant and not excessive
4. Accurate and up to date
5. Not kept for longer than is necessary
6. Processed in line with the rights of the data subject
7. Held securely
8. Not transferred to other countries without adequate protection

### **PRIVACY NOTICE - FAIR PROCESSING OF DATA**

The school has a duty under principle 4 of the data protection act to check that children, parents and carers information is accurate and up to date. It fulfils this by sending out a data collection form to parents/carers on an annual basis. This form will also include a privacy notice which outlines to the parent/carers:

- What information is held
- Why the information is held
- Who the information is shared with

The current privacy notice for children, parents and carers can be found by searching the Information Commissioner’s Office (ICO) list of data controllers:

[http://ico.org.uk/what\\_we\\_cover/register\\_of\\_data\\_controllers](http://ico.org.uk/what_we_cover/register_of_data_controllers)

The school also has a duty to check that staff information is accurate and up to date. It fulfils this by asking staff to complete a data collection form. The form will also include a fair processing notice which will outline:

- What information is held
- Why the information is held
- Who the information is shared with

## **INFORMATION SECURITY**

The school has a duty under principle 7 of the data protection act to ensure that data is handled securely. To fulfill its obligations under the act and to comply with Cabinet Office guidelines outlined in “Data Handling Procedures in Government” the school will adopt the following to maintain data security:

- Users may not remove or copy sensitive or personal data from the school or authorised premises unless the media is encrypted and is transported securely for storage in a secure location.
- When data is required by an authorised user from outside the school premises (for example, by a teacher or student working from their home or a contractor) they must have secure remote access to the management information system (MIS) or learning platform.
- Users must protect all portable and mobile devices, including media, used to store and transmit personal information using approved encryption software.
- Sensitive or personal data must be securely deleted when it is no longer required.
- Computer passwords should not be disclosed or shared between users.
- Files and paperwork that identifies individuals must never be left unattended and must be stored in locked cabinets within a controlled access room that must be locked when not in use.
- All staff processing personal information should be appropriately trained.

The school will introduce a protective marking scheme to ensure that all data – electronic or on paper – is labelled according to the protection it requires based on Impact Levels:

Impact level	Colour code	Unencrypted memory stick	Encrypted memory stick	Example
OFFICIAL <i>(<u>routine information that could be published</u>)</i>		Yes	Yes	Newsletters, public information, generic letters to parents containing no personal
OFFICIAL <i>(<u>information that could cause prejudice or harm</u>)</i>		No	Yes	Basic student information such as name and address
OFFICIAL-SENSITIVE <i>(<u>information that would cause significant prejudice or harm</u>)</i>		No	Yes	Sensitive Student information such as ethnicity and medical information

An Information Risk Register will be created and maintained by the school which summarises each information asset the school maintains. Appropriate measures will be taken to mitigate the risk of disclosure of each information asset based on the impact level assigned. The information risk register can be found in the Business Manager's office.

## INCIDENT REPORTING

Records will be maintained of any suspected breaches of information security using the form attached in [Appendix 2](#)

The form will be completed in the event of loss of unauthorised disclosure of information. The details of the incident will be used to create a correctional action plan to ensure that a similar incident does not happen again.

Following a reported incident, the school will investigate and decide if the incident is of sufficient severity to report to the ICO.

## RECORD RETENTION

The school maintains a records management policy which details compliance with the Lord Chancellor's Code of Practice which can be found here:

<http://www.justice.gov.uk/downloads/information-access-rights/foi/foi-section-46-code-of-practice.pdf>

A detailed retention schedule and protective marking scheme is outlined in [Appendix 1](#)

This retention schedule is based on guidance from the information and records management society: <http://www.irms.org.uk/resources/information-guides/199-rm-toolkit-for-school>. It encompasses records managed by all types of school – some of the file descriptions listed may not be relevant to every school.

Regarding documents marked as offer or transfer to Archive, it would be the schools responsibility to have an agreement in place with a reputable Records Management company to handle achieved material.

\*\*Please note that retaining documents beyond their retention or transfer dates may breach principle 5 of the Data Protection Act 1998 ([see principles](#)).

## **DISCLOSURE OF PERSONAL INFORMATION**

Personal information will only be disclosed to 3<sup>rd</sup> parties under the following conditions:

### **INFORMATION SHARING WITH PROFESSIONALS WORKING WITH CHILDREN**

Information sharing between professionals is vital to ensure the wellbeing of Children. The school will follow the "[7 golden rules of Information Sharing](#)" described by the DfE:

1. Remember that the DPA is not a barrier to sharing information
2. Be open and honest with the person or family
3. Seek advice if you are in any doubt
4. Share with consent where appropriate
5. Consider safety and well-being
6. Necessary, proportionate, relevant, accurate timely, and secure
7. Keep a record of your decision and reasons

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/277834/information\\_sharing\\_guidance\\_for\\_practitioners\\_and\\_managers.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/277834/information_sharing_guidance_for_practitioners_and_managers.pdf)

Unauthorised disclosure of personal data is a criminal offence under Section 55 of the Data Protection Act 1998 and will likely lead to disciplinary action.

### **INVESTIGATION OF A CRIME**

The school will treat requests for information from an official bodies related to criminal or taxation purposes under Sections 28, 29 and 35 of the Data Protection Act 1998. The school requires the requestor to complete the Request for personal data form ([Appendix 3](#)).

Under section 29 requests from the police will be countersigned by a person no lower than inspector. For requests from other organisations other than the police, the form will be countersigned by a person of a higher position within the organisation than the person making the request.

Generally, the school reserves the right not to release the data but there may be situations such as the receipt of a court order that requires the school to release the information.

## **ACCESS TO PUPILS RECORDS**

There are two distinct rights to information held by schools about pupils.

1. The Subject Access Right (SAR) – under the Data Protection Act 1998 a pupil has the right to a copy of their own information. In certain circumstances requests may be made by a parent on behalf of their child.
2. Rights to the educational record – under the Education (Pupil Information) (England) Regulations 2005, a parent has the right to access their child’s educational record.

A child or young person will always be the owner of their personal information as defined within the Data Protection Act 1998, however if a young person is incapable of making their own decisions which is generally accepted as under the age of 12, the primary carer or guardian would act on their behalf. This authority is only extended to functions that are in the ‘best interests’ of the child or young person.

The school will respond to the request within 40 Calendar days. If this request comes from someone other than the individual, the school will consider the capability of the individual and also must ensure the requester is acting in the best interests of the individual.

Requests for information from pupils, or parents, for information that contains, wholly or partly, an educational record must receive a response within 15 school days. Most requests for information are likely to ask for at least some information in the educational record.

Under the Regulations, requests from parents to view their child’s **educational** record will be dealt with by the Board of Governors. All other requests for personal information from the **pupil**, or someone acting on their behalf, will be dealt with by the Head Teacher on behalf of the school.

## **THE PROTECTION OF FREEDOMS ACT 2012**

The Protection of Freedoms Act was introduced in February 2011 and came into force on 9<sup>th</sup> May 2012 with the commencement orders coming into force in July 2012. It is an Act to impose consent and other requirements in relation to processing of biometric information relating to children, to provide a code of practice about surveillance camera systems amongst other things.

## **CCTV AND OTHER SURVEILLANCE CAMERA TECHNOLOGY**

CCTV surveillance has become a common feature of our daily lives and now there is an increasing use of these in and around educational settings. Information held by the school is covered under the Data Protection Act 1998 (DPA).

Recorded material will be stored in a way that maintains the integrity of the image. Once there is no reason to retain the recorded images, they will be deleted.

In area where CCTV surveillance is being carried out there will be clear markings to reflect this.

### **SUBJECT ACCESS REQUESTS FOR CCTV IMAGES**

Individuals whose images are recorded have a right to view the images of themselves and, unless they agree otherwise, to be provided with a copy of the images. This will be provided within 40 calendar days of receiving a request. King Edward VI School will charge a fee of £10 for any such request.

### **BIOMETRIC DATA**

Biometric technologies are those which automatically measure people's physiological or behavioural characteristics. Examples include automatic fingerprint identification, iris and retina scanning, face recognition and hand geometry, and their use is becoming increasingly popular in educational settings.

Before the first processing of a child's biometric information, the school will notify each parent of the child:

- Of its intention to process the child's biometric information.
- That the parent may object at any time to the processing of the information.

The school is not required to notify a parent, or obtain the consent of a parent, if the school is satisfied:

- a) The parent cannot be found.
- b) The parent lacks capacity (within the meaning of the Mental Capacity Act 2005) to object or consent (as the case may be) to the processing of the child's biometric information.
- c) The welfare of the child requires that the parent is not contacted.
- d) It is otherwise not reasonable practicable to notify the parent or (as the case may be) obtain the consent of the parent.

## **FREEDOM OF INFORMATION / ENVIRONMENTAL INFORMATION REGULATIONS**

The school as a public authority is subject to The Freedom of Information Act 2000 (FOI) and Environmental Information Regulations 2004 (EIR) and all requests for information that is not personal information must be treated as a FOI or EIR. These requests must be fully responded within 20 (school) working days by law. The information will be provided unless the school can provide an exemption or exception under the FOI act or EIR respectively.

In line with FOI the school is required to have a publication scheme showing what information is held and how you can access this (<https://ico.org.uk/for-organisations/guide-to-freedom-of-information/publication-scheme/>). The schools publication scheme can be found on our website.

A more detailed guide to FOI exemptions and EIR exception is here:

[http://ico.org.uk/for\\_organisations/guidance\\_index/freedom\\_of\\_information\\_and\\_environmental\\_information#exemptions](http://ico.org.uk/for_organisations/guidance_index/freedom_of_information_and_environmental_information#exemptions)

[http://ico.org.uk/for\\_organisations/guidance\\_index/freedom\\_of\\_information\\_and\\_environmental\\_information#exceptions](http://ico.org.uk/for_organisations/guidance_index/freedom_of_information_and_environmental_information#exceptions)

## **ROLES AND RESPONSIBILITIES**

The senior information risk owner (SIRO) for the school is Andrew Blit, Business Manager.

They are responsible for:

- Owning and updating this policy.
- Owning the information risk register.
- Appointing Information Asset Owners (IAOs) for each Information Asset.
- Advocating information risk management and raising awareness of information security issues.
- Deciding if a security incident is of sufficient severity to report to the ICO.

Information Asset Owners are responsible for:

- Ensuring the information is used for the purpose it was collected.
- How information has been amended or added to over time.
- Who has access to protected data and why.

**All staff are responsible for ensuring that information is managed according to this policy.**

Signed on behalf of the Governing body:

Signed \_\_\_\_\_ Date \_\_\_\_\_

Chairperson of the Governing body



## Appendix 1

# Retention schedules and impact levels

**NOTE TO SCHOOLS:** This retention schedule is based on guidance from the information records management society: <http://www.irms.org.uk/resources/information-guides/199-rm-toolkit-for-school>. It encompasses records managed by all types of school – some of the file descriptions listed may not be relevant to every school.

[1] For Data Protection purposes the information below should be kept on the file for the following periods:	
All documentation on the personal file	Duration of employment
Pre-employment and vetting information	Start date + 6 months
Records relating to accident or injury at work	Minimum of 12 years
Annual appraisal/assessment records	Minimum of 5 years
Records relating to disciplinary matters (kept on personal files) <ul style="list-style-type: none"><li>• oral warning</li><li>• first level warning</li><li>• second level warning</li><li>• final warning</li></ul>	<ul style="list-style-type: none"><li>• 6 months</li><li>• 6 months</li><li>• 12 months</li><li>• 18 months</li></ul>

## 1 Child Protection

These retention periods should be used in conjunction with the document [Keeping children safe in education](#)

	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record		Protective marking classification
1.1	Child protection files	Yes	Education Act 2002, s175 <a href="#">Education Act 2002</a>	DOB + 25 years [1]	SHRED or delete securely	Child Protection information must be copied and sent under separate cover to new school/college whilst the child is still under 18 (i.e. the information does not need to be sent to a university for example)	OFFICIAL SENSITIVE
1.2	Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	<a href="#">Employment Practices Code: Supplementary Guidance</a> 2.13.1 (Records of Disciplinary and Grievance)  Education Act 2002 guidance <a href="#">Keeping children safe in education</a>	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer		<a href="#">Keeping children safe in education</a> p35 (Record Keeping)	OFFICIAL SENSITIVE

## 2 Governors

	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record		
							OFFICIAL
2.2	Minutes Inspection copies	No		Date of meeting + 3 years	SHRED or delete securely		OFFICIAL
2.3	Agendas	No		Date of meeting	SHRED		OFFICIAL
2.4	Reports	No		Date of meeting + 6 years	SHRED	Consider transferring to <a href="#">Archives</a>	OFFICIAL
2.5	Annual Patents' meeting papers	No		Date of meeting + 6 years	SHRED	Consider transferring to <a href="#">Archives</a>	OFFICIAL
2.6	Trusts and Endowments	No		Permanent <i>(Retain in school whilst operationally required)</i>	SHRED	Consider transferring to <a href="#">Archives</a>	OFFICIAL
2.7	Action plans	No		Date of meeting + 3 years	SHRED	Consider transferring to <a href="#">Archives</a>	OFFICIAL
2.8	Statutory policy documents	No		Expiry of policy <i>(Retain in school whilst operationally required)</i>	SHRED	Consider transferring to <a href="#">Archives</a> if part of a past decision making process	OFFICIAL
2.9	Complaints files	Yes		Date of resolution of complaint + 6 years	Retain in school for the first 6 years  Review for further retention in the case of contentious disputes  SHRED (or delete)		OFFICIAL-SENSITIVE

					securely) routine complaints		
2.10	Proposals for schools to become, or be established as Specialist Status schools	No		Current year + 3 years	SHRED	Consider transferring to <a href="#">Archives</a>	OFFICIAL

### 3 Management

	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record		Protective marking classification
3.1	Log books	Yes [1]		Date of last entry in the book + 6 years	Retain in school for 3 years from date of entry	Consider transferring to <a href="#">Archives</a>	OFFICIAL
3.2	Minutes of the Senior Management Team and other internal administrative bodies	Yes [1]		Date of last entry in the book + 5 years	Retain in school for 5 years from date of meeting	Consider transferring to <a href="#">Archives</a>	OFFICIAL
3.3	Reports made by the Head Teacher or the Management Team	Yes [1]		Date of last entry in the book + 3 years	Retain in school for 3 years from date of meeting	Consider transferring to <a href="#">Archives</a>	OFFICIAL
3.4	Records created by Head Teacher or other members of staff with administrative responsibilities	Yes [1]		Closure of file + 6 years	SHRED or delete securely		OFFICIAL
3.5	Correspondence created by Head Teacher or other	No		Date of correspondence + 3 years	SHRED or delete securely		OFFICIAL

	members of staff with administrative responsibilities						
3.6	Professional development places	Yes		Closure + 6 years	SHRED or delete securely		OFFICIAL
3.7	School development plans	No		Closure + 6 years		Consider transferring to <a href="#">Archives</a>	OFFICIAL
3.8	Admissions - <i>Successful</i>	Yes		Resolution of case + 1 year	SHRED		OFFICIAL-SENSITIVE
3.9	Admissions - <i>Unsuccessful at appeal</i>	Yes		Current year + 1 year	SHRED or delete securely		OFFICIAL-SENSITIVE
3.10	Admissions – Secondary Schools - <i>Casual</i>	Yes		Current year + 1 year	SHRED or delete securely		OFFICIAL-SENSITIVE
3.11	Proofs of address (supplied by parents as part of admissions process)	Yes		Current year + 1 year	SHRED or delete securely		OFFICIAL-SENSITIVE

#### 4 School

	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record		Protective marking classification
4.1	Admission registers	Yes		Date of last entry in the book (or file) + 6 years	Retain in school for 6 years from date of the last entry	Consider transferring to <a href="#">Archives</a>	OFFICIAL-SENSITIVE
4.2	Attendance registers	Yes	<a href="#">The Education (Pupil Registration) (England) Regulations 2006 (No. 1751)</a>	Date of register + 3 years	SHRED or delete securely		OFFICIAL-SENSITIVE
4.3	Pupil record cards - <i>Primary</i>	Yes		Retain for the time which the pupil remains at the primary	Transfer to secondary school (or		OFFICIAL-SENSITIVE

				school	other primary school) when the child leaves the school.  In the case of exclusion it may be necessary to transfer the record to the appropriate service.		
4.4	Pupil record cards - <i>Secondary</i>	Yes	<a href="#">Limitation Act 1980</a>	DOB of the pupil + 25 years	SHRED or delete securely		OFFICIAL-SENSITIVE
4.5	Pupil files - <i>Primary</i>	Yes		Retain for the time which the pupil remains at the primary school	Transfer to secondary school (or other primary school) when the child leaves the school.  In the case of exclusion it may be necessary to transfer the record to the appropriate service.		OFFICIAL-SENSITIVE
4.6	Pupil files - <i>Secondary</i>	Yes	<a href="#">Limitation Act 1980</a>	DOB of the pupil + 25 years	SHRED or delete securely		OFFICIAL-SENSITIVE

4.7	Special Education Needs files, reviews and Individual Education plans	Yes		DOB of the pupil + 25 years	SHRED or delete securely		OFFICIAL-SENSITIVE
4.8	Letters authorising absence	No		Date of absence + 2 years	SHRED or delete securely		OFFICIAL
4.9	Absence books	Yes		Current year + 6 years	SHRED or delete securely		OFFICIAL-SENSITIVE
4.10	Examination results - <i>Public</i>	No		Year of examination + 6 years	SHRED or delete securely	Any certifications left unclaimed should be returned to the appropriate Examinations Board	OFFICIAL
4.11	Examination results - <i>Internal</i>	Yes		Current year + 5 years	SHRED or delete securely		OFFICIAL
4.12	Any other records created in the course of contact with pupils	Yes		Current year + 3 years	Review at end - allocate a further retention period or SHRED		OFFICIAL-SENSITIVE
4.13	Statement maintained under the Education Act 1996 – section 324	Yes	<a href="#">Special Educational Needs and Disability Act 2001</a> (section 1)	DOB + 30 years	SHRED or delete securely - unless legal action is pending		OFFICIAL-SENSITIVE
4.14	Proposed statement or amended statement	Yes	<a href="#">Special Educational Needs and Disability Act 2001</a> (section 1)	DOB + 30 years	SHRED or delete securely - unless legal action is pending		OFFICIAL-SENSITIVE
4.15	Advice and	Yes	<a href="#">Special Educational</a>	Closure + 12	SHRED or		OFFICIAL-

	information to parents regarding educational needs		<a href="#">Needs and Disability Act 2001</a> (section 2)	years	delete securely - unless legal action is pending		SENSITIVE
4.16	Accessibility strategy	Yes	<a href="#">Special Educational Needs and Disability Act 2001</a> (section 14)	Closure + 12 years	SHRED or delete securely - unless legal action is pending		OFFICIAL-SENSITIVE
4.17	Children's SEN files	Yes		DOB of pupil + 25 years	SHRED or delete securely - unless legal action is pending		OFFICIAL-SENSITIVE
4.18	Parental permission slips for school trips – <i>where there has been no major incident</i>	Yes		Conclusion of the trip	SHRED or delete securely		OFFICIAL-SENSITIVE
4.19	Parental permission slips for school trips – <i>where there has been a major incident</i>	Yes	<a href="#">Limitation Act 1980</a>	DOB of the pupil involved + 25 years  The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils.	SHRED or delete securely		OFFICIAL-SENSITIVE
4.20	Records created by schools to obtain approval to run an	No	3 part supplement to the <a href="#">Health &amp; Safety of Pupils on Educational visits (HASPEV) (1998)</a>	Date of visit + 14 years	SHRED or delete securely		OFFICIAL



	Educational Visit outside the Classroom - <i>Primary Schools</i>						
4.21	Records created by schools to obtain approval to run an Educational Visit outside the Classroom - <i>Secondary Schools</i>	No	3 part supplement to the <a href="#">Health &amp; Safety of Pupils on Educational visits (HASPEV) (1998)</a>	Date of visit + 10 years	SHRED or delete securely		OFFICIAL
4.22	Dinner Register	Yes		Current year + 3 years	SHRED or delete securely		OFFICIAL
4.23	School meals summary sheets	Yes		Current year + 3 years	SHRED or delete securely		OFFICIAL
4.24	Walking Bus registers	Yes		Date of register + 3 years	SHRED or delete securely		OFFICIAL-SENSITIVE

## 5 Curriculum

	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record	Protective marking classification
5.1	Curriculum development	No		Current year + 6 years	SHRED	OFFICIAL
5.2	Curriculum returns	No		Current year + 3 years	SHRED	OFFICIAL
5.3	Schools syllabus	No		Current year + 1 year	Review at end - allocate a further retention period or SHRED	OFFICIAL
5.4	Schemes of work	No		Current year + 1	Review at	OFFICIAL

				year	end - allocate a further retention period or SHRED		
5.5	Timetable	No		Current year + 1 year	Review at end - allocate a further retention period or SHRED		OFFICIAL
5.6	Class record books	No		Current year + 1 year	Review at end - allocate a further retention period or SHRED		OFFICIAL
5.7	Mark books	No		Current year + 1 year	Review at end - allocate a further retention period or SHRED		OFFICIAL
5.8	Record of homework set	No		Current year + 1 year	Review at end - allocate a further retention period or SHRED		OFFICIAL
5.9	Pupil's work	No		Current year + 1 year	Review at end - allocate a further retention period or SHRED		OFFICIAL
5.10	Examination results	Yes		Current year + 6 years	SHRED or delete securely		OFFICIAL-SENSITIVE
5.11	SATS records	Yes		Current year + 6	SHRED or		OFFICIAL-

				years	delete securely		SENSITIVE
5.12	PAN records	Yes		Current year + 6 years	SHRED or delete securely		OFFICIAL-SENSITIVE
5.13	Value added records	Yes		Current year + 6 years	SHRED or delete securely		OFFICIAL-SENSITIVE

6 Curriculum							
	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record		Protective marking classification
6.1	Timesheets, sick pay	Yes	<a href="#">Financial regulations</a>	Current year + 6 years	SHRED or delete securely		OFFICIAL
6.2	Staff personal files	Yes		Termination + 7 years	SHRED or delete securely		OFFICIAL
6.3	Interview notes and recruitment records	Yes		Date of interview + 6 months	SHRED or delete securely		OFFICIAL
6.4	Pre-employment vetting information (including DBS checks)	Yes	<a href="#">DBS guidelines</a>	Date of check + 6 months	SHRED or delete securely		OFFICIAL
6.5	Single Central Record	Yes	<a href="#">ISA guidelines</a>	Keep until school closure	Consider transferring to Archives or SHRED or delete securely		OFFICIAL
6.6	Disciplinary proceedings	Yes	Where the warning relates to child protection issues see <a href="#">1.2</a> . If the disciplinary proceedings relate to a child protection matter, contact your safeguarding children offer for further advice.				OFFICIAL-SENSITIVE
6.6a	Disciplinary proceedings - Warning	Yes		Date of warning + 6 months	SHRED or delete securely		OFFICIAL

	- oral							
6.6b	Disciplinary proceedings - Warning - written (level one)	Yes		Date of warning + 6 months	SHRED or delete securely		OFFICIAL	
6.6c	Disciplinary proceedings - Warning - written (level two)	Yes		Date of warning + 12 months	SHRED or delete securely		OFFICIAL	
6.6d	Disciplinary proceedings - Warning - final	Yes		Date of warning + 18 months	SHRED or delete securely		OFFICIAL	
6.6e	Disciplinary proceedings - Warning - case not found	Yes	Where the warning relates to child protection issues see <a href="#">1.2</a> . Otherwise immediately at conclusion of case SHRED or delete securely					OFFICIAL-SENSITIVE
6.7	Annual appraisal – assessment records	Yes		Current year + 5 years	SHRED or delete securely		OFFICIAL	
6.8	Salary records	Yes		SHRED or delete securely			OFFICIAL	
6.9	Maternity pay records	Yes	<a href="#">Statutory Maternity Pay (SMP) – General Information</a>	Current year + 3 years	SHRED or delete securely		OFFICIAL	
6.10	Records held under <a href="#">Retirement Benefits Schemes (Information Powers) Regulations 1995</a>	Yes		Current year + 6 years	SHRED or delete securely	<i>If this is placed in the personal file it must be weeded out.</i>	OFFICIAL	

## 7 Health & Safety

	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record	Protective marking classification
7.1	Accessibility plans	No	<a href="#">Disability Discrimination Act 2005</a>	Current year +6 years	SHRED	OFFICIAL

7.2	Accident reporting	No	<a href="#">Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980.</a>				
7.2a	Accident reporting- - Adults (all accidents)	Yes		Date of incident +7 years	SHRED or delete securely		OFFICIAL-SENSITIVE
7.2b	Accident reporting- - Children (all accidents)	Yes		DOB of child + 25 years	SHRED or delete securely		OFFICIAL-SENSITIVE
7.3	<a href="#">COSHH</a>	No		Current year + 10 years	SHRED	Review for further retention where appropriate	OFFICIAL
7.4	Incident reports	Yes		Current year + 20 years	SHRED or delete securely		OFFICIAL-SENSITIVE
7.5	Policy statements	No		Date of expiry + 1 year	SHRED		OFFICIAL
7.6	Risk assessments	No		Current year +3 years	SHRED		OFFICIAL
7.7	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No		Last action + 40 years	SHRED		OFFICIAL
7.8	Process of monitoring of areas where employees and persons are likely to have come in contact with radiation	No		Last action + 40 years	SHRED		OFFICIAL
7.9	Fire Precautions log books	No		Current year + 6 years	SHRED		OFFICIAL

8 Administrative							
	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record		Protective marking classification
8.1	Employer's liability certificate	No		Closure of the school + 40 years	SHRED		OFFICIAL
8.2	Inventories of equipment and furniture	No		Current year +6 years	SHRED		OFFICIAL
8.3	General administrative records <i>(records not specifically listed elsewhere)</i>	No		Current year + 5 years	Review to see if further retention is needed or SHRED	Consider transferring to <a href="#">Archives</a>	OFFICIAL
8.4	School brochure or prospectus	No		Current year + 3 years	SHRED	Consider transferring to <a href="#">Archives</a>	OFFICIAL
8.5	Circulars (staff / parents / pupils)	No		Current year + 1 year	SHRED		OFFICIAL
8.6	Newsletters, ephemera	No		Current year + 1 years	Review to see if further retention is needed - or SHRED	Consider transferring to <a href="#">Archives</a>	OFFICIAL
8.7	Visitors book	Yes		Current year + 2 years	Review to see if further retention is needed or SHRED or delete securely	Consider transferring to <a href="#">Archives</a>	OFFICIAL
8.8	PTA / Old pupils associations	Yes		Current year + 6 years	Review to see if further retention is needed or SHRED or delete securely	Consider transferring to <a href="#">Archives</a>	OFFICIAL

## 9 Finance

	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record		Protective marking classification
9.1	Annual accounts	No	<a href="#">Financial Regulations</a>	Current year + 6 years	Review to see if further retention is needed or SHRED or delete securely	Consider transferring to <a href="#">Archives</a>	OFFICIAL
9.2	Loans and grants	No	<a href="#">Financial Regulations</a>	Date of last payment on loan + 12 years	Review to see if further retention is needed or SHRED or delete securely	Consider transferring to <a href="#">Archives</a>	OFFICIAL
9.3a	Contracts - <i>under seal</i>	No		Contract completion date + 12 years	SHRED or delete securely		OFFICIAL
9.3b	Contracts - <i>under signature</i>	No		Contract completion date + 6 years	SHRED or delete securely		OFFICIAL
9.3c	Monitoring records	No		Current year + 2 years	SHRED or delete securely		OFFICIAL
9.4	Copy orders	No		Current year + 2 years	SHRED or delete securely		OFFICIAL
9.5	Budget reports, budget monitoring, etc.	No		Current year + 3 years	SHRED or delete securely		OFFICIAL
9.6	Invoice, receipts and other records covered by the Financial	No	<a href="#">Financial Regulations</a>	Current year + 6 years	SHRED or delete securely		OFFICIAL

	regulations						
9.7	Annual budget and background papers	No		Current year + 6 years	SHRED or delete securely		OFFICIAL
9.8	Order books and requisitions	No		Current year + 6 years	SHRED or delete securely		OFFICIAL
9.9	Delivery documentation	No		Current year + 6 years	SHRED or delete securely		OFFICIAL
9.10	Debtors' records	No	<a href="#">Limitation Act 1980</a>	Current year + 6 years	SHRED or delete securely		OFFICIAL
9.11	School fund - <i>Cheque book</i>	No		Current year + 3 years	SHRED or delete securely		OFFICIAL
9.11 a	School fund - <i>Paying in books</i>	No		Current year + 6 years (the review)	SHRED or delete securely		OFFICIAL
9.11 b	School fund - <i>Ledger</i>	No		Current year + 6 years (the review)	SHRED or delete securely		OFFICIAL
9.11 c	School fund - <i>Invoices</i>	No		Current year + 6 years (the review)	SHRED or delete securely		OFFICIAL
9.11 d	School fund - <i>Receipts</i>	No		Current year + 6 years (the review)	SHRED or delete securely		OFFICIAL
9.11 e	School fund - <i>Bank statements</i>	No		Current year + 6 years (the review)	SHRED or delete securely		OFFICIAL
9.11 f	School fund - <i>School journey books</i>	No		Current year + 6 years (the review)	SHRED or delete securely		OFFICIAL
9.12	Free school meals registers	Yes	<a href="#">Financial Regulations</a>	Current year + 6 years	SHRED or delete securely		OFFICIAL-SENSITIVE
9.13	Petty case books	No	<a href="#">Financial Regulations</a>	Current year + 6	SHRED or		OFFICIAL



				years	delete securely		
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10 Property							
	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record		Protective marking classification
10.1	Title deeds	No		Permanent	These should follow the property, unless the property has been registered at the Land Registry	Consider transferring to <a href="#">Archives</a> , if the deeds are no longer needed	OFFICIAL
10.2	Plans	No		Permanent	Retain in school whilst operational	Consider transferring to <a href="#">Archives</a> , if the plans are no longer needed	OFFICIAL-SENSITIVE
10.3	Maintenance and contractors	No	<a href="#">Financial Regulations</a>	Current year + 6 years	SHRED or delete securely		OFFICIAL
10.4	Leases	No		Expiry of lease + 6 years	SHRED or delete securely		OFFICIAL
10.5	Lettings	No		Current year + 3 years	SHRED or delete securely		OFFICIAL
10.6	Burglary, theft and vandalism report forms	Yes		Current year + 6 years	SHRED or delete securely		OFFICIAL
10.7	Maintenance log books	No		Last entry + 10 years	SHRED		OFFICIAL
10.8	Contractors' reports	No		Current year + 6 years	SHRED or delete securely		OFFICIAL

## 11 Local Education Authority

	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record		Protective marking classification
11.1	Year 6 admission to independent school confirmation letters	Yes		Current year + 2 years	SHRED or delete securely		OFFICIAL-SENSITIVE
11.2	Attendance returns	Yes		Current year + 1 year	SHRED or delete securely		OFFICIAL-SENSITIVE
11.3	Circulars from LEA	No		Whilst required operationally	Review to see if further retention is needed or SHRED or delete securely	Consider transferring to <a href="#">Archives</a>	OFFICIAL

## 12 Department for Children, Schools and Families

	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record		Protective marking classification
12.1	OFSTED reports and papers	No		Replace former report with any new inspection report	Schools may wish to retain copies for former reports for longer	Consider transferring to <a href="#">Archives</a>	OFFICIAL
12.2	Returns	No		Current year + 6 years	SHRED or delete securely		OFFICIAL-SENSITIVE
12.3	Circulars from Department for Children, Schools and Families	No		Whilst operational required	Review to see if further retention is needed or SHRED	Consider transferring to <a href="#">Archives</a>	OFFICIAL

### 13 Family Liaison Officers and Parent Support Assistants

	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record		Protective marking classification
13.1	Day books	Yes		Current year + 2 years (then review)	SHRED or delete securely		OFFICIAL-SENSITIVE
13.2	Reports for outside agencies – <i>where the report has been included on the case file created by the outside agency</i>	Yes		Whilst the child is attending the school then destroy	SHRED or delete securely		OFFICIAL-SENSITIVE
13.3	Referral forms	Yes		Whilst referral is current	SHRED or delete securely		OFFICIAL-SENSITIVE
13.4	Contact data sheets	Yes		Current year then review, if contact is no longer active then destroy	SHRED or delete securely		OFFICIAL
13.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	SHRED or delete securely		OFFICIAL
13.6	Group registers	Yes		Current year + 2 years	SHRED or delete securely		OFFICIAL
13.7	CAFs	Yes		Current year + 6 years	SHRED or delete securely		OFFICIAL-SENSITIVE

### 14.1 Early Years Provision (Childcare / Nursery provision, etc.)

#### **Records to be kept by Registered Persons - All Cases**

	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record		Protective marking classification
14.1	Looked After Child	Yes		Closure of setting	SHRED or	These could be	OFFICIAL-

a	(LAC) - <i>contact details, including DOB, of each child who is looked after on the premises</i>			+ 50 years	delete securely	required to show whether or not an individual child attended the setting in a child protection investigation	SENSITIVE
14.1 b	Looked After Child (LAC) - <i>contact details of a parent, or person, of each child who is looked after on the premises</i>	Yes		Termination + 6 years then review	SHRED or delete securely		OFFICIAL-SENSITIVE
14.1 c	Looked After Child (LAC) - <i>daily record of children looked after on the premises, their hours of attendance and the names of the persons who looked after them</i>	Yes	<a href="#">The Day Care and Child Minding (National Standards) (England) Regulations 2003</a>	Current year + 2 years Unless likely to be needed in a child protection setting then the records should be retained for closure of setting + 50 years	SHRED or delete securely		OFFICIAL-SENSITIVE
14.1 d	A record of accidents occurring on the premises and incident books relating to other incidents	Yes	<a href="#">The Day Care and Child Minding (National Standards) (England) Regulations 2003</a>	DOB of the child involved in the accident or the incident + 25 years  If an adult is injured then the accident book must be kept for 7 years from the date of the	SHRED or delete securely		OFFICIAL

				incident			
14.1 e	A record of any medicinal product administered to any child on the premises  (including the date, circumstances of administration, by whom it was administered, medicinal products administered, together with a record of parent's consent)	Yes	<a href="#">The Day Care and Child Minding (National Standards) (England) Regulations 2003</a>	DOB of the child being given/taking the medicine + 25 years	SHRED or delete securely		OFFICIAL-SENSITIVE
14.1 f	Records of transfer	Yes		One copy is to be given to the parents, one copy transferred to the Primary School where the child is going			OFFICIAL
14.1 g	Portfolio of work, observations and so on	Yes		To be sent home with the child			OFFICIAL
14.1 h	Birth certificates	Yes		Once the school has seen the birth certificate and recorded the necessary information, the original can be returned to the parents. There is no requirement to keep a copy of the birth certificate.			OFFICIAL-SENSITIVE

## 14.2 Early Years Provision (Childcare / Nursery provision, etc.)

### Records to be kept by Registered Persons - Day Care (Relates to nursery and child minding provision)

	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record		Protective marking classification
14.2 a	The name, address and telephone number of the registered person and every other person living or employed on the premises	Yes		Termination + 6 years (then review)	SHRED or delete securely		OFFICIAL-SENSITIVE
14.2 b	A statement of the procedure to be followed in the event of a fire or accident	No		Procedure superseded + 7 years	SHRED		OFFICIAL
14.2 c	A statement of the procedure to be followed in the event of a child being lost or not collected	No		Procedure superseded + 7 years	SHRED		OFFICIAL
14.2 d	A statement of the procedure to be followed where a parent has a complaint about the service being provided by the registered person	No		Until superseded	SHRED		OFFICIAL
14.2 e	A statement of the arrangements in place for the protection of	Yes		Closure of setting + 50 years <i>(These could be required to show</i>	SHRED or delete securely		OFFICIAL-SENSITIVE

	children (including arrangements to safeguard the children from abuse or neglect and procedures to be followed in the event of allegations of abuse or neglect)			<i>whether or not an individual child attended the setting in a child protection investigation)</i>			
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### 14.3 Early Years Provision (Childcare / Nursery provision, etc.)

#### Records to be kept by Registered Persons - Overnight provision – under 2's

	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record	Protective marking classification
14.3 a	Emergency contact details for appropriate adult to collect the child if necessary	Yes		Destroy once the child has left the setting <i>(unless the information is collected for anything other than emergency contact)</i>	SHRED or delete securely	OFFICIAL-SENSITIVE
14.3 b	Contract (signed by the parent) stating all the relevant details regarding the child and their care  (including the name of the emergency contact and confirmation of their agreement to collect the child during the night)	Yes		Date of birth of the child who is the subject of the contract + 25 years	SHRED or delete securely	OFFICIAL-SENSITIVE

### 14.4 Early Years Provision (Childcare / Nursery provision, etc.)

#### Other Records – Administration

<b>FINANCE</b>							
	Basic file description	DP Issues	Statutory provisions	Retention period	Action at end of the administrative life of the record		Protective marking classification
14.4 a	Financial records – accounts, statements, invoices, petty cash etc	No		Current year + 6 years	SHRED or delete securely		OFFICIAL
<b>Other Records – Administration</b>							
<b>INSURANCE</b>							
14.4 b	Insurance policies – Employers Liability	No	<a href="#">Employers Liability</a> <a href="#">Financial Regulations</a>	The policies are kept for a minimum of 6 years and a maximum of 40 years depending on the type of policy	SHRED		OFFICIAL
14.4 c	Claims made against insurance policies – damage to property	Yes		Case concluded + 3 years	SHRED or delete securely		OFFICIAL
14.4 d	Claims made against insurance policies – personal injury	Yes		Case concluded + 6 years	SHRED or delete securely		OFFICIAL
<b>Other Records – Administration</b>							
<b>HUMAN RESOURCES</b>							
14.5 a	Personal Files - records relating to an individual's employment history	Yes		Termination + 6 years then review	SHRED or delete securely		OFFICIAL-SENSITIVE
14.5 b	Pre-employment vetting information (including DBS	Yes	<a href="#">DBA guidelines</a>	Date of check + 6 months	SHRED or delete securely		OFFICIAL-SENSITIVE



	checks)						
14.5 c	Staff training records – general	Yes		Current year + 2 years	SHRED or delete securely		OFFICIAL
14.5 d	Training (proof of completion such as certificates, awards, exam results)	Yes		Last action + 7 years	SHRED or delete securely		OFFICIAL
<b>Other Records – Administration</b>							
<b>PREMISES AND HEALTH AND SAFETY</b>							
14.5 e	Premises files (relating to maintenance)	No		Cessation of use of building + 7 years then review	SHRED		OFFICIAL
14.5 f	Risk Assessments	No		Current year + 3 years	SHRED		OFFICIAL

## **Appendix 2**

# **Information Security Incident Report Form (ISIR)**

<b>ISIR Reference</b>	ISIR20xx00x	<b>Date Opened:</b>		<b>Information Security Incident Report Form</b>
<b>Short Title</b>				
<b>Associated Reference number:</b>		<b>ISIR owner (provide name and job title):</b>		
<b>Police Crime No:</b>		<b>Device ID:</b>		
Lost <input type="checkbox"/> Stolen <input type="checkbox"/> Other <input type="checkbox"/>				
Impact Risk Low <input type="checkbox"/> Medium <input type="checkbox"/> High <input type="checkbox"/>				
Has Insurance been informed? Yes/No Date:				
Description of Data lost (Format, Volume, Personal Data, from which system):				
Has the data/system owner been informed? Yes/No Date:				
Name:				
Definition of the Problem and how it was reported, including history of events:				
Impact Summary:				
Detail of Resolution or Workaround:				
Root Cause Analysis:				
Corrective Actions:				
<b>Ref:</b>	<b>Action</b>	<b>Target date</b>	<b>Owner</b>	<b>Complete?</b>
<b>Lessons Learned:</b>				
<b>Ref</b>	<b>Lesson Learned</b>			
<b>Date agreed for Evaluation</b>		<b>Evaluation Date</b>		
<b>Date Closed</b>		<b>Head teacher Signoff</b>		

## **Appendix 3**

# **Request for personal data Form**

### **INVESTIGATION OF A CRIME**

Sections 28, 29 and 35 of the Data Protection Act 1998

# Request for personal data

All boxes must be completed



To

## Details of applicant

Name of applicant	
Job title	
Department and Section	
Full Address	
Telephone number	
e-mail address or fax number	
Investigation reference / Operation Name	
Date	

## Details of application

1. This request is made pursuant to the Data Protection Act 1998. I can confirm that this request complies with the following non-disclosure provisions

### Section 29

  

The data is necessary for the prevention or detection of crime

The data is necessary for the apprehension or prosecution of offenders

### Section 35

  

The data is necessary for the purpose of or in connection with present legal proceedings

The data is necessary for the purpose of or in connection with prospective legal proceedings

2. I require the following information

--

**3. Why I require the information**

**4. What statutory powers does the requester have to demand the information**

**5. I can confirm that the information you provide will be held in the strictest confidence and will not be further processed beyond the purpose for which it was requested.**

**I have grounds believing that failure to disclose the required information will be likely to prejudice my enquiries and can confirm that the details supplied on this form are, to the best of my knowledge, correct.**

**I am aware of the provisions of Section 55 of the Data protection Act 1998, regarding the unlawful obtaining of personal details.**

Signature

Print Name