

**RECORDS MANAGEMENT POLICY
FOR PERSONAL DATA**

Role	<i>Designated Teacher for Records Management</i>	<i>Deputy Designated Teacher</i>
Name	<i>Louise Maddison</i>	<i>Sarina Totty</i>
Contact via	<i>Head Teachers office Main school office Tel 0208-304-8311</i>	<i>Head Teacher's office Main school office Tel 0208-304-8311</i>

Our 'Named Governor' with special responsibility for Records Management is Stephen Hailes

Policy Reviewed & Approved by Governors:

Date: May 2018

Signed by Headteacher: _____

Signed on behalf of the
Governors Committee: _____

Date of next review: May 2020

Contents:

Statement of intent

Legal framework

Responsibilities

Management of pupil records

Retention of pupil records and other pupil-related information

Retention of staff records

Retention of senior leadership and management records

Retention of health and safety records

Retention of financial records

Retention of other school records

Storing and protecting information

Accessing information

Digital continuity statement

Information audit

Disposal of data

Monitoring and review

Statement of intent

Townley Grammar School is committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible by the appropriate individuals. In line with the requirements of the General Data Protection Regulation (GDPR), the school also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

The school has created this policy to outline how records containing any Personal Data are stored, accessed, monitored, retained and disposed of, in order to meet the school’s statutory requirements.

This document complies with the requirements set out in the GDPR, which will come into effect on 25 May 2018. The government has confirmed that the UK’s decision to leave the EU will not affect the commencement of the GDPR.

Signed by:

Head Teacher

Date: _____

Finance Director

Date: _____

Legal framework

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

General Data Protection Regulation (2016)
Freedom of Information Act 2000
Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)

This policy also has due regard to the following guidance:

Information Records Management Society 'Information Management Toolkit for Schools' 2016
This policy will be implemented in accordance with the following school policies and procedures:
Data Protection Policy
Freedom of Information Policy
E-security Policy
Security Breach Management Plan

Responsibilities

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

The **Head of School/Head Teacher** holds overall responsibility for this policy and for ensuring it is implemented correctly.

The **Data Protection Officer** is responsible for the management of records at **TOWNLEY GRAMMAR SCHOOL**.

The **DPO** is responsible for promoting compliance with this policy and reviewing the policy on an **annual** basis, in conjunction with the **Head of School/Head Teacher**.

The **DPO** is responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of correctly.

All staff members are responsible for ensuring that any records for which they are responsible for are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

Management of pupil records

Pupil records are specific documents that are used throughout a pupil's time in the education system – they are passed to each school that a pupil attends and includes all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievement.

The following information is stored on the front of a pupil record, and will be easily accessible:
Forename, surname, Intake Year & Tutor Group.

The following information is stored in a pupil record, and will be easily accessible, we transfer all of this data onto an electronic pupil record. The electronic pupil record is then used on a day to day basis:

The completed Admissions booklet (blue Form) which contains the following data:

- Date of birth
- Unique pupil number
- Ethnic origin, religion and first language (if not English)
- Any preferred names
- Emergency contact details and the name of the pupil's doctor
- Any allergies or other medical conditions that are important to be aware of
- Names of parents, including their home address(es) and telephone number(s)
- Name of the school, admission number, the date of admission and the date of leaving, where appropriate
- Any other agency involvement, e.g. speech and language therapist
- Details of any SEND
- If the pupil has attended an early years setting, the record of transfer
- Initial Consent forms for Photography & Filming. Then electronically stored.
- Fair processing notice – only the most recent notice will be included
- Reports to parents – electronic Only
- Any information about an education and healthcare (EHC) plan and support offered in relation to the EHC plan – electronic Only
- Any information relating to exclusions – electronic only.
- Notes indicating that records of complaints made by parents or the pupil are held
- Correspondence with parents about minor issues, e.g. behaviour – electronic only
-

The following information is subject to shorter retention periods and, therefore, will be stored separately in student services:

- Absence notes
- Councillors Appointments

Hard copies of disclosures and reports relating to child protection and any related correspondence are stored in a securely locked filing cabinet in SENCO's office– a note indicating this is marked on the pupil's file & electronic record.

Hard copies of complaints made by parents or pupils are stored in the pupil file. Also scanned onto the electronic record.

Actual copies of accident and incident information are stored in the pupil's file summaries or scanned copies are on the electronic pupil file.

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

Electronic records relating to a pupil's record will also be transferred to the pupils' next school. This policy outlines how electronic records will be transferred.

Townley Grammar School & Sixth Form

If any pupil attends the school until statutory school leaving age, the school will keep the pupil's records until the pupil reaches the age of 25 years.

The school will, wherever possible, avoid sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The school it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to the school.

Retention of pupil records and other pupil-related information

The table below outlines the school's retention periods for individual pupil records and the action that will be taken after the retention period, in line with any requirements.

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

Type of file	Retention period	Action taken after retention period ends
Admissions		
Secondary school admissions	If not successful, all details, 3 months	Securely disposed of
Secondary school admissions	If successful, 25 years after the pupil's date of birth	Securely disposed of
Proof of address (supplied as part of the admissions process)	If successful, 25 years after the pupil's date of birth	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was successful)	If successful, 25 years after the pupil's date of birth	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was not successful)	If successful, 25 years after the pupil's date of birth	Securely disposed of
Academic Summer School	Current Academic Year	Securely disposed of
Outreach Programme	Current Academic Year	Securely disposed of
Pupils' educational records		
Secondary Pupils' educational records	If successful, 25 years after the pupil's date of birth	Electronic, Deleted
Public examination results	Added to the pupil's record electronically, 25 years after the pupil's date of birth	Anonymised kept for analysis
Exams for Bexley Consortium	Current academic year, plus 4 years	Electronic, Deleted

Internal examination results	Added to the pupil's record electronically, 25 years after the pupil's date of birth	Anonymised kept for analysis
Child protection records held in a separate file	Stored in a secure locked cabinet in SENCO office, 25 years after the pupil's date of birth. Unless need for continuing legal reasons.	Securely disposed of – shredded
Attendance		
Attendance registers	Added to the pupil's record electronically, 25 years after the pupil's date of birth	Securely disposed of
Letters authorising absence	Current academic year, plus one years	Securely disposed of
SEND		
SEND files, reviews and individual education plans	Stored in a secure locked cabinet in SENCO office, 25 years after the pupil's date of birth	Information is reviewed and the file may be kept for longer than necessary if it is required for the school to defend themselves in a 'failure to provide sufficient education' case
Statement of SEN maintained under section 324 of the Education Act 1996 or an EHC plan maintained under section 37 of the Children and Families Act 2014 (and any amendments to the statement or plan)	Continuation of plan then passed on to new centre	Securely disposed of, unless it is subject to a legal hold
Information and advice provided to parents regarding SEND	Stored in a secure locked cabinet in SENCO office, 25 years after the pupil's date of birth	Securely disposed of, unless it is subject to a legal hold
Accessibility strategy	Stored in a secure locked cabinet in SENCO office, 25 years after the pupil's date of birth	Securely disposed of, unless it is subject to a legal hold
Curriculum management		
Examination papers	Until the appeals and validation process has been completed (approximately 3 months)	Securely disposed of
Examination Certificates	Three Years after release from boards.	Securely disposed of
Examination Candidate Cards	Current Exam Season	Securely disposed of
Examination: General Day Paperwork	Current Exam Season, plus 1 year	Securely disposed of

Published Admission Number (PAN) reports	Current academic year, plus six years	Deleted as in electronic form
Valued added and contextual data	Current academic year, plus six years	Anonymised kept for analysis
Pupils' work	Returned to pupils at the end of the academic year, or course (if 2 year course)	Securely disposed of
General Student Lists/Information extracted from Sims.	Current Academic Year	Securely disposed of
Subject Specific		
Subject Mark Books	Duration of course, plus 1 year	Securely disposed of
Subject Coursework/Oral Recordings/Performance Recordings	Duration of course, plus 1 year	Securely disposed of or anonymised if retained
Subject Exam Entry Lists/Permissions	Current Exam Season	Securely disposed of
Subject Exam Analysis	Current academic year, plus 2 years	Securely disposed of or anonymised if retained
Subject Progress Tracking	Duration of course, plus 1 year	Securely disposed of or anonymised if retained
Departmental Minutes/Evaluation Documentation	Current Academic Year	Securely disposed of or anonymised if retained
Library: Accelerated Reader/Book Club Lists	Duration of pupil's time at school	Deleted
Extra-curricular activities		
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip, plus 2 weeks	Securely disposed of
Trips & Visits Information extracted from MIS Plus Medical/Passport/Emergency Contact	Return of trip, plus 2 weeks.	Securely disposed of
Parental consent forms for school trips where a major incident occurred	25 years after the pupil's date of birth (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils)	<u>Securely disposed of</u>
Family liaison officers and home-school liaison assistants		
Reports for outside agencies	25 years after the pupil's date of birth	<u>Securely disposed of</u>
Referral forms	25 years after the pupil's date of birth	<u>Securely disposed of</u>

Retention of staff records

The table below outlines the school's retention period for staff records and the action that will be taken after the retention period, in line with any requirements.

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

Type of file	Retention period	Action taken after retention period ends
Operational		
Staff members' personal file	Termination of employment, plus six years	Securely disposed of
Timesheets	Current academic year, plus six years	Securely disposed of
Absence Forms	Current academic year	Securely disposed of
Absence & Sickness Records	Become part of the personal file. Termination of employment plus six years	Deleted/Securely disposed of
Annual appraisal and assessment records	Duration of employment	Securely disposed of
Proof of identity as part of enhanced DBS check	Termination of employment plus six years	Reviewed and a note kept of what was seen and what has been checked – if it is necessary to keep a copy this will be placed on the staff member's personal file, if not, <u>securely disposed of</u>
Appraisal Records	Current academic year, plus five years	Deleted/Securely disposed of
Recruitment		
Records relating to the appointment of a new Head Teacher	Date of appointment, plus six years	Securely disposed of
Records relating to the appointment of new members of staff (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	Securely disposed of
Records relating to the appointment of new members of staff (successful candidates)	All information added to the member of staff's personal file	Securely disposed of
Evidence of right to work in the UK	Added to staff personal file or, if kept separately, termination of employment, plus no longer than two years	<u>Securely disposed of</u>

NQT/PGCE Depart Assessment	Current academic year, plus one year	Securely disposed of
Disciplinary and grievance procedures		
Child protection allegations, including where the allegation is unproven	Added to staff personal file, and until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer If allegations are malicious, they are removed from personal files	Reviewed and securely disposed of – shredded
First5 Written warning	Date of warning, plus 12 months	Securely disposed of – if placed on staff personal file, removed from file
Final warning	Date of warning, plus 18 months	Securely disposed of – if placed on staff personal file, removed from file
Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related and is disposed of as <u>above</u>	Securely disposed of

Retention of senior leadership and management records

The table below outlines the school's retention periods for senior leadership and management records, and the action that will be taken after the retention period, in line with any requirements. The list below only includes those where Personal Data may be used.

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

Type of file	Retention period	Action taken after retention period ends
Governing board		
Reports presented to the governing board	Minimum of six years, unless they refer to individual reports – these are kept permanently	Securely disposed of or, if they refer to individual reports, retained with the signed, original copy of minutes
Records relating to complaints dealt with by the governing board	Date of the resolution of the complaint, plus a minimum of six years	Reviewed for further retention in case of contentious disputes, then securely disposed of

Head Teacher and senior leadership team (SLT)		
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus five years	Reviewed and securely disposed of
Correspondence created by the Head Teacher, deputy Head Teacher, heads of year and other members of staff with administrative responsibilities	Date of correspondence, plus seven years	Reviewed and securely disposed of
Professional development plan	Termination of employment, plus six years	Securely disposed of

Retention of health and safety records

The table below outlines the school's retention periods for health and safety records which could contain personal data, and the action that will be taken after the retention period, in line with any requirements.

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

Type of file	Retention period	Action taken after retention period ends
Health and safety		
Records relating to accidents and injuries at work	Date of incident, plus 12 years. In the case of serious accidents, a retention period of 15 years is applied	Securely disposed of
Accident reporting – adults	Date of the incident, plus six years	Securely disposed of
Accident reporting – pupils	25 years after the pupil's date of birth, on the pupil's record	Securely disposed of
Fire precautions log books	Current academic year, plus six years	Securely disposed of

Retention of financial records

The table below outlines the school's retention periods for financial records that could contain personal data and the action that will be taken after the retention period, in line with any requirements.

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

Type of file	Retention period	Action taken after retention period ends
Payroll pensions		
Maternity pay records	Termination of employment, plus six years	Securely disposed of
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Termination of employment, plus six years	Securely disposed of
School meals		
Free school meals registers	Current academic year, plus six years	Securely disposed of

Retention of other school records

The table below outlines the school's retention periods for any other records that may contain personal data held by the school, and the action that will be taken after the retention period, in line with any requirements.

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

Type of file	Retention period	Action taken after retention period ends
Operational administration		
General file series	Current academic year, plus three years	Reviewed and securely disposed of
Records relating to the creation and publication of the school brochure and/or prospectus	Current academic year, plus three years	Disposed of against common standards
Records relating to the creation and distribution of circulars to staff, parents or pupils	Current academic year, plus three year	Disposed of against common standards
Newsletters and other items with short operational use	Current academic year plus one year	Disposed of against common standards
Visitors' books and signing-in sheets	Current academic year, plus six years	Reviewed then securely disposed of
Records relating to the creation and management of parent-teacher associations and/or old pupil associations	Current academic year, plus six years	Reviewed then securely disposed of

Fire/Evacuation Registers	Daily	Securely disposed of
Accident Book	Current academic year, plus six years	
Student Locker Database	Current academic year, plus one year	Electronic, Deleted
General Emails containing student or staff personal data	Current academic year. If required to keep, attached to staff or pupil record.	Electronic, Deleted
CCTV Footage	30 days, rolling	Overwritten
ANPR	Duration of Employment	Electronic, Deleted

Storing and protecting information

The **DPO** will ensure record vital to school management will be stored in the most secure manner. The **Network Manager** will conduct a back-up of information on a regular basis to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data.

Where possible, backed-up information will be stored off the school premises, using a central web based service operated by Redstor.

Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access. Confidential paper records are not left unattended or in clear view when held in a location with general access.

Digital data password-protected, on a permissioned based network drive that is regularly backed-up off-site. In addition, Finance & Sims Manager have access to a local drive where data is password-protected.

Memory sticks are not used to hold personal.

All electronic devices are password-protected to protect the information on the device in case of theft. All members of staff are provided with their own secure login and password.

Emails do not contain sensitive or confidential information. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

When sending confidential information by fax, members of staff always check that the recipient is correct before sending.

Where personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with the GDPR, either in an electronic or paper format, staff take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.

Before sharing data, staff always ensure that:

- They have consent from data subjects to share it.
- Adequate security is in place to protect it.
- The data recipient has been outlined in a privacy notice.

Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times. The school takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action. The Director of Finance is responsible for continuity and recovery measures which are in place to ensure the security of protected data. This is currently under review.

Any damage to or theft will be managed in accordance with the school's Data Breach Procedures.

Accessing information

TOWNLEY GRAMMAR SCHOOL is transparent with data subjects, the information we hold and how it can be accessed.

All members of staff, parents of registered pupils and other users of the school, e.g. visitors and third-party clubs, are entitled to:

- Know what information the school holds and processes about them or their child and why.
- Understand how to gain access to it.
- Understand how to provide and withdraw consent to information being held.
- Understand what the school is doing to comply with its obligations under the GDPR.

All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the GDPR, to access certain personal data being held about them or their child.

Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents.

Pupils who are considered to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.

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

Business continuity statement

This statement/policy is current under review.

Information audit

The DPO conducts information audits on an **annual** basis against all information held by the school to evaluate the information the school is holding, receiving and using, and to ensure that this is correctly managed in accordance with the GDPR. This includes the following information:

- Paper documents and records
- Electronic documents and records
- Databases
- Sound recordings
- Video and photographic records
- Hybrid files, containing both paper and electronic information

The information audit may be completed in a number of ways, including, but not limited to:

- Interviews with staff members with key responsibilities – to identify information and information flows, etc.
- Questionnaires to key staff members to identify information and information flows, etc.
- A mixture of the above

The **DPO** is responsible for completing the information audit. The information audit will include the following:

- The school's data needs
- The information needed to meet those needs
- The format in which data is stored
- How long data needs to be kept for
- Vital records status and any protective marking
- Who is responsible for maintaining the original document

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

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

The information displayed on the **Information Asset Register** will be shared with the **Head Teacher** to gain their approval.

Disposal of data

Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.

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

Where the disposal action is indicated as reviewed before it is disposed, the **DPO** will review the information against its administrative value – if the information should be kept for administrative value, the **DPO** will keep a record of this.

If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.

Where information has been kept for administrative purposes, the **DPO** will review the information again after **three** years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every **three** subsequent years.

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

Monitoring and review

This policy will be reviewed on an **annual** basis by the **DPO** in conjunction with the **Head of School/Head Teacher** – the next scheduled review date for this policy is **May 2020**.

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