Reedham Primary and Nursery School

Data Protection Policy

Date policy last reviewed: 05 July 2023

Signed by:

____________________ Headteacher Date: ____________________

____________________ Chair of governors Date: ____________________

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Statement of intent

Reedham Primary and Nursery School is required to keep and process certain information about its staff members, pupils, their families, volunteers and external contractors in accordance with its legal obligations under data protection legislation.

The school may, from time to time, be required to share personal information about its staff or pupils with other organisations, mainly the LA, DfE, other schools and educational bodies, and potentially children’s services.

This policy is in place to ensure all staff and governors are aware of their responsibilities and outlines how the school complies with the following core principles of the UK GDPR.

Organisational methods for keeping data secure are imperative, and the school believes that it is good practice to keep clear practical policies, backed up by written procedures.

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018 (DPA)
- School Standards and Framework Act 1998
- Freedom of Information Act 2000
- Electronic Commerce (EC Directive) Regulations 2002
- The Privacy and Electronic Communications (EC Directive) Regulations 2003
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2018)
- Protection of Freedoms Act 2012

This policy also has regard to the following guidance:

- ICO (2021) ‘Guide to the UK General Data Protection Regulation (UK GDPR)’
- ICO (2012) ‘IT asset disposal for organisations’
- DfE (2018) ‘Data protection: a toolkit for schools’

This policy operates in conjunction with the following school policies:

- Photography and Video Policy

For the purpose of this policy, **‘personal data’** refers to information that relates to an identifiable, living individual, including information such as an online identifier, e.g. an IP address. The UK GDPR applies to both automated personal data and to manual filing systems, where personal data is accessible according to specific criteria, as well as to chronologically ordered data and pseudonymised data, e.g. key-coded.

‘Sensitive personal data’ is referred to in the UK GDPR as ‘special categories of personal data’, and is defined as:

- Genetic data.
- Biometric data.
- Data concerning health.
- Data concerning a person’s sex life.
- Data concerning a person’s sexual orientation.
- Personal data which reveals:
    - Racial or ethnic origin.
    - Political opinions.
    - Religious or philosophical beliefs.
    - Trade union membership.
    - Principles.

‘Sensitive personal data’ does not include data about criminal allegations, proceedings or convictions. In the case of criminal offence data, schools are only able to process this if it is either:

- Under the control of official authority; or
- Authorised by domestic law.

The latter point can only be used if the conditions of the reason for storing and requiring the data fall into one of the conditions below:

- The processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller of the data subject in connection with employment, social security, social protection, health or social care purposes, public health, and research.

In accordance with the requirements outlined in the UK GDPR, personal data will be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered incompatible with the initial purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods, insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the UK GDPR in order to safeguard the rights and freedoms of individuals.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The UK GDPR also requires that “the controller shall be responsible for, and able to demonstrate, compliance with” the above principles.

2. Accountability

The school will implement appropriate technical and organisational measures to demonstrate that data is processed in line with the principles set out in the UK GDPR, and will provide comprehensive, clear and transparent privacy policies.

Records of activities relating to higher risk processing will be maintained, such as the processing of activities that:

- Are not occasional.
- Could result in a risk to the rights and freedoms of individuals.
- Involve the processing of special categories of data or criminal conviction and offence data.

Internal records of processing activities will include the following:

- Name and details of the organisation
- Purpose(s) of the processing
- Description of the categories of individuals and personal data
- Retention schedules
- Categories of recipients of personal data
- Description of technical and organisational security measures
- Details of transfers to third countries, including documentation of the transfer mechanism safeguards in place

The school will also document other aspects of compliance with the UK GDPR and DPA where this is deemed appropriate in certain circumstances by the DPO, including the following:

- Information required for privacy notices, e.g. the lawful basis for the processing
- Records of consent
- Controller-processor contracts
- The location of personal data
- Data Protection Impact Assessment (DPIA) reports
- Records of personal data breaches

The school will implement measures that meet the principles of data protection by design and data protection by default, such as:

- Minimising the processing of personal data.
- Pseudonymising personal data as soon as possible.
- Ensuring transparency in respect of the functions and processing of personal data.
- Allowing individuals to monitor processing.
- Continuously creating and improving security features.

DPIAs will be used to identify and reduce data protection risks, where appropriate.

3. Data protection officer (DPO)

Schools are required to appoint a DPO who will be the central point of contact for all data subjects and others in relation to matters of data protection.

A DPO will be appointed in order to:

- Inform and advise the school and its employees about their obligations to comply with the UK GDPR and other data protection laws.
- Monitor the school’s compliance with the UK GDPR and other laws, including managing internal data protection activities, advising on DPIAs, conducting internal audits, and providing the required training to staff members.

- Cooperate with the ICO and act as the first point of contact for the ICO and for individuals whose data is being processed.

The DPO is responsible for:

- Coordinating a proactive and preventative approach to data protection.
- Calculating and evaluating the risks associated with the school's data processing.
- Having regard to the nature, scope, context, and purposes of all data processing.
- Prioritising and focussing on more risky activities, e.g. where special category data is being processed.
- Promoting a culture of privacy awareness throughout the school community.
- Carrying out ad hoc reviews of data practices to ensure staff understand and are acting in accordance with relevant data protection laws.

The DPO will have professional experience and be highly knowledgeable about data protection law, particularly that in relation to schools. Data Protection Education has been appointed to the role of DPO for Reedham Primary and Nursery School.

The DPO will operate independently and will not be penalised for performing their duties. Sufficient resources and appropriate access will be provided to the DPO to enable them to meet their UK GDPR obligations.

Staff will ensure that they involve the DPO in all data protection matters closely and in a timely manner.

4. Lawful processing

The legal basis for processing data will be identified and documented prior to data being processed. Under the UK GDPR, data will be lawfully processed under the following conditions:

- The consent of the data subject has been obtained
- Processing is necessary for a contract held with the individual, or because they have asked the school to take specific steps before entering into a contract
- Processing is necessary for compliance with a legal obligation (not including contractual obligations)
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
- Processing is necessary for protecting vital interests of a data subject or another person, i.e. to protect someone's life
- Processing is necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject – this condition is not available to processing undertaken by the school in the performance of its tasks

The school will only process personal data without consent where any of the above purposes cannot reasonably be achieved by other, less intrusive means or by processing less data.

Sensitive data will only be processed under the following conditions:

- Explicit consent of the data subject
- Processing carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes) and provided there is no disclosure to a third party without consent
- Processing relates to personal data manifestly made public by the data subject
- Processing is necessary for:
  - Carrying out obligations under employment, social security or social protection law, or a collective agreement
  - Protecting the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent
  - The establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity
  - Reasons of substantial public interest with a basis in law which is proportionate to the aim pursued and which contains appropriate safeguards
  - The purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services with a basis in law
  - Reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of healthcare and of medicinal products or medical devices
  - Archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with a basis in law
- When none of the above apply, consent will be obtained by the data subject to the processing of their special category personal data.

For personal data to be processed fairly, data subjects must be made aware:

- That the personal data is being processed.
- Why the personal data is being processed.
- What the lawful basis is for that processing.
- Whether the personal data will be shared, and if so, with whom.
- The existence of the data subject’s rights in relation to the processing of that personal data.
- The right of the data subject to raise a complaint with the ICO in relation to any processing.

The school has privacy notices for the following groups, which outline the information above that is specific to them:

- Pupils and their families
- School workforce
- Third parties

These are available in the Appendices.

There may be circumstances where it is considered necessary to process personal data or special category personal data in order to protect the vital interests of a data subject. This may include medical emergencies where it is not possible for the data subject to give consent to the processing. In such circumstances, the DPO will be consulted and a decision made only after seeking further clarification.

Where the school relies on:

- ‘Performance of contract’ to process a child’s data, the school considers the child’s competence to understand what they are agreeing to, and to enter into a contract.
- ‘Legitimate interests’ to process a child’s data, the school takes responsibility for identifying the risks and consequences of the processing, and puts age-appropriate safeguards in place.
- Consent to process a child’s data, the school ensures that the requirements outlined in the ‘Consent’ section are met, and the school does not exploit any imbalance of power in the relationship between the school and the child.

5. Consent

Consent must be a positive indication expressly confirmed in words. It cannot be inferred from silence, inactivity, a positive action without words or pre-ticked boxes. Consent will only be accepted where it is freely given, specific, informed and an unambiguous indication of the individual’s wishes. Consent can be withdrawn by the individual at any time.

Where consent is given, a record will be kept documenting how and when consent was given, and what the data subject was told.

The school ensures that consent mechanisms meet the standards of the UK GDPR. Where the standard of consent cannot be met, an alternative legal basis for processing the data must be found, or the processing must cease. Consent accepted under the DPA will be reviewed to ensure it meets the standards of the UK GDPR; however, acceptable consent obtained under the DPA will not be reobtained.

When pupils and staff join the school, the staff member or pupil (or, where appropriate, pupil’s parent) will be required to complete a consent form for personal data use. This consent form deals with the taking and use of photographs and videos, amongst other things. Where appropriate, third parties may also be required to compete a consent form.

Where the school opts to provide an online service directly to a child, the child is aged 13 or over, and the consent meets the requirements outlined above, the school obtains consent directly from that child; otherwise, consent is obtained from whoever holds parental responsibility for the child, except where the processing is related to preventative or counselling services offered directly to children. In all other instances with regards to obtaining consent, an appropriate age of consent is considered by the school on a case-by-case basis, taking into account the requirements outlined above.

6. The right to be informed

Adults and children have the same right to be informed about how the school uses their data. The privacy notices supplied to individuals, including children, in regard to the processing of their personal data will be written in clear, plain, age-appropriate language which is concise, transparent, easily accessible and free of charge.

In relation to data obtained both directly from the data subject and not obtained directly from the data subject, the following information will be supplied within the privacy notice:

- The identity and contact details of the controller, the controller's representative, where applicable, and the DPO
- The purpose of, and the lawful basis for, processing the data
- The legitimate interests of the controller or third party
- Any recipient or categories of recipients of the personal data
- Details of transfers to third countries and the safeguards in place
- The retention period of criteria used to determine the retention period
- The existence of the data subject's rights, including the right to:
    - Withdraw consent at any time
    - Lodge a complaint with a supervisory authority
- The existence of automated decision making, including profiling, how decisions are made, the significance of the process and the consequences

Where data is obtained directly from the data subject, information regarding whether the provision of personal data is part of a statutory or contractual requirement, as well as any possible consequences of failing to provide the personal data, will be provided – this information will be supplied at the time the data is obtained.

Where data is not obtained directly from the data subject, information regarding the categories of personal data that the school holds, the source that the personal data originates from and whether it came from publicly accessible sources, will be provided – this information will be supplied:

- Within one month of having obtained the data.
- If disclosure to another recipient is envisaged, at the latest, before the data are disclosed.
- If the data are used to communicate with the individual, at the latest, when the first communication takes place.

7. The right of access

Individuals, including children, have the right to obtain a copy of their personal data as well as other supplementary information, including confirmation that their data is being processed, and the right to submit a subject access request (SAR) to gain access to their personal data in order to verify the lawfulness of the processing. The school will verify the identity of the person making the request before any information is supplied.

A copy of the information will be supplied to the individual free of charge; however, the school may impose a 'reasonable fee' to cover the administrative costs of complying with requests that are manifestly unfounded or excessive or if an individual requests further copies of the same information. Where a request is manifestly unfounded, excessive or repetitive, a reasonable fee will be charged. All fees will be based on the administrative cost of providing the information.

Where a SAR has been made electronically, the information will be provided in a commonly used electronic format.

Where a SAR has been made for information held about a child, the school will evaluate whether the child is capable of fully understanding their rights. If the school determines the child can understand their rights, it will respond directly to the child.

All requests will be responded to without delay and at the latest, within one month of receipt. In the event of numerous or complex requests, the period of compliance will be extended by a further two months. The individual will be informed of this extension, and will receive an explanation of why the extension is necessary, within one month of the receipt of the request.

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

The school will ensure that information released in response to a SAR does not disclose personal data of another individual. If responding to the SAR in the usual way would disclose such data, the school will:

- Omit certain elements from the response if another individual's personal data would be disclosed otherwise.
- Reject requests that cannot be fulfilled without disclosing another individual's personal data, unless that individual consents or it is reasonable to comply without consent.
- Explain to the individual who made the SAR why their request could not be responded to in full.

In the event that a large quantity of information is being processed about an individual, the school will ask the individual to specify the information the request is in relation to – the time limit for responding to the request will be paused until clarification from the individual is received.

8. The right to rectification

Individuals, including children, are entitled to have any inaccurate or incomplete personal data rectified.

Requests for rectification will be responded to within one month; this will be extended by two months where the request for rectification is complex.

Requests for rectification will be investigated and resolved, where appropriate, free of charge; however, the school may impose a 'reasonable fee' to cover the administrative costs of complying with requests that are manifestly unfounded or excessive or if an individual makes multiple requests at once. The school reserves the right to refuse to process requests for rectification if they are manifestly unfounded or excessive or if exemptions apply.

The school will take reasonable steps to ensure that data is accurate or is rectified if inaccurate, implementing a proportional response for data that has a significant impact on the individual, e.g. if significant decisions are made using that data. The school will restrict processing of the data in question whilst its accuracy is being verified, where possible.

Where the personal data in question has been disclosed to third parties, the school will inform them of the rectification where possible. Where appropriate, the school will inform the individual about the third parties that the data has been disclosed to.

Where no action is being taken in response to a request for rectification, or where the request has been investigated and the data has been found to be accurate, the school will explain the reason for this to the individual, and will inform them of their right to complain to the supervisory authority and to a judicial remedy.

9. The right to erasure

Individuals, including children, hold the right to request the deletion or removal of personal data where there is no compelling reason for its continued processing. Individuals, including children, have the right to erasure in the following circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected or processed
- When the individual withdraws their consent where consent was the lawful basis on which the processing of the data relied
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed
- The personal data is required to be erased in order to comply with a legal obligation
- The personal data is processed in relation to the offer of information society services to a child

The school will comply with the request for erasure without undue delay and at the latest within one month of receipt of the request.

The school has the right to refuse a request for erasure where the personal data is being processed for the following reasons:

- To exercise the right of freedom of expression and information
- To comply with a legal obligation for the performance of a public interest task or exercise of official authority
- For public health purposes in the public interest
- For archiving purposes in the public interest, scientific research, historical research or statistical purposes
- The establishment, exercise or defence of legal claims

The school has the right to refuse a request for erasure for special category data where processing is necessary for:

- Public health purposes in the public interest, e.g. protecting against serious cross-border threats to health.
- Purposes of preventative or occupational medicine, the working capacity of an employee, medical diagnosis, the provision of health or social care, or the management of health or social care systems or services.

Requests for erasure will be handled free of charge; however, the school may impose a ‘reasonable fee’ to cover the administrative costs of complying with requests that are manifestly unfounded or excessive or if an individual makes multiple requests at once.

As a child may not fully understand the risks involved in the processing of data when consent is obtained, special attention will be given to existing situations where a child has given consent to processing and they later request erasure of the data, regardless of age at the time of the request.

Where personal data has been disclosed to third parties, they will be informed about the erasure of the personal data, unless it is impossible or involves disproportionate effort to do so. Where personal data has been made public within an online environment, the school will inform other organisations who process the personal data to erase links to and copies of the personal data in question.

10. The right to restrict processing

Individuals, including children, have the right to block or suppress the school’s processing of personal data.

The school will restrict the processing of personal data in the following circumstances:

- Where an individual contests the accuracy of the personal data, processing will be restricted until the school has verified the accuracy of the data
- Where an individual has objected to the processing and the school is considering whether their legitimate grounds override those of the individual
- Where processing is unlawful and the individual opposes erasure and requests restriction instead
- Where the school no longer needs the personal data but the individual requires the data to establish, exercise or defend a legal claim

In the event that processing is restricted, the school will store the personal data, but not further process it, guaranteeing that just enough information about the individual has been retained to ensure that the restriction is respected in future. The school will inform individuals when a restriction on processing has been lifted.

Where the school is restricting the processing of personal data in response to a request, it will make that data inaccessible to others, where possible, e.g. by temporarily moving the data to another processing system or unpublishing published data from a website.

If the personal data in question has been disclosed to third parties, the school will inform them about the restriction on the processing of the personal data, unless it is impossible or involves disproportionate effort to do so.

The school reserves the right to refuse requests for restricting processing if they are manifestly unfounded or excessive or if exemptions apply. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the supervisory authority and to a judicial remedy, within one month of the refusal.

11. The right to data portability

Individuals, including children, have the right to obtain and reuse their personal data for their own purposes across different services. The right to data portability only applies in the following cases:

- Where personal data has been provided directly by an individual to a controller
- Where the processing is based on the individual's consent or for the performance of a contract
- When processing is carried out by automated means

Personal data can be easily moved, copied or transferred from one ICT environment to another in a safe and secure manner, without hindrance to usability. Personal data will be provided in a structured, commonly used and machine-readable form. Where feasible, data will be transmitted directly to another organisation at the request of the individual. The school will not be required to adopt or maintain processing systems which are technically compatible with other organisations.

The school will provide the information free of charge.

In the event that the personal data concerns more than one individual, the school will consider whether providing the information would prejudice the rights of any other individual.

The school will respond to any requests for portability within one month. Where the request is complex, or a number of requests have been received, the timeframe can be extended by two months, ensuring that the individual is informed of the extension and the reasoning behind it within one month of the receipt of the request.

Where no action is being taken in response to a request, the school will, without delay and at the latest within one month, explain to the individual the reason for this and will inform them of their right to complain to the supervisory authority and to a judicial remedy.

12. The right to object

The school will inform individuals, including children, of their right to object at the first point of communication, and this information will be outlined in the privacy notice and explicitly brought to the attention of the data subject, ensuring that it is presented clearly and separately from any other information. Individuals, including children, have the right to object to the following:

- Processing based on legitimate interests or the performance of a task in the public interest
- Processing used for direct marketing purposes
- Processing for purposes of scientific or historical research and statistics.

Where personal data is processed for the performance of a legal task or legitimate interests:

- An individual's grounds for objecting must relate to his or her particular situation.
- The school will stop processing the individual's personal data unless the processing is for the establishment, exercise or defence of legal claims, or, where the school can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual.

- The school will respond to objections proportionally, granting more weight to an individual's objection if the processing of their data is causing them substantial damage or distress.

Where personal data is processed for direct marketing purposes:

- The right to object is absolute and the school will stop processing personal data for direct marketing purposes as soon as an objection is received.
- The school cannot refuse an individual's objection regarding data that is being processed for direct marketing purposes.
- The school will retain only enough information about the individual to ensure that the individual's preference not to receive direct marketing is respected in future.

Where personal data is processed for research purposes:

- The individual must have grounds relating to their particular situation in order to exercise their right to object.
- Where the processing of personal data is necessary for the performance of a public interest task, the school is not required to comply with an objection to the processing of the data.

Where the processing activity is outlined above, but is carried out online, the school will offer a method for individuals to object online.

The DPO will ensure that details are recorded for all objections received, including those made by telephone or in person, and will clarify each objection with the individual making the request to avoid later disputes or misunderstandings. The school will respond to all objections without undue delay and within one month of receiving the objection; this may be extended by a further two months if the request is complex or repetitive.

Where no action is being taken in response to an objection, the school will, without delay and at the latest within one month, explain to the individual the reason for this and will inform them of their right to complain to the supervisory authority and to a judicial remedy.

13. Automated decision making and profiling

The school will only ever conduct solely automated decision making with legal or similarly significant effects is the decision is:

- Necessary for entering into or performance of a contract.
- Authorised by law.
- Based on the individual's explicit consent.

Automated decisions will not concern a child nor use special category personal data, unless:

- The school has the explicit consent of the individual.
- The processing is necessary for reasons of substantial public interest.

The school will conduct a DPIA for automated decision making to mitigate risk of errors, bias and discrimination.

The school will ensure that individuals concerned are given specific information about the processing and an opportunity to challenge or request a review of the decision.

Individuals have the right not to be subject to a decision when both of the following conditions are met:

- It is based on automated processing, e.g. profiling
- It produces a legal effect or a similarly significant effect on the individual

The school will take steps to ensure that individuals are able to obtain human intervention, express their point of view, and obtain an explanation of the decision and challenge it.

When automatically processing personal data for profiling purposes, the school will ensure that the appropriate safeguards are in place, including:

- Ensuring processing is fair and transparent by providing meaningful information about the logic involved, as well as the significance and the predicted impact.
- Using appropriate mathematical or statistical procedures.
- Implementing appropriate technical and organisational measures to enable inaccuracies to be corrected and minimise the risk of errors.
- Securing personal data in a way that is proportionate to the risk to the interests and rights of the individual and prevents discriminatory effects.

14. Data protection by design and default

The school will act in accordance with the UK GDPR by adopting a data protection by design and default approach and implementing technical and organisational measures which demonstrate how the school has considered and integrated data protection into all aspects of processing activities. In line with the data protection by default approach, the school will ensure that only data that is necessary to achieve its specific purpose will be processed.

The school will implement a data protection by design and default approach by using a number of methods, including, but not limited to:

- Considering data protection issues as part of the design and implementation of systems, services and practices.
- Making data protection an essential component of the core functionality of processing systems and services.
- Automatically protecting personal data in school ICT systems.
- Implementing basic technical measures within the school network and ICT systems to ensure data is kept secure.
- Promoting the identity of the DPO as a point of contact.
- Ensuring that documents are written in plain language so individuals can easily understand what is being done with personal data.

15. Data Protection Impact Assessments (DPIAs)

DPIAs will be used in certain circumstances to identify the most effective method of complying with the school’s data protection obligations and meeting individuals’ expectations of privacy. DPIAs will allow the school to identify and resolve problems at an early stage, thus reducing associated costs and preventing damage from being caused to the school’s reputation which might otherwise occur. A DPIA will be carried out when using new technologies or when the processing is likely to result in a high risk to the rights and freedoms of individuals, and will be used for more than one project, where necessary.

High risk processing includes, but is not limited to, the following:

- Systematic and extensive processing activities, such as profiling
- Large scale processing of special categories of data or personal data which is in relation to criminal convictions or offences
- The use of CCTV

The school will ensure that all DPIAs include the following information:

- A description of the processing operations and the purposes
- An assessment of the necessity and proportionality of the processing in relation to the purpose
- An outline of the risks to individuals
- The measures implemented in order to address risk

Where a DPIA indicates high risk data processing, the school will consult the ICO to seek its opinion as to whether the processing operation complies with the UK GDPR.

16. Data breaches

The term ‘personal data breach’ refers to a breach of security which has led to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. The headteacher will ensure that all staff are made aware of, and understand, what constitutes a data breach as part of their training.

Effective and robust breach detection, investigation and internal reporting procedures are in place at the school, which facilitate decision-making in relation to whether the relevant supervisory authority or the public need to be notified.

Where the school faces a data security incident, the DPO will coordinate an effort to establish whether a personal data breach has occurred, assess the significance of any breach, and take prompt and appropriate steps to address it.

All notifiable breaches will be reported to the relevant supervisory authority within 72 hours of the school becoming aware of it. Where a breach is likely to result in a risk to the rights and freedoms of individuals, the relevant supervisory authority will be informed, and the individuals concerned will be contacted directly. A ‘high risk’ breach means that the threshold for notifying the individual is higher than that for notifying the relevant supervisory authority. The risk of the breach having a detrimental effect on the individual, and the need to notify the relevant supervisory authority, will be assessed on a case-by-case basis. In the event that a breach is sufficiently serious, the public will be notified without undue delay.

Within a breach notification to the supervisory authority, the following information will be outlined:

- The nature of the personal data breach, including the categories and approximate number of individuals and records concerned
- The name and contact details of the DPO
- An explanation of the likely consequences of the personal data breach
- A description of the proposed measures to be taken to deal with the personal data breach
- Where appropriate, a description of the measures taken to mitigate any possible adverse effects

Where notifying an individual about a breach to their personal data, the school will provide specific and clear advice to individuals on the steps they can take to protect themselves and their data, where possible and appropriate to do so.

The school will ensure all facts regarding the breach, the effects of the breach and any decision-making processes and actions taken are documented in line with the UK GDPR accountability principle and in accordance with the Records Management Policy.

Failure to report a breach when required to do so may result in a fine, as well as a fine for the breach itself.

The school will work to identify the cause of the breach and assess how a recurrence can be prevented, e.g. by mandating data protection refresher training where the breach was a result of human error.

17. Data security

Confidential paper records will be kept in a locked filing cabinet, drawer or safe, with restricted access, and will not be left unattended or in clear view anywhere with general access.

Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed up via the cloud. Where digital data is saved on removable storage or a portable device, the device will be kept in a locked filing cabinet, drawer or safe when not in use. Memory sticks will not be used to hold personal information unless they are password-protected and fully encrypted. All electronic devices are password-protected to protect the information on the device in case of theft. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.

Where possible, staff and governors will not use their personal laptops or computers for school purposes. All necessary members of staff are provided with their own secure login and password.

If staff and governors need to use their personal laptops for school purposes, particularly if they are working from home, they will bring their device into school before using it for work to ensure the appropriate software can be downloaded and information encrypted.

Emails containing sensitive or confidential information are password-protected if there are unsecure servers between the sender and the recipient. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients or sent through a secure third party software programme, currently Pupil Asset. When sending confidential information staff will always check that the recipient is correct before sending.

Before sharing data, all staff will ensure:

- They are allowed to share it.
- That adequate security is in place to protect it.
- Who will receive the data has been outlined in a privacy notice.

Where personal information that could be considered private or confidential is taken off the premises, either in electronic or paper format, staff will 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.

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 physical security of the school's buildings and storage systems, and access to them, is reviewed on an annual basis. If an increased risk in vandalism, burglary or theft is identified, extra measures to secure data storage will be put in place.

The school will regularly test, assess and evaluate the effectiveness of any and all measures in place for data security.

The school takes its duties under the UK GDPR seriously and any unauthorised disclosure may result in disciplinary action. The SBM is responsible for continuity and recovery measures are in place to ensure the security of protected data.

When disposing of data, paper documents will be shredded and digital storage devices will be physically destroyed when they are no longer required. ICT assets will be disposed of in accordance with the ICO's guidance on the disposal of ICT assets.

The school holds the right to take the necessary disciplinary action against a staff member if they believe them to be in breach of the above security measures.

18. Safeguarding

The school understands that the UK GDPR does not prevent or limit the sharing of information for the purposes of keeping children safe.

The school will ensure that information pertinent to identify, assess and respond to risks or concerns about the safety of a child is shared with the relevant individuals or agencies proactively and as soon as is reasonably possible. Where there is doubt over whether safeguarding information is to be shared, especially with other agencies, the DSL will ensure that they record the following information:

- Whether data was shared
- What data was shared
- With whom data was shared
- For what reason data was shared
- Where a decision has been made not to seek consent from the data subject or their parent
- The reason that consent has not been sought, where appropriate

The school will aim to gain consent to share information where appropriate; however, will not endeavour to gain consent if to do so would place a child at risk. The school will manage all instances of data sharing for the purposes of keeping a child safe in line with the Child Protection and Safeguarding Policy.

19. Publication of information

The school publishes a Freedom of Information Publication Scheme on its website outlining classes of information that will be made routinely available, including:

- Policies and procedures.
- Minutes of meetings.
- Annual reports.
- Financial information.

Classes of information specified in the Freedom of Information Publication Scheme are made available quickly and easily on request.

The school will not publish any personal information, including photos, on its website without the permission of the affected individual. When uploading information to the school website, staff are considerate of any metadata or deletions which could be accessed in documents and images on the site.

20. CCTV and photography

The school understands that recording images of identifiable individuals constitutes as processing personal information, so it is done in line with data protection principles.

The school notifies all pupils, staff and visitors of the purpose for collecting CCTV images via notice boards, letters and email. Cameras are only placed where they do not intrude on anyone’s privacy and are necessary to fulfil their purpose. All CCTV footage will be kept for six months for security purposes; the headteacher is responsible for keeping the records secure and allowing access.

Before the school is able to obtain the data of pupils or staff, it is required to give notification and obtain consent for this Special Category Data due to additional requirements for processing such data under the Protection of Freedoms Act 2012.

The school will always indicate its intentions for taking photographs of pupils and will retrieve permission before publishing them. If the school wishes to use images or video footage of pupils in a publication, such as the school website, prospectus, or recordings of school plays, written permission will be sought for the particular usage from the parent of the pupil. Precautions, as outlined in the Photography Policy, are taken when publishing photographs of pupils, in print, video or on the school website.

Images captured by individuals for recreational or personal purposes, and videos made by parents for family use, are exempt from the UK GDPR.

Parents and others attending school events are able to take photographs and videos of those events as long as they are for domestic purposes only. Photographs or videos being used for any other purpose are prohibited to be taken by parents or visitors to the school.

The school asks that parents and others do not post any images or videos which include any children other than their own on any social media, or otherwise publish those images or videos.

21. Cloud computing

For the purposes of this policy, **‘cloud computing’** refers to storing and accessing data and programs, such as documents, photos or videos, over the internet, rather than on a device’s hard drive. Cloud computing involves the school accessing a shared pool of ICT services remotely via a private network or the internet.

All staff will be made aware of data protection requirements and how these are impacted by the storing of data in the cloud, including that cloud usage does not prevent data subjects from exercising their data protection rights.

If the cloud service offers an authentication process, each user will have their own account. A system will be implemented to allow user accounts to be created, updated, suspended and deleted, and for credentials to be reset if they are forgotten, lost or stolen. Access for employees will be removed when they leave the school.

All files and personal data will be encrypted before they leave a school device and are placed in the cloud, including when the data is ‘in transit’ between the device and cloud. A robust encryption key management arrangement will be put in place to maintain protection of the encrypted data. The loss of an encryption key will be reported to the DPO immediately; failure to do so could result in accidental access or destruction of personal data and, therefore, a breach of the relevant data protection legislation.

As with files on school devices, only authorised parties will be able to access files on the cloud. An audit process will be put in place to alert the school should unauthorised access, deletion or modification occur, and ensure ongoing compliance with the school’s policies for the use of cloud computing.

The school’s usage of cloud computing, including the service’s security and efficiency, will be assessed and monitored by the DPO. The DPO will also ensure that a contract and data processing agreement are in place with the service provider, confirming compliance with the principles of the UK GDPR and DPA. The agreement will specify the circumstances in which the service provider may access the personal data it processes, such as the provision of support services.

The DPO will also:

- Ensure that the service provider has completed a comprehensive and effective self-certification checklist covering data protection in the cloud.
- Ensure that the service provider can delete all copies of personal data within a timescale in line with the school’s Data Protection Policy.
- Confirm that the service provider will remove all copies of data, including back-ups, if requested.
- Find out what will happen to personal data should the school decide to withdraw from the cloud service in the future.
- Assess the level of risk regarding network connectivity and make an informed decision as to whether the school is prepared to accept that risk.

- Monitor the use of the school's cloud service, with any suspicious or inappropriate behaviour of pupils, staff or parents being reported directly to the headteacher

22. Record Management

Data will not be kept for longer than is necessary. Unrequired data will be deleted as soon as practicable. Some educational records relating to former pupils or employees of the school may be kept for an extended period for legal reasons, but also to enable the provision of references or academic transcripts. Paper documents will be shredded or pulped, and electronic memories scrubbed clean or destroyed, once the data should no longer be retained.

The retention schedule is detailed in Appendix D.

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

The following information is stored on the front of a pupil record, and will be easily accessible:

- Forename, surname, and date of birth
- Unique pupil number
- Note of the date when the file was opened

The following information is stored inside the front cover of a pupil record, and will be easily accessible:

- 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 people with parental responsibility, including their home address(es) and telephone number(s)
- Any other agency involvement, e.g. speech and language therapist
- Reference to any other linked files

The following information is stored in a pupil record, and will be easily accessible:

- Admissions form
- Details of any SEND
- If the pupil has attended an early years setting, the record of transfer
- Data collection or data checking form
- Annual written reports to parents
- National curriculum and agreed syllabus record sheets
- Notes relating to major incidents and accidents involving the pupil
- Any information about an EHC plan and support offered in relation to the EHC plan
- Medical information relevant to the pupil's on-going education and behaviour
- Any notes indicating child protection disclosures and reports
- Any information relating to exclusions

- Any correspondence with parents or external agencies relating to major issues, e.g. mental health
- Notes indicating that records of complaints made by parents or the pupil
- Examination results – pupil copy
- SATs results

The following information is subject to shorter retention periods and, therefore, will be stored separately in a personal file for the pupil in the school office:

- Attendance registers and information
- Absence notes and correspondence
- Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.
- Accident forms – forms about major accidents will be recorded on the pupil record
- Consent to administer medication and administration records
- Copies of pupil birth certificates, passports etc.
- Correspondence with parents about minor issues, e.g. behaviour
- Pupil work
- Previous data collection forms that have been superseded

Hard copies of disclosures and reports relating to child protection are stored in a sealed envelope, in a securely locked filing cabinet in the headteacher's office – a note indicating this is marked on the pupil's file.

Hard copies of complaints made by parents or pupils are stored in a file in the headteacher's office – a note indicating this is marked on the pupil's file.

Actual copies of accident and incident information are stored separately on the school's management information system and held in line with the retention periods outlined in this policy – a note indicating this is marked on the pupil's file. An additional copy may be placed in the pupil's file in the event of a major accident or incident.

The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend. The only exception is if any records placed on the pupil's file have a shorter retention period and may need to be removed. In such cases, the DPO will remove these records.

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

The school will not keep any copies of information stored within a pupil's record unless there is ongoing legal action at the time during which the pupil leaves the school. The responsibility for these records will then transfer to the next school that the pupil attends.

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.

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

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

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

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

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

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

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

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

Before sharing data, staff always ensure that:

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

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

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

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

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

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

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

The DPO is responsible for ensuring continuity and recovery measures are in place to ensure the security of protected data.

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

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

Data controllers and processors follow the EU GDPR where:

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

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

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

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

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

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

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

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

- Paper documents and records
- Electronic documents and records
- Databases
- Microfilm or microfiche
- Sound recordings
- Video and photographic records
- Hybrid files, containing both paper and electronic information
- Knowledge
- Apps and portals

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

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

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

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

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

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

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

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

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

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

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

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

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

Academy conversion

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

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

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

Sale or re-use of the site

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

Merger of schools

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

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

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

Managing records

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

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

When sorting records, the DPO and their team will:

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

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

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

23. DBS data

All data provided by the DBS will be handled in line with data protection legislation; this includes electronic communication. Data provided by the DBS will never be duplicated. Any third parties who access DBS information will be made aware of the data protection legislation, as well as their responsibilities as a data handler.

24. Cyber Security

Unauthorised use without damage to data – involves unauthorised persons accessing data on the school system, e.g. 'hackers', who may read the data or copy it, but who do not actually damage the data in terms of altering or deleting it. This includes unauthorised people within the school, e.g. schools where pupils access systems that staff have left open and/or logged in, or where staff access data beyond their authorisation, as can occur in schools where all staff are given admin-level access for ease.

Unauthorised removal of data – involves an authorised person accessing data, who removes the data to pass it on to another person who is not authorised to view it, e.g. a staff member with authorised access who passes the data on to a friend without authorised access. This is also known as data theft. The data may be forwarded or deleted altogether.

Damage to physical systems – involves damage to the hardware in the school's ICT system, which may result in data being inaccessible to the school and/or becoming accessible to unauthorised persons.

Unauthorised damage to data – involves an unauthorised person causing damage to data, either by altering or deleting it. Data may also be damaged by a virus attack, rather than a specific individual.

Breaches in security may be caused by the actions of individuals, and may be accidental, malicious or the result of negligence:

- Accidental breaches can occur as a result of human error or insufficient training for staff, so they are unaware of the procedures to follow
- Malicious breaches can occur as a result of a hacker wishing to cause damage to the school through accessing and altering, sharing or removing data

Breaches caused by negligence can occur as a result of a staff member knowingly disregarding school policies and procedures or allowing pupils to access data without authorisation and/or supervision

Breaches in security may also be caused by system issues, which could involve incorrect installation, configuration problems or operational errors:

- The incorrect installation of antivirus software and/or use of outdated software can make the school software more vulnerable to a virus
- Incorrect firewall settings being applied, e.g. unrestricted access to the school network, can allow unauthorised individuals to access the school system
- Operational errors, such as confusion between back-up copies of data, can cause the most recent data to be overwritten

The governing board will be responsible for:

- Ensuring the school has appropriate cyber-security measures in place.
- Ensuring the school has an appropriate approach to managing data breaches in place.
- Supporting the headteacher and other relevant staff in the delivery of this policy.
- Ensuring the school meets the relevant cyber-security standards.

The headteacher will be responsible for:

- Ensuring all staff members and pupils are aware of their responsibilities in relation to this policy.
- Ensuring appropriate user access procedures are in place.
- Responding to alerts for access to inappropriate content in line with the Online Safety Policy.
- Organising training for staff members in conjunction with the online safety officer and DPO.
- Ensuring a log of cyber-security incidents is maintained.
- Appointing a cyber recovery team who is responsible for implementing the school's procedures in the event of a cyber-security incident.

The DPO will be responsible for:

- The overall monitoring and management of data security.
- Deciding which strategies are required for managing the risks posed by internet use.
- Leading on the school's response to incidents of data security breaches, including leading the cyber recovery team.
- Assessing the risks to the school in the event of a cyber-security breach.
- Determining which organisations and individuals need to be notified following a data security breach, and ensuring they are notified.
- Working with the ICT technician and headteacher after a data security breach to determine where weaknesses lie and improve security measures.
- Organising training for staff members on data security, network security and preventing breaches.
- Monitoring and reviewing the effectiveness of this policy, alongside the headteacher, and communicating any changes to staff members.

The ICT technician will be responsible for:

- Maintaining an inventory of all ICT hardware and software currently in use at the school.
- Ensuring any out-of-date software is removed from the school systems.
- Implementing effective firewalls to enhance network security and ensuring that these are monitored regularly.
- Installing, monitoring and reviewing filtering systems for the school network.
- Setting up user privileges in line with recommendations from the headteacher.
- Maintaining an up-to-date and secure inventory of all usernames and passwords.
- Removing any inactive users from the school system and ensuring that this is always up-to-date.
- Installing appropriate security software on staff members' personal devices where the headteacher has permitted for them to be used for work purposes.
- Performing a back-up of all electronic data held by the school, ensuring detailed records of findings are kept.
- Ensuring all school-owned devices have secure malware protection and are regularly updated.
- Recording any alerts for access to inappropriate content and notifying the headteacher.

The DSL will be responsible for:

- Assessing whether there is a safeguarding aspect to any cyber-security incident and considering whether any referrals need to be made.

All staff members will be responsible for:

- Understanding their responsibilities in regard to this policy.
- Undertaking the appropriate training.
- Ensuring they are aware of when new updates become available and how to safely install them.

An inventory will be kept of all ICT hardware and software currently in use at the school, including mobile phones and other personal devices provided by the school. The inventory will be stored on a software programme (currently Star Accounts) and will be audited on an annual basis to ensure it is up-to-date. Any changes to the ICT hardware or software will be documented using the inventory and will be authorised by the ICT technician before use.

All systems will be audited on an ongoing basis by the ICT technician to ensure the software is up-to-date. Any new versions of software or new security patches will be added to systems, ensuring that they do not affect network security, and will be recorded in the inventory. Any software that is out-of-date or reaches its ‘end of life’ will be removed from systems, e.g. when suppliers end their support for outdated products, meaning that the product is not able to fulfil its purpose anymore.

All hardware, software and operating systems will require passwords from individual users. Passwords will be changed on a regular basis to prevent access to facilities which could compromise network security. The school believes that locking down hardware, such as through the use of strong passwords, is an effective way to prevent access to facilities by unauthorised users. Passwords will need to adhere to a specific character length, use special characters, and not be obvious or easy to guess, in line with the school’s policy on passwords.

The school will consider referring to the five security controls outlined in the National Cyber Security Centre’s (NCSC’s) ‘Cyber Essentials’. These are:

- **Firewalls** – Firewalls function as a barrier between internal networks and the internet. They will be installed on any device that can access the internet, particularly where staff are using public or otherwise insecure Wi-Fi.
- **Secure configuration** – The default configurations on devices and software are often as open as possible to ensure ease of use, but they also provide more access points for unauthorised users. The school will disable or remove any unnecessary functions and change default passwords to reduce the risk of a security breach.
- **Access control** – The more people have access to data, the larger the chance of a security breach. The school will ensure that access is given on a ‘need-to-know’ basis to help protect data. All accounts will be protected with strong passwords, and where necessary, two-factor authorisation.
- **Malware protection** – The school will protect itself from malware by installing antivirus and anti-malware software, and using techniques such as whitelisting (a cyber-security strategy under which a user can only take actions on their computer that an administrator has explicitly allowed in advance) and sandboxes (an isolated virtual machine in which potentially unsafe software code can execute without affecting network resources or local applications).
- **Patch management** – The school will install software updates as soon as they are available to minimise the time frame in which vulnerabilities can be exploited. If the manufacturer stops offering support for the software, the school will replace it with a more up-to-date alternative.

The ICT technician will:

- Protect every device with a correctly configured boundary, or software firewall, or a device that performs the same function.
- Change the default administrator password, or disable remote access on each firewall.
- Protect access to the firewall's administrative interface with multi-factor authentication (MFA), or a small, specified IP-allow list combined with a managed password, or prevent access from the internet entirely.
- Keep firewall firmware up to date.
- Check monitoring logs as they can be useful in detecting suspicious activity.
- Block inbound unauthenticated connections by default.
- Document reasons why particular inbound traffic has been permitted through the firewall.
- Review reasons why particular inbound traffic has been permitted through the firewall often, change the rules when access is no longer needed.
- Enable a software firewall for devices used on untrusted networks, like public wi-fi.

All devices will be set up in a way that meets the standards described in the technical requirements.

The ICT technician will devise a system for monitoring logs and documenting decisions made on inbound traffic.

In line with the UK GDPR, the school will appropriately test, assess, and evaluate any security measures put in place on an ongoing basis to ensure these measures remain effective.

The school will employ firewalls in order to prevent unauthorised access to the systems.

Centralised firewall deployment

The school's firewall will be deployed as a centralised deployment, which means the broadband service connects to a firewall that is located within a data centre or other major network location.

As the school's firewall is managed locally by a third party, the firewall management service will be thoroughly investigated by the ICT technician to ensure that:

- Any changes and updates that are logged by authorised users within the school are undertaken efficiently by the provider to maintain operational effectiveness.
- Patches and fixes are applied quickly to ensure that the network security is not compromised.

The school will consider installing additional firewalls on the servers in addition to the third-party service as a means of extra network protection. This decision will be made by the DPO, taking into account the level of security currently provided and any incidents that have occurred.

The school will be aware that security standards may change over time with changing cyber threats.

The school will ensure that the security of every device on its network is reviewed regularly.

The school will agree with the ICT technician a system for recording and reviewing decisions made about network security features.

To ensure that the network is as secure as possible, the school will:

- Keep a register, list, or diagram of all the network devices.
- Avoid leaving network devices in unlocked or unattended locations.
- Remove or disable unused user accounts, including guest and unused administrator accounts.
- Change default device passwords.
- Require authentication for users to access sensitive school data or network data.
- Remove or disable all unnecessary software according to your organisational need.
- Disable any auto-run features that allow file execution.
- Set up filtering and monitoring services to work with the network's security features enabled.
- Immediately change passwords which have been compromised or suspected of compromise.
- Protect against a brute-force attack on all passwords by allowing no more than 10 guesses in five minutes, or locking devices after no more than 10 unsuccessful attempts.

Unlicenced hardware or software will never be used by the school.

All unpatched or unsupported hardware or software will be replaced by the ICT technician. Where it is not possible to replace these devices, they will have their access to the internet removed so that scanning tools cannot find weaknesses.

The school understands that malware can be damaging for network security and may enter the network through a variety of means, such as email attachments, social media, malicious websites or removable media controls.

The ICT technician will ensure that all school devices have secure malware protection and undergo regular malware scans in line with specific requirements. The ICT technician will update malware protection on an ongoing basis to ensure it is up-to-date and can react to changing threats. Malware protection will also be updated in the event of any attacks to the school's hardware and software.

Filtering of websites, as detailed in the 'User privileges and passwords' section of this policy, will ensure that access to websites with known malware are blocked immediately and reported to the ICT technician.

The school will use mail security technology, which will detect and block any malware that is transmitted by email. This will also detect any spam or other messages which are designed to exploit users. The ICT technician will review the mail security technology on an ongoing basis to ensure it is kept up-to-date and effective.

Staff members are only permitted to download apps on any school-owned device from manufacturer-approved stores and with prior approval from the online safety officer. Where apps are installed, the ICT technician will keep up-to-date with any updates, ensuring staff are informed of when updates are ready and how to install them.

The school will use anti-malware software that:

- Is set up to scan files upon access, when downloaded, opened, or accessed from a network folder.
- Scans web pages as they are accessed.
- Prevents access to potentially malicious websites, unless risk-assessed, authorised and documented against a specific business requirement.

The school understands that controlling what users have access to is important for promoting network security and data protection. User privileges will be differentiated, e.g. pupils will have different access to data and the network than members of staff, whose access will also be role-based.

The headteacher will clearly define what users have access to and will communicate this to the ICT technician, ensuring that a written record is kept. The ICT technician will ensure that user accounts are set up to allow users access to the facilities required, in line with the headteacher's instructions, whilst minimising the potential for deliberate or accidental attacks on the network.

All users will be required to change their passwords if they become known to other individuals, in line with the 'Secure configuration' section of this policy. Pupils are responsible for remembering their passwords; however, the ICT technician will have an up-to-date record of all usernames and passwords and will be able to reset them if necessary. The record of all usernames and passwords is encrypted. Only the ICT technician has access to this inventory. Multi-factor authentication (multiple different methods of verifying the user's identity) should be used wherever possible.

The 'master user' password used by the ICT technician will be made available to the headteacher and any other nominated senior leader, and will be kept in the headteacher's office.

The master user account accessed by the ICT technician, DPO and headteacher is subject to a two-factor authentication for logins. This account requires two different methods to provide identity before logging in: a password and a verification code sent to another school-owned device which must be entered following the password. The master user account is used as the 'administrator' which allows designated users to make changes that will affect other users' accounts in the school, such as changing security settings, monitoring usage, and installing software and hardware.

A multi-user account will be created for visitors to the school, such as volunteers, and access will be filtered as per the headteacher's instructions. Usernames and passwords for this account will be changed on an ongoing basis and will be provided as required.

Automated user provisioning systems will be employed in order to automatically delete inactive users or users who have left the school. The ICT technician will manage this provision to ensure that all users that should be deleted are, and that they do not have access to the system.

Password strength will be enforced at a system level – the school will use a deny list for automatic blocking of common passwords and passwords must contain a minimum of eight characters.

The school will implement a user account creation, approval and removal process which is part of the school joining and leaving protocols.

User accounts and access privileges will be appropriately controlled, and only authorised individuals will have an account which enables them to access, alter, disclose or delete personal data.

Users will have a separate account for routine business if their main account:

- Is an administrative account.
- Enables the execution of software that makes significant system or security changes.
- Can make changes to the operating system.
- Can create new accounts.
- Can change the privileges of existing accounts.

The school will consider using multi-factor authentication, particularly for accounts that have access to sensitive or personal data.

The ICT technician will review the password system on an ongoing basis to ensure it is working at the required level.

Monitoring user activity is important for the early detection of attacks and incidents, as well as inappropriate usage by pupils or staff. The school will inform all pupils and staff that their usage will be monitored, as well as how it is being monitored and why, in accordance with the school’s Online Safety Policy.

If a user accesses inappropriate content or a threat is detected, an alert will be sent to the ICT technician. Alerts will also be sent for unauthorised and accidental access. Alerts will identify the user, the activity that prompted the alert, and the information or service the user was attempting to access.

The ICT technician will record any alerts using an incident log and will report this to the DPO. The DPO will then inform the headteacher and online safety officer as appropriate. All incidents will be responded to in accordance with the ‘Data security breach incidents’ section of this policy, and as outlined in the Online Safety Policy.

The ICT technician will ensure that websites are filtered on an ongoing basis for inappropriate and malicious content. Any member of staff or pupil that accesses inappropriate or malicious content will be recorded in accordance with the monitoring process in the ‘Data security breach incidents’ section of this policy.

All data gathered by monitoring usage will be kept on a secure shared drive for easy access when required. This data may be used as a method of evidence for supporting a not-yet-discovered breach of network security. In addition, the data may be used to ensure the school is protected and all software is up-to-date.

The ICT technician will encrypt all school-owned devices for personal use, such as laptops, USB sticks, mobile phones and tablets, to ensure that they are password protected. If any portable devices are lost, this will prevent unauthorised access to personal data.

Before distributing any school-owned devices, the ICT technician will ensure that manufacturers' default passwords have been changed. A set password will be chosen, and the staff member will be prompted to change the password once using the device. The ICT technician will check school-owned devices on a termly basis to detect any unchanged default passwords.

When using laptops, tablets and other portable devices, the headteacher will determine the limitations for access to the network, as described in the 'Network security' section of this policy.

Staff who use school-owned laptops, tablets and other portable devices will use them for work purposes only, whether on or off the school premises. Staff will avoid connecting to unknown Wi-Fi hotspots, such as in coffee shops, when using any school-owned laptops, tablets or other devices.

The ICT Technician will use encryption to filter the use of websites on school-owned devices in order to prevent inappropriate use and external threats which may compromise network security when bringing the device back onto the premises. The school uses tracking technology where possible to ensure that lost or stolen school-owned devices can be retrieved.

All data will be held on systems centrally in order to reduce the need for the creation of multiple copies, and/or the need to transfer data using removable media controls.

The Wi-Fi network at the school will be password protected and will only be given out as required. Staff and pupils are not permitted to use the Wi-Fi for their personal devices, such as mobile phones or tablets, unless agreed prior to usage.

Staff and pupils will adhere to data protection legislation and the school's related policies when working remotely.

Staff will receive annual training regarding what to do if a data protection issue arises from any home working or remote learning.

Wherever possible, personal data will not be taken home by staff members for the purposes of home working, due to the risk of data being lost or the occurrence of a data breach.

Staff and pupils are not permitted to let their family members or friends use any school equipment, in order to protect the confidentiality of any personal data held on the device. Any staff member found to have shared personal data without authorisation will be disciplined in line with the Disciplinary Policy and Procedure. This may also result in a data breach that the school would need to record and potentially report to the ICO.

Staff who require access to personal data to enable them to work from home will first seek approval from the headteacher, and it will be ensured that the appropriate security measures are in place by the ICT technician and the DPO, e.g. secure passwords and anti-virus software.

Staff will be informed that caution should be exercised while accessing personal data if an unauthorised person is in the same room. If a member of staff needs to leave their device unattended, the device should be locked. School devices will automatically lock after one minute of inactivity to avoid an unauthorised person gaining access to the device. Where staff are using a personal device, they will be advised that a similar function should be implemented.

Personal data should only be transferred to a home device if this is necessary for the member of staff to carry out their role. When sending confidential information, staff must never save confidential information to a personal or household device. Data that is transferred from a work to a home device will be encrypted so that if any data is lost, stolen or subject to unauthorised access, it will remain safe until it can be recovered.

To ensure reasonable precautions are taken when managing data, staff will avoid:

- Keeping personal data on unencrypted hard drives.
- Sending work emails to and from personal email addresses.
- Leaving logged-in devices and files unattended.
- Using shared home devices where other household members can access personal data.
- Using an unsecured Wi-Fi network.

Pupils are not permitted to use school-owned devices or software for activities that do not pertain to their online education, e.g. use of social media, gaming, streaming or viewing content that is not applicable to their curriculum. Pupils are not permitted to download any software onto school devices, unless instructed to and approved by their teacher.

Pupils will not alter the passwords or encryptions protecting school documents and systems put in place by the school. Pupils will not alter or disable any security measures that are installed on school devices, e.g. firewalls, malware prevention or anti-virus software. Pupils will not share any confidential and/or personal information made accessible to them, e.g. VPN passwords, with anyone who is not authorised to view that information.

Pupils that do not use school devices or software in accordance with this policy will be disciplined in line with the Behavioural Policy.

Pupils must report any technical issues to their teacher as soon as possible. Parents and pupils will be encouraged to contact the class teacher / headteacher if they wish to report any concerns regarding online safety.

Any devices that are used by staff and pupils for remote working and learning will be assessed by the ICT technician prior to being taken to the home setting, using the following checks:

- System security check – the security of the network and information systems
- Data security check – the security of the data held within the systems
- Online security check – the security of any online service or system, e.g. the school website

- Device security check – the security of the personal device, including any ‘bring your own device’ systems

In the event that a staff member or pupil decides to leave the school permanently, all data in any form will be returned on or before their last day.

The ICT technician will ensure that there are backup copies of important data, on at least two separate devices – one of which will remain off-site, e.g. cloud backups.

The number of devices with access to back up data will be kept to an absolute minimum.

The school must follow the NCSC’s guidance on backing up data where necessary, including:

- Identifying what essential data needs to be backed up.
- Storing backed-up data in a separate location to the original data.
- Considering using the Cloud to store backed-up data.
- Referring to the NCSC’s Cloud Security Guidance.
- Ensuring that backing up data is regularly practised.

Where possible, back-ups are run overnight and are completed before the beginning of the next school day. Only authorised personnel will be able to access back-ups of the school’s data.

The school will ensure that offline or ‘cold’ back-ups are secured. This can be done by only digitally connecting the back-up to live systems when necessary, and never having all offline back-ups connected at the same time.

The school’s back-up strategy will be tested on a monthly basis.

The ICT technician will configure all staff accounts using the principle of ‘least privilege’ – staff members are only provided with as much rights as are required to perform their jobs.

Designated individuals who have access to the master user account will avoid browsing the web or checking emails whilst using this account. Two-factor authentication is used on any important accounts, such as the master user account, or any key accounts, such as the headteacher’s or SBM’s accounts.

Staff will use the following warning signs when considering whether a communication may be unusual:

- Is it from overseas?
- Is the spelling, grammar and punctuation poor?
- Is the design and quality what you would expect from a large organisation?
- Is it addressed to a ‘valued customer’, ‘friend’ or ‘colleague’?
- Does it contain a veiled threat that asks the staff member to act urgently?
- Is it from a senior member of the school asking for a payment?
- Is it from a supplier advising of a change in bank account details for payment?
- Does it sound too good to be true? It is unlikely someone will want to give another individual money or access to another service for free.
- Is it from a generic email address, such as Gmail or Hotmail?

The ICT technician will ensure that an appropriate email filtering system is used to identify which emails would be classed as junk or spam, applied in accordance with the ‘Malware prevention’ section of this policy. The ICT technician will ensure that the filtering system is neither too strict nor too lenient, to allow the correct emails to be sent to the relevant folders.

To prevent anyone having access to unnecessary personal information, the DPO will ensure the school’s social media accounts and websites are reviewed on a termly basis, making sure that only necessary information is shared. The headteacher and DPO will ensure the school’s Social Media Policy includes expectations for sharing of information and determines what is and is not appropriate to share.

The headteacher will ensure parents, pupils, staff and other members of the school community are aware of acceptable use of social media and the information they share about the school and themselves.

The headteacher will arrange training for pupils and staff on an annual basis to ensure they are aware of how to use the network appropriately. This will cover identifying irregular methods of communication in order to help staff members spot requests that are out of the ordinary, such as receiving an invoice for a service not used, and who to contact if they notice anything unusual. Unusual communications could come in a variety of forms, e.g. emails, phone calls, text messages or social media messages.

The headteacher will also arrange training for pupils and staff on an annual basis on maintaining data security, preventing data breaches, and how to respond in the event of a data breach. Training for all staff members will be arranged by the headteacher and DPO within two weeks following an attack, breach or significant update.

Through training, all pupils and staff will be aware of who they should inform first in the event that they suspect a security breach, and who they should inform if they suspect someone else is using their passwords. All staff will receive training as part of their induction programme. All pupils will receive training upon joining the school.

All users will be made aware of the disciplinary procedures for the misuse of the network leading to malicious attacks, in accordance with the process detailed in the Behavioural Policy and the Disciplinary Procedure.

Any individual that discovers a cyber-security incident will report this immediately to the headteacher and the DPO.

When an incident is raised, the DPO will record the following information:

- Name of the individual who has raised the incident
- Description and date of the incident
- Description of any perceived impact
- Description and identification codes of any devices involved, e.g. school-owned laptop
- Location of the equipment involved
- Contact details for the individual who discovered the incident
- Whether the incident needs to be reported to the relevant authorities, e.g. the ICO or police

The DPO, as quickly as reasonably possible, will ascertain the severity of the incident and determine if any personal data is involved or has been compromised. The DPO will oversee a full investigation and produce a comprehensive report. The cause of the incident, and whether it has been contained, will be identified – ensuring that the possibility of further loss or jeopardising of data is eliminated or restricted as much as possible.

If the DPO determines that the severity of the security breach is low, the incident will be managed in accordance with the following procedures:

- In the event of an internal breach, the incident is recorded using an incident log, and by identifying the user and the website or service they were trying to access
- The headteacher will issue disciplinary sanctions to the pupil or member of staff who caused the breach, in accordance with the Behavioural Policy or Disciplinary Procedure
- The school will work with the third-party provider to provide an appropriate response to the attack, including any in-house changes
- The school will organise updated staff training following a breach
- Any further action which could be taken to recover lost or damaged data will be identified – this includes the physical recovery of data, as well as the use of back-ups

Where the security risk is high, the DPO will establish what steps need to be taken to prevent further data loss, which will require support from various school departments and staff. This action will include:

- Informing relevant staff of their roles and responsibilities in areas of the containment process.
- Taking systems offline.
- Retrieving any lost, stolen or otherwise unaccounted for data.
- Restricting access to systems entirely or to a small group.
- Backing up all existing data and storing it in a safe location.
- Reviewing basic security, including:
    - Changing passwords and login details on electronic equipment.
    - Ensuring access to places where electronic or hard data is kept is monitored and requires authorisation.

Where appropriate, e.g. if offences have been committed under the Computer Misuse Act 1990, the DPO will inform the police of the security breach.

Schools are required to report personal data breaches to the ICO if there is a likelihood of risk to people’s rights and freedoms. If the DPO decides that risk is unlikely, the breach does not need to be reported; however, the school will need to justify this decision and document the breach.

The DPO will notify the ICO within 72 hours of becoming aware of a breach where it is likely to result in a risk to the rights and freedoms of individuals.

The UK GDPR recognises that it will not always be possible to investigate a breach fully within 72 hours. The information required can be provided in phases, as long as this is done without undue further delay.

In line with the UK GDPR, the following must be provided to the ICO when reporting a personal data breach:

- A description of the nature of the breach, including, where possible:
  - The categories and approximate number of individuals concerned
  - The categories and approximate number of personal data records concerned
- The name and contact details of the DPO
- A description of the likely consequences of the breach
- A description of the measures taken, or proposed to be taken, to deal with the breach
- A description of the measures taken to mitigate any possible adverse effects, where appropriate

The school will report a personal data breach via the ICO website. The school will also make use of the ICO's self-assessment tool to determine whether reporting a breach is a necessary next step.

Where a breach is likely to result in a significant risk to the rights and freedoms of individuals, the DPO will notify those concerned directly of the breach without undue delay.

Where the school has been subject to online fraud, scams or extortion, the DPO will also report this using the Action Fraud website.

The DPO and ICT technician will test all systems to ensure they are functioning normally, and the incident will only be deemed 'resolved' when it has been assured that the school's systems are safe to use.

The following questions will be considered by the DPO to fully and effectively assess the risks that the cyber-security breach has brought, and to help take the next appropriate steps. All relevant questions will be clearly and fully answered in the DPO's report, which should record:

- What type of, and how much, data is involved?
- How sensitive is the data? Sensitive data is defined in the UK GDPR; some data is sensitive because of its very personal nature (e.g. health records) while other data types are sensitive because of what might happen if it is misused (e.g. bank account details).
- Is it possible to identify what has happened to the data – has it been lost, stolen, deleted or tampered with?
- If the data has been lost or stolen, were there any protective measures in place to prevent this, such as data and device encryption?
- If the data has been compromised, have there been effective measures in place that have mitigated the impact of this, such as the creation of back-up tapes and spare copies?
- Has individuals' personal data been compromised – how many individuals are affected?
- Who are these individuals – are they pupils, staff, governors, volunteers, stakeholders, suppliers?
- Could their information be misused or manipulated in any way?
- Could harm come to individuals? This could include risks to the following:

  - Physical safety
  - Emotional wellbeing
  - Reputation
  - Finances
  - Identity
  - Private affairs becoming public
- Are there further implications beyond the risks to individuals? Is there a risk of loss of public confidence and/or damage to the school's reputation, or risk to the school's operations?
- Who could help or advise the school on the breach? Could the LA, external partners, authorities, or others provide effective support?
- Does the breach need to be reported to the ICO? If so, has it been successfully reported without undue delay?

In the event that the DPO, or other persons involved in assessing the risks to the school, are not confident in the assessment of risk, they will seek advice from the ICO.

The DPO will consider whether there are any legal, contractual or regulatory requirements to notify individuals or organisations that may be affected or who will have an interest in data security.

The DPO will assess whether notification could help the individual(s) affected, and whether the individual(s) could act on the information provided to mitigate risks, e.g. by cancelling a credit card or changing a password. In line with the 'Data security breach incidents' section of this policy, if a large number of people are affected, or there are very serious consequences, the ICO will be informed.

The DPO will consider who to notify, what to tell them and how they will communicate the message, which may include:

- A description of how and when the breach occurred and what data was involved.
- Details of what has already been done to respond to the risks posed by the breach.
- Specific and clear advice on the steps they can take to protect themselves, and what the school is willing to do to help them.
- A way in which they can contact the school for further information or to ask questions about what has occurred.

The DPO will consider, as necessary, the need to notify any third parties, such as the police, insurers, professional bodies, funders, trade unions, website and/or system owners, banks and/or credit card companies, who can assist in helping or mitigating the impact on individuals.

The DPO will document all the facts regarding the breach, its effects and the remedial action taken. This should be an evaluation of the breach, and what actions need to be taken forward.

The DPO will consider the data and contexts involved, establish the root of the breach, and where any present or future risks lie, taking into consideration whether the breach is a result of human or systematic error and see how a recurrence can be prevented.

The DPO and headteacher will identify any weak points in existing security measures and procedures. The DPO will work with the ICT technician to improve security procedures wherever required. The DPO and headteacher will identify any weak points in levels of security awareness and training.

The DPO will report on findings and implement the recommendations of the report after analysis and discussion.

25. Monitoring and review

This policy is reviewed annually by the DPO and the headteacher. The next scheduled review date for this policy is July 2024.

Appendix A – Data Privacy for Third Parties

Privacy notice – how the school uses information from third parties

What categories of information are processed?

The categories of personal information that we process include the following:

- Name
- Associated business
- Purpose of visit
- Car registration
- Driving licence, passport or other official documentation for identity verification
- Disclosure and Barring Service check results

Why do we collect and use your information?

We collect and use your information for the following reasons:

- We have a record of who is and has been in the building, for health, safety and operational purposes (legal obligation)
- We have a record of official visits, such as inspections or maintenance (task in a public interest)
- Where needed, Disclosure and Barring Service checks can take place (task in a public interest or legal obligation)

Under the UK GDPR, the legal basis/bases we rely on for processing personal information for general purposes are:

- Under Article 6 of the General Data Protection Regulation (GDPR) to perform our official function (public task)
- Classed as Special Category data, e.g. health etc under Article 9 of the General Data Protection Regulation (GDPR) to carry out tasks in the public interest
- Where it is carried out as a task in the public interest such as equal opportunities monitoring, for child protection purposes or where otherwise authorised by law, such as Departmental Censuses as required in the Education Act 1996
- Under the terms of a contract we hold with you
- As part of your attendance in schools, background checks from the Disclosure and Barring Service may be done which may involve the collection of criminal convictions
- Where you have given us consent to do so

How do we collect your information?

We collect your personal information via the following methods:

- Contracts and enquiry forms
- Employment forms
- Communication either in a paper form or electronically

Data relating to third parties is essential for the school's operational use. Whilst most of the information you provide us is mandatory, some of it is requested on a voluntary basis. To comply with the UK GDPR, we will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice.

How do we store your information?

Your personal information is retained in line with the school's Records Management Procedures, which can be found in our Data Protection Policy.

Who do we share your information with?

Your information will not be shared unless requested by an external agency in the course of a health and safety incident or in the investigation of a crime.

Any information we share with other parties is transferred securely and held by the other organisation in line with their data security policies.

What are your rights?

You have specific rights to the processing of your data; these are the right to:

- Request access to the information the school holds about you.
- Restrict the school's processing of your personal data, i.e. permitting its storage but no further processing.
- Object to direct marketing (including profiling) and processing for the purposes of scientific and/or historical research and statistics.
- Have your personal data rectified if it is inaccurate or incomplete.
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.
- Request the deletion or removal of personal data where there is no compelling reason for the continued processing.

If you want to request access to the personal information we hold about you, please contact the headteacher on 01493 700271 or via head@reedham.norfolk.sch.uk.

If you are concerned about the way we are collecting or using your information, please raise your concern with the school's DPO in the first instance. You can also contact the ICO at https://ico.org.uk/concerns.

How to withdraw consent and lodge complaints

Where our school processes your personal data with your consent, you have the right to withdraw your consent at any time.

If you change your mind or are unhappy with how our school uses your personal data, you should let us know by contacting the DPO.

Updating this privacy notice

We may need to update this privacy notice periodically if we change how we collect and process data. We recommend that you revisit this privacy notice periodically.

This privacy notice was last updated on 05/09/2023.

How can you find out more information?

If you would like to discuss anything in this privacy notice, please contact Data Protection Education on

Telephone: 0800 0862018

Email: dpo@dataprotection.education

Appendix B - Data Privacy for Pupils

Privacy notice – how the school uses pupil information

We also have a privacy notice written in child-friendly language, to aid pupils' understanding of their rights in relation to their data. A copy of this is available as Appendix D.

What categories of information are processed?

The categories of personal information that we process include the following:

- **Personal identifiers and contacts** – e.g. name, unique pupil number, contact details and address
- **Characteristics** – e.g. ethnicity, language and eligibility for free school meals
- **Safeguarding information** – e.g. court orders and professional involvement
- **Special educational needs and disabilities (SEND) information** – e.g. any additional needs
- **Medical and administration** – e.g. doctors' information, general health, dental health, allergies, medication and dietary requirements
- **Attendance** – e.g. sessions attended, number of absences, reasons for absences and any previous schools you have attended
- **Assessment and attainment** – e.g. any relevant test and exam results
- **Behavioural information** – e.g. exclusions and any relevant alternative provision put in place

This list is not exhaustive.

Why do we collect and use your information?

We will only collect your information when we have a good reason to do so in line with the law – this is known as having a lawful basis to use data. Here are the reasons we collect your information:

- **To support pupil learning**
- **To monitor and report on pupil attainment and progress**
- **To provide appropriate pastoral care**
- **To assess the quality of our services**
- **To keep pupils safe**
- **To meet legal duties placed on us by the government**

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis/bases we rely on for processing pupil information are:

● We collect and use pupil information under a task performed in the public interest where it relates to a child's educational progression;

● Under Article 6 of the General Data Protection Regulation (GDPR) to perform our official function (public task);

● Classed as Special Category data, e.g. health etc under Article 9 of the General Data Protection Regulation (GDPR) to carry out tasks in the public interest;

● Some photographs and videos are used only after gaining explicit consent;

● Where medical data is being processed, this is processed under a legal obligation (Children and Families Act 2014 which includes a duty on schools to support children with medical conditions);

● Safeguarding data is processed under the legal obligation of The Education Act 2002. Sections 21 and 175 detail how governing bodies of schools must promote the wellbeing of pupils and take a view to the safeguarding of children at the school;

● We collect and process pupil information under Article 6 of the General Data Protection Regulation (GDPR) to perform our official function (public task);

● where it is carried out as a task in the public interest such as equal opportunities monitoring, for child protection purposes or where otherwise authorised by law, such as Departmental Censuses as required in the Education Act 1996;

● Children and Families Act 2014 includes a duty on schools to support children with medical conditions;

● The Equality Act 2010 (England, Scotland and Wales) requires you to make reasonable adjustments to ensure that children and young people with a disability are not put at a substantial disadvantage compared with their peers;

● The Education Act 2002, Sections 21 and 175 detail how governing bodies of schools must promote the wellbeing of pupils and take a view to the safeguarding of children at the school;

● Section 3 of the Children Act 1989 places a duty on a person with the care of a child to do all that is reasonable in the circumstances for the purposes of safeguarding the child;

● Education Act 1996, relating to attendance at school

How do we collect your information?

We collect your personal information via the following methods:

- **Registration forms**
- **Consent Forms**
- **Common Transfer File (CTF) from your previous school**
- **Child protection plans**

Pupil data is essential for the school’s operational use. Whilst the majority of information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with data protection legislation, we will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice.

How do we store your information?

We hold your personal information securely for the set amount of time shown in the school's Appendix E – Retention Schedule.

Who do we share your information with?

We routinely share your information with:

- The local authority (LA)
- The Department for Education (DfE)
- Schools that you go to after leaving us
- Examination Boards
- The police when investigating or preventing crime
- Other admissions authorities
- Appropriate health services, such as NHS, who provide a necessary service, such as flu immunisations or National Child Measurement Programme.

Why do we share your information?

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

Department for Education (DfE)

The DfE collects personal information from us and our LA through various collections the school is required to undertake legally. We are required to share information about pupils with the DfE either directly or via our LA for the purpose of those data collections, under:

- Section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013

All information we share with the DfE is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework,, which can be found by following this link: https://www.gov.uk/government/publications/security-policy-framework

How does the government use your data?

The pupil data that we lawfully share with the DfE through data collections:

- Underpins school funding, which is calculated based upon numbers of pupils and their characteristics in each school.
- Informs 'short-term' education policy monitoring and school accountability and intervention.
- Supports 'longer-term' research and monitoring of educational policy, e.g. how certain subject choices go on to affect education or earnings beyond school.

To find out more about the data collection requirements placed on us by the DfE, e.g. via the school census, follow this link: https://www.gov.uk/education/data-collection-and-censuses-for-schools

The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in the NPD.

The NPD is owned and managed by the DfE and contains information about pupils in schools in England – it provides evidence on educational performance to inform independent research as well as studies commissioned by the DfE.

Information on the NPD is held in an electronic format for statistical purposes and it is securely collected from a range of sources, including schools, LAs and awarding bodies.

You can find out more about the NPD by following this link: https://www.gov.uk/guidance/how-to-access-department-for-education-dfe-data-extracts.

Sharing by the DfE

The DfE is legally allowed to share pupils' personal information with certain third parties, including the following:

- Schools
- LAs
- Researchers
- Organisations connected with promoting the education or wellbeing of children in England
- Other government departments and agencies
- Organisations fighting or identifying crime

Organisations fighting or identifying crime, such as the Home Office and the police, may use their legal powers to contact the DfE to request access to individual level information relating to a crime.

For more information about how the DfE collects and shares pupil information, you can look at the information in the following two links:

- https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data
- https://www.gov.uk/government/publications/dfe-external-data-shares

How to find out what personal information the DfE holds about you

Under the Data Protection Act 2018, you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it processes your personal data.
- For a description of the data it holds about you.
- The reasons it is holding your data and any recipient it may be disclosed to.
- For a copy of your personal data and any details of its source.

To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link:

https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter

You can also contact the DfE directly using its online contact form by following this link: https://www.gov.uk/contact-dfe.

What are your rights?

You have specific rights to the processing of your data; these are the right to:

- Request access to the information the school holds about you.
- Restrict our processing of your personal data, i.e. permitting its storage but no further processing.
- Object to direct marketing (including profiling) and processing for the purposes of scientific and/or historical research and statistics.
- Have your personal data rectified if it is inaccurate or incomplete.
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.
- Request the deletion or removal of personal data where there is no compelling reason for the continued processing.

If you want to request access to the personal information that we hold about you, please contact the headteacher.

If you are concerned about the way we are collecting or using your information, please raise your concern with the school's headteacher in the first instance. You can also contact the Information Commissioner's Office (ICO) at https://ico.org.uk/concerns. The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

Updating this privacy notice

We may need to update this privacy notice periodically if we change how we collect and process data. The school will inform you when this privacy notice has changed; however, we also recommend that you revisit this privacy notice periodically.

This privacy notice was last updated on 5 July 2023.

How can you find out more information?

If you would like to discuss anything in this privacy notice, please contact the headteacher.

Declaration

I, (name of pupil or parent)__________________________, declare that I understand:

- The categories of my personal information Reedham Primary and Nursery School collects and uses.

- Reedham Primary and Nursery School has a lawful basis for collecting and using my personal information.
- Reedham Primary and Nursery School may share my information with the DfE, LA and other stated organisations.
- Reedham Primary and Nursery School does not share information about me with anyone without my consent, unless the law and our policies allow them to do so.
- My information is retained in line with Reedham Primary and Nursery School’s Records Retention Schedule.
- My rights to the processing of my personal information.

Name: ________________________________

Signature: ________________________________

Date: ________________________________

For school use only

Date privacy notice last updated: _05 July 2023_

Appendix C - Data Privacy for Workforce

Privacy notice – how school workforce information is used

What categories of information are processed?

The categories of personal information that we process include the following:

- Personal information – e.g. name, employee or teacher number, National Insurance number, and contact details
- Characteristics information – e.g. gender, age and ethnicity
- Contract information – e.g. start date, hours worked, post, roles and salary information
- Work absence information – e.g. number of absences and reasons for absence
- Qualifications and, where relevant, the subjects taught

This list is not exhaustive.

Why do we collect and use your information?

We collect and use your information for the following reasons:

- To enable the development of a comprehensive picture of the workforce and how it is deployed
- To inform the development of recruitment and retention policies
- To enable individuals to be paid

Under the UK General Data Protection Regulation (UK GDPR), the legal basis/bases we rely on for processing personal information for general purposes are:

- under Article 6 of the General Data Protection Regulation (GDPR) to perform our official function (public task).
- classed as Special Category data, e.g. race, ethnicity etc under Article 9 of the General Data Protection Regulation (GDPR) to carry out tasks in the public interest.
- where it is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law.
- where it is carried out as a task in the public interest such as equal opportunities monitoring, for child protection purposes or where otherwise authorised by law, such as Departmental Censuses as required in the Education Act 1996.
- under the terms of the contract of employment.
- as part of the recruitment process background checks will be done which may involve the collection of criminal convictions. We will process criminal conviction data as it is reported during employment/recruitment to assess suitability of continued employment/recruitment.
- where you have given us consent to do so.

How do we collect your information?

We collect your personal information via the following methods:

- Staff contract forms
- Medication forms

Workforce data is essential for the school's operational use. Whilst most information you provide to us is mandatory, some of it is requested on a voluntary basis. To comply with the UK GDPR, we will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice.

How do we store your information?

Your personal information is retained in line with the school's Records Retention Schedule, which can be found in Appendix E.

Who do we share your information with?

We routinely share your information with:

- The LA, where applicable
- The DfE
- Third-party service providers (where a contract exists) in order to fulfil contractual obligations (such as payroll) or where a service is being used in the operations of the school (such as parent communication applications). Only information required for the stated purpose is shared and all third-parties are required to ensure appropriate technical and organisational measures are in place to secure your data.

Why do we share your information?

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

Sharing with the LA

We are required to share information about our school workforce with our LA under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Sharing with the DfE

The DfE collects personal data from educational settings and LAs via various statutory data collections.

We are required to share information about our school employees with the DfE section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

All information we share with the DfE is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework, which can be found by following the link below:

https://www.gov.uk/government/publications/security-policy-framework

How does the government use your data?

The workforce information that we lawfully share with the DfE through data collections:

- Informs the DfE's policy on pay and the monitoring of the effectiveness and diversity of the school workforce.
- Links to school funding and expenditure.
- Supports longer term research and monitoring of educational policy.

You can find more information about the data collection requirements placed on us by the DfE by following this link: https://www.gov.uk/education/data-collection-and-censuses-for-schools.

The DfE may share your information with third parties who promote the education or wellbeing of children or the effective deployment of school staff in England by:

- Conducting research or analysis.
- Producing statistics.
- Providing information, advice or guidance.

The DfE has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to and use of the information. The DfE makes decisions on whether they will share personal information with third parties based on an approval process, where the following areas are considered in detail:

- Who is requesting the information.
- The purpose for which the information is required.
- The level and sensitivity of the information requested.
- The arrangements in place to securely store and handle the information.

To have access to school workforce information, organisations must comply with strict terms and conditions covering the confidentiality and handling of information, security arrangements and retention of the information.

How to find out what personal information the DfE holds about you

Under the Data Protection Act 2018, you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it processes your personal data.
- For a description of the data it holds about you.
- The reasons it is holding your data and any recipient it may be disclosed to.
- For a copy of your personal data and any details of its source.

To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link: https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter.

You can also contact the DfE directly using its online contact form by following this link: https://www.gov.uk/contact-dfe.

What are your rights?

You have specific rights to the processing of your data; these are the right to:

- Request access to the information the school holds about you.
- Restrict our processing of your personal data, i.e. permitting its storage but no further processing.
- Object to direct marketing (including profiling) and processing for the purposes of scientific and/or historical research and statistics.
- Have your personal data rectified if it is inaccurate or incomplete.
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.
- Request the deletion or removal of personal data where there is no compelling reason for the continued processing.

If you want to request access to the personal information we hold about you, please contact the headteacher.

If you are concerned about the way we are collecting or using your information, please raise your concern with the school's headteacher in the first instance. You can also contact the ICO at https://ico.org.uk/concerns.

How to withdraw consent and lodge complaints

Where our school processes your personal data with your consent, you have the right to withdraw your consent at any time.

If you change your mind or are unhappy with how our school uses your personal data, you should let us know by contacting the headteacher.

Updating this privacy notice

We may need to update this privacy notice periodically if we change how we collect and process data. The school will inform you when this privacy notice has changed; however, we also recommend that you revisit this privacy notice periodically.

This privacy notice was last updated on 5th July 2023.

How can you find out more information?

If you would like to discuss anything in this privacy notice, please contact the headteacher.

Declaration

I, (name of staff member)_________________________, declare that I understand:

- The categories of my personal information Reedham Primary and Nursery School collects and uses.
- The school has a lawful basis for collecting and using my personal information.
- The school shares my information with the DfE, LA and other stated organisations.
- The school does not share information about me with anyone without my consent, unless the law and our policies allow the school to do so.
- My information is retained in line with the school's Records Retention Schedule.
- My rights to the processing of my personal information.

Name of staff member:	________________________________
Signature of staff member:	________________________________
Date:	________________________________

For school use only

Date privacy notice last updated:	__5 July 2023__

Appendix D - Data Privacy (Child Friendly)

Privacy notice – how the school uses pupil information

What is a privacy notice?

There is a law that keeps your information safe – things like your address, date of birth and phone number. The school and other people collect and use information for all kinds of reasons, and the law tells them exactly what they are allowed to do with information that belongs to you.

We collect some information about our pupils, like you. It's our job to tell you how we collect the information, how we record it and how we use it.

In this notice, you will see different names or terms used that you may not be familiar with, such as:

- **Data controller**: This person (or group of people, like a school) is in charge of the information we collect.
- **Data processor**: This person processes information for us.
- **Data protection officer (DPO)**: This person makes sure we do everything the law says. The school's DPO is Data Protection Education.
- **Personal data**: This means any information that can be used to identify you, such as your address and date of birth.
- **Special category data:** This is personal data that needs more protection because it is sensitive.

Who looks after your information?

The school is the data controller of the personal information you give to us – we look at how and why your information is collected and used.

Sometimes the school has to give your information to other people, such as the government, but we will only give away your information when you say it is ok or when we have a lawful reason to do so. When we give your data to someone else, they must look after it and keep it safe.

What information do we collect and use?

The categories of information that the school collects and uses include the following:

- **Personal information that can identify you** – this includes information like your name, contact details and address
- **Characteristics** – this includes information like what language you speak and your ethnicity
- **Safeguarding information** – this includes important information that helps us to keep you safe from harm

- **Special educational needs and disabilities** – this includes information about any additional needs you have that we need to support you with
- **Medical information** – this includes information about your health and any medical conditions you have that we need to know about to keep you safe
- **Attendance information** – this includes information about your attendance at school, how many times you have missed school, and why you could not come to school
- **Your assessment information** – this includes information about any tests you take at school
- **Behavioural information** – this includes information about any time you have been excluded from school and why

Why do we collect and use your information?

We collect and use your information for the following reasons:

- To support your learning
- To monitor and report on your progress
- To provide appropriate support
- To assess the quality of our service
- To comply with the law regarding data sharing
- To keep you safe

We will only collect your information when we have a good reason to do so in line with the law – this is known as having a lawful basis to use data.

How do we collect your information?

These are the ways we collect your information:

- School registration forms
- School consent forms
- Information sent from your old school (sometimes called a common transfer file)

Collecting and using your information is really important to make sure the school can run properly. You must give us most of the information we need, but there is some information that you can choose whether to give it to us. We will let you know when we collect your information whether you need to provide the information to us or if you have a choice.

How long will we keep your information and how do we keep it safe?

We do not keep your information forever, only for as long as we need it. We have rules that tell us when to keep it and when we should safely delete it. You can ask us for these details if you want to.

We also have rules in place to make sure we keep your information safe.

Will your information be shared?

We normally share your information with:

- The local authority (LA) – this is the local government who helps the school
- The Department for Education (DfE) – this is the part of the government in charge of education
- Schools that you go to after leaving us
- Health services – this is services, such as the NHS, who provide services in school, such as flu immunisations

Why do we share your information?

We do not share your information with anyone without your permission, unless the law and our rules say we can or should.

Department for Education (DfE)

The school needs to share certain information with the DfE to make sure we meet certain laws, including:

- 3 of The Education (Information About Individual Pupils) (England) Regulations 2013

If you have a question about what these laws mean, you can ask the headteacher.

All information we share with the DfE is given to them safely and kept by the DfE under strict safety rules.

How does the government use your information?

The pupil information that we need to share with the DfE:

- Makes sure our school can get the money it is entitled to.
- Helps the government to create rules for schools.
- Helps the government to research future rules that may need to be put in place for schools.

To find out more about why we need to give the DfE your information, follow this link: https://www.gov.uk/education/data-collection-and-censuses-for-schools.

The National Pupil Database (NPD)

A lot of the data you give to us goes on to be stored on the NPD.

This database is looked after by the DfE and has information about pupils in schools in England.

You can find out more about the NPD by following this link: https://www.gov.uk/guidance/how-to-access-department-for-education-dfe-data-extracts.

Sharing by the DfE

The DfE is legally allowed to share your personal information with certain individuals and organisations, including the following:

- Schools

- LAs
- Researchers
- Organisations that support your wellbeing
- Other parts of the government
- People that fight crime

For more information about how the DfE collects and shares pupil information, you can look at the information in the following two links:

- https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data
- https://www.gov.uk/government/publications/dfe-external-data-shares

How to find out what personal information the DfE holds about you

You are legally allowed to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it uses your personal information.
- What information it holds about you.
- Why your information is held and who it might be shared with.
- For a copy of your personal data and any details of its source.

You can find out more about this by following this link: https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter

You can also contact the DfE directly using its online contact form by following this link: https://www.gov.uk/contact-dfe.

What are your rights?

You and your parents or legal guardians have the right to:

- Be told how we use your information.
- Ask to see the information we hold.
- Ask us to change information you think is wrong.
- Ask us to remove information when it is not needed anymore.
- Ask us to only use your information in certain ways.
- Tell us you don’t want your information to be processed.
- Say no to direct marketing (people trying to sell you things).
- Stop people using your information for scientific, research or statistical purposes.

If you want to request for us to give you a copy of the information we hold about you, or if you want access to the information that we hold, you can contact the headteacher at the school and they will be able to help you.

You also have the right **not** to be subject to decisions based purely on automated processing. This means that we will not make important decisions about you and your education based only on what a computer tells us. We will always think carefully about these decisions to make sure you are treated fairly.

If the information we are collecting is information that you can choose not to give, you can tell us to stop collecting it at any time.

If you're worried about how we get and use your information, you can speak to the headteacher at the school, who will be able to help you and answer any questions that you have. If you want to speak to somebody not at the school, you can contact the people who look after information, called the Information Commissioner's Office (ICO), on 0303 123 1113 or using their live chat which can be accessed through this link: https://ico.org.uk/global/contact-us/live-chat

If you're not happy with how we have handled your data

If for any reason you're not happy with the way we have handled your data, you can tell us at any time, even if you're not sure whether your data has been handled incorrectly. Contact the headteacher at the school as soon as you think something is wrong, and they will be able to help you. Remember, we want to make sure that everyone's choices are respected and their data is handled properly – if you're not happy or think something has gone wrong, it is important you let us know as soon as possible.

1. Will you need to read this again?

Sometimes we need to change this privacy notice, so it is important that you take a look every now and then to make sure you are happy with it.

The last time we changed this privacy notice was 5th July 2023.

2. Four important things to understand

Now you have read this, we hope you understand that:

- The law allows us to get and use your information to help us do our job.
- We may share your information with others, but only when we really need to.
- We will ask for your permission to share your information whenever you have a choice.
- You can tell us not to share your information, even when you have said yes before.

If you have any questions, the headteacher will be happy to help you.

Appendix E – Retention Schedule

Type of file	Retention period	Action taken after retention period ends
Personal identifiers, contacts and personal characteristics		
Images used for identification purposes	For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month	Securely disposed of
Images used in displays	Whilst the pupil is at school	Securely disposed of
Images used for marketing purposes	In line with the consent period	Securely disposed of
Biometric data	For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month	Securely disposed of
Postcodes, names and characteristics	Whilst the pupil is at school, plus five years	Securely disposed of
House number and road	For the duration of the event/activity, plus one month	Securely disposed of
Admissions		
Register of admissions	Every entry in the admissions register will be preserved for a period of three years after the date on which the entry was made	Information is reviewed and the register may be kept permanently
Admissions (where the admission is successful)	Date of admission, plus one year	Securely disposed of
Admissions appeals (where the appeal is unsuccessful)	Resolution of the case, plus one year	Securely disposed of
Proof of address (supplied as part of the admissions process)	Current academic year, plus one year	Securely disposed of

Supplementary information submitted, including religious and medical information etc. (where the admission was successful)	Information added to the pupil file	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was not successful)	Retained until the appeals process is complete	Securely disposed of
All records relating to the creation and implementation of the Admissions Policy	Life of the policy, plus three years and then review	Securely disposed of
Pupils' educational records		
Pupils' educational records	Whilst the pupil remains at the school	Transferred to the next destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory period The IRMS advises to retain the information for a short period to allow for any queries or reports to be completed or where linked records in the school information management system have not yet reached the end of their retention period and deleting would cause problems
Public examination results	Added to the pupil's record and transferred to next school	All uncollected certificates returned to the examination board
Internal examination results	Added to the pupil's record and transferred to next school	Reviewed and securely disposed of if no longer needed
Behaviour records	Added to the pupil's record and transferred to the next school Copies are held whilst the pupil is at school, plus one year	Securely disposed of
Exclusion records	Added to the pupil's record and transferred to the next school	Securely disposed of

	Copies are held whilst the pupil is at school, plus one year	
Child protection information held on a pupil’s record	Stored in a sealed envelope for the same length of time as the pupil’s record Records also subject to any instruction given by the Independent Inquiry into Child Sex Abuse (IICSA)	Securely disposed of – shredded
Child protection records held in a separate file	25 years after the pupil’s date of birth Records also subject to any instruction given by the IICSA	Securely disposed of – shredded
Curriculum returns	Current academic year, plus three years	Review and allocate a further retention period or securely dispose of
Schemes of work	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Timetable	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Class record books	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Mark books	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Record of homework set	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Pupils’ work	Returned to pupil at the end of current academic year If this is not possible, hold for the current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Attendance		
Attendance registers	Every entry is retained for a period of three years after the date on	Securely disposed of

	which the entry was made	
Correspondence relating to any absence (authorised or unauthorised)	Current academic year, plus two years	Securely disposed of
Medical information and administration		
Permission slips	For the duration of the period that medication is given, plus one month	Securely disposed of
Medical conditions – ongoing management	Added to the pupil's record and transferred to the next school Copies held whilst the pupil is at school, plus one year	Securely disposed of
Medical incidents that have a behavioural or safeguarding influence	Added to the pupil's record and transferred to the next school Copies held whilst the pupil is at school, plus 25 years	Securely disposed of
SEND		
SEND files, reviews and EHC plans, including advice and information provided to parents regarding educational needs and accessibility strategy	The pupil's date of birth, plus 31 years	Securely disposed of
Curriculum management		
SATs results	25 years after the pupil's date of birth (as stated on the pupil's record) A composite of the whole year's results may be held for the current year plus six	Securely disposed of

	years, for comparative purposes	
Examination papers	Until the appeals/validation process has been completed	Securely disposed of
Published Admission Number (PAN) reports	Current academic year, plus six years	Securely disposed of
Valued added and contextual data	Current academic year, plus six years	Securely disposed of
Self-evaluation forms (internal moderation)	Current academic year, plus one year	Securely disposed of
Self-evaluation forms (external moderation)	Retained until superseded	Securely disposed of
Pupils' work	Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year	Securely disposed of
Extra-curricular activities		
Field file – information taken on school trips	Until the conclusion of the trip, plus one month Where a minor incident occurs, field files are added to the core system as appropriate	Securely disposed of
Trip packs – information taken on school trips	Until the end of the visit Where a minor incident occurs, files are added to the core system as appropriate	Shredded upon return to school
Financial information relating to school trips	Whilst the pupil remains at school, plus one year	Securely disposed of
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip, unless a school risk assessment decides the forms are likely to be required for any reason, in which	Securely disposed of – shredded

	case they should be retained for 22 years after the pupil's date of birth	
Parental consent forms for school trips where a major incident occurred	25 years after the pupil's date of birth on the pupil's record (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils)	Securely disposed of – shredded
Educational visitors in school – sharing of personal information	Until the conclusion of the visit, plus one month	Securely disposed of
Family liaison officers and home-school liaison assistants		
Day books	Current academic year, plus two years	Reviewed and securely destroyed if no longer required
Reports for outside agencies	Duration of the pupil's time at school	Securely disposed of
Referral forms	Whilst the referral is current	Securely disposed of
Contact data sheets	Current academic year	Reviewed and securely destroyed if no longer active
Contact database entries	Current academic year	Reviewed and securely destroyed if no longer required
Group registers	Current academic year, plus two years	Securely disposed of
Catering and free school meal management		
Meal administration	Whilst the pupil is at school, plus one year	Securely disposed of
Meal eligibility	Whilst the pupil is at school, plus five years	Securely disposed of
School meal registers	Current year plus three years	Securely disposed of
Free school meal registers (where used as a basis for funding)	Current year plus six years	Securely disposed of
School meals summary sheets	Current year plus three years	Securely disposed of

Operational		
Staff members’ personnel file	Termination of employment, plus six years, unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file will be retained until the IICSA enquiries are complete	Securely disposed of
Annual appraisal and assessment records	Current academic year, plus six years	Securely disposed of
Sickness absence monitoring (where sickness pay is not paid)	Current academic year, plus three years	Securely disposed of
Sickness absence monitoring (where sickness pay is paid)	Current academic year, plus six years	Securely disposed of
Staff training (where training leads to CPD)	Length of time required by the CPD professional body	Securely disposed of
Staff training (except where the training relates to dealing with pupils, e.g. first aid or health and safety)	Retained in the personnel file	Securely disposed of
Staff training (where the training relates to pupils, e.g. safeguarding or other pupil-related training)	Date of the training, plus 40 years	Securely disposed of
Recruitment		
Records relating to the appointment of a new headteacher (unsuccessful attempts)	Date of appointment, plus six months.	Securely disposed of
Records relating to the appointment of a new headteacher (successful appointments)	Added to personnel file and retained until the end of appointment, plus six years, except in cases of negligence or claims of child abuse, then records are retained for at least 15 years	Securely disposed of
Records relating to the appointment of new members of staff or governors (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	Securely disposed of

Pre-employment vetting information (successful candidates)	For the duration of the employee's employment, plus six years	Securely disposed of
DBS certificates	Up to six months	Securely disposed of
Proof of identify as part of the enhanced DBS check	If it is necessary to keep a copy, it will be placed in the staff member's personnel file	Securely disposed of
Evidence of right to work in the UK	Added to staff personnel file or, if kept separately, termination of employment, plus no longer than two years	Securely disposed of
Disciplinary and grievance procedures		
Child protection allegations, including where the allegation is unproven	Added to staff personnel file, and until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer If allegations are malicious, they are removed from personal files If allegations are found, they are kept on the personnel file and a copy is provided to the person concerned unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file is retained until IICSA enquiries are complete	Reviewed and securely disposed of – shredded
Oral warnings	Date of warning, plus six months	Securely disposed of – if placed on staff personnel file, removed from file
Written warning – level 1	Date of warning, plus six months	Securely disposed of – if placed on staff personnel file, removed from file

Written warning – level 2	Date of warning, plus 12 months	Securely disposed of – if placed on staff personnel file, removed from file
Final warning	Date of warning, plus 18 months	Securely disposed of – if placed on staff personnel file, removed from file
Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related, then it is disposed of as above	Securely disposed of
Governance		
Agendas for governing board meetings	One copy alongside the original set of minutes – all others disposed of without retention	Local archives consulted before secure disposal
Original, signed copies of the minutes of governing board meetings	Permanent – or at least for 10 years from the date of the meeting	Shredded if they contain any sensitive or personal information, but the local archives will be consulted first
Reports presented to the governing board that are referred to in the minutes	Permanent – all others disposed of without retention	Local archives consulted and then securely disposed of
Meeting papers relating to the annual parents' meeting	Date of meeting, plus a minimum of six years	Securely disposed of
Instruments of government	Permanent	Local archives consulted and then securely disposed of
Trusts and endowments managed by the governing board	Permanent	Local archives consulted and then securely disposed of
Action plans created and administered by the governing board	Until superseded or whilst relevant	Securely disposed of
Policy documents created and administered by the governing board	Until superseded or whilst relevant	Securely disposed of
Records relating to complaints dealt with by the governing board or headteacher	Date of resolution of complaint, plus six years If negligence is involved, records are retained for the	Reviewed for further retention in case of contentious disputes, then securely disposed of

	current academic year, plus 15 years If child protection or safeguarding issues are involved, the records are retained for the current academic year, plus 40 years	
Annual reports required by the DfE	Date of report, plus 10 years	Securely disposed of
Proposals concerning changing the status of the school	Date proposal accepted or declined, plus three years	Securely disposed of
Records relating to the appointment of co-opted governors	Date of election, plus six months	Securely disposed of
Records relating to the election of the chair of the governing board and the vice chair	Destroyed after the decision has been recorded in the minutes	Securely disposed of
Scheme of delegation and terms of reference for committees	Until superseded or whilst relevant	Reviewed and offered to the local archives if appropriate
Meeting schedule	Current academic year	Standard disposal
Register of attendance at full governing board meetings	Date of last meeting in the book, plus six years	Securely disposed of
Records relating to governor monitoring visits	Date of the visit, plus three years	Securely disposed of
[Academies or maintained schools converting to academy status] All records relating to the conversion of the school to academy status	Permanent	Local archives are consulted before disposal
Correspondence sent and received by the governing board or headteacher	Current academic year, plus three years	Securely disposed of
Records relating to the appointment of the clerk to the governing board	Date on which the clerk’s appointment ends, plus six years	Securely disposed of

Records relating to the terms of office of serving governors, including evidence of appointment	Date on which the governor’s appointment ends, plus six years	Securely disposed of
Records relating to governor declaration against disqualification criteria	Date on which the governor’s appointment ends, plus six years	Securely disposed of
Register of business interests	Date the governor’s appointment ends, plus six years	Securely disposed of
Governor code of conduct	Dynamic document – kept permanently	Securely disposed of
Records relating to the training required and received by governors	Date the governor steps down, plus six years	Securely disposed of
Records relating to the induction programme for new governors	Date on which the governor’s appointment ends, plus six years	Securely disposed of
Records relating to DBS checks carried out on the clerk and members of the governing board	Date of the DBS check, plus six months	Securely disposed of
Governor personnel files	Date on which the governor’s appointment ends, plus six years	Securely disposed of
Headteacher and SLT		
Log books of activity in the school maintained by the headteacher	Date of last entry, plus a minimum of six years	Reviewed and offered to the local archives if appropriate
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus three years	Reviewed annually and securely disposed of if not needed
Reports created by the headteacher or SLT	Date of the report, plus a minimum of three years	Reviewed annually and securely disposed of if not needed
Records created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Current academic year, plus six years	Reviewed annually and securely disposed of if not needed
Correspondence created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Date of correspondence, plus three years	Securely disposed of

Professional development plan	Held on the individual's personnel record. If not, then it is retained for the duration of the plan, plus six years	Securely disposed of
SDP	Duration of the plan, plus three years	Securely disposed of
Health and safety		
Health and safety policy statements	Duration of policy, plus three years	Securely disposed of
Health and safety risk assessments	Duration of risk assessment, plus three years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred	Securely disposed of
Records relating to any reportable death, injury, disease or dangerous occurrence under RIDDOR	Date of incident, plus three years provided that all records relating to the incident are held on the personnel file	Securely disposed of
Accident reporting – adults	Three years after the last entry in the accident reporting book	Securely disposed of
Accident reporting – pupils	Three years after the last entry in the accident reporting book	Securely disposed of
Records kept under the Control of Substances Hazardous to Health Regulations	Date of incident, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with asbestos	Date of last action, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with radiation (maintenance records or controls, safety features and PPE)	Two years from the date on which the examination was made	Securely disposed of

Information relating to areas where employees and persons are likely to come into contact with radiation (dose assessment and recording)	Until the person to whom the record relates would have reached 75-years-old, but in any event for at least 30 years from when the record was made	Securely disposed of
Fire precautions log books	Current academic year, plus three years	Securely disposed of
Health and safety file to show current state of buildings, including all alterations (wiring, plumbing, building works etc.) to be passed on in the case of change of ownership	Permanent	Passed to new owner on sale or transfer of building
Payroll and pensions		
Maternity pay records	Current academic year, plus three years	Securely disposed of
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current academic year, plus six years	Securely disposed of
Timesheets, clock cards and flexitime records	Current academic year, plus three years	Securely disposed of
Absence record	Current academic year, plus three years	Securely disposed of
Batches	Current academic year, plus six years	Securely disposed of
Bonus sheets	Current academic year, plus three years	Securely disposed of
Car allowance claims	Current academic year, plus three years	Securely disposed of

Car loans	Current academic year, plus three years	Securely disposed of
Car mileage outputs	Current academic year, plus six years	Securely disposed of
Elements	Current academic year, plus two years	Securely disposed of
Income tax form P60	Current academic year, plus six years	Securely disposed of
Insurance	Current academic year, plus six years	Securely disposed of
Members allowance register	Current academic year, plus six years	Securely disposed of
National insurance – schedule of payments	Current academic year, plus six years	Securely disposed of
Overtime	Current academic year, plus three years	Securely disposed of
Part-time fee claims	Current academic year, plus six years	Securely disposed of
Pay packet receipt by employee	Current academic year, plus two years	Securely disposed of

Payroll awards	Current academic year, plus six years	Securely disposed of
Payroll (gross/net weekly or monthly)	Current academic year, plus six years	Securely disposed of
Payroll reports	Current academic year, plus six years	Securely disposed of
Payslips (copies)	Current academic year, plus six years	Securely disposed of
Pension payroll	Current academic year, plus six years	Securely disposed of
Personal bank details	Until superseded, plus three years	Securely disposed of
Sickness records	Current academic year, plus three years	Securely disposed of
Staff returns	Current academic year, plus three years	Securely disposed of
Superannuation adjustments	Current academic year, plus six years	Securely disposed of
Superannuation reports	Current academic year, plus six years	Securely disposed of

Tax forms	Current academic year, plus six years	Securely disposed of
Risk management and insurance		
Employer’s liability insurance certificate	Closure of the school, plus 40 years	Securely disposed of Passed to the LA if the school closes
Asset management		
Inventories of furniture and equipment	Current academic year, plus six years	Securely disposed of
Burglary, theft and vandalism report forms	Current academic year, plus six years	Securely disposed of
Accounts and statements including budget management		
Annual accounts	Current academic year, plus six years	Disposed of against common standards
Loans and grants managed by the school	Date of last payment, plus 12 years	Information is reviewed then securely disposed of
All records relating to the creation and management of budgets	Duration of the budget, plus three years	Securely disposed of
Invoices, receipts, order books, requisitions and delivery notices	Current financial year, plus six years	Securely disposed of
Records relating to the collection and banking of monies	Current financial year, plus six years	Securely disposed of
Records relating to the identification and collection of debt	Final payment, plus six years	Securely disposed of
Contract management		
All records relating to the management of contracts under seal	Last payment on the contract, plus 12 years	Securely disposed of
All records relating to the management of contracts under signature	Last payment on the contract, plus six years	Securely disposed of
All records relating to the monitoring of contracts	Life of the contract, plus six or 12 years	Securely disposed of

School fund		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Securely disposed of
School meals		
FSM registers (where the register is used as a basis for funding)	Current academic year, plus six years	Securely disposed of
School meals registers	Current academic year, plus three years	Securely disposed of
School meals summary sheets	Current academic year, plus three years	Securely disposed of
Pupil finance		
Student grant applications	Current academic year, plus three years	Securely disposed of
Pupil premium fund records	Date the pupil leaves the school, plus six years	Securely disposed of
Property management		
Title deeds of properties belonging to the school	Permanent	Transferred to new owners if the building is leased or sold
Plans of property belonging to the school	For as long as the building belongs to the school	Transferred to new owners if the building is leased or sold
Leases of property leased by or to the school	Expiry of lease, plus six years	Securely disposed of
Records relating to the letting of school premises	Current financial year, plus six years	Securely disposed of
Maintenance		
All records relating to the maintenance of the school carried out by contractors	For as long as the school owns the building and then passed onto any new owners if the building is leased or sold	Securely disposed of
All records relating to the maintenance of the school carried out by school employees	For as long as the school owns the building and then passed onto any new	Securely disposed of

	owners if the building is leased or sold	
Operational administration		
General file series	Current academic year, plus five years	Reviewed and securely disposed of
Records relating to the creation and publication of the school brochure and/or prospectus	Current academic year, plus three years	If a copy is not preserved by the school, standard disposal
Records relating to the creation and distribution of circulars to staff, parents or pupils	Current academic year, plus one year	Disposed of against common standards
Newsletters and other items with short operational use	Current academic year, plus one year	One copy archived, other copies standard disposal
Visitors' books and signing-in sheets	Last entry in the logbook, plus six years	Reviewed then securely disposed of
Records relating to the creation and management of parent-teacher associations and/or old pupil associations	Current academic year, plus six years	Reviewed then securely disposed of
Walking bus registers	Date of register, plus six years	Securely disposed of
School privacy notice which is sent to parents	Until superseded, plus six years	Standard disposal
Consents relating to school activities	While pupil attends the school	Secure disposal