

**St. John's Mosley**  
**Common C.E. Primary**  
**School**

Records Management  
Policy

Last updated: 25 April 2018

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## **Statement of intent**

St. John's Mosley Common C.E. Primary School is committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible by the appropriate individuals. In line with the requirements of the GDPR, the school also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended.

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

This document complies with the requirements set out in the GDPR, which is effective of 25 May 2018.

## 1. Legal framework

- 1.1. This policy has due regard to legislation including, but not limited to, the following:
  - General Data Protection Regulation
  - Freedom of Information Act 2000
  - Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
- 1.2. This policy also has due regard to the following guidance:
  - Information Records Management Society (2016) 'Information Management Toolkit for Schools'
  - DfE (2018) 'Data protection: a toolkit for schools'
- 1.3. This policy will be implemented in accordance with the following school policies and procedures:
  - Data Protection Policy
  - Freedom of Information Policy
  - Disposal of Records Log
  - Archived Files Log

## 2. Responsibilities

- 2.1. The school as a whole has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.
- 2.2. The headteacher holds overall responsibility for this policy and for ensuring it is implemented correctly.
- 2.3. The data protection officer (DPO) (*to be appointed*) is responsible for the management of records at St. John's Mosley Common C.E. Primary School.
- 2.4. The DPO (*to be appointed*) is responsible for promoting compliance with this policy and reviewing the policy on an annual basis, in conjunction with the headteacher.
- 2.5. The DPO (*to be appointed*) is responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of correctly.
- 2.6. All staff members are responsible for ensuring that any records for which they are responsible for are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy

## 3. Management of pupil records

- 3.1. Pupil records are specific documents that are used throughout a pupil's time in the education system – they are passed to each school that a pupil attends and includes all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievement.
- 3.2. The following information is stored on the front of a pupil record, and will be easily accessible:
  - Forename, surname, date of birth
- 3.3. The following information is stored inside the pupil record, and will be easily accessible:
  - Ethnic origin, religion and first language, home language
  - Any preferred names
  - Emergency contact details and the name of the pupil's doctor
  - Any allergies or other medical conditions that are important to be aware of
  - Names of parents, including their home address(es) and telephone number(s)
  - Name of the school, admission number (management system only), the date of admission and the date of leaving, where appropriate
  - Any other agency involvement, e.g. speech and language therapist
- 3.4. The following information is stored in a pupil record, and will be easily accessible:
  - Admissions form
  - Details of any SEND (SENCo file)
  - If the pupil has attended an early years setting, the record of transfer
  - Fair processing notice – only the most recent notice will be included (where applicable)
  - Annual written reports to parents return slip; where returned
  - Any information about an education, health and care (EHC) plan and support offered in relation to the EHC plan (SENCo file)
  - Any notes indicating child protection disclosures and reports are held (Safeguarding file)
  - Any information relating to exclusions
  - Any correspondence with parents or external agencies relating to major issues, e.g. mental health (SENCo file)
  - Notes indicating that records of complaints made by parents or the pupil are held

- Correspondence with parents about minor issues, e.g. behaviour (Safeguarding file, where applicable)
- 3.5. The following information is subject to shorter retention periods and, therefore, will be stored separately;
- Absence notes
  - Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.
- 3.6. Hard copies of disclosures and reports relating to child protection are stored in a securely locked filing cabinet in the Headteacher's office.
- 3.7. Hard copies of complaints made by parents or pupils are stored in a file in the Headteacher's office.
- 3.8. Actual copies of accident and incident information are stored separately and held in line with the retention periods outlined in this policy. An additional copy may be placed in the pupil's file in the event of a major accident or incident.
- 3.9. The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend.
- 3.10. The only exception to the above 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 (*to be appointed*) responsible for disposing records, will remove these records.
- 3.11. Electronic records relating to a pupil's record will also be transferred to the pupils' next school. [Section 11](#) of this policy outlines how electronic records will be transferred.
- 3.12. 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.
- 3.13. 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.

#### **4. Retention of pupil records and other pupil-related information**

- 4.1. The table below outlines the school's retention periods for individual pupil records and the action that will be taken after the retention period, in line with any requirements.
- 4.2. Electronic copies of any information and files will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Personal identifiers, contacts and personal characteristics</b>		
Images used for identification purposes	For the duration of the event/activity/requirement, or whilst the pupil remains at school, whichever is less + 1 month	Securely disposed of
Images used in displays in schools	Whilst the pupil is at school	Securely disposed of
Images used for marketing purposes, or other	In line with the consent period	Securely disposed of
Postcodes, names and characteristics	Whilst the pupil is at school, plus five years (via management system only; no paper records retained after leaving)	Securely disposed of
House number and road	For the duration of the event/activity + 1 month	Securely disposed of
<b>Admissions</b>		
Register of admissions – School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014	Every entry must be preserved for a period of 3 years after the date on which the entry was made; (management systems only – no paper copies)	Information retained on management system permanently
Admissions appeals - Statutory Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals panels December 2014	Date of admission + 1 year	Securely disposed of
Proof of address (supplied as part of the admissions process). School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, school adjudicators and admission appeals December 2014	Current year + 1 year	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was successful)	Added to pupil file	Securely disposed of
Supplementary information submitted, including religious and medical	Until appeals process completed	Securely disposed of



information etc. (where the admission was not successful)		
<b>Pupils' educational records</b>		
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
Public examination results (Primary)	Added to the pupil's record and transferred to next school (management system only)  Primary; no certificates. Information retained on management system only.	Securely disposed of
Internal examination results (Primary)	Added to the pupil's record and transferred to next school (management system only)  Primary, no certificates. Information retained on management system only.	Securely disposed of
Behaviour records	Information currently held by Headteacher.  Copies are held whilst the pupil is at school + 1 year	Securely disposed of
Exclusion records	Added to the pupil's record and transferred to the next school (management system only)	Securely disposed of
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	Securely disposed of – shredded
<b>Attendance</b>		
Attendance registers – School attendance; Departmental advice for maintained schools, academies,	Every entry in the attendance register must be preserved for a period	Securely disposed of

independent schools and local authorities October 2014	of 3 years after the date on which the entry was made.	
Letters authorising absence – Education Act 1996 Section 7	Current academic year + 2 years	Securely disposed of
<b>Medical information and administration</b>		
Permission slips	For the duration of the period that medication is given + 1 month	Securely disposed of
Medical conditions – ongoing management	Added to the pupil's record and transferred to the next school + in transition meetings	Securely disposed of
Medical incidents that have a behavioural or safeguarding influence	Added to the pupil's record and transferred to the next school + in transition meetings  Copies held whilst the pupil is at school + 25 years	Securely disposed of
<b>SEND</b>		
SEND files, reviews and individual education plans – Limitation At 1980 (Section 2)	Date of Birth of the pupil + 25 years	Information is reviewed and the file may be kept for longer than necessary if it is required for the school to defend themselves in a 'failure to provide sufficient education' case
An EHC plan maintained under section 37 of the Children and Families Act 2014 (and any amendments to the statement or plan)	Date of Birth of the pupil + 25 years	Securely disposed of, unless it is subject to a legal hold
Information and advice provided to parents regarding SEND	Date of Birth of the pupil + 25 years	Securely disposed of, unless it is subject to a legal hold
Accessibility strategy	Date of Birth of the pupil + 25 years	Securely disposed of, unless it is subject to a legal hold
<b>Curriculum management</b>		

SATs results	SAT's results recorded on the pupil's educational file (management system only) and will therefore be retained until the pupil reaches 25 years (in line with Secondary School pupil files). School will keep a composite record of all the whole year SATs results (management system only). Retained for current year + 6 years to allow suitable comparison.	Securely disposed of
Examination papers	Until the appeals/validation process has been completed	Securely disposed of
Published Admission Number (PAN) reports	Current academic year + 6 years	Securely disposed of
Valued added and contextual data	Current academic year + 6 years	Securely disposed of
Self-evaluation forms	Current academic year + 6 years	Securely disposed of
<b>Extra-curricular activities</b>		
Field file – information taken on school trips	Until the conclusion of the trip + 1 month  Where a minor incident occurs, field files are added to the core system as appropriate	Securely disposed of
Records created by school to obtain approval for Educational visit outside of classroom (Primary)	Date of visit + 14 years	Securely disposed of
Financial information relating to school trips	In line with financial requirements; current year + 6 years	Securely disposed of
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip. <u><i>Permission slips must be retained for all pupils on</i></u>	Securely disposed of

	<u>the trip where there has been a major incident.</u>	
Parental consent forms for school trips where a major incident occurred	Date of Birth of the pupil + 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
Walking bus registers	Date of register + 3 years	Securely disposed of
Educational visitors in school – sharing of personal information	Until the conclusion of the visit + 1 month	Securely disposed of
<b>Family liaison officers and home-school liaison assistants</b>		
Day books	Current academic year + 2 years	Reviewed and 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 destroyed if no longer active
Contact database entries	Current academic year	Reviewed and destroyed if no longer required
Group registers	Current academic year + 2 years	Securely disposed of
<b>Catering and free school meal management</b>		
Free School Meal registers	Current year + 6 years	Securely disposed of
School meals registers	Current year + 3 years	Securely disposed of

## 5. Retention of staff records

- 5.1. The table below outlines the school's retention period for staff records and the action that will be taken after the retention period, in line with any requirements.
- 5.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Operational</b>		
Staff members' personal file	Termination of employment + 6 years	Securely disposed of
Timesheets	Current academic year + 6 years	Securely disposed of
Annual appraisal and assessment records	Current academic year + 5 years	Securely disposed of
<b>Recruitment</b>		
Records relating to the appointment of a new headteacher	Date of appointment + 6 years	Securely disposed of
Records relating to the appointment of new members of staff (unsuccessful candidates)	Date of appointment of successful candidate + 6 months	Securely disposed of
Records relating to the appointment of new members of staff (successful candidates)	Relevant information added to the member of staff's personal file and other information retained for 6 months	Securely disposed of
DBS certificates	Up to six months	Securely disposed of
Proof of identify as part of the enhanced DBS check	After identity has been proven – Ebulk system used for requesting DBS clearance holds information on documents produced	Securely disposed of
Evidence of right to work in the UK	Forwarded to HR. In line with GDPR, retained until HR have completed new employee information checks only	Securely disposed of
<b>Disciplinary and grievance procedures</b>		
Child protection allegations, including where the allegation is unproven	Added to staff personal file. Until the individual's normal retirement age or 10 years from the date of the allegation – whichever is longer  If allegations are found to be malicious they should be	Reviewed and securely disposed of – shredded

	removed from personnel files	
Oral warnings	Date of warning + 6 months	Securely disposed of – if placed on staff personal file, removed from file
Written warning – level 1	Date of warning + 6 months	Securely disposed of – if placed on staff personal file, removed from file
Written warning – level 2	Date of warning + 12 months	Securely disposed of – if placed on staff personal file, removed from file
Final warning	Date of warning + 18 months	Securely disposed of – if placed on staff personal file, removed from file
Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related and is disposed of as <a href="#">above</a>	Securely disposed of

## 6. Retention of senior leadership and management records

- 6.1. The table below outlines the school's retention periods for senior leadership and management records, and the action that will be taken after the retention period, in line with any requirements.
- 6.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Governing board</b>		
Agendas for governing board meetings	One copy alongside the original set of minutes – all others disposed of without retention	Securely disposed of

Original, signed copies of the minutes of governing board meetings	Permanent	Archive storage; if unable to store, offer to the County Archives Service
Inspection copies of the minutes of governing board meetings	Date of meeting + 3 years	Shredded if they contain any sensitive and personal information
Reports presented to the governing board	Minimum of 6 years, unless they refer to individual reports – these are kept permanently	Securely disposed of or, if they refer to individual reports, retained with the signed, original copy of minutes
Instruments of government, including articles of association	Permanent	Archive storage; if unable to store, offer to the County Archives Service
Trusts and endowments managed by the governing board	Permanent	Archive storage; if unable to store, offer to the County Archives Service
Action plans created and administered by the governing board	Duration of the action plan + 3 years	Securely disposed of
Policy documents created and administered by the governing board	Duration of the policy + 3 years	Securely disposed of
Records relating to complaints dealt with by the governing board	Date of the resolution of the complaint + a minimum of 6 years	Reviewed for further retention in case of contentious disputes, then securely disposed of
Annual reports created under the requirements of The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002	Date of report + 10 years	Securely disposed of
Proposals concerning changing the status of the school	Date proposal accepted or declined + 3 years	Securely disposed of
<b>Headteacher and senior leadership team (SLT)</b>		
Log books of activity in the school maintained by the Headteacher	Date of last entry + a minimum 6 years	Reviewed and offered to the county archives service if appropriate
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting + 3 years	Reviewed and securely disposed of
Reports created by the Headteacher or SLT	Date of the report + a minimum of 3 years	Reviewed and securely disposed of

Records created by the Headteacher, Deputy Headteacher and other members of staff with administrative responsibilities	Current academic year + 6 years	Reviewed and securely disposed of
Correspondence created by the Headteacher, Deputy Headteacher and other members of staff with administrative responsibilities	Date of correspondence + 3 years	Reviewed and securely disposed of
Professional development plan	Duration of the plan + 6 years	Securely disposed of
School development plan	Duration of the plan + 3 years	Securely disposed of

## 7. Retention of health and safety records

- 7.1. The table below outlines the school's retention periods for health and safety records, and the action that will be taken after the retention period, in line with any requirements.
- 7.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Health and safety</b>		
Health and safety policy statements	Duration of policy + 3 years	Securely disposed of
Health and safety risk assessments	Duration of risk assessment + 3 years	Securely disposed of
Records relating to accidents and injuries at work	Date of incident + 12 years. In the case of serious accidents, a retention period of 15 years is applied	Securely disposed of
Accident reporting – adults	Date of the incident + 6 years	Securely disposed of



Accident reporting – pupils	Date of Birth of pupil + 25 years	Securely disposed of
Control of substances hazardous to health	Current academic year + 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 + 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with radiation	Date of last action + 50 years	Securely disposed of
Fire precautions log books	Current academic year + 6 years	Securely disposed of

## 8. Retention of financial records

- 8.1. The table below outlines the school's retention periods for financial records and the action that will be taken after the retention period, in line with any requirements.
- 8.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Payroll pensions</b>		
Maternity pay records	Current academic year + 3 years	Securely disposed of
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current academic year + 6 years	Securely disposed of
<b>Risk management and insurance</b>		
Employer's liability insurance certificate	Closure of the school + 40 years. (Wigan Council issued)	Securely disposed of

<b>Asset management</b>		
Inventories of furniture and equipment	Current academic year + 6 years	Securely disposed of
Burglary, theft and vandalism report forms	Current academic year + 6 years	Securely disposed of
<b>Accounts and statements including budget management</b>		
Annual accounts	Current academic year + 6 years	Disposed of against common standards
Loans and grants managed by the school	Date of last payment + 12 years	Information is reviewed then securely disposed of
All records relating to the creation and management of budgets	Duration of the budget + 3 years	Securely disposed of
Invoices, receipts, order books, requisitions and delivery notices	Current financial year + 6 years	Securely disposed of
Records relating to the collection and banking of monies	Current financial year + 6 years	Securely disposed of
Records relating to the identification and collection of debt	Current financial year + 6 years	Securely disposed of
<b>Contract management</b>		
All records relating to the management of contracts under seal	Last payment on the contract + 12 years	Securely disposed of
All records relating to the management of contracts under signature	Last payment on the contract + 6 years	Securely disposed of
All records relating to the monitoring of contracts	Current academic year + 2 years	Securely disposed of
<b>School fund</b>		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Securely disposed of
<b>School meals</b>		
Free school meals registers	Current academic year + 6 years	Securely disposed of
School meals registers	Current academic year + 3 years	Securely disposed of
School meals summary sheets	Current academic year + 3 years	Securely disposed of

## 9. Retention of other school records

- 9.1. The table below outlines the school's retention periods for any other records held by the school, and the action that will be taken after the retention period, in line with any requirements.
- 9.2. Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Property management</b>		
Title deeds of properties belonging to the school	Permanent (Wigan Council/Manchester Diocese)	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 + 6 years	Securely disposed of
Records relating to the letting of school premises	Current financial year + 6 years	Securely disposed of
<b>Maintenance</b>		
All records relating to the maintenance of the school carried out by contractors	Current academic year 6 years	Securely disposed of
All records relating to the maintenance of the school carried out by school employees	Current academic year + 6 years	Securely disposed of
<b>Operational administration</b>		
General file series	Current academic year + 5 years	Reviewed and securely disposed of
Records relating to the creation and publication of the school brochure and/or prospectus	Current academic year + 3 years	Disposed of against common standards
Records relating to the creation and distribution of circulars to staff, parents or pupils	Current academic year + 1 year	Disposed of against common standards
Newsletters and other items with short operational use	Current academic year + 1 year	Disposed of against common standards

Visitors' books and signing-in sheets	Current academic year + 6 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 + 6 years	Reviewed then securely disposed of

## 10. Identifying information

- 10.1. Under the GDPR, all individuals have the right to data minimisation and data protection by design and default – as the data controller, the school ensures appropriate measures are in place in order for individuals to exercise this right.
- 10.2. Wherever possible, the school uses pseudonymisation, also known as the 'blurring technique', to reduce risk of identification.
- 10.3. Once an individual has left the school, if identifiers such as names and dates of birth are no longer required, these are removed or less specific personal data is used, e.g. the month of birth rather than specific date – the data is blurred slightly.
- 10.4. Where data is required to be retained over time, e.g. attendance data, the school removes any personal data not required and keeps only the data needed – in this example, the statistics of attendance rather than personal information.

## 11. Storing and protecting information

- 11.1. The DPO (*to be appointed*) will undertake a risk analysis to identify which records are vital to school management and these records will be stored in the most secure manner.
- 11.2. Information back-ups are undertaken weekly to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data.
- 11.3. Backed-up information will be stored off the school premises, using a back-up service (systems management company) and IT provider.
- 11.4. Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access.
- 11.5. Confidential paper records are not left unattended or in clear view when held in a location with general access.
- 11.6. Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed-up off-site.

- 11.7. Where data is saved on removable storage or a portable device, the device is kept in a locked and fireproof filing cabinet, drawer or safe when not in use.
- 11.8. Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.
- 11.9. All electronic devices are password-protected to protect the information on the device in case of theft.
- 11.10. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- 11.11. Staff and governors do not use their personal laptops or computers for school purposes.
- 11.12. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.
- 11.13. Emails containing sensitive or confidential information are password-protected to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email.
- 11.14. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.
- 11.15. When sending confidential information by fax, members of staff always check that the recipient is correct before sending.
- 11.16. Where personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with the GDPR, either in an electronic or paper format, staff take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.
- 11.17. 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.
- 11.18. All staff members will implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information will be stored in a securely locked filing cabinet, drawer or safe with restricted access.
- 11.19. 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.

- 11.20. The physical security of the school's buildings and storage systems, and access to them, is reviewed half yearly by the DPO in conjunction with Headteacher. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the Headteacher and extra measures to secure data storage will be put in place.
- 11.21. The school takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action.
- 11.22. The DPO (*to be appointed*) is responsible for continuity and recovery measures are in place to ensure the security of protected data.

## **12. Accessing information**

- 12.1. St. John's Mosley Common C.E. Primary School is transparent with data subjects, the information we hold and how it can be accessed.
- 12.2. All members of staff, parents of registered pupils and other users of the school, e.g. visitors and third-party clubs, are entitled to:
- Know what information the school holds and processes about them or their child and why.
  - Understand how to gain access to it.
  - Understand how to provide and withdraw consent to information being held.
  - Understand what the school is doing to comply with its obligations under the GDPR.
- 12.3. All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the GDPR, to access certain personal data being held about them or their child.
- 12.4. 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.
- 12.5. Pupils who are considered to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.
- 12.6. The school will adhere to the provisions outlined in the school's Data Protection Policy when responding to requests seeking access to personal information.

## **13. Information audit**

- 13.1. 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 GDPR. This includes the following information:

- Paper documents and records
  - Electronic documents and records
  - Database
  - Video and photographic records
- 13.2. 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
- 13.3. The DPO (*to be appointed*) 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
- 13.4. The DPO (*to be appointed*) will consult with staff members involved in the information audit process to ensure that the information is accurate.

## **14. Disposal of data**

- 14.1. 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.
- 14.2. Where disposal of information is outlined as secure disposal, this will be shredded or pulped and electronic information will be scrubbed clean and, where possible, cut. The DPO (*to be appointed*) will keep a record of all files that have been destroyed.
- 14.3. Where the disposal action is indicated as reviewed before it is disposed, the DPO (*to be appointed*) will review the information against its administrative value – if the information should be kept for administrative value, the DPO (*to be appointed*) will keep a record of this.
- 14.4. 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.
- 14.5. Where information has been kept for administrative purposes, the DPO (*to be appointed*) 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.

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

## **15. Monitoring and review**

- 15.1. This policy will be reviewed on an annual basis by the DPO (*to be appointed*) in conjunction with the Headteacher – the next scheduled review date for this policy is September 2019.
- 15.2. Any changes made to this policy will be communicated to all members of staff and the governing board.