Data Protection Policy

Contents:

1. Statement of intent

Lokrum Fields collects and uses personal data about staff, students, parents and other individuals who come into contact with the school. This information is gathered in order to enable us to provide education and other associated functions.

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Lokrum Fields is committed to maintaining the culture, processes and documentation required to ensure that personal data is handled correctly and securely in accordance with the related legislation at all times.

We ensure that all staff and governors who come into contact with personal data are aware of their responsibilities for compliance with data protection legislation and, in particular, the role that data protection plays in safeguarding our students.

2. About our policies

2.1. Our policies have been developed to comply with all relevant legislation and associated guidance. Policies will be updated periodically as necessary.

2.2. Our policies are inter-related and are intended to be read, understood, and used collectively.

2.3. All staff and governors are expected to be familiar with and abide by our policies.

2.4. The Office Manager is responsible for ensuring volunteers and visitors are familiar with any policies which are relevant to their involvement and for taking reasonable steps to ensure compliance.

2.5. The Headteacher is responsible for ensuring policies are implemented fairly, effectively, and consistently.

2.6. The Headteacher is responsible for identifying any training needs in relation to our policies. The Office Manager is responsible for arranging the required training. All staff are expected to engage in continuous learning and ongoing training appropriate to their roles.

2.7. The effectiveness of our policies and their implementation is monitored by the Governing Body. Unless otherwise stated, the Governing Body reviews each policy annually.

2.8. The Governing Body for Lokrum Fields is provided by Governing for Ambition, an independent community interest company. The Governing Body uses its expertise to monitor the performance of Lokrum Fields and to advise the Proprietor of any recommended actions. Responsibilities assigned to the Governing Body are limited to these advisory and accountability functions.

2.9. Lokrum Fields is owned by Wider Ambition Ltd, a subsidiary of Wider Plan Ltd. References to the Proprietor mean a Director of Lokrum Fields or a senior representative from Wider Plan with delegated authority.

2.10. The Lokrum Fields Senior Leadership Team (SLT) includes the Headteacher, Proprietor, and any member of staff to whom responsibility is temporarily delegated by the Headteacher or Proprietor.

2.11. All references to parents within our policies should be interpreted to include parent carers.

3. Roles and responsibilities

3.1. The Head Teacher holds overall responsibility for the implementation of this policy in school and ensuring that all staff are suitably trained and equipped to fulfil their duties under data protection legislation.

3.2. The Office Manager holds responsibility for the management of records at Lokrum Fields, including ensuring information is stored and disposed of safely and correctly and processed only where there is a legal basis for doing so.

4. Applicable data

4.1. For the purpose of this policy, personal data refers to information that relates to an individual and identifies them.

4.2. Special Category Data is information about more sensitive topics. For example, a person's ethnicity, mental health, or and criminal offences.

4.3. Biometric data is personal data resulting from specific technical processing relating to the physical, physiological, or behavioural characteristics of an individual, which allows or confirms the unique identification of that individual, such as facial images or fingerprint data.

5. Principles

5.1. In accordance with the requirements outlined in the GDPR, personal data held by Lokrum Fields will be:

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5.1.1. Processed lawfully, fairly and in a transparent manner.
5.1.2. Collected for specified, explicit and legitimate purposes.
5.1.3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
5.1.4. Accurate and, where necessary, kept up-to-date.
5.1.5. 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.
5.1.6. Processed in a manner that ensures appropriate security of the personal data.

5.2. Wider Ambition will fulfil its obligation to register as data controller with the Information Commissioner's Office.

5.3. Personal data may be shared between Wider Ambition settings and the head office, subject to needs.

6. Biometric data

6.1. Where students' biometric data as part of an automated biometric recognition system, we will notify parents in advance and only collect such data with consent of the individual and their parent if they are aged 12 years or less.

6.2. Individuals have the right to choose not to use the school's biometric systems. We will provide alternative means of accessing the relevant services for those individuals.

6.3. Individuals can withdraw consent for the processing of their biometric data at any time, at which point any relevant personal data already captured will be deleted.

7. Accountability

7.1. Records of activities relating to higher risk processing will be maintained.

7.2. Internal records of processing activities will include the following:

7.2.1. The lawful basis for processing
7.2.2. Conditions for processing special category data
7.2.3. Purpose(s) of the processing
7.2.4. Storage arrangements
7.2.5. Retention schedules
7.2.6. Description of technical and organisational security measures

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7.2.7. Details of transfers to third parties, including documentation of the transfer mechanism safeguards in place

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

7.3.1. Data minimisation

7.3.2. Anonymisation

7.3.3. Transparency

7.3.4. Allowing individuals to monitor processing

7.3.5. Continuously creating and improving security features

7.4. Data Protection Impact Assessments will be used, where appropriate to assist with the identification and limitation of data protection risks.

8. Lawful processing

8.1. Lokrum Fields will only process personal data if there is a lawful basis for doing so, i.e., under the following conditions:

8.1.1. The consent of the data subject or their parent in the case of a student aged under 13 years, has been obtained.

8.1.2. Processing is necessary for:

8.1.2.1. Compliance with a legal obligation.

8.1.2.2. The performance of a task carried out in the public interest or in the exercise of official authority held by the school.

8.1.2.3. Entering into or fulfilling the terms of a contract with the data subject or third party.

8.1.2.4. Protecting the vital interests of a data subject or another person.

8.2. For Special Categories of personal data, we will also meet one of the special category conditions for processing which are set out in the GDPR and Data Protection Act 2018.

8.3. Whenever we first collect personal data directly from individuals, we will provide them with the relevant information required by data protection law.

8.4. Where the school relies on:

8.4.1.1. ‘Performance of contract’ to process a child’s data, the school will consider the child’s competence to understand what they are agreeing to, and to enter into a contract.

8.4.1.2. ‘Legitimate interests’ to process a child’s data, the school will take responsibility for identifying the risks and consequences of the processing and puts age-appropriate safeguards in place.

8.4.1.3. Consent to process a child’s data, the school will not exploit any imbalance of power in the relationship between the school and the child.

9. Consent

9.1. Lokrum Fields recognises that:

9.1.1. Anyone aged 13 years or over is considered competent to give consent and make requests regarding the processing of their personal data.

9.1.2. Consent must be a positive indication of the individual’s wishes and is freely given.

9.1.3. Consent can be withdrawn by the individual at any time.

9.2. For students under 13 years, consent will be sought from the student and their parents.

9.3. Where a student aged under 13 makes a request regarding their data processing we will comply with the request, unless we believe that the student is not competent to understand the full implications and to do so may not be in their best interests, at which time, we will work with them to identify a mutually acceptable course of action which may include consultation with their parents.

10. The right to be informed

10.1. Individuals, including children have the right to be informed about how the school uses their data.

10.2. The privacy notices will be supplied to individuals, including children, in regard to the processing of their personal data.

10.3. Privacy notices will be written in clear, plain, age-appropriate language, which is concise, transparent, intelligible, easily accessible and free of charge.

11. The right of access

11.1. Individuals, including children, have the right to obtain confirmation that their data is being processed.

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11.2. Individuals, including children, have 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.

11.3. The school will verify the identity of the person making the request before any information is supplied.

11.4. A copy of the information will be supplied to the individual free of charge; however, the school may impose a 'reasonable fee', based on the administrative cost of providing the information, to comply with requests for further copies of the same information.

11.5. The information will be provided in a commonly used electronic format.

11.6. Where a request is manifestly unfounded, excessive or repetitive, a reasonable fee, based on the administrative cost of providing the information, will be charged.

11.7. All requests will be responded to without delay and at the latest, within one month of receipt.

11.8. 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.

11.9. 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.

11.10. 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.

12. The right to rectification

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

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

12.3. Where appropriate, the school will inform the individual about the third parties that the data has been disclosed to.

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

12.5. Where no action is being taken in response to a request for rectification, 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.

13. The right to erasure

13.1. Individuals, including children, hold the right to request the deletion or removal of personal data (sometimes known as the right to be forgotten) in certain circumstances and where there is no compelling reason for its continued processing.

13.2. The school has the right to refuse a request for erasure in certain circumstances where the processing of the data is necessary.

13.3. Where no action is being taken in response to a request for deletion, 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.

14. The right to restrict processing

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

14.2. 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.

14.3. The school will restrict the processing of personal data when there are legitimate grounds for doing so or while considering a request for deletion or restriction of processing.

14.4. 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.

14.5. The school will inform individuals when a restriction on processing has been lifted.

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15. The right to data portability

15.1. Individuals, including children, have the right to obtain and reuse their personal data for their own purposes across different services.

15.2. The right to data portability only applies in the following cases:

15.2.1. To personal data that an individual has provided to a controller

15.2.2. Where the processing is based on the individual's consent or for the performance of a contract

15.2.3. When processing is carried out by automated means

15.3. Personal data will be provided in a structured, commonly used and machine-readable form.

15.4. The school will provide the information free of charge.

15.5. Where feasible, data will be transmitted directly to another organisation at the request of the individual.

15.6. 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.

15.7. The school will respond to any requests for portability within one month.

15.8. 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.

16. The right to object

16.1. Individuals, including children, have the right to object to the processing of their personal data in certain circumstances.

16.2. The school cannot refuse an individual's objection regarding data that is being processed for direct marketing purposes.

16.3. 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.

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17. Automated decision making and profiling

17.1. Individuals have the right not to be subject to a decision when it is based on automated processing, e.g. profiling and it produces a legal effect or a similarly significant effect on the individual.

17.2. 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.

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

17.4. Automated decisions must not concern a child or be based on the processing of sensitive data, unless:

17.4.1. The school has the explicit consent of the individual.

17.4.2. The processing is necessary for reasons of substantial public interest on the basis of UK law.

18. Requests to exercise individual rights

18.1. An individual wishing to exercise their right in relations to point 9 to 16 above should contact the school office to make their request.

18.2. 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 Information Commissioner's Office and to a judicial remedy.

19. Data breaches

19.1. 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.

19.2. The Headteacher will ensure that all staff members are made aware of, and understand, what constitutes a data breach as part of their CPD training.

19.3. 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 Information Commissioner's Office or the public need to be notified.

19.4. On detection of a data breach, the Office Manager and Proprietor will be informed immediately.

19.5. The office manager will inform individuals, in a timely manner, of any data breaches that involve their personal data, what data is involved, any likely consequences that may affect them and what steps are being taken to address the issue.

19.6. Where this is required, the Office Manager will inform the Information Commissioner's Office (ICO) of the breach within 72 hours of its detection.

19.7. Within a breach notification, the following information will be outlined:

19.7.1. The nature of the personal data breach, including the categories and approximate number of individuals and records concerned

19.7.2. An explanation of the likely consequences of the personal data breach

19.7.3. A description of the proposed measures to be taken to deal with the personal data breach

19.7.4. Where appropriate, a description of the measures taken to mitigate any possible adverse effects

19.8. Records will be kept of all known personal data breaches, regardless of whether there was a requirement to notify the ICO.

20. Data security

20.1. Confidential paper records will be kept in a locked filing cabinet, drawer or safe, with restricted access.

20.2. Confidential paper records will not be left unattended or in clear view anywhere with general access.

20.3. Digital data is coded, encrypted or password-protected, on a network drive that is regularly backed up off-site.

20.4. Where 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.

20.5. Memory sticks will not be used to hold personal information unless they are password-protected and fully encrypted.

20.6. All electronic devices are password-protected to protect the information on the device in case of theft.

20.7. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.

20.8. Staff and governors will not use their personal laptops or computers to save school documents or data for school purposes. Instead they will log into Governor Hub to look at information.

20.9. All necessary members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.

20.10. Emails containing sensitive or confidential information are password-protected if there are unsecure servers between the sender and the recipient.

20.11. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

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

20.13. 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.

20.14. Before sharing data, all staff members will ensure:

20.14.1. Appropriate consent has been secured.

20.14.2. They are permitted to share it.

20.14.3. That adequate security is in place to protect it.

20.14.4. Who will receive the data has been outlined in a privacy notice.

20.15. 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.

20.16. 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/theft is identified, extra measures to secure data storage will be put in place.

20.17. Lokrum Fields takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action.

20.18. The Office Manager is responsible for continuity and recovery measures are in place to ensure the security of protected data. For example, regular training of Staff, Governors and Volunteers, regular data clearance, clear processes, and up to date internet security etc.

21. Publication of information

21.1. Lokrum Fields publishes the following information on its website:

21.1.1. Policies and procedures

21.1.2. Governors and contact information

21.1.3. Curriculum/topics overview

21.2. Classes of information specified in the publication scheme are made available quickly and easily on request.

21.3. Lokrum Fields will not publish any personal information on its website without securing the consent of the affected student or parent.

21.4. 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.

22. CCTV and photography

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

22.2. The school notifies all students, staff and visitors of the purpose for collecting CCTV images.

22.3. Cameras are only placed where they do not intrude on anyone's privacy and are necessary to fulfil their purpose.

22.4. All CCTV footage will be kept for one month for security purposes; the Office Manager is responsible for keeping the records secure and allowing access.

22.5. The school will always indicate its intentions for taking photographs of students and will secure consent from the affected student or parent before publishing them.

22.6. If the school wishes to use images/video footage of students in a publication, such as the school website, prospectus, or recordings of school plays, written consent will be sought for the particular usage from the affected student or parent.

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

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23. Data retention

23.1. Data that has reached the minimum retention period will be deleted as soon as practicable.

23.2. Some educational records relating to former students or employees of the school may be kept for an extended period for legal reasons, or to enable the provision of references or academic transcripts.

23.3. All records containing personal information, or sensitive policy information will be made either unreadable or not reconstructable following the retention period.

23.4. All records should be stored in electronic form wherever possible. Paper documents received or created by the school will be scanned and saved electronically as soon as possible and wherever practicable, with the paper copy then being securely destroyed unless there is an overriding reason for retention.

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Appendix 1 - Data Retention Table

1. Management of the School

1.1 Governing Body			
Ref	**Basic file description**	**Retention period**	**Action at the end of the retention period**
1.1.1	Agendas for Governing Body meetings	Review after 10 years Retain until 3 years after any issues, decisions or actions have ceased to be live	Deletion
1.1.2	Minutes of Governing Body meetings		
1.1.3	Reports presented to the Governing Body, including School Development Plans		
1.1.4	Action plans created and administered by the Governing Body		
1.1.5	Policy documents created and administered by the Governing Body		
1.1.6	Instruments of Government including Articles of Association	Permanent	Pass to Wider Ambition if Governing for Ambition ceases to operate Secure disposal if both Governing for Ambition and Wider Ambition cease to operate
1.1.7	Records relating to complaints dealt with by the Governing Body	Review 6 years after the date of resolution of the complaint Retain until 3 years after the issue has ceased to be live or 3 years after the date of last communication if later	Deletion

Appendix 1 - Data Retention Table

1.2 Senior Leadership Team Records			
1.2.1	Minutes of Senior Management Team meetings, Staff Meetings and similar	Date of the meeting + 3 years then review	Deletion
1.2.2	Reports created by the Head Teacher or the Management Team	Date of the report + 3 years then review	
1.3 Admissions			
1.3.1	Admissions enquiries and related paperwork where the process (a) does not result in a place either being offered or declined, or (b) results in a place being declined and the decision is not appealed within 6 months, or (c) results in an offer of a place which is not taken up	6 months from date of last correspondence	Deletion
1.3.2	Admissions enquiries where a place is offered and taken up	Transfer to student's educational records and follow the relevant retention policy	N/A
1.3.3	Admissions enquiries leading to an appeal	The later of: Resolution of case + 1 year 6 months from date of last correspondence	Deletion

Appendix 1 - Data Retention Table

1.3.4	Register of Admissions	Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made. Retain for 3 years after the student ceases to be on roll.	Deletion
1.4 Operational Administration			
1.4.1	Correspondence with parents, staff, students etc containing matters of policy not otherwise documented in school policies and forming part of an individual HR issue or educational record	Refer to Governing Body within 1 month so the relevant policy can be reviewed Retain for 3 years then review – delete if the issue is no longer live or if the relevant policy has been updated	Deletion
1.4.2	Newsletters for parents or public and other items with a short operational use	1 year	Deletion
1.4.3	Visitors' Books	3 months	Secure disposal
1.4.4	Student signing in sheets	Transfer details to the attendance register and/or student file as applicable within 1 week	Deletion

Appendix 1 - Data Retention Table

2. Human Resources

2.1 Recruitment			
Ref	**Basic file description**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
2.1.1	Records leading up the appointment of a new member of staff (job advert, job description, application form, interview materials and scores, references, employment contract and related documents)	Date of leaving employment + 6 years	Deletion
2.1.2	Recruitment records in relation to unsuccessful candidates	Date of appointment of successful candidate + 6 months	Deletion
2.1.3	DBS checks	Summary information (DBS number and date of check) to be retained on the Single Central Record until a subsequent DBS check is completed or date of leaving employment Evidence of the DBS check (eg a photocopy of the employee's address and DBS number but no content) may be retained in the HR file The DBS certificate may only be retained in circumstances where an offence is shown and the purpose of retention is to justify the employment decision, in which case the rationale for retention should be reviewed on a case-by-case basis annually	Deletion

Appendix 1 - Data Retention Table

2.1.4	Proof of identity and right-to-work checks	Retain electronic copies on the HR file for 6 years after ceasing employment	Deletion
2.2 Operational Staff Management			
2.2.1	Personnel File	Termination of employment + 6 years	Deletion
2.2.2	Timesheets	Current year + 1 year	
2.2.3	Annual appraisal / assessment records	Current year + 5 years	
2.3 Management of Disciplinary and Grievance Processes			
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded	Until the person's normal retirement age or 10 years from the date of the allegation, whichever is longer, then review. Allegations that are found to be malicious should be removed from personnel files.	Deletion
2.3.2	Disciplinary Proceedings	Termination of employment + 6 years	
2.4 Health and Safety			
2.4.1	Health and Safety Policy Statements	Life of policy + 3 years	Secure disposal
2.4.2	Health and Safety Risk Assessments	Life of risk assessment + 3 years	
2.4.3	Records relating to accident/ injury at work	Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	
2.4.4	Accident Reporting		

Appendix 1 - Data Retention Table

	Adults	Date of the incident + 6 years	
	Children	DOB of the child + 25 years	
2.4.5	Control of Substances Hazardous to Health (COSHH)	Current year + 40 years	
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	Last action + 40 years	
2.4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	Last action + 50 years	
2.4.8	Fire Precautions log books	Current year + 6 years	
2.5 Payroll and Pensions			
2.5.1	Maternity pay records	Current year + 3 years	Deletion
2.5.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current year + 6 years	

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Appendix 1 - Data Retention Table

3. Financial Management of the School

3.1 Risk Management and Insurance			
Ref	**Basic file description**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
3.1.1	Employer's Liability Insurance Certificate	Closure of the school + 40 years	Secure disposal
3.2 Asset Management			
3.2.1	Inventories of furniture and equipment	Current year + 6 years	Deletion
3.2.2	Burglary, theft and vandalism report forms	Current year + 6 years	
3.3 Accounts and Statements including Budget Management			
3.3.1	Annual Accounts	Current year + 6 years	Deletion
3.3.2	Student Grant applications	Current year + 3 years	
3.3.3	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	Life of the budget + 3 years	
3.3.4	Invoices and receipts	Current financial year + 6 years	
3.3.5	Records relating to the collection and banking of monies	Current financial year + 6 years	
3.4 Contract Management			
3.4.1	Contracts	Last payment on the contract + 12 years	Secure disposal
3.6 School Meals			
3.6.1	Free School Meals Registers	Until student ceases to be on roll + 1 year	Secure disposal

Appendix 1 - Data Retention Table

4. Property Management

4.1 Property Management			
Ref	**Basic file description**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
4.1.1	Title deeds of properties belonging to the school	Permanent	Secure disposal
4.1.2	Plans of property belonging to the school	For as long as the property is owned + 3 years	
4.1.3	Leases of property leased by or to the school	Expiry of lease + 6 years	
4.1.4	Records relating to the letting of school premises	Current year + 6 years	
4.2 Maintenance			
4.2.1	All records relating to the maintenance of the school carried out by contractors	Current year + 6 years	Secure disposal
4.2.2	All records relating to the maintenance of the school carried out by school employees including maintenance log books	Current year + 6 years	Secure disposal

Appendix 1 - Data Retention Table

5. Student Management

5.1 Student's Educational Record			
Ref	**Basic file description**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
5.1.1	Student's Educational Record required by The Education (Student Information) (England) Regulations 2005	Date of birth of the student + 25 years	Secure disposal
5.1.2	Examination Results	Add to the student's educational record	
5.1.3	Child protection information	Retain for the same period as the student file	
5.2 Attendance			
5.2.1	Attendance Registers	Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made	Secure disposal
5.2.2	Correspondence relating to authorized absence	Current academic year + 2 years unless the correspondence forms part of the student's file	
5.3 Special Educational Needs			
5.3.1	Special Educational Needs files, EHCPs, reviews and Individual Education Plans	Date of Birth of the student + 25 years	Deletion

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Appendix 1 - Data Retention Table

6. Curriculum Management

6.1 Statistics and Management Information			
Ref	**Basic file description**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
6.1.1	Examination Results where a copy is held in addition to copies held on student files	Current year + 6 years	Secure disposal
6.1.2	Examination Papers	The examination papers should be kept until any appeals/validation process is complete	Secure disposal
6.1.3	Contextual or other data collected for the purpose of formal monitoring or to inform management decisions	Current year + 6 years	Secure disposal
6.2 Implementation of Curriculum			
6.2.1	Schemes of work	Current year + 3 years	Review these records at the end of each year and allocate a further retention period or Secure disposal
6.2.2	Timetable	Current year + 1 year	Secure disposal
6.2.3	Assessment records held outside a student's educational record	Current year + 6 years	Secure disposal

Appendix 1 - Data Retention Table

6.2.6	Students' work	Where possible students' physical work should be returned to the student by the end of the academic year Retain electronic copies of work for current year + 1 year, or until the end of a GCSE course if longer, or in sample form as evidence of progress within the student's educational record or separate assessment records and follow the relevant retention policy	Secure disposal

7. Extra Curriculum Management

7.1 Educational Visits outside the Classroom			
Ref	**Basic file description**	**Retention Period [Operational]**	**Action at the end of the administrative life of the record**
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom	Date of visit + 10 years	Secure disposal
7.1.2	Parental consent forms for school trips where there has been no major incident	Conclusion of the trip + 3 months	Secure disposal
7.1.4	Parental permission slips for school trips where there has been a major incident	DOB of the student involved in the incident + 25 years The permission slips for all the students on the trip need to be retained to show that the rules had been followed for all students	Secure disposal
7.2 Family Liaison Officers and Home School Liaison Assistants			

Appendix 1 - Data Retention Table

7.3.1	Reports for outside agencies	Add to student's file	Secure disposal
7.3.2	Referral forms	Add to student's file	Secure disposal
7.3.3	Contact details for external professionals	Current year then review, if contact is no longer active then destroy any contact record which is not held within other documentation on the student's file	Secure disposal

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