



**Enabling children to grow and love life**

# Records Management Policy

Responsibility for Review: Chief Operating Officer  
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## 1.0 Policy statement

St Margaret Clitherow Catholic School Trust is committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible by the appropriate individuals. In line with the requirements of the General Data Protection Regulations (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 trust has created this policy to outline how records are stored, accessed, monitored, retained and disposed of to meet the school's statutory requirements.

Our Mission is to make God known to all through the advancement of the Catholic Faith. Our Vision is to bring joy, hope, opportunity and purpose for our children in an uncertain world, through exemplary Catholic and Christian education, the love of what we do and the courage to make a difference. The Christian values of the Trust and of all our schools are expected to be embedded into the delivery and implementation of this policy in order to advance the vision for all its staff, pupils, local governors and parents

## 2.0 Scope and purpose

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

Schools should understand that there is no sector-wide data retention policy that prescribes the length of time for which data should be retained. The retention periods outlined in this policy are good practice guidelines only, and schools should ensure that they consider the requirements specific to their school when implementing these time frames. The tables for retention periods are based on information provided by the Information Records Management Society (IRMS) and the DfE and are not an exhaustive list of records that may be kept by academies.

Any retention periods should be in line with the school's local arrangements and its justification for processing the data.

## 3.0 Legal framework

3.1 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)

3.2 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

3.3 This policy will be implemented in accordance with the following school policies and procedures:

- GDPR Policy
- Freedom of Information Policy
- E-security Policy
- Information Asset Register

## 4.0 Responsibilities

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

4.2 The Head Teacher holds the overall responsibility for this policy and for ensuring that it is implemented correctly.

4.3 The Data Protection Officer (DPO) is responsible for the management of records across St Margaret Clitherow Catholic School Trust.

4.4 The DPO is responsible for promoting compliance with this policy and reviewing the policy on an annual basis in conjunction with the Principal.

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

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

## 5.0 Management of student records

5.1 Student records are specific documents that are used throughout a student's time in the education system – they are passed to each school that a student attends and include all the personal information relating to them, for example their date of birth, their home address and their progress and achievement.

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

- forename, surname, gender and date of birth
- unique student number
- note of the date when the file was opened
- note of the date when the file was closed, if appropriate

- 5.3** The following information is stored inside the front cover of a student record and will be easily accessible:
- ethnic origin, religion and first language (if not English)
  - any preferred names
  - position in their family, for example eldest sibling
  - emergency contact details and the name of the student's doctor
  - any allergies or other medical conditions of which it is important for the school to be aware
  - names of the student's parents, including their home address(es) and telephone number(s)
  - name of the school, admission number, date of admission and date of leaving, where appropriate
  - any other agency's involvement, for example a speech and language therapist
- 5.4** The following information is stored in a student record and will be easily accessible:
- admissions form
  - details of any special educational needs and disability (SEND)
  - if the student has attended an early years setting, the record of transfer
  - fair processing notice – only the most recent notice will be included
  - annual written reports for parents
  - national curriculum and agreed syllabus recordsheets
  - notes relating to major incidents and accidents involving the student
  - any information about an education, health and care (EHC) plan and support offered in relation to the EHC plan
  - any notes indicating that child protection disclosures and reports are held
  - any information relating to exclusions
  - any correspondence with parents or external agencies relating to major issues, for example mental health
  - notes indicating that records of complaints made by parents or the student are held
- 5.5** The following information is subject to shorter retention periods and therefore will be stored separately in a personal file for the student in the school office:
- absence notes
  - parental and, where appropriate, student consent forms for educational visits, photographs and videos and so on
  - correspondence with parents about minor issues, for example behaviour
- 5.6** Hard copies of disclosures and reports relating to child protection are stored in a sealed envelope in a securely locked filing cabinet in the school office – a note indicating this is written on the student's file.
- 5.7** Hard copies of complaints made by parents or students are stored in a file in the principal's office – a note indicating this is written on the student's file.
- 5.8** 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 written on the student's file. An additional copy may be placed in the student's file in the event of a major accident or incident.
- 5.9** The school will ensure that no student records are altered or amended before transferring them to the next school that the student will attend.
- 5.10** The only exception to the above is if any records placed in the student's file have a shorter retention period and may need to be removed. In such cases, the DPO responsible for disposing of records will remove them.
- 5.11** Electronic records relating to a student's record will also be transferred to the students' next school. Section 11 of this policy outlines how electronic records will be transferred.
- 5.12** (Primary schools only) The school will not keep any copies of information stored within a student's record unless there is ongoing legal action at the time during which the student leaves the school. The responsibility for these records will then transfer to the next school that the student attends.
- 5.13** (Secondary schools and sixth-form colleges only) If any student attends the school until the statutory school leaving age, the school will keep the student's records until the student reaches the age of 25 years.
- 5.14** The school will, whenever possible, avoid sending a student's record by post. When a student's record must be sent by post, it will be sent by registered post with an accompanying list of the files included. The school that it is sent to is required to sign a copy of the list to indicate that it has received the files and return this to the school.

## 6.0 Retention of student records and other student-related information

- 6.1 The table below outlines the school's retention periods for individual student 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 be destroyed in accordance with the retention periods below.

## 7.0 Retention of staff records

- 7.1 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.
- 7.2 Electronic copies of any information and files will also be destroyed in accordance with the retention periods below.

Type of file	Retention period	Action taken after the retention period ends
<b>Personal identifiers, contact details and personal characteristics</b>		
Images used for identification purposes	For the duration of the event / activity or whilst the student remains at school , whichever is shorter, plus one month	Securely disposed of
Images used in displays in academies	Whilst the student is at the school	Securely disposed of
Images used for marketing purposes or other	In line with the consent period	Securely disposed of
Biometric data	For the duration of the event / activity or whilst the student remains at the school , whichever is shorter, plus one month	Securely disposed of
Postcodes, names and characteristics	Whilst the student is at the school plus five years	Securely disposed of
House number and road	For the duration of the event / activity plus one month	Securely disposed of
<b>Admissions</b>		
Register of admissions	Whilst the student remains at the school plus one year	Information is reviewed and the register may be kept permanently
Admission appeals	Whilst the student remains at the school plus five years	Securely disposed of
Secondary school admissions	Whilst the student remains at the school plus one year	Securely disposed of
Proof of address (supplied as part of the admission process)	Whilst the student remains at the school plus one year	Securely disposed of
Supplementary information submitted, including religious and medical information (when the admission was successful)	Whilst the student remains at the school plus one year	Securely disposed of
Supplementary information submitted, including religious and medical information (when the admission was not successful)	Whilst the student remains at the school plus five years	Securely disposed of

Type of file	Retention period	Action taken after the retention period ends
<b>Students' educational records</b>		
(Primary schools only) Students' educational records	Whilst the student remains at the school	Transferred to the next destination – if this is an independent school, home schooling or outside the UK, the file will be kept by the LA and retained for the statutory period
[Secondary schools only] Students' educational records	25 years after the student's date of birth, with their personal data removed	Securely disposed of
Public examination results	Added to the student's record and transferred to the next school  Copies with students' names are held whilst the student is at the school plus five years  Copies with students' names removed are held for 25 years after the student's date of birth	Returned to the examination board
Internal examination results	Added to the student's record and transferred to the next school  Copies with the student's personal data are held whilst the student is at the school plus five years  Copies with personal data removed are held for 25 years after the student's date of birth	Securely disposed of
Behaviour records	Added to the student's record and transferred to the next school  Copies are held whilst the student is at school plus one year	Securely disposed of
Exclusion records	Added to the student's record and transferred to the next school  Copies are held whilst the student is at the school plus one year	Securely disposed of
Child protection information held on a student's record	Stored in a sealed envelope for the same length of time as the student's record	Securely disposed of – shredded
Child protection records held in a separate file	25 years after the student's date of birth	Securely disposed of – shredded
<b>Attendance</b>		
Attendance registers	Whilst the student remains at the school plus one year  Non-identifiable summary statistics are held after the initial retention period for 25 years after the student's date of birth	Securely disposed of
Letters authorising absence	Whilst the student remains at the school plus one year  Non-identifiable summary statistics are held after the initial retention period for 25 years after the student's date of birth	Securely disposed of

<b>Medical information and administration</b>		
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 student's record and transferred to the next school  Copies held whilst the student is at the school plus one year	Securely disposed of
Medical incidents that have a behavioural or safeguarding influence	Added to the student's record and transferred to the next school  Copies held whilst the student is at school plus 25 years	Securely disposed of

**SEND**

SEND files, reviews and individual education plans	25 years after the student's date of birth (as stated on the student's record)	Information is reviewed and the file may be kept for longer than necessary if it is required for the school to defend itself 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)	25 years after the student's date of birth (as stated on the student's record)	Securely disposed of unless it is subject to a legal hold
Information and advice provided to parents regarding SEND	25 years after the student's date of birth (as stated on the student's record)	Securely disposed of unless it is subject to a legal hold
Accessibility strategy	25 years after the student's date of birth (as stated on the student's record)	Securely disposed of unless it is subject to a legal hold

**Curriculum management**

SATs results	25 years after the student's date of birth (as stated on the student's record)	Securely disposed of
Examination papers	Until the appeal / validation process has been completed	Securely disposed of
Published Admission Number (PAN) reports	Current academic year plus six years	Securely disposed of
Value-added and contextual data	Current academic year plus six years	Securely disposed of
Self-evaluation forms	Current academic year plus six years	Securely disposed of
Students' work	Returned to students at the end of the academic year or retained for the current academic year plus one year	Securely disposed of

**Type of file****Retention period****Action taken after the retention period ends**

<b>Extra-curricular activities</b>		
Field file – information taken on school trips	Until the conclusion of the trip plus one month  When a minor incident occurs, field files are added to the core system as appropriate	Securely disposed of
Financial information relating to school trips	Whilst the student remains at the school plus one year	Securely disposed of
Parental consent forms for school trips on which no major incident occurred	Until the conclusion of the trip	Securely disposed of
Parental consent forms for school trips on which no major incident occurred	U25 years after the student's date of birth on the student's record (permission slips of all students on the trip will also be held to show that the rules had been followed for all students)	Securely disposed of
Walking bus registers	Three years from the date of the register being taken	Securely disposed of
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 destroyed if no longer required
Reports for outside agencies	Duration of the student'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 plus two years	Securely disposed of

**Catering and free school meal management**

Meal administration	Whilst the student is at the school plus one year	Securely disposed of
Meal eligibility	Whilst the student is at the school plus five years	Securely disposed of

## 8.0 Retention of senior leadership and management records

8.1 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.

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

Type of file	Retention period	Action taken after the retention period ends
<b>Operational</b>		
Staff members' personal file	Termination of employment plus six years	Securely disposed of
Time sheets	Current academic year plus six years	Securely disposed of
Annual appraisal and assessment records	Current academic year plus five years	Securely disposed of
<b>Recruitment</b>		
Records relating to the appointment of a new Principal	Date of appointment plus six years	Securely disposed of
Records relating to the appointment of new members of staff (unsuccessful candidates)	Date of appointment of successful candidate plus six months	Securely disposed of
Records relating to the appointment of new members of staff (successful candidates)	Relevant information added to the member of staff's personal file and other information retained for six 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	Reviewed and a note kept of what was seen and what has been checked – if it is necessary to keep a copy, this will be placed on the staff member's personal file; if not, it will be securely disposed of
Evidence of the right to work in the UK	Added to the staff personal file or, if kept separately, termination of employment plus no longer than two years	Securely disposed of
<b>Disciplinary and grievance procedures</b>		
Child protection allegations, including allegations that are unproven	Added to the staff personal file and held until the individual's normal retirement age or 10 years from the date of the allegation – whichever is longer  If the allegations are malicious, they are removed from personal files	Reviewed and securely disposed of – shredded
Oral warnings	Date of warning plus six months	Securely disposed of – if placed in the staff personal file, removed from the file
Written warning – level 1	Date of warning plus six months	Securely disposed of – if placed in the staff personal file, removed from the file
Written warning – level 2	Date of warning plus 12 months	Securely disposed of – if placed in the staff personal file, removed from the file
Final warning	Date of warning plus 18 months	Securely disposed of – if placed in the staff personal file, removed from the file
Records relating to unproven incidents	Conclusion of the case unless the incident is child protection related and is disposed of as above	Securely disposed of

## 9.0 Retention of health and safety records

9.1 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.

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

Type of file	Retention period	Action taken after the 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	If unable to store, these will be given to the county archive service
Inspection copies of the minutes of governing board meetings	Date of the meeting plus three years	Shredded if they contain any sensitive and personal information
Reports presented to the governing board	Minimum of six years unless they refer to individual reports – these are kept permanently	Securely disposed of or, if they refer to individual reports, retained with the signed, original copy of minutes
Meeting papers relating to the annual parents' meeting	Date of the meeting plus a minimum of six years	Securely disposed of
Instruments of government, including articles of association	Permanent	If unable to store, these will be given to the county archive service
Trusts and endowments managed by the governing board	Permanent	Retained in the school whilst it remains open, then given to the county archive service when the school closes
Action plans created and administered by the governing board	Duration of the action plan plus three years	Securely disposed of
Policy documents created and administered by the governing board	Duration of the policy, plus three years	Securely disposed of
Records relating to complaints dealt with by the governing board	Date of the resolution of the complaint plus a minimum of six years	Reviewed for further retention in case of contentious disputes, then securely disposed of
Annual reports created under the requirements of the Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002	Date of the report plus 10 years	Securely disposed of
Proposals concerning changing the status of the school	Date on which the proposal is accepted or declined plus three years	Securely disposed of

Type of file	Retention period	Action taken after the retention period ends
<b>Head Teacher and Senior Leadership Team (SLT)</b>		
Log books of activity in the school maintained by the Head Teacher	Date of the last entry plus a minimum of six years	Reviewed and offered to the county archive service if appropriate
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting plus three years	Reviewed and securely disposed of
Reports created by the Head Teacher or SLT	Date of the report plus a minimum of three years	Reviewed and securely disposed of
Records created by the Head Teacher , deputy Head Teacher , heads of year and other members of staff with administrative responsibilities	Current academic year plus six years	Reviewed and securely disposed of
Correspondence created by the Head Teacher, deputy Head Teacher, heads of year and other members of staff with administrative responsibilities	Date of correspondence plus three years	Reviewed and securely disposed of
Professional development plan	Duration of the plan plus six years	Securely disposed of
School development plan	Duration of the plan plus three years	Securely disposed of

## 10.0 Retention of financial records

**10.1** 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.

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

Type of file	Retention period	Action taken after the retention period ends
<b>Health and safety</b>		
Health and safety policy statements	Duration of the policy plus three years	Securely disposed of
Health and safety risk assessments	Duration of the risk assessment plus three years	Securely disposed of
Records relating to accidents and injuries at work	Date of the incident plus 12 years. In the case of serious accidents, a retention period of 15 years is applied	Securely disposed of
Accident reporting – adults	Date of the incident plus six years	Securely disposed of
Accident reporting – students	25 years after the student’s date of birth on the student’s record	Securely disposed of



Type of file	Retention period	Action taken after the retention period ends
<b>Health and safety</b>		
Control of substances hazardous to health	Current academic year plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with asbestos	Date of the last action plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with radiation	Date of the last action plus 50 years	Securely disposed of
Fire precaution log books	Current academic year plus six years	Securely disposed of

## 11.0 Retention of other school records

**11.1** 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.

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

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

Type of file	Retention period	Action taken after the retention period ends
<b>Accounts and statements including budget management</b>		
Annual accounts	Current academic year plus six years	Disposed of in accordance with common standards
Loans and grants managed by the school	Date of the 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	Current financial year plus six years	Securely disposed of
<b>Contract management</b>		
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	Current academic year plus two 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 meal registers	Current academic year plus six years	Securely disposed of
School meal registers	Current academic year plus three years	Securely disposed of
School meal summary sheets	Current academic year plus three years	Securely disposed of

## 12.0 Identifying information

12.1 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 that appropriate measures are in place for individuals to exercise this right.

12.2 Whenever possible, the school uses pseudonymisation, also known as the ‘blurring technique’, to reduce the risk of identification.

Type of file	Retention period	Action taken after the retention period ends
<b>Property management</b>		
Title deeds of properties belonging to the school	Permanent	Transferred to the 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 the 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
<b>Maintenance</b>		
All records relating to the maintenance of the school carried out by contractors	Current academic year plus six years	Securely disposed of
All records relating to the maintenance of the school carried out by school employees	Current academic year plus six years	Securely disposed of
<b>Operational administration</b>		
General file series	Current academic year plus five years	Reviewed and securely disposed of
Records relating to the creation and publication of the school 's brochure and / or prospectus	Current academic year plus three years	Disposed of in accordance with common standards
Records relating to the creation and distribution of circulars to staff, parents or students	Current academic year plus one year	Disposed of in accordance with common standards
Newsletters and other items with short operational use	Current academic year plus one year	Disposed of in accordance with common standards
Visitors' books and signing-in sheets	Current academic year plus six years	Reviewed then securely disposed of
Records relating to the creation and management of parent-teacher associations and / or old student associations	Current academic year plus six years	Reviewed then securely disposed of

- 12.3** 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 are used, for example the month of birth rather than a specific date, and the data are blurred slightly.
- 12.4** When data are required to be retained over time, for example attendance data, the school removes any personal data that are not required and keeps only the data needed – in this example, the statistics of attendance rather than personal information.

### **13.0 Storing and protecting information**

- 13.1** The DPO 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.
- 13.2** If possible, backed-up information will be stored off the school premises, using a central back-up service operated by the LA.
- 13.3** Confidential paper records are kept in a locked filing cabinet, drawer or safe with restricted access.
- 13.4** Confidential paper records are not left unattended or in clear view when held in a location with general access.
- 13.5** Digital data are coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed up off-site.
- 13.6** When data are 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.
- 13.7** Memory sticks are not to be used in any device, whether they contain personal information or not.
- 13.8** All electronic devices are password-protected to protect the information on the device in case of theft.
- 13.9** If possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- 13.10** Staff and governors do not use their personal laptops or computers for school purposes.
- 13.11** All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.
- 13.12** Emails containing sensitive or confidential information are password-protected to ensure that only the recipient is able to access the information. The password is shared with the recipient in a separate email.
- 13.13** Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.
- 13.14** When sending confidential information by fax, members of staff always check that the recipient is correct before sending.
- 13.15** When 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 in a paper format, staff take extra care to follow the same procedures for security, for example keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.
- 13.16** Before sharing data, staff always ensure that:
- they have consent from the data subjects to share them
  - adequate security is in place to protect them
  - the data recipient has been outlined in a privacy notice
- 13.17** 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.
- 13.18** 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.
- 13.19** The physical security of the school's buildings and storage systems, and access to them, is reviewed termly by the campus site manager in conjunction with the DPO. If an increased risk of vandalism, burglary or theft is identified, this will be reported to the Head Teacher and extra measures to secure data storage will be put in place.
- 13.20** The school takes its duties under the GDPR seriously, and any unauthorised disclosure may result in disciplinary action.
- 13.21** The DPO is responsible for continuity, and recovery measures are in place to ensure the security of protected data.
- 13.22** Any damage to or theft of data will be managed in accordance with the school's Security Breach Management Plan.

### **14.0 Accessing information**

- 14.1** St Margaret Clitherow Catholic School Trust is transparent with data subjects, the information that it holds and how it can be accessed.
- 14.2** All members of staff, parents of registered students and other users of the school, for example visitors and third-party clubs, are entitled:
- to know what information the school holds and processes about them or their child and why
  - to understand how to gain access to it
  - to understand how to provide and withdraw consent to information being held
  - to understand what the school is doing to comply with its obligations under the GDPR

- 14.3** All members of staff, parents of registered students and other users of the school and its facilities have the right, under the GDPR, to access certain personal data that are held about them or their child.
- 14.4** Personal information can be shared with students 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.
- 14.5** Students 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.
- 14.6** The school will adhere to the provisions outlined in the school's GDPR Policy when responding to requests seeking access to personal information.

## **15.0 Digital continuity statement**

- 15.1** Digital data that are retained for longer than six years will be named as part of a digital continuity statement.
- 15.2** The DPO will identify any digital data that will need to be named as part of a digital continuity statement.
- 15.3** The data will be archived to dedicated files on the school's server, which are password-protected – these will be backed-up in accordance with section 11 of this policy.
- 15.4** Memory sticks will never be used to store digital data, subject to a digital continuity statement.
- 15.5** The IT Technician will review the new and existing storage methods annually and, when appropriate, add them to the digital continuity statement.
- 15.6** The following information will be included in the digital continuity statement:
- a statement of the purpose and requirements for keeping the records
  - the names of the individuals responsible for long-term data preservation
  - a description of the information assets to be covered by the digital preservation statement
  - a description of when the record needs to be captured in the approved file formats
  - a description of the appropriate supported file formats for long-term preservation
  - a description of the retention of all software specification information and licence information
  - a description of how access to the information asset register is to be managed in accordance with the GDPR

## **16.0 Information audit**

- 16.1** The school conducts information audits of all the information held by the school on an annual basis to evaluate the information that the school is holding, receiving and using and to ensure that this is managed correctly in accordance with the 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
- 16.2** 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, information flows and so on
  - questionnaires distributed to key staff members to identify information, information flows and so on
  - a mixture of the above
- 16.3** The DPO is responsible for completing the information audit. The information audit will include the following:
- the school's data needs
  - the information required to meet those needs
  - the format in which data are stored
  - how long data needs to be kept for
  - vital records' status and any protective marking
  - who is responsible for maintaining the original document

- 16.4 The DPO will consult the staff members involved in the information audit process to ensure that the information is accurate.
- 16.5 Once it has been confirmed that the information is accurate, the DPO will record all the details on the school's Information Asset Register.
- 16.6 The information displayed on the Information Asset Register will be shared with the Principals to gain their approval.

## **17.0 Disposal of data**

- 17.1 When the disposal of information is outlined as standard disposal, it will be recycled in a way that is appropriate to the form of the information, for example paper recycling or electronic recycling.
- 17.2 When the disposal of information is outlined as secure disposal, it will be shredded or pulped and electronic information will be scrubbed clean and, if possible, cut. The DPO will keep a record of all files that have been destroyed.
- 17.3 When the disposal action is indicated as reviewing the information before disposing of it, the DPO will review the information against its administrative value – if the information should be kept for its administrative value, the DPO will keep a record of this.
- 17.4 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.
- 17.5 When 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.
- 17.6 When information must be kept permanently, it is exempt from the normal review procedures.

## **18.0 Monitoring and review**

- 18.1 This policy will be reviewed by the DPO on an annual basis in conjunction with the executive.
- 18.2 Any changes made to this policy will be communicated to all members of staff and the governing board.