**Emmanuel Christian School Leicester**

# **Emmanuel Christian School Personal Data Handling Policy**

**Written May 2018 – Reviewed September 2024 – Next Review Date August 2026**

### 1.0 **Introduction**

Emmanuel Christian School and our staff will do everything within our power to ensure the safety and security of any material of a personal or sensitive nature held by the school. It is the responsibility of all members of the school community to take care when handling, using or transferring personal data that it cannot be accessed by anyone who does not:

* have permission to access that data, and/or
* need to have access to that data.

Data breaches can have serious effects on individuals and / or institutions concerned, and can bring the school into disrepute and may well result in disciplinary action, criminal prosecution and fines imposed by the Information Commissioners Office for the school and the individuals involved. Individuals will have a legal liability if they are responsible for a breach.

Anyone who has access to personal data must know, understand and adhere to this policy, which brings together the legal requirements contained in relevant data protection legislation (General Data Protection Regulations – GDPR).

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### 2.0 **Policy Statement**

2.1 The school will hold the minimum personal data necessary to enable it to perform its function and it will not hold it for longer than necessary for the purposes it was collected for.

2.3 Every effort will be made to ensure that data held is accurate and up to date. Individuals have the right to have personal data rectified where the records held are inaccurate or incomplete. Where we have held and processed incorrect data involving a third party e.g. an exam board or the school nurse, we will ensure that they receive corrected information. All actions to rectify information held by ECS and forwarded to 3rd parties will be completed within 1 month of receipt of the new information.

2.4 All personal data will be fairly obtained in accordance with the “Privacy Notice” and lawfully processed in a transparent manner. All personal data will be processed and stored with appropriate security including protection against unlawful or unauthorised processing and against accidental loss, destruction or damage using appropriate technical and organisational measures.

2.5 Individuals have the right to access their personal data and the right to verify the lawfulness of the processing. Please see section 10for information on Subject Access Requests.

2.6 An individual is able to request deletion or removal of personal data where there is no compelling reason for its continued processing. The right to erasure does not apply where the information is still being used to comply with a legal obligation.

### 3.0 **Personal Data**

The school and individuals will have access to a wide range of personal information and data. The data may be held in a digital format or on paper records. Personal data is defined as any information relating to an individual person who can be directly or indirectly identified in particular by reference to an identifier. This will include:

* Personal information about members of the school community – including students, members of staff and parents / carers e.g. names, addresses, contact details, legal guardianship contact details, health records, disciplinary records
* Curricular / academic data e.g. class lists, student progress records, reports, references
* Professional records e.g. employment history, taxation and national insurance records, appraisal records and references
* Any other information that might be disclosed by parents / carers or by other agencies working with families or staff members. E.G. Payment records / financial records.
* Personal information that may be shared with the Charities Commission.

### 4.0 **Responsibilities**

4.1 The school’s Senior Information Risk Officer (SIRO) is Simon Terry. This person will keep up to date with current legislation and guidance and will:

* determine and take responsibility for the school’s information asset audit and data storage security
* determine what information is held, for how long and for what purpose
* determine how information has been amended or added to over time, and
* determine who has access to protected data and why.

4.2 Everyone in the school has the responsibility of handling protected or sensitive data in a safe and secure manner.

4.3 Governors are required to comply fully with this policy in the event that they have access to personal data, when engaged in their role as a Governor.

### 5.0 **The Privacy Notice**

### 5.1 **Information to Parents / Carers**

In order to comply with the fair processing requirements GDPR, the school will inform parents / carers of all students of the data they collect, process and hold on the students, the purposes for which the data is held and the third parties (e.g. school nurse, exam boards, etc) to whom it may be passed. This privacy notice will be passed to parents / carers through a specific letter. Parents / carers of young people who are new to the school will be provided with the privacy notice through a specific letter. The notice to be used by the school is at Annex A to this policy and will be sent out annually to all parents and carers. As explained in the privacy notice, the data that ECS processes is necessary for compliance with legal obligations to which the controller is subject.

5.2 **Staff, Volunteers and Governors**

Personal information is also held for staff, volunteers and governors, as employer the school will annually provide a privacy notice to all staff, volunteers and governors informing them of the data we collect and process and the purpose for which that data is held and any third parties to whom it may be passed. The notice to be used by the school is at Annex B to this policy and will be sent out annually to all staff with their annual contracts.

### 6.0 **Training & Awareness**

6.1 All staff will receive data handling awareness / data protection training and will be made aware of their responsibilities, as described in this policy through:

* Induction training for new staff
* Staff meetings / briefings / Inset
* Day to day support and guidance from the Head teacher.

### 7.0 **Information Asset Audit**

7.1 ECS will complete an Information Asset Audit in which they will identify all personal Information that is held on individuals indicating:-

* Where it came from
* Who we share it with

7.2 Once the Information audit is complete ECS will create a data asset register detailing :

* How the information is stored and ensure that it is stored safely and securely.
* The risks that are present, and judge the level of the risks (both the likelihood and consequences)
* Any concerns and their resolution
* Retention and destruction
* Processing completed with the data

### 8.0 **Secure Storage of; and Access to Data**

The school will ensure that systems are set up so that the existence of protected files is hidden from unauthorised users and that users will be assigned a clearance that will determine which files are accessible to them. Access to protected data will be controlled according to the role of the user.

8.1 All users will use strong passwords. User passwords will never be shared.

8.2 Personal data will only be accessed on machines that are securely password protected. Any device that can be used to access data will be locked if left (even for very short periods) and set to auto lock if not used for five minutes.

8.3 All storage media will be stored in an appropriately secure and safe environment that avoids physical risk, loss or electronic degradation.

When personal data is stored on any portable computer system, SB stick or any other removable media:

* the data must be encrypted and password protected,
* the device must be password protected
* the device must offer approved virus and malware checking software
* the data must be securely deleted from the device, in line with school policy (below) once it has been transferred or its use is complete.

8.4 ECShas clear policy and procedures for the use of “Cloud Based Storage Systems” (see 8.5)(for example google apps and google docs) and is aware that data held in remote and cloud storage is still required to be protected in line with GDPR. ECS will ensure that it is satisfied with controls put in place by remote / cloud based data services providers to protect the data.

8.5 As a Data Controller, ECS is responsible for the security of any data passed to a “third party”. Data Protection clauses will be included in all contracts where data is likely to be passed to a third party.

8.6 **All paper based material containing personal data will be held in lockable storage.**

9.0 **Subject Access Requests**

9.1 Recital 63 of the GDPR states, “a data subject should have the right of access to personal data which have been collected concerning him or her, and to exercise that right easily and at reasonable intervals, in order to be aware of, and verify, the lawfulness of the processing.”

9.2 In compliance with this regulation, if you wish to see a copy of the information held in relation to yourself or your child please email or write to the school office stating what information you wish to see a copy of and in relation to whom. The school Admin assistant will:-

* Respond to your request within one month unless the request is complex or numerous, in which circumstance ECS is permitted to extend the deadline to three months. However, ECS will still respond to the request within a month to explain why the extension is necessary.
* Provide the information free of charge unless a request is manifestly unfounded, excessive or repetitive then a fee will be charged based on the administrative cost of providing the information.
* Provide a description of the data held
* Explain the purpose for which the data is processed
* Disclose the sources of that data and to whom the data may be disclosed;
* Provide a copy of all the personal data that is held about the individual redacting any data that is about another person.

10.0 **Secure Transfer of Data and Access Out of School**

The school recognises that personal data may be accessed by users out of school, or transferred to exam boards or other agencies. In these circumstances:

* Users may not remove or copy sensitive personal data from the school or authorised premises without permission and unless the media is encrypted and password protected and is transported securely for storage in a secure location.
* Users must take particular care that computers or removable devices which contain personal data must not be accessed by other users (e.g. family members) when out of school.
* When restricted or protected personal data is required by an authorised user from outside the organisation’s premises (for example, by a member of staff to work from their home), they should preferably have secure remote access to the management information system or learning platform.
* If secure remote access is not possible, users must only remove or copy personal or sensitive data from the organisation or authorised premises if the storage media, portable or mobile device is encrypted and is transported securely for storage in a secure location
* Users must protect all portable and mobile devices, including media, used to store and transmit personal information using approved encryption software
* Particular care should be taken if data is taken or transferred to another country, particularly outside Europe, and advice should be taken from the local authority (if relevant) in this event.

### 11.0 **Disposal of Data**

The school will comply with the requirements for the safe destruction of personal data when it is no longer required. As a guide the destruction of data will follow the schedule at Annex E

11.1 The disposal of personal data, in either paper or electronic form, must be conducted in a way that makes reconstruction highly unlikely. Electronic files must be securely overwritten, in accordance with government guidance and other media must be shredded, incinerated or otherwise disintegrated.

11.2 A Destruction Log (Annex C) will be kept of all data that is disposed of. The log should include the document ID, date of destruction, method and authorisation.

### 12.0 **Personal Data Breaches**

12.1 A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. Personal data breaches can include:

* access by an unauthorised third party;
* deliberate or accidental action (or inaction) by a controller or processor;
* sending personal data to an incorrect recipient;
* computing devices containing personal data being lost or stolen;
* alteration of personal data without permission; and
* loss of availability of personal data.

12.2 Recital 87 of the GDPR makes clear that when a security incident takes place, we should quickly establish whether a personal data breach has occurred and, if so, promptly take steps to address it, including telling the ICO if required. When a personal data breach has occurred, ECS will establish the likelihood and severity of the resulting risk to people’s rights and freedoms. If it’s likely that there will be a risk then ECS will notify the ICO within 72 hours. Where ECS decides not to report the breach, we will document the reasons why.

12.3 If a breach is likely to result in a high risk to the rights and freedoms of individuals, ECS will inform those concerned directly as soon as possible.

12.4 Where possible ECS documents the activities where possible of data users in our electronic environment using electronic logs.

12.5 The audit logs will be kept to provide evidence of accidental or deliberate data security breaches – including loss of protected data or breaches of an acceptable use policy, for example; the school has a system for reporting, managing and recovering from information risk incidents, which establishes:

* a “responsible person” for each incident
* a communications plan, including escalation procedures
* a plan of action for rapid resolution and
* a plan of action of non-recurrence and further awareness raising.

12.6 ECS will record all personal data breaches (Annex D), regardless of whether or not they need to be reported to the ICO. Article 33(5) of the GDPR requires ECS to document the facts relating to the breach, its effects and the remedial action taken. The log will record whether or not the breach was a result of human error or a systemic issue and establish how a recurrence can be prevented – whether this is through better processes, further training or other corrective steps.

13.0 **Data Sharing**

### 13.1 Wherever ECS (the data controller) shares data with a third party (a data processor) for example and exam board for GCSE examinations or the school nurse, we will ensure that a written contract is in place to ensure that both parties understand their responsibilities and liabilities in relation to the personal data that has been shared.

13.2 These contracts will contain:-

* the subject matter and duration of the processing
* the nature and purpose of the processing
* the type of personal data and categories of data subject
* The obligations and rights of the controller
* That the data processor must only act on the written instruction of the data controller
* That the data processor must ensure that the people processing the data are subject to a duty of confidence
* That the data processor takes appropriate measures to ensure the security of processing

### 14.0 **Privacy and Electronic Communications**

14.1 ECS complies with GDPR and the Privacy and Electronic Communications Regulations in the operation of their websites and electronic communications including texts, e-mail and social media, covering all advertising or promotional details including promoting the aims or ideals of the school to those who do not currently have a child or work in the school.

14.2 We will actively seek to gain consent from all recipients on our mailing lists. We will retain clear records of the consent received and will ensure that the party has the opportunity to withdraw consent at any time.

### 15.0 **Freedom of Information**

15.1 ECS proactively publishes information and policies on the school web page.

15.2 Where information of a general nature in relation to school policies is not available on the web page; a request can be made to the school business manager for the required information. The school Admin assistant will prepare a response in consultation with the head teacher and chair of governors.

15.3 Where a request for information is refused a record of refusals and reasons for refusals will be kept.

## 16.0 **Development / Monitoring / Review of this Policy**

16.1 This Data handling policy has been developed in consultation with:

* Headteacher and Senior Leadership Team
* Staff – including Teachers, Support Staff
* Governors

16.2 In writing this policy Emmanuel Christian School acknowledges:

* the materials supplied and used from SWGfL Online Safety School Template Policies
* General Data Protection Regulations
* Guide to General data protection regulations
* Data protection: a toolkit for schools

17.0 **Registration**

The school is registered as a Data Controller on the Data Protection Register held by the Information Commissioner; registration number ZA502761.

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| Formally agreed through Governors compliance: | **(date)** |
| Signed Julian Mercik – Chair of Governors | September 2024 |
| Signed Andy Harris – Head Teacher | September 2024 |
| Review Date: | **August 2026** |

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## **Annex A**

**Emmanuel Christian School Leicester**

**Privacy Notice – How we collect and use pupil information**

**Written May 2018 – Reviewed September 2021 – Next Review Date August 2023**

**1.0 Privacy Notice (How we use pupil information)**

1.1 This notice is to give pupils and parents insight into how information about pupils is used in Emmanuel Christian School

1.2 The categories of pupil information that we collect, hold and share include:

* Personal information (such as name and address) *This is a legal obligation under the Education(pupil registration)(England) Regulations 2006*
* Attendance information (such as sessions attended, number of absences and absence reasons) *This is a legal obligation under the Education(pupil registration)(England) regulations 2006*
* Assessment information. *This is a legal obligation under the Education (Pupil Information)(England) Regulations 2005*
* Relevant medical information. *This is a legal obligation under Section 100 of the Children and Families Act 2014 which places a duty on governing bodies of maintained schools, proprietors of academies and management committees of PRUs to make arrangements for supporting pupils at their school with medical conditions.*
* Special educational needs information. T*his is a legal obligation under the Education (Pupil Information)(England) Regulations 2005*
* Exclusions / behavioural information. *This is an Ofsted requirement*
* Safeguarding. *This is a legal obligation under Keeping children safe in education and also the Education (Independent School Standards) Regulations 2014*

2.0 **Why we collect and use this information**

2.1 We use the pupil data:

* to support pupil learning
* to monitor and report on pupil progress
* to provide appropriate pastoral care
* to assess the quality of our services
* to comply with the law regarding data sharing

**3.0 The lawful basis on which we use this information**

3.1 We collect and use pupil information under The EU general data protection regulation 2016/679 (GDPR) Article 6 whereprocessing is necessary for compliance with a legal obligation to which the controller is subject.

3.2 We collect and use sensitive pupil health information under The EU general data protection regulation 2016/679 (GDPR) Article 9 (h) where processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law

4.0 **Collecting pupil information**

4.1 Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis, for example, extra contact numbers when needed.

**5.0 Storing pupil data**

5.1 We hold pupil data for the length of time that the student is a pupil in the school and will destroy data in line with the data retention document that can be viewed within the data protection policy.

**6.0 Who we share pupil information with**

6.1 We routinely share pupil information with:

* schools that the pupil’s attend after leaving us
* our local authority
* school nurse
* NHS
* Examination bodies
* Careers Service (Key Stage 4)

**7.0 Why we share pupil information**

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

**8.0 Requesting access to your personal data**

8.1 Under data protection legislation, parents and pupils have the right to request access to information about them that ECS holds. To make a request for your personal information, or be given access to your child’s educational record, contact our Head Teacher.

8.2 You also have the right to:

* object to processing of personal data that is likely to cause, or is causing, damage or distress
* prevent processing for the purpose of direct marketing
* object to decisions being taken by automated means
* in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;
* claim compensation for damages caused by a breach of the Data Protection regulations

8.3 If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner’s Office at <https://ico.org.uk/concerns/>

**9.0 Contact**

9.1 If you would like to discuss anything in this privacy notice, please contact our Head Teacher.

**Annex B**

**Emmanuel Christian School Leicester**

**Privacy Notice – How we collect and use staff information**

**Written May 2018 – Reviewed September 2021 – Next Review Date August 2023**

1.0 **Privacy Notice (How we use staff, volunteer and governor information)**

1.1 This notice is to give staff, volunteers and governors insight into how information about them is collected and used in Emmanuel Christian School

1.2 The information we collect, hold and share includes:

* personal information such as your name, address and contact details, including email address and telephone number, date of birth, gender and teacher number;
* the terms and conditions of your employment;
* details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with Emmanuel Christian School
* information about your remuneration, including entitlement to benefits such as pensions
* details of your bank account and national insurance number;
* information about your marital status, next of kin, dependants and emergency contacts;
* information about your nationality and entitlement to work in the UK;
* information about your criminal record;
* details of your schedule (days of work and working hours) and attendance at work;
* details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, and the reasons for the leave;
* details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
* assessments of your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence;
* information about medical or health conditions, including whether you have a disability for which the organisation needs to make reasonable adjustments.

1.5 Data will be stored in a range of different places, including in your personnel file, the single central record, and in other IT systems including the organisation's email system.

2.0 **Why we collect and use this information**

2.1 ECS needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. For example, we need to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer pension entitlements.

2.2 In some cases, ECS needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.

2.3 In other cases, the organisation has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows the organisation to:

* run recruitment processes
* maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights
* Maintain the Single Central Record
* operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace
* operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
* operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled
* obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
* operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement
* to ensure that employees are receiving the pay or other benefits to which they are entitled;
* ensure effective general HR and business administration;
* provide references on request for current or former employees;
* respond to and defend against legal claims.
* Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities)

3.0 **The lawful basis on which we process this information**

3.1 We process staff data under The EU general data protection regulation 2016/679 (GDPR) Article 6 where:

* processing is necessary for compliance with a legal obligation to which the controller is subject
* processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.

3.2 We also process data The EU general data protection regulation 2016/679 (GDPR) Article 9(2) where processing is necessary for the purpose of assessment of the working capacity of the employee

4.0 **Collecting this information**

4.1 Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

4.2 ECS collects this information in a variety of ways, E.G. through application forms, obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment; from correspondence with you; or through interviews, meetings or other assessments.

4.3 ECS will also collect personal data about you from third parties, such as references supplied by former employers, and information from criminal records checks permitted by law.

5.0 **Storing this information**

5.1 We hold school workforce data for length of time that the individual is officially connected to the school and will destroy data in line with the data retention document that can be viewed within the data protection policy.

5.2 Data will be stored in a range of different places, including in your personnel file, the single central record, and in other IT systems including the organisation's email system.

6.0 **Who we share this information with/ has access to this information:**

6.1 We routinely share this information with:

* our local authority
* the Department for Education (DfE)
* HMRC
* The school pension provider

**6.2** We do not share information about staff with anyone without consent unless the law and our policies allow us to do so. E.G.

* Department for Education (DfE) - We share personal data with the Department for Education (DfE) on a statutory basis.
* Your information may be shared internally, including the school administration assistant, your line manager, other SLT managers as appropriate and IT staff if access to the data is necessary for performance of their roles.
* ECS shares your data with third parties in order to obtain pre-employment references from other employers and obtain necessary criminal records checks from the Disclosure and Barring Service.
* ECS shares your data with third parties that process data on its behalf, in connection with payroll, and the provision of benefits.

8.0 **Requesting access to your personal data**

8.1 Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the Head Teacher

8.2 You also have the right to:

* object to processing of personal data that is likely to cause, or is causing, damage or distress
* prevent processing for the purpose of direct marketing
* object to decisions being taken by automated means
* in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
* claim compensation for damages caused by a breach of the Data Protection regulations

8.3 If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with the school business manager in the first instance. Alternatively, you can contact the Information Commissioner’s Office at <https://ico.org.uk/concerns/>

9.0 **Further information**

9.1 If you would like to discuss anything in this privacy notice, please contact our Head Teacher.

**Annex C**

**Emmanuel Christian School – Data Destruction Log**

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| --- | --- | --- | --- |
| **Document ID** | **Date of Destruction** | **Method** | **Authorisation** |
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**Personal Data Breaches Annex D**

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| --- | --- | --- | --- | --- | --- | --- |
| **Date** | **Description of Breach** | **Human Error/ Systemic Error** | **Resolution** | **Plan to Prevent Reoccurrence** | **Report to ICO Yes/No + Reason** | **Report to Individual Yes/No + Reason** |
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**Annex E**

**Destruction Schedule for Documents Holding Personal Data**

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| **Data Item** | **Duration to be Held For** | **Justification** |
| Admissions | + 1 year after subject has left school | Information used to validate and cross check enrolment details |
| Attainment | + 3 years after subject has left school | Important for future schools to understand previous attainment and allows for handover.  After 2 years look to remove identifying data e.g. name date of birth, but retain outcomes for trend analysis |
| Attendance  (REGISTERS) | + 3 years after subject has left school | Important for future schools to understand previous attendance and allows for handover |
| Accident records | + 6 years after the last entry was made | The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) (SI 1995/3163) as amended. |
| Behaviour Records | + 1 year after subject has left school | Important for future schools to understand previous behaviours and allows for handover |
| Exclusions | + 1 year after subject has left school | Important for future schools to understand previous behaviours and allows for handover |
| Trips and activities (permission slips) | One term after trip |  |
| Educational Trip Risk Assessments | + 6 years from the date of the trip |  |
| Medical Information (Annual form pupil) | For 1 Year | Medical information is updated annually with parents and previous forms should be destroyed as new information is received. |
| Medicine Administration (pupil) | For 3 years |  |
| Safeguarding | Until pupil is aged 25 if we are the last educational establishment | All safeguarding files should be transferred in their entirety to the next educational establishment unless there is no further educational establishment in which case apply the retention policy |
| Special educational needs | + 1 year after subject has left school | Important for future schools to understand previous needs and allows for handover |
| Names, Addresses and Date of Birth of pupils | + 3 years after subject has left school | To enable references to be completes as required. |
| Staff maternity records | +6 years after the end of the tax year in which the maternity period ends | The Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960) as amended |
| Wage and salary record | + 6 years from the date paid | The Income Tax (Employments) Regulations 1993 (SI 1993/744) as amended, for example by The Income Tax (Employments) (Amendment No. 6) Regulations 1996 (SI 1996/2631)  Taxes Management Act 1970 |
| Application forms and interview records for unsuccessful candidates | + 1 year from the end of the campaign | This period takes into account the fact that a job applicant can bring a claim for discrimination in the Employment Tribunal within 3 months from the date of the rejection for the role |
| Staff /volunteer / governor personnel files | +6 years after employment ceases | The Limitations Act 1980 (to reflect that legal proceedings must start within 6 years) |
| Staff sick records | +6 years after the end of the tax year to which they relate | The Statutory Sick Pay (General) Regulations 1982 (SI 1982/894) as amended |
| Payment records / financial records in relation to parents. | +6 years from the end of the last company financial year they relate to | UK Tax laws |
| Information shared with charities commission | +6 years from the end of the last company financial year they relate to |  |