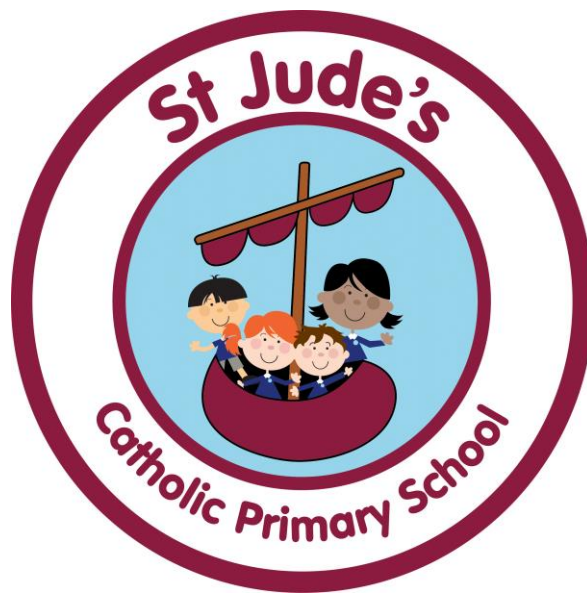


# St Jude's Catholic Primary School



## Retention and Destruction of Documents Policy

Approved: Summer 2023

To be reviewed: Summer 2025

*Together, we learn, love and grow with Jesus*

## Contents:

### [Statement of intent](#)

1. [Legal framework](#)
2. [Responsibilities](#)
3. [Management of pupil records](#)
4. [Retention of pupil records and other pupil-related information](#)
5. [Retention of staff records](#)
6. [Retention of senior leadership and management records](#)
7. [Retention of health and safety records](#)
8. [Retention of financial records](#)
9. [Retention of other school records](#)
10. [Retention of emails](#)
11. [Identifying information](#)
12. [Storing and protecting information](#)
13. [Accessing information](#)
14. [Digital continuity statement](#)
15. [Information audit](#)
16. [Disposal of data](#)
17. [Monitoring and review](#)

## Statement of intent

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

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

This document complies with the requirements set out in the UK GDPR and Data Protection Act 2018.

Schools should understand that there is not a sector wide data retention policy that prescribes how long data should be retained for. The retention periods outlined in this policy are good practice guidelines only, and schools should ensure that they consider requirements specific to their school when implementing these timeframes. 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 schools.

IRMS retention periods should only be used as a guide. Please note, some of the records in this policy are no longer listed in the IRMS toolkit; however, to ensure that you have good practice recommendations for as many types of information as possible, we have chosen to include these records alongside their retention periods.

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

# 1. Legal framework

This policy has due regard to legislation including, but not limited to, the following:

- UK General Data Protection Regulation (GDPR)
- EU GDPR
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
- Data Protection Act 2018

This policy also has due regard to the following guidance:

- Information Records Management Society (IRMS) (2019) 'Information Management Toolkit for Schools'
- DfE (2018) 'Data protection: a toolkit for schools'
- DfE (2018) 'Careers guidance and access for education and training providers'

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

- Data Protection Policy
- E-Security Policy
- Security Breach Management Plan
- Privacy Notices
- Data Breach Notification Policy
- Procedure for Receiving and Responding to Subject Access Requests
- ICT Acceptable Use Policy

## 2. Responsibilities

- 2.1. The school as a whole has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.
- 2.2. The governing body hold overall responsibility for this policy and for ensuring it is implemented correctly.
- 2.3. The Headteacher is responsible for the management of records at St Jude's Catholic Primary School.
- 2.4. The DPO is responsible for promoting compliance with this policy and reviewing the policy on an annual basis, in conjunction with SLT.
- 2.5. The Headteacher is responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of correctly.

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

### 3. Management of pupil records

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

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

- Forename and surname
- Note of the date when the file was opened
- Note of the date when the file was closed, if appropriate

- 3.3. The following information is stored inside the pupil record, and will be easily accessible:

Document / Information	Electronic	Hard Copy (Pupil file)
Admission form		✓
Signed consent forms		✓
Consent information	✓	
Ethnic origin, religion and languages spoken at home	✓	✓
Address, gender and date of birth	✓	✓
Any preferred names	✓	✓
Names of any siblings		✓
Adoption/residency order/special guardianship or armed forces information	✓	✓
Parental/Carer information, along with telephone numbers and email addresses	✓	✓
Emergency contact details	✓	✓
Educational establishment history		✓
Allergies, medical conditions, dietary needs and GP information	✓	✓
Free school meal eligibility	✓	
Details of any SEND	✓	✓
Agency involvement e.g. speech therapist	✓	✓
Safeguarding details – adults permitted to collect the child from school	✓	✓
Educational and Health Care (EHC) plans	✓	✓
Information relating to accidents or major incidents involving the child		✓

Notes relating to any child protection disclosures	✓	✓
Assessment information	✓	
Information relating to exclusions	✓	✓
Correspondence with outside agencies concerning the child		✓
Notes concerning any major parental complaints		✓

3.4. The following information is subject to shorter retention periods and, therefore, will be stored separately in the school office:

- Absence notes
- Holiday request forms
- Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.

3.5. Hard copies of disclosures and reports relating to child protection are stored in a sealed envelope, in the pupil's file. Any information held on a child subject to a Child Protection Plan is held in the child protection cupboard with a note indicating this marked on the pupil's file.

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

3.7. Records of accident and incident information are stored in the accident book and held in line with the retention periods outlined in this policy. An additional copy may be placed in the pupil's file in the event of a major accident or incident.

3.8. The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend.

3.9. The only exception to the above is if any records placed on the pupil's file have a shorter retention period and may need to be removed.

3.10. Electronic records relating to a pupil's record will also be transferred to the pupils' next school. [Section 10](#) of this policy outlines how electronic records will be transferred.

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

3.12. The school will, wherever possible, avoid sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The school it is sent

to is required to sign a copy of the list to indicate that they have received the files and return this to the school.

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

4.1. The table below outlines the school's retention periods for individual pupil records and the action that will be taken after the retention period, in line with any requirements.

4.2. Electronic copies of any information and files will be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Admissions</b>		
Register of admissions	Three years after the date on which the entry was made	Information is reviewed and the register may be kept permanently
Proof of address (supplied as part of the admissions process)	The current academic year, plus one year	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was successful)	Added to the pupil's record	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was not successful)	Until the appeals process has been completed	Securely disposed of
<b>Pupils' educational records</b>		
Pupils' educational records	Whilst the pupil remains at the school	Transferred to the next destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory period
Public examination results	Added to the pupil's record	Securely disposed of
Internal examination results	Added to the pupil's record	Securely disposed of

Child protection and safeguarding information held on a pupil's record	Stored in pupil's file for the same length of time as the pupil's record	Securely disposed of
Child protection plans and records held in a separate file	25 years after the pupil's date of birth	Securely disposed of
<b>Attendance</b>		
Attendance registers	Last date of entry on to the register, plus three years	Securely disposed of
Letters authorising absence	Current academic year, plus two years	Securely disposed of
<b>SEND</b>		
SEND files, reviews and individual education plans	25 years after the pupil's date of birth (as stated on the pupil's record)	Information is reviewed and the file may be kept for longer than necessary if it is required for the school to defend themselves in a 'failure to provide sufficient education' case
Statement of SEN maintained under section 324 of the Education Act 1996 or 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 pupil's date of birth (as stated on the pupil'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 pupil's date of birth (as stated on the pupil's record)	Securely disposed of, unless it is subject to a legal hold
Accessibility strategy	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of, unless it is subject to a legal hold
<b>Curriculum management</b>		
SATs results	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of



Examination papers	Until the appeals/validation process has been completed	Securely disposed of
Published Admission Number (PAN) reports	Current academic year, plus six years	Securely disposed of
Valued added and contextual data	Current academic year, plus six years	Securely disposed of
Self-evaluation forms	Current academic year, plus six years	Securely disposed of
Pupils' work	Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year	Securely disposed of
<b>Extra-curricular activities</b>		
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip	Securely disposed of
Parental consent forms for school trips where a major incident occurred	25 years after the pupil's date of birth on the pupil's record (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils)	Securely disposed of
Walking bus registers	Three years from the date of the register being taken	Securely disposed of
<b>Family liaison officers and home-school liaison assistants</b>		
Day books	Current academic year, plus two years	Reviewed and destroyed if no longer required
Reports for outside agencies	Duration of the pupil's time at school	Securely disposed of
Referral forms	Whilst the referral is current	Securely disposed of
Contact data sheets	Current academic year	Reviewed and destroyed if no longer active

Contact database entries	Current academic year	Reviewed and destroyed if no longer required
Group registers	Current academic year, plus two years	Securely disposed of

## 5. Retention of staff records

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

Type of file	Retention period	Action taken after retention period ends
<b>Operational</b>		
Staff members' personal file	Termination of employment, plus six years	Securely disposed of
Timesheets	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 headteacher	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	Date of appointment, plus six years	Securely disposed of

Proof of identify as part of the enhanced DBS check	After identity has been proven	Securely disposed of
Evidence of right to work in the UK	Added to staff personal file or, if kept separately, termination of employment, plus no longer than two years	Securely disposed of

### Disciplinary and grievance procedures

Child protection allegations, including where the allegation is unproven	<p>Added to staff personal file, and until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer</p> <p>If allegations are malicious, they are removed from personal files</p>	Reviewed and securely disposed of – shredded
Oral warnings	Date of warning, plus six months	Securely disposed of – if placed on staff personal file, removed from file
Written warning – level 1	Date of warning, plus six months	Securely disposed of – if placed on staff personal file, removed from file
Written warning – level 2	Date of warning, plus 12 months	Securely disposed of – if placed on staff personal file, removed from file
Final warning	Date of warning, plus 18 months	Securely disposed of – if placed on staff personal file, removed from file
Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related and is disposed of as above	Securely disposed of

## 6. Retention of senior leadership and management records

6.1. The table below outlines the school's retention periods for senior leadership and management records, and the action that will be taken after the retention period, in line with any requirements.

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

Type of file	Retention period	Action taken after retention period ends
<b>Governing board</b>		
Agendas for governing board meetings	One copy alongside the original set of minutes – all others disposed of without retention	Securely disposed of
Original, signed copies of the minutes of governing board meetings	Permanent	If unable to store, these will be provided to the county archives service
Inspection copies of the minutes of governing board meetings	Date of 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 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 provided to the county archives service
Trusts and endowments managed by the governing board	Permanent	Retained in the school whilst it remains open, then provided to the county archives 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 report, plus 10 years	Securely disposed of
Proposals concerning changing the status of the school	Date proposal accepted or declined, plus three years	Securely disposed of
<b>Headteacher and senior leadership team (SLT)</b>		
Log books of activity in the school maintained by the headteacher	Date of last entry, plus a minimum of six years	Reviewed and offered to the county archives 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 headteacher or SLT	Date of the report, plus a minimum of three years	Reviewed and securely disposed of
Records created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Current academic year, plus six years	Reviewed and securely disposed of
Correspondence created by the headteacher, deputy headteacher, 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

## 7. Retention of health and safety records

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

Type of file	Retention period	Action taken after retention period ends
<b>Health and safety</b>		
Health and safety policy statements	Duration of policy, plus three years	Securely disposed of
Health and safety risk assessments	Duration of risk assessment, plus three years	Securely disposed of
Records relating to accidents and injuries at work	Date of 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 – pupils	25 years after the pupil's date of birth, on the pupil's record	Securely disposed of
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 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 last action, plus 50 years	Securely disposed of
Fire precautions log books	Current academic year, plus six years	Securely disposed of

## 8. Retention of financial records

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

Type of file	Retention period	Action taken after retention period ends
<b>Payroll pensions</b>		
Maternity pay records	Current academic year, plus three years	Securely disposed of
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current academic year, plus six years	Securely disposed of
<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
<b>Accounts and statements including budget management</b>		
Annual accounts	Current academic year, plus six years	Disposed of against common standards
Loans and grants managed by the school	Date of last payment, plus 12 years	Information is reviewed then securely disposed of
All records relating to the creation and management of budgets	Duration of the budget, plus three years	Securely disposed of
Invoices, receipts, order books, requisitions and delivery notices	Current financial year, plus six years	Securely disposed of
Records relating to the collection and banking of monies	Current financial year, plus six years	Securely disposed of

Records relating to the identification and collection of debt	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 meals registers	Current academic year, plus six years	Securely disposed of
School meals registers	Current academic year, plus three years	Securely disposed of
School meals summary sheets	Current academic year, plus three years	Securely disposed of

## 9. Retention of other school records

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

Type of file	Retention period	Action taken after retention period ends
<b>Property management</b>		
Title deeds of properties belonging to the school	Permanent	Transferred to new owners if the building is leased or sold



Plans of property belonging to the school	For as long as the building belongs to the school	Transferred to new owners if the building is leased or sold
Leases of property leased by or to the school	Expiry of lease, plus six years	Securely disposed of
Records relating to the letting of school premises	Current financial year, plus six years	Securely disposed of
<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 brochure and/or prospectus	Current academic year, plus three years	Disposed of against common standards
Records relating to the creation and distribution of circulars to staff, parents or pupils	Current academic year, plus one year	Disposed of against common standards
Newsletters and other items with short operational use	Current academic year plus one year	Disposed of against 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 pupil associations	Current academic year, plus six years	Reviewed then securely disposed of

## 10. Retention of E-Mails

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

Emails can act as evidence of the school's activities, i.e. in business and fulfilling statutory duties, so all relevant emails, e.g. invoices, will be retained for at least 12 months. Invoices received and sent in emails will be printed off and retained in accordance with Section 8 of this policy.

The school's expectations of staff members in relation to their overall conduct when sending and receiving emails is addressed in the school's Online Safety Policy.

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

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

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

Individuals, including children, have the right to submit an SAR to gain access to their personal data to verify the lawfulness of the processing – this includes accessing emails.

All SARs will be handled in accordance with the school's Data Protection Policy. FOI requests will be handled in accordance with the school's Freedom of Information Policy.

When handling a request for information, the DPO will speak to the requestor to clarify the scope of the request and whether emails will be required to fulfil the SAR or FOI request. Where an SAR has been made electronically, the information will be provided in a commonly used electronic format. All requests will be responded to without delay and at the latest, within one month of receipt.

If a request is manifestly unfounded, excessive or repetitive, a fee will be charged. All fees will be based on the administrative cost of providing the information.

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.

Staff members will discuss any queries regarding email retention with the DPO.

## 11. Identifying Information

11.1 Under the UK GDPR, all individuals have the right to data minimisation and data protection by design and default – as the data controller, the school ensures appropriate measures are in place for individuals to exercise this right.

Wherever possible, the school uses pseudonymisation, also known as the 'blurring technique', to reduce the risk of identification.

Once an individual has left the school, if identifiers such as names and dates of birth are no longer required, these are removed or less specific personal data is used, e.g. the month of birth rather than specific date – the data is blurred slightly.

Where data is required to be retained over time, e.g. attendance data, the school removes any personal data not required and keeps only the data needed – in this example, the statistics of attendance rather than personal information.

## 12. Storing and protecting information

- 12.1. 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.
- 12.2. The Business Manager will conduct a back-up of information on a weekly basis to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data.
- 12.3. A back-up of digital information will be carried out each evening by Benchmark and stored in a secure, encrypted cloud.
- 12.4. Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access.
- 12.5. Confidential paper records are not left unattended or in clear view when held in a location with general access.
- 12.6. Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed-up off-site.
- 12.7. Where data is saved on removable storage or a portable device, the device is kept in a locked and fireproof filing cabinet, drawer or safe when not in use.
- 12.8. Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.
- 12.9. All electronic devices are password-protected to protect the information on the device in case of theft.

- 12.10. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- 12.11. Staff and governors do not use their personal laptops or computers for school purposes.
- 12.12. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.
- 12.13. Emails containing sensitive or confidential information are password-protected to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email.
- 12.14. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.
- 12.15. When sending confidential information by fax, members of staff always check that the recipient is correct before sending.
- 12.16. Where personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with the GDPR, either in an electronic or paper format, staff take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data. If a member of staff is aware of a potential loss of data then he/she must inform the Headteacher or DPO immediately. Action will then be taken in accordance with the ICO guidelines.
- 12.17. Before sharing data, staff always ensure that:
- They have consent from data subjects to share it.
  - Adequate security is in place to protect it.
  - The data recipient has been outlined in a privacy notice.
- 12.18. All staff members will implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information will be stored in a securely locked filing cabinet, drawer or safe with restricted access.
- 12.19. Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times.
- 12.20. The physical security of the school's buildings and storage systems, and access to them, is reviewed termly by the site manager in conjunction

with the DPO. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the headteacher and extra measures to secure data storage will be put in place.

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

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

12.23. Any damage to or theft of data will be managed in accordance with the school's [Data Breach Notification Policy](#).

12.24. As a result of the EU exit, completed 1 January 2021, data controllers and processors follow the UK GDPR, and the Data Protection Act 2018, where:

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

12.25. Data controllers and processors follow the EU GDPR where:

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

## 13. Accessing information

13.1. St Jude's is transparent with data subjects, the information we hold and how it can be accessed.

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

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

- 13.3. All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the GDPR, to access certain personal data being held about them or their child.
- 13.4. Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents.
- 13.5. Pupils who are considered to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.
- 13.6. The school will adhere to the provisions outlined in the school's [Data Protection Policy](#) when responding to requests seeking access to personal information.

## 14. Digital continuity statement

- 14.1. Digital data that is retained for longer than six years will be named as part of a digital continuity statement.
- 14.2. The DPO will identify any digital data that will need to be named as part of a digital continuity statement.
- 14.3. The data will be archived to dedicated files on the school's server, which are password-protected – this will be backed-up in accordance with [section 10](#) of this policy.
- 14.4. Memory sticks will never be used to store digital data, subject to a digital continuity statement.
- 14.5. The IT technician will review new and existing storage methods annually.
- 14.6. The following information will be included within the digital continuity statement:
  - A statement of 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 into 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

## 15. Information audit

15.1. The school will conduct information audits on an annual basis against all information held by the school to evaluate the information the school is holding, receiving and using, and to ensure that this is correctly managed in accordance with the GDPR. The audit 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

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

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

15.3. The DPO is responsible for completing the information audit.

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

## 16. Disposal of data

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

16.2. Where disposal of information is outlined as secure disposal, this will be shredded or pulped and electronic information will be scrubbed clean and, where possible, cut. The DPO will keep a record of all files that have been destroyed.

- 16.3. Where the disposal action is indicated as reviewed before it is disposed, the DPO will review the information against its administrative value – if the information should be kept for administrative value, the DPO will keep a record of this.
- 16.4. 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.
- 16.5. Where information has been kept for administrative purposes, the DPO will review the information again after three years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every three subsequent years.
- 16.6. Where information must be kept permanently, this information is exempt from the normal review procedures

## 17. Monitoring and review

- 17.1. This policy will be reviewed bi-annually, or if legislation changes, by the DPO / SBM / Headteacher.
- 17.2. Any changes made to this policy will be communicated to all members of staff and the governing board.