



## Data Protection Policy

This policy is made available to all parents, prospective parents, staff and prospective employees of Hurlingham School (both Putney Bridge Road and Gwendolen Avenue sites) on our website, and a hard copy can also be viewed at our School Office.

### 1. Introduction

Hurlingham School is required to process relevant personal data regarding members of staff, pupils and their parents and guardians as part of its operation and shall take all reasonable steps to do so in accordance with this Policy. Processing may include obtaining, recording, holding, disclosing, destroying or otherwise using data. In this Policy any reference to pupils includes current past, current or prospective pupils.

### 2. Data Protection Controller

The School Principal has overall responsibility as Data Protection Controller (DPC) to endeavour to ensure that all personal data is processed in compliance with this Policy and the Principles of the Data Protection Act 1998. The Headmaster has a duty to endeavour to ensure that our Data Protection Policy is understood and observed by the teaching staff.

### 3. The Principles

We shall so far as is reasonably practicable comply with the Data Protection Principles ("the Principles") contained in the Data Protection Act to ensure all data is:-

- fairly and lawfully processed
- processed for a lawful purpose
- adequate, relevant and not excessive
- accurate and up to date
- not kept for longer than necessary
- processed in accordance with the data subject's rights
- secure
- not transferred to other countries without adequate protection

Members of staff accept a job at our school in the knowledge that data about them will be collected periodically and stored and processed in order to allow for the efficient operation of the school. Individual permission is requested from members of staff to use their photographs in School related publications.

Parents accept a place for their child at our school in the knowledge that data about pupils and their parents will be collected periodically and stored and processed in order to allow for the efficient operation of the school.

Parents who accept a place for their child at our school are invited to agree to the school using anonymous photographs of their child and information relating to his or her achievements for promotional purposes, which may be published in the prospectus or on the web site.

### 4. Personal Data

Personal data covers both facts and opinions about an individual.

#### 4.1. Staff

We process a wide range of personal data of members of staff. This personal data may include (but is not limited to); names and addresses, bank details, qualifications, disciplinary, job application forms, references, professional development records, identification documentation, CRB checks and medical details.

#### 4.2. Pupils

We process a wide range of personal data of our pupils and their parents or guardians as part of our operation. Personal data processed by the School includes contact details, national curriculum and other assessment results, attendance information, special educational needs, and images of pupils engaging in

School activities (and in relation to parents and/or guardians, may include financial information). The School may also process sensitive personal data such as ethnic group, religious beliefs and relevant medical information. Your personal data will usually be collected directly from you, but some may be passed to the School by third parties.

We are always happy to discuss each individual pupil's attainments and results with his or her parents. Parents of children in the Early Years Foundation Stage are always welcome to come in and view their child's EYFS Profile and this is sent home at the end of the Reception year for parents to keep.

## **5. Processing of Personal Data**

### **5.1. Staff**

Consent may be required for the processing of personal data unless the processing is necessary for us to undertake its legal obligations particularly with regard to child protection issues and safer recruitment. Any information which falls under the definition of personal data, and is not otherwise exempt, will remain confidential and will only be disclosed to third parties with the consent of the appropriate individual or under the terms of this Policy.

### **5.2. Pupils**

Pupils' personal data (including sensitive personal data, where appropriate) is processed by the School strictly in accordance with the Data Protection Act in order to:

- support its pupils' teaching and learning
- monitor and report on their progress
- publish examination results
- provide appropriate pastoral care
- assess how well our School as a whole is doing
- communicate with former pupils
- where appropriate, promote the School to prospective pupils (including through the School's prospectus and website)
- other reasonable purposes relating to the operation of the School.

Consent may be required for the processing of personal data unless the processing is necessary for us to undertake our obligations to pupils and their parents or guardians. Any information which falls under the definition of personal data, and is not otherwise exempt, will remain confidential and will only be disclosed to third parties with the consent of the appropriate individual or under the terms of this Policy.

## **6. Sensitive Personal Data**

### **6.1. Staff**

We may, from time to time, be required to process sensitive personal data regarding a member of staff. Sensitive personal data includes medical information and data relating to religion, race, or criminal records and proceedings. Where sensitive personal data is processed by us, the explicit consent of the appropriate individual will generally be required in writing.

### **6.2. Pupils**

We may, from time to time, be required to process sensitive personal data regarding a pupil, their parents or guardians. Sensitive personal data includes medical information and data relating to religion, race, or criminal records and proceedings. Where sensitive personal data is processed by us, the explicit consent of the appropriate individual will generally be required in writing.

## **7. Right of access to one's own personal data**

### **7.1. Staff**

Individuals have a right of access to information held by us. Any individual wishing to access their personal data should put their request in writing to the DPC. We will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event, within 40 days for access to records and 21 days to provide a reply to an access to information request.

### **7.2. Pupils**

Parents should be aware that certain data is exempt from the right of access under the Data Protection Act this may include information which identifies other individuals, information which we reasonably believe is likely to cause damage or distress, or information which is subject to legal professional privilege.

- We are also not required to disclose details of any compromise agreements.

- We will also treat as confidential any reference given by us for the purpose of the employment of any member of staff. We acknowledge that an individual may have the right to access a reference relating to them received by us. However such a reference will only be disclosed if such disclosure will not identify the source of the reference or where, notwithstanding this, the referee has given their consent or if disclosure is reasonable in all the circumstances.

Pupils and their parents and/or guardians, as data subjects, have certain rights under the Data Protection Act, including a general right to be given access to personal data held about them by any data controller. A parent would normally be expected to make a request on a child's behalf as all of our pupils are under the age of 12. If you wish to access your personal data, or that of your child or a pupil for whom you have parental responsibility, then please contact the School in writing.

A personal data subject request is a written request by an individual entitling them to be:

- told whether any personal data is being processed;
- given a description of the personal data, the reasons it is being processed, and whether it will be given to any other organisations or people;
- given a copy of the information comprising the data; and given details of the source of the data (where this is available).

Certain data is exempt from the right of access under the Data Protection Act this may include information which identifies other individuals, information which we reasonably believe is likely to cause damage or distress, or information which is subject to legal professional privilege. We are also not required to disclose any pupil examination scripts.

We will also treat as confidential any reference given by us for the purpose of the education or prospective education of any pupil. We acknowledge that an individual may have the right to access a reference relating to them received by us. However, such a reference will only be disclosed if such disclosure will not identify the source of the reference or where, notwithstanding this, the referee has given their consent or if disclosure is reasonable in all the circumstances.

## **8. Whose rights**

The rights under the Data Protection Act are the individual's to whom the data relates.

Where a member of staff seeks to raise concerns confidentially with a member of SLT, we will maintain confidentiality unless we have reasonable grounds to believe that disclosure will be in the best interests of a pupil or member of staff.

## **9. Third parties with whom the School may need to share your personal data**

### **9.1. Staff**

We may receive requests from third parties to disclose personal data we hold about members of staff. We confirm that we will not generally disclose information unless the individual has given their consent or one of the specific exemptions under the Data Protection Act applies. However, we do intend to disclose such data as is necessary to third parties for the following purposes:

- To give a confidential reference relating to a member of staff to any educational institution which it is proposed that the member of staff may be employed.
- To disclose details of a member of staff's medical condition where it is in their interests to do so, for example for medical advice, insurance purposes or to organisers of school trips.

Where we receives a disclosure request from a third party it will take reasonable steps to verify the identity of that third party before making any disclosure.

### **9.2. Pupils**

From time to time the School may pass a pupil's or their family's personal data (including sensitive personal data where appropriate) to third parties, including local authorities, other public authorities, independent school bodies such as the Independent Schools Inspectorate and the Independent Schools Council, health professionals and the School's professional advisers, who will process the data:

- to enable the relevant authorities to monitor the School's performance
- to compile statistical information (normally used on an anonymous basis)
- to secure funding for the School (and where relevant, on behalf of individual pupils)
- to safeguard pupils' welfare and provide appropriate pastoral (and where relevant, medical and dental) care for pupils

- where specifically requested by pupils and/or their parents or guardians
- where necessary in connection with learning and extra-curricular activities undertaken by pupils
- to enable pupils to take part in national and other assessments and to monitor pupils' progress and educational needs
- to obtain appropriate professional advice and insurance for the School
- where a reference or other information about a pupil or ex-pupil is requested by another educational establishment or employer to whom they have applied
- where otherwise required by law
- otherwise where reasonably necessary for the operation of the School.

All of the above are data controllers in respect of the personal data they receive, and must themselves comply with the Data Protection Act 1998.

We confirm that we will not generally disclose information unless the individual has given their consent or one of the specific exemptions under the Data Protection Act applies. However we do intend to disclose such data as is necessary to third parties for the following purposes:

- to give a confidential reference relating to a pupil to any educational institution which it is proposed that the pupil may attend
- to give information relating to outstanding fees or payment history to any educational institution which it is proposed that the pupil may attend
- to publish the results of public examinations or other achievements of pupils of our School
- to disclose details of a pupil's medical condition where it is in the pupil's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips.

Where we receive a disclosure request from a third party, we will take reasonable steps to verify the identity of that third party before making any disclosure.

### **9.2.1. Pupil References**

We undertake to provide honest and unbiased references on pupils on request for other schools. These are based on the opinions of the Headmaster and/or Head of Nursery and Prep-Prep, who are informed by the Hurlingham teachers who have timetabled responsibility for the learning of each child in question.

On the Putney Bridge Road site, the majority of pupils who leave us at the end of Form VI move on to leading local day and boarding schools having successfully passed the school's entrance examination or Common Entrance. The reference we provide is an essential part of the selection process. All our staff who are involved in preparing these references and in predicting entrance exam and Common entrance results are highly trained and experienced. We maintain close links with the senior schools that most of our former pupils go on to attend.

On the Gwendolen Avenue site, the majority of pupils who leave us at the end of Form II move on to leading local day and boarding schools having successfully passed the school's entrance examination. We maintain close links with the prep and junior schools that most of our former pupils go on to attend.

In line with the Code of Practice for Schools in IAPS (and other major associations of independent schools) we recognise that the schools who request such references recognise them to be exempt from the subject access request provisions of the Data Protection Act. However, we are always happy to disclose any reference on a child voluntarily providing parents seek permission from the receiving school too.

### **9.2.2. References on Former Pupils**

Our former pupils form an important part of our School community. We are always happy to provide references on them in line with the procedures detailed above.

### **9.2.3. Access to Reports and References from a feeder school**

All parents and legal guardians are entitled to see their son or daughter's reports. (More details are given in our Data Protection policy, which also covers the exceptional circumstances when disclosure is not permitted).

We treat as confidential any reference given by us for the purpose of the education or prospective education of any pupil. We acknowledge that an individual has the right to access a reference relating to them received by us.

### **9.2.4. Providing Information on Pupils**

We follow the provisions of the Data Protection Act and will comply with legal requests from Local Authorities, Police or Court requiring the disclosure of information on a pupil or former pupil on the understanding that the authority is a data controller and is subject to the same legal constraints as the school regarding the manner in which it handles data.

### **9.2.5. Complaints**

We hope that parents or guardians do not have any complaints about the operation of our reports and references policy; but copies of the School's complaints procedure can be provided on request or viewed on our School website.

## **10. Exemptions**

Certain data is exempted from the provisions of the Data Protection Act including the following:

- the prevention or detection of crime
- the assessment of any tax or duty
- where the processing is necessary to exercise a right or obligation conferred or imposed by law upon us

The above are examples only of some of the exemptions under the Act. Any further information on exemptions should be sought from the DPC.

## **11. Use of Personal Information by our School**

### **11.1. Staff**

We will, from time to time, make use of personal data relating to members of staff by making use of photographic images of members of staff in School publications and on our School website. However, we will not publish photographs of individual members of staff with their names on our School website without the express agreement of the member of staff concerned.

Should you wish to limit or object to any such use please notify the DPC in writing.

### **11.2. Pupils**

We will, from time to time, make use of personal data relating to pupils, their parents or guardians in the following ways. Should a parent or guardian wish to limit or object to any such use please notify the DPC in writing.

- To make use of photographic images of pupils in School publications and on our School website. However we will not publish photographs of individual pupils with their names on our School website without the express agreement of the appropriate individual.
- For fundraising, marketing or promotional purposes and to maintain relationships with pupils who have left our School, including transferring information to any association society or club set up for the purpose of establishing or maintaining contact with pupils or for fundraising, marketing or promotional purposes.

## **12. Record Keeping**

Records are the life blood of any school. We need to create and maintain accurate records in order to function. The policy for managing records at our School has been drawn up in conformity with legislation and regulations affecting schools.

### **12.1. Current Staff Records**

A file is kept on each member of staff and all volunteers in a locked cupboard adjacent to the Principal's office on the Putney Bridge Road site, and in the Head of Nursery and Pre-Prep's office at Gwendolen Avenue. The file holds the all the information required to fulfil our safer recruitment policy including photocopies of identification and certification. It will also include copies of all references received or given, any disciplinary records and general correspondence.

Increasingly, the bulk of information relating to members of staff is held on the school's electronic database covers in order to comply with the requirements of the centralised employment register. This includes the member of staff's name, address, emergency contact information, medical information, qualifications, personal development training record, position within school, working hours, DfES number, CRB check details.

A record card with individual contact information and emergency contact details is held for each member of staff in the School Office on both sites.

## **12.2. Current Pupils' Records**

A file is kept on each pupil in the School Office. The file holds the registration and acceptance form, (the parent contract) and some academic records of a pupil as he or she progresses through the school. It will also include reports of conversations between parents and members of staff about any academic or pastoral issues, historic school reports, references from previous schools and transfer reports. A record of any disciplinary sanctions imposed on a pupil will also be kept in the pupil's file.

Increasingly, the bulk of information relating to pupils is held on the school's electronic database. This includes the pupil's name, address, family information, medical information, form, house, and emergency contact details, assessment records, reports, extra activities, achievements and awards, library usage records, parent meeting records, transfer reports, sanctions, learning support records where relevant and daily attendance registers.

## **12.3. Records of Past Pupils**

We keep all essential records of past pupils until a pupil is 25 years old in accordance with the record keeping guidance in Appendix 1. At that point, we securely destroy: all disciplinary, medical and financial records. The majority of records relating to past pupils are stored electronically and any ancillary documents are stored in a locked room in the basement.

## **13. Medical Needs and Records**

### **13.1. Staff with Medical Needs**

Medical needs are recorded on the member of staff's individual record card the school's database. Where a member of staff has been designated 'code red' because of a potentially life-threatening medical condition, a hard copy of their individual medical advice card (detailing what action to take in an emergency) including a current photograph to assist in identification is generated from the database. These cards are displayed in the Medical and Staff rooms and copies are also placed in outing medical bags.

### **13.2. Pupils with Special Educational or Medical Needs**

Special educational or medical needs are recorded in the children's individual record on the school's database. Where a child has been designated 'code red' because of a potentially life-threatening medical condition, a hard copy of their individual medical advice card (detailing what action to take in an emergency) including a current photograph to assist in identification is generated from the database. These cards are displayed in the Medical and Staff rooms and copies are also placed in the sport and outing medical bags.

### **13.3. Staff Medical Records**

A completed confidential medical questionnaire for each member of staff is kept securely on the staff personnel files. Details of any medical conditions or allergies which may be required in a medical emergency are detailed on the School database.

Records of all accidents and injuries to members of staff are recorded in numbered accident books and an electronic record for analysis purposes is stored against each member of staff on the school database.

### **13.4. Pupil Medical Records**

A confidential medical record on each pupil is kept securely on the school's electronic database. The medical record contains details of any current or past medical conditions, the medical questionnaire that the parents completed when their child joined the school, and records of any medication or treatment which the School administers to individual pupils during their time at the school. Records of all accidents and injuries to pupils are recorded in numbered accident books and an electronic record for analysis purposes is stored against each child on the school database.

A box containing pupil record cards for all current pupils is kept in the School office. Details of any medical conditions, allergies or dietary needs are included on these cards. A traffic light alert system operates on the school database to ensure that the teaching staff are fully informed of any medical needs.

## **14. Financial Records**

### **14.1 Staff Financial Records**

Details of staff salaries and financial records are kept separate from the main school database. All paper records are retained in the personnel files in a locked cupboard adjacent to the School Principal's office. The Company Accountant and the School Principal retain secure electronic records on a separate drive to the main School system.

## **14.2. Pupil Financial Records**

The Admissions Secretary is responsible for updating financial records on the School database on all pupils throughout their career at the school. These cover: a record of the deposit, the acceptance form, bills for tuition fees and extras throughout a pupil's time at the school. If a pupil receives a bursary or scholarship, this will form part of the record, along with records of annual assessments and awards. All pupil billing information is then provided to the School accounts department for accounting and audit purposes.

## **15. Access**

### **15.1. Access by Staff to Staff Records**

Access to staff records (non-financial) is limited to the School principal, Headmaster, School Secretary, Admissions Secretary, Head of Media and Computing.

Access to staff financial records is restricted to the School Principal and Accounts department.

### **15.2. Access by Staff to Pupil Records**

All teaching and office staff are able to access pupil information on the School's password protected database. Teaching staff may also consult the pupil records held in the School Office. Access to medical records is available to all teaching and office staff. Access to financial records is restricted to the Head, Head of Nursery and Pre-Prep, School Principal, Admissions Secretary and Accounts department. There is also a facility on the database and our electronic document storage to limit viewing rights on certain documentation such as confidential letters home.

## **16. Staff Induction**

All new teaching and office staff will be given training accessing and managing school records (including the database), as part of their induction into our school. This will include taking the register, report-writing, assessment data, pupil notes, notes on meetings with pupils and written and electronic communications with pupils and parents.

## **17. Fair Processing Notice**

Our school will comply with a Fair Processing Notice legally issued by a public body or other authority that is a data controller and is subject to the same legal constraints regarding the manner in which it handles data.

## **18. Accuracy**

We will endeavour to ensure that all personal data held in relation to an individual is accurate. Individuals must notify the DPC of any changes to information held about them. An individual has the right to request that inaccurate information about them is erased or corrected.

## **19. Security and confidentiality**

We will take reasonable steps to ensure that personal information is held securely and is not accessible to unauthorised persons. All staff will be made aware of this policy and their duties under the Data Protection Act. We will take reasonable steps to ensure that members of staff will only have access to personal data relating to pupils, their parents or guardians where it is necessary for them to do so. Should any employee ever encounter potentially sensitive information in an insecure or otherwise inappropriate setting they should not read it but should keep it private and inform the data controller or Headmaster as a matter of urgency. (Please see Appendix 1 below).

## **20. Enforcement**

If an individual believes that we have not complied with this Policy or acted otherwise than in accordance with the Data Protection Act, they should utilise our School complaints procedure and should also notify the DPC. Failure to retain the confidentiality of sensitive data is an example of gross misconduct and is likely to result in immediate dismissal.

## **Further questions**

If you have any queries about this policy or how personal data is processed by the School, please contact **The School Principal, Mrs Fiona Goulden.**

Date created: Autumn 2009

Date of last review: June 2017

Date of next review: March 2018, to include all new requirements in light of GDPR legislation



**Appendix 1**  
**Extract from Staff Contracts regarding Confidentiality**

**1. Confidential Information & Documents**

- 1.1 For the purposes of this clause, “Confidential Information” means information in whatever form (including, without limitation, in written, oral, visual or electronic form or on any magnetic or optical disk or memory and wherever located) relating to the School, pupils and their families, staff, the Board of Directors, or regarding the affairs and finances of the School for the time being confidential to the School, whether or not such information (if in anything other than oral form) is marked confidential.
- 1.2 You recognise that both during the employment and after the employment has terminated, notwithstanding the reason for the termination, you have a duty of confidentiality towards the School. You acknowledge that in the course of employment you will have access to Confidential Information. You agree that you shall not divulge or communicate to any person, corporation, company or other organisation; use for your own purposes other than those of the School; or otherwise disclose or make use of any Confidential Information relating to or belonging to the School.
- 1.3 All notes, memoranda, records, correspondence, computer and other discs and tapes and all other documents and material whatsoever (whether made or created by you or otherwise) relating to the affairs of the School, whether or not they constitute Confidential Information, shall be and remain the property of the School and shall be returned to the Head on demand.
- 1.4 You shall obtain the Head’s prior written consent before having any communication with the press (including television, radio and other electronic communications) on matters affecting the School or its pupils. No connection with the School may be revealed or implied if you wish to communicate with the press on other matters.

**Appendix 2  
Record Keeping Guidance**

**1. Child Protection**

These retention periods should be used in conjunction with the document “Safeguarding Children and Safer Recruitment in Education”.

	<b>Basic file description</b>	<b>Data Prot Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [operational]</b>	<b>Action at the end of the administrative life of the record</b>	
1.1	Child Protection files	Yes	Education Act 2002, s175, related guidance “Safeguarding Children in Education”, September 2004	DOB + 25 years	SHRED	Child Protection information must be copied and sent under separate cover to new school/college whilst the child is still under 18 (i.e. the information does not need to be sent to a university for example) Where a child is removed from roll to be educated at home, the file should be copied to the Local Education Authority.
1.2	Allegation of a child protection nature against a member of staff, including where the allegation is unfounded	Yes	Employment Practices Code: Supplementary Guidance 2.13.1 (Records of disciplinary and Grievance) Education Act 2002 guidance “Dealing with Allegations of Abuse against Teachers and Other Staff” November 2005	Until the person’s normal retirement age, or 10 years from the date of the allegation whichever is the longer	SHRED	The following is an extract from “Safeguarding Children and Safer Recruitment in Education” p60 “Record Keeping 5.10 It is important that a clear and comprehensive summary of any allegations made, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on a person’s confidential personnel file and a copy provided to the person concerned. The purpose of the record is to enable accurate information to be given in response to any future request for a reference if the person has moved on. It will provide clarification in cases where a future CRB Disclosure reveals information from the police about an allegation that did not result in a criminal conviction. And it will help to prevent unnecessary reinvestigation if, as sometimes happens, an allegation resurfaces after a period of time. The record should be retained at least until the person has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.”

<b>2. Early Years Foundation Stage</b>				
	<b>Basic file description</b>	<b>Data Prot Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [operational]</b>
2.1	Pupil & family records	Yes		Closure of setting +50 years [These could be required to show whether or not an individual child attended the setting in a child protection investigation]
2.2	Name & contact details of any person who looks after the children on the premises	Yes		If this information is kept in the same book or on the same form as in 16.1.1 then the same retention period should be used as in 16.1.1 If the information is stored separately, then destroy once the child has left the setting (unless the information is collected for anything other than emergency contact)
2.3	A daily record of the names of children looked after on the premises, their hours of attendance and the names of the persons who looked after them	Yes	The Day Care and Child Minding (National Standards) (England) Regulations 2003	The regulations say that these records should be kept for 2 years (SI20031996 7(1b)). If these records are likely to be needed in a child protection setting (see 16.1.1 above) then the records should be retained for closure of setting + 50 years
2.4	A record of accidents occurring on the premises and incident books relating to other incidents		The Day Care and Child Minding (National Standards) (England) Regulations 200311	DOB of the child being given/taking the medicine + 25 years
2.5	Early Years Profile	Yes		To be sent home with child
2.6	Birth Certificates	Yes		Once the setting has had sight of the birth certificate and recorded the necessary information the original can be returned to the parents. There is no requirement to keep a copy of the birth certificate.

<b>3. Management</b>						
	<b>Basic file description</b>	<b>Data Prot Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [operational]</b>	<b>Action at the end of the administrative life of the record</b>	
3.1	Minutes of Advisory Board Meeting	Yes		Date of last entry in the book + 6 years	Retain in the school for 6 years from the date of the last entry.	Transfer to the Archives
3.2	Minutes of the Senior Management Team and other internal administrative bodies	Yes		Date of meeting + 5 year	Retain in the school for 5 years from meeting	Transfer to the Archives
3.3	Reports made by the head teacher or the management team	Yes		Date of report + 3 years	Retain in the school for 3 years from meeting Transfer to Archives	Transfer to the Archives
3.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff	Yes		Closure of file + 6 years	SHRED	

	with administrative responsibilities					
3.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	No		Date of correspondence + 3 years	SHRED	
3.6	Professional development plans	Yes		Closure + 6 years	SHRED	
3.7	School development plans	Yes		Closure + 6 years	Review	Transfer to the Archives
3.8	Admissions – if the admission is successful	Yes		Admission + 1 year	SHRED	

<b>4. Pupils</b>						
	<b>Basic file description</b>	<b>Data Prot Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [operational]</b>	<b>Action at the end of the administrative life of the record</b>	
4.1	Admission Registers	Yes		Date of last entry in the book + 6 years	Retain in the school for 6 years from the date of the last entry.	Transfer to the Archives
4.2	Attendance Registers	Yes		Date register + 3 years	SHRED	
4.3	Pupil Record Cards	Yes		Retain for the time which the pupil remains at the primary school	Retain in the school for 6 years from the date of the last entry.	Transfer to the Archives
4.4	Pupil Files	Yes		Retain for the time which the pupil remains at the primary school	Retain in the school for 6 years from the date of the last entry.	Transfer to the Archives
4.5	Special Educational Needs files, reviews and Individual Education Plans	Yes		DOB of the pupil + 25 years the review NOTE: This retention period is the minimum period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a “failure to provide a sufficient education” case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period	SHRED	
4.6	Letters authorising absence	No		Date of absence + 2 years	SHRED	
4.7	Public Examination results  Internal Exam results	No  Yes		Year of Exam + 6 Years Current year + 5 years	SHRED  SHRED	Any certificates left unclaimed should be returned to the appropriate Examination

						Board
4.8	Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 Section 1	DOB + 30 years	SHRED unless legal action is pending	
4.9	Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 1	Closure + 12 years	SHRED unless legal action is pending	
4.10	Accessibility Strategy	Yes	Special Educational Needs and Disability Act 2001 Section 1	Closure + 12 years	SHRED unless legal action is pending	
4.11	Children's SEN Files	Yes	DOB of pupil + 25 years then review – it may be appropriate to add an additional retention period in certain cases		SHRED unless legal action is pending	
4.12	Parental permission slips for school trips – where there has been no major incident	Yes	Conclusion of the trip		SHRED	
4.13	Parental permission slips for school trips – where there has been a major incident	Yes	Limitation Act 1980	DOB of the pupil involved in the incident + 25 years The permission slips for all pupils on the trip need to be retained to show that the rules had been followed for all pupils	SHRED	
4.14	Records created by schools to obtain approval to run an Educational Visit outside the Classroom - Primary Schools		3 part supplement to the Health & Safety of pupils on Educational Visits	Date of visit + 14 years	SHRED	

## 5. Curriculum

	<b>Basic file description</b>	<b>Data Prot Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [operational]</b>	<b>Action at the end of the administrative life of the record</b>
5.1	Curriculum development	No		Current year + 6 years	SHRED
5.2	Curriculum returns	No		Current year + 3 years	SHRED
5.3	School syllabus	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
5.4	Schemes of work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
5.5	Timetable	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
5.6	Class record books	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
5.7	Mark Books	Np		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
5.8	Record of homework set	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
5.9	Pupils' work	Yes		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a new retention period or SHRED
5.10	Examination results	Yes		Current year + 6 year	SHRED

## 6. Management

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
6.1	Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	SHRED	
6.2	Staff Personnel files	Yes		Termination + 7 years	SHRED	
6.3	Interview notes and recruitment records	Yes		Date of Interview + 6 months	SHRED	
6.4	Pre-employment vetting info (inc CRB)	No	CRB Guidelines	Date of check + 6 months	SHRED (by designated staff member)	
6.5	Disciplinary proceedings	Yes				
a	oral warning	Yes		Date of warning + 6 months	SHRED	
b	written warning – level 1	Yes		Date of warning + 6 months	SHRED	
c	written warning – level 2	Yes		Date of warning + 12 months	SHRED	
d	final warning	Yes		Date of warning + 18 months	SHRED	
6.6	Records relating to accident/injury at work	Yes		Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied	SHRED	
6.7	Professional Development records	No		Current year + 5 years	SHRED	
6.8	Salary records	Yes		Last date of employment + 85 years	SHRED	
6.9	Maternity pay records	Yes		Current year + 6 years	SHRED	
6.10	Proofs of identity collected as part of the process of checking “portable” enhanced CRB disclosure	Yes		Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file.		

## 7. Health & Safety

	Basic file description	Data Prot Issues	Statutory Provisions	Retention Period [operational]	Action at the end of the administrative life of the record	
7.1	Accessibility Plans		Disability Discrimination Act	Current year + 6 years	SHRED	
7.2	Accident Reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		SHRED	
7.2a	<i>Adults</i>	Yes		Date of incident + 7 years	SHRED	
7.2b	<i>Children</i>	Yes		DOB of child + 25 years	SHRED	
7.3	COSHH			Current year + 10 years [where appropriate an additional retention period may be allocated]	SHRED	
7.4	Incident reports	Yes		Current year + 20 years	SHRED	
7.5	Policy Statements			Date of expiry + 1 year	SHRED	
7.6	Risk Assessments			Current year +3 years	SHRED	
7.7	Fire records			Current year + 6 years	SHRED	



<b>8. Administration &amp; Finance</b>						
	<b>Basic file description</b>	<b>Data Prot Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [operational]</b>	<b>Action at the end of the administrative life of the record</b>	
8.1	Employer's Liability certificate			Closure of the school + 40 years	SHRED	
8.2	General Files			Current year + 3 years		Transfer to Archives
8.3	Inventories of equipment and furniture			Current year + 6 years	Review to see whether a further retention period is required	Transfer to Archives
8.4	School brochure or prospectus			Current year + 3 years		Transfer to Archives
8.5	Circulars (staff/parents/pupils)			Current year + 1 year	SHRED	
8.6	Newsletters			Current year + 1 year	Review to see whether a further retention period is required	Transfer to Archives
8.7	Visitors book			Current year + 2 years		Transfer to Archives
8.8	Annual Accounts		Financial Regulations	Current year + 6 years		Transfer to Archives
8.9	Loans & Grants		Financial Regulations	Date of last payment on loan + 12 years	Review to see whether a further retention period is required	Transfer to Archives
8.10	Bank records, cheque books etc			Current year + 6 years	SHRED	
8.11	Purchase orders			Current year + 6 years	SHRED	

**9. LEA, Inspection Reports & Returns, Census**

	<b>Basic file description</b>	<b>Data Prot Issues</b>	<b>Statutory Provisions</b>	<b>Retention Period [operational]</b>	<b>Action at the end of the administrative life of the record</b>	
9.1	Secondary transfer reports	Yes		Current year + 2 years	SHRED	
9.2	Attendance returns	Yes		Current year + 1 year	SHRED	
9.3	Inspection reports & papers			Replace former report with any new inspection report	Review to see whether a further retention period is required	Transfer to Archives
9.4	Returns			Current year + 6 years	SHRED	