

Document: Policy template on the data protection legislation namely the General Data Protection Regulation (GDPR) and the Data Protection Act 2018

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Responsibility: It is the responsibility of the Governors to ensure procedures are in place to ensure that the school complies with data protection legislation (DPL)

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1. Introduction

In order to operate efficiently, XXXX (the School) has to collect and use information about people with whom it works. These may include members of the public, current, past and prospective employees, pupils and suppliers. In addition, it may be required by law to collect and use information in order to comply with the requirements of central government.

The school is committed to ensuring that personal information is properly managed and that it ensures compliance with data protection legislation. The School will make every effort to meet its obligations under the legislation and will regularly review procedures to ensure that it is doing so.

Definitions

Personal Data is information which relates to an identifiable living individual that is processed as data. Processing means collecting, using, disclosing, retaining, or disposing of information. The data protection principles apply to all information held electronically or in structured files that tells you something about an identifiable living individual.

The principles also extend to all information in education records. Examples would be names of staff and pupils, dates of birth, addresses, national insurance numbers, school marks, medical information, exam results, SEN assessments and staff development reviews.

Special Category Data is information that relates to race and ethnicity, political opinions, religion, trade union membership, health, genetics, sexuality, sex life, and biometric data.

The difference between processing personal data and special category data is that there are greater legal restrictions on the latter as they are more sensitive.

Criminal Data - Article 10 of the General Data Protection Regulation (GDPR) sets out the regulations to process criminal data.

2. Scope

This policy applies to all employees, governors, contractors, agencies and representatives and temporary staff working for or on behalf of the school.

This policy applies to all personal information created or held by the School in whatever format (e.g. paper, electronic, email, film) and however it is stored, (for example ICT system/database, shared drive filing structure, email, filing cabinet, personal filing shelves and drawers).

DPL does not apply to access to information about deceased individuals.

3. Responsibilities

The Governors have overall responsibility for compliance with DPL.

The Headteacher is responsible for ensuring compliance with DPL and this policy within the day to day activities of the school. The Headteacher is responsible for ensuring that appropriate training is provided for all staff.

All members of staff or contractors who hold or collect personal data are responsible for their own compliance with DPL and must ensure that personal information is kept and processed in line with DPL.

All members of staff should demonstrate that they have read, understood and accepted this Policy.

4. The Requirements

DPL stipulates that anyone processing personal data must comply with six principles of good practice; these principles are legally enforceable. In the context of personal information, the principles require the following:

Article 5 GDPR

- a) Information should be processed in a legal, fair and transparent manner
- b) Information should only be acquired for one or more specific, clear and lawful purposes, and it should not be further processed in any manner incompatible with that purpose or those purposes;
- c) Information will be adequate, relevant and non-excessive in relation to the purpose or purposes for which it is processed;
- d) Information will be accurate, and where appropriate, completely up-to-date;
- e) Information should not be kept for longer than needed for that purpose or those purposes;
- f) Information will be processed safely, i.e. protected by an appropriate degree of security.

5. Annual fee

It is required to pay an annual fee to the Information Commissioner's Office. Failure to do so could lead to a financial penalty.

6. Privacy Notices

Whenever information is collected about individuals, the school will provide the following information:

- The identity of the data controller, e.g. the school;
- The purpose that the information is being collected for;
- The lawful basis for collecting the information
- Any other purposes that it may be used for;
- With who the information will or may be shared with;
- How long the information is kept
- Details about the rights of individuals
- Details about the Data Protection Officer

This must happen at the time that information first starts to be gathered on an individual.

For example:

xxxx school will collect information about pupils in order to track their educational progress. It will not be used for any other purpose.

This is done as part of its public task.

It will share the information with the Local Education Authority and Welsh Government.

Information will not be transferred abroad/Information will be transferred abroad.

The information will be retained for years.

You may have rights in relation to receiving, correcting, objecting, deleting or transporting personal information. Contact the Data Protection Officer for details.

The Data Protection Officer's contact details are xxxxxxxxxxxxxx

If information is directly collected from a child, the privacy notice must be age appropriate..

7. Conditions for Processing

Processing of personal information may only be carried out where one of the conditions of Article 6, GDPR has been satisfied.

Processing of special category data may only be carried out if a condition in Article 9, GDPR is met as well as one in Article 6.

See Appendix 1 for a list of the conditions.

8. Disclosure of Data

It is a criminal offence to knowingly or recklessly obtain or disclose information about an individual without legitimate cause. Relevant, confidential data should only be given to:

- *other staff members on a need to know basis;*
- *relevant parents/guardians;*
other organisations if it is necessary in the public interest, e.g. prevention of crime;
- *other authorities, such as the Local Education Authority and schools to which a pupil may move, where there are legal requirements*
- *organisations that collaborate with the school or that are part of an information sharing protocol*

The school should not disclose anything on a pupil's record which would be likely to cause serious harm to their physical or mental health or that of anyone else.

Where there is doubt or statutory requirements conflict, advice should be sought.

When giving information to an individual, particularly by telephone, it is most important that the individual's identity is verified. If in doubt, questions should be asked of the individual, to which only he/she is likely to know the answers. Information should not be provided to other parties, even if they are related. For example: in the case of divorced parents it is important that information regarding one party is not given to the other party to which he/she is not entitled.

9. Individuals' rights

Access to information about themselves

Anyone has the right, to request a copy of all information retained about them by the school (or information about a child they are responsible for).

When a request is received, it must be dealt with promptly; an answer must be presented as soon as possible within a month. The period can be extended by up to two months if a request is complex or numerous.

No fee can be charged. However, if a request is unfounded, excessive and has been submitted previously, there is a right to charge an administrative fee.

When providing information, the school must also provide the same details to the individuals as those provided in a privacy notice.

See Appendix 2 for the procedure on how to deal with these requests.

Up to £50 (on a sliding scale for photocopying fees) can be charged for access to a pupil's educational record.

(ii) Provision of data to children

In relation to the capacity of a child to make a request, guidance provided by the Information Commissioner's Office states that by the age of 12 a child can be expected to have sufficient maturity to

understand the nature of the request. A child may of course reach sufficient maturity earlier; each child should be judged on a case by case basis.

If the child does not understand the nature of the request, someone with parental responsibility for the child, or a guardian, is entitled to make the request on behalf of the child and receive a response.

Pupils who submit requests to access their educational records should be allowed to do so unless it is obvious that they do not understand what they are asking for.

(iii) Parents' rights

An adult with parental responsibility can access the information about their child, provided that the child is not considered to be sufficiently mature. They must be able to prove their parental responsibility and the School is entitled to request relevant documentation to evidence this as well as the identities of the person making the request and the child.

In addition, parents have their own independent right under The Education (Pupil Information) (Wales) Regulations 2004 to access to the official education records of their children. Students do not have a right to prevent their parents from obtaining a copy of their school records.

10. The right to request that inaccurate information is corrected

Every individual has the right to inform the school if they believe that information about them has been recorded incorrectly.

Up to one month is allowed to respond to requests, however, this could be extended by up to a further two months if the application is bulky or complicated;

It may be possible that one will be unable to change or delete the information on every occasion, but anything that is factually incorrect should be corrected;

In the meantime, a notice should be placed on the person's file to note that there is doubt regarding accuracy.

11. The right to request that information is deleted

Every individual, in some circumstances, has the right to make a request to delete information about themselves. The school will consider every request on an individual basis.

12. The right to object to or restrict processing

Every individual has the right to object to their information being processed under the following circumstances:

- We have processed their information on the basis of lawful interests or an official public/authority task;
- Where there is public marketing;
- Processing due to research or statistics.

The school will comply with the request unless:

- There are strong, lawful reasons for processing;
- There is a need to establish, exercise or defend legal claims.

In terms of limiting processing, there is a right to do so if individuals insist that data is incorrect and therefore, it must be limited during the investigation; where individuals have objected; where processing is illegal and where the school does not require the data but individuals require it in order to defend a legal claim.

There will be a need to inform any third party that has received the data of the need to limit processing, and to inform the individual of the identity of these third parties.

13. Security

Paper records

Whenever possible, storage rooms, strong cabinets, and other lockable storage systems should be used to store paper records. Papers containing confidential personal information should not be left on office and classroom desks, on staffroom tables or pinned to noticeboards where there is general access. Particular care should be taken if documents have to be taken out of school

Electronic Records

All portable electronic devices should be kept as securely as possible. If they contain personal information, they should be kept under lock and key when not in use.

Encryption software should be used to protect all portable devices and removable media, such as laptops and USB devices (or another form of memory storage not part of the computer itself), which hold confidential personal information. All devices must be password protected.

Data must be disposed of securely once it has been transferred or is no longer required.

Strong passwords, i.e. at least eight characters long and containing special symbols, should be encouraged if any electronic equipment holds confidential personal information. Different passwords should be used for separate systems and devices.

Disposal

If any confidential information is held on paper records, they should be shredded; electronic memories should be erased or destroyed.

Data Breach

A data breach means that personal information has been compromised or lost which could be as a result of a cyber incident; data left in insecure location; data posted to the wrong recipient; loss or theft of paperwork or insecure device etc.

The school will investigate any such breaches and take appropriate remedial action. Serious data breaches will be reported to the Information Commissioner's Office.

14. Data Retention

Out of date information should be disposed of if no longer relevant. Information should only be kept as long as needed, for legal or business purposes.

Appendix 3 sets out the relevant periods for school records.

15. Data Recording

Records should be kept in such a way that the individual concerned can inspect them. It should also be borne in mind that at some time in the future the data may be inspected by the courts or any legal official. It should therefore be correct, unbiased, unambiguous and clearly decipherable/readable. Where information is obtained from an outside source, details of the source and date obtained should be recorded.

16. Website

Any person whose details, or child's details, are to be included on the school's website will be required to give written consent. At the time the information is included, all such individuals will be properly informed about the consequences of their data being disseminated worldwide.

17. Photographs

Photos taken for official school use may be covered by DPL and the School will advise pupils and students why they are being taken.

Photos taken purely for personal use are exempt from DPL.

A consent form for photographs is provided in Appendix 4.

18. Sharing Information

When sharing personal information, the school will ensure that:

- it is allowed to share it;
- adequate security (taking into account the nature of the information) is in place to protect it; and
- it will provide an outline in a privacy statement of who receives personal information from the school.

Any personal data passed to a third party for processing (namely an external company) will be covered by a data processing agreement.

19. CCTV

Capturing and/or recording images of identifiable individuals is an example of processing personal information and therefore needs to comply with DPL.

The school will notify staff, pupils and visitors why it is collecting personal information in the form of CCTV images.

The school will ensure that it has a set retention period based on the possible need to review the footage and will consider who is allowed access to this footage and why.

Individuals and law enforcement agencies will have the right to request access to the images. All such requests will be logged.

See the Information Commissioner's Office's guide on CCTV here:

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

20. Biometric Information (fingerprinting) - OPTIONAL

The Protection of Freedoms Act 2012 includes measures relating to the use of biometric identification systems, i.e. fingerprinting and facial recognition systems.

Under the GDPR, it is recognised that this type of data is special category data

- For every school pupil under the age of 18, the school will obtain the written consent of parents before recording and processing their child's biometric details.
- All such data must be handled appropriately and in accordance with DPL principles.
- Alternative methods of service provision must be identified if a parent or pupil refuses to provide consent.

An consent form for biometric information is provided in Appendix 5.

21. Breach of the policy

Non-compliance with the requirements of DPL by the members of staff could lead to serious action being taken by third parties against the school authorities. Non-compliance by a member of staff is therefore considered a disciplinary matter which, depending on the circumstances, could lead to dismissal. It should be noted that an individual can commit a criminal offence under the Act, for example, by obtaining and/or disclosing personal data for his/her own purposes without the consent of the data controller.

Useful Resources

A pack specifically for schools from the Information Commissioner's Office:

<https://ico.org.uk/for-organisations/education/>

Hwb

National resources on on-line safety:

<https://hwb.gov.wales/resources/resource/def9bffd-1fba-4902-9834-3ecca60bb7e7/cy>

Guidance on information management for schools, including retention periods:

<https://www.shropshirelg.net/media/442737/IRMS-Toolkit-for-Schools-2016.pdf>

Article 6 Conditions (summary)

- 6(1)(a) – Individual's consent;
- 6(1)(b) – Processing is necessary for a contract;
- 6(1)(c) – Processing is necessary to comply with a legal duty;
- 6(1)(d) – Processing is necessary for the individual's vital interests;
- 6(1)(e) - Processing is necessary as it undertakes a task in the public's interest
- 6(1)(f) – Processing is necessary for the purposes of legitimate interests of the data controller or third party

Article 9 Conditions (summary)

- 9(2)(a) – Processing with the specific consent of the individual;
- 9(2)(b) – Processing is necessary under employment law;
- 9(2)(c) – Processing is necessary to protect the individual's vital interests;
- 9(2)(d) – Processing for the use of a special category group (Not-for-profit organisation with a political or religious aim or a trade union)
- 9(2)(e) – Processing relates to information made public by the individual;
- 9(2)(f) – Processing is necessary so that the establishment can defend legal claims;
- 9(2)(g) – Processing is necessary for reasons of substantial public interests based on law;
- 9(2)(h) – Processing is necessary to respond to the needs of Occupational Health and Social Care;
- 9(2)(i) – Processing is necessary for Public Health reasons;
- 9(2)(j) – Processing is necessary for archiving purposes in the public interest; or for scientific or historical research purposes; or for statistical purposes.

Further Special Category conditions are included in Schedule 1 of the Data Protection Act 2018.

Appendix 2

The right to have access to information

There are two distinct rights of access to information held by schools about students.

1. Under data protection legislation, any individual has the right to make a request to access the personal information held about them.

2. The right of those entitled to have access to curricular and educational records as defined within the Education (Pupil Information) (Wales) Regulations 2004.

Actioning a request

1) Requests for information must be made in writing; which includes email, and be addressed to the Headteacher. If the initial request does not clearly identify the information required, then further enquiries will be made.

2) The identity of the person making the request must be established before the disclosure of any information, and checks should also be carried out regarding proof of relationship to the child.

Evidence of identity can be established by requesting production of:

- Passport
- driving licence
- utility bills with the current address
- Birth / Marriage certificate
- P45/P60
- Credit Card or Mortgage statement

This list is not exhaustive.

3) Any individual has the right of access to information held about them. However with children, this is dependent upon their capacity to understand (normally age 12 or above) and the nature of the request. The Headteacher should discuss the request with the child and take their views into account when making a decision. A child with competency to understand can refuse to consent to the request for their records. Where the child is not deemed to be competent, an individual with parental responsibility or guardian shall make the decision on behalf of the child.

4) The school may make a charge for the provision of information, dependent upon the following:

- Should the information requested contain the educational record, then the amount charged will be dependant upon the number of pages provided.
- Should the information requested be personal information that does not include any information contained within educational records, no fee is charged.

• if the information requested is only the educational record, viewing will be free, but a charge for the cost of photocopying the information can be made by the Headteacher.

5) The response time for subject access requests, once officially received, is one month (**not working or school days but calendar days, irrespective of school holiday periods**). However, the one month will not commence until after receipt of fees or clarification of information sought.

If it is deemed that the request is complex or there are numerous requests, the school will inform the person making the request within a month that the request period will be extended and the reasons why. Under such circumstances, an addition of up to two months is permitted to respond to the request.

Clearly, if requests are unfounded or excessive (especially if they are repetitive), the school will charge a reasonable fee for administrative costs or refuse to deal with the request.

6) DPL allows exemptions as to the provision of some information; **therefore, all information will be reviewed prior to disclosure.**

7) Third party information is that which has been provided by another, such as the Police, Local Authority, Health Care professional or another school. Before disclosing third party information consent should normally be obtained. There is still a need to adhere to the timescale.

8) Any information which may cause serious harm to the physical or mental health or emotional condition of the student or another should not be disclosed. Information that would reveal that the child is at risk of abuse, or information relating to court proceedings should not be disclosed either.

9) If there are concerns over the disclosure of information then additional advice should be sought.

10) Where redaction (information blacked out/removed) has taken place then a full copy of the information provided should be retained in order to establish, if a complaint is made, what was redacted and why.

11) Information disclosed should be clear, thus any codes or technical terms will need to be clarified and explained. If information contained within the disclosure is difficult to read or illegible, then it should be retyped.

12) Information can be provided at the school with a member of staff on hand to help and explain matters if requested, or provided at face to face handover. The views of the applicant should be taken into account when considering the method of delivery. If postal systems have to be used then registered/recorded mail must be used.

Complaints

Complaints about the above procedures should be made to the Chairperson of the Governing Body who will decide whether it is appropriate for the complaint to be dealt with in accordance with the school's complaint procedure. Complaints which are not appropriate to be dealt with through the school's complaint procedure can be dealt with by the Information Commissioner. Contact details of both will be provided with the disclosure information.

Contacts

If you have any queries or concerns regarding these policies / procedures then please contact the Headteacher.

Further advice and information can be obtained from the Information Commissioner's Office ('ICO'), www.ico.gov.uk

1. School Management

This section contains retention periods connected to the general management of the school. This covers the work of the Governing Body, the Headteacher and the senior management team, the admissions process and operational administration.

1.1 Governing Body					
	Basic File Description	Data Protection Issues	Legal Requirements	Retention Period [Operational]	Action at the end of the administrative life of the record
1.1.1	Agendas for Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of. PERMANENT	SECURE DISPOSAL ¹
1.1.2	Minutes of Governing Body meetings:	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		PERMANENT	
	Principal Set (signed)			PERMANENT	If the school is unable to store these then they should be offered to the County Archives Service
	Inspection Copies ²			Date of meeting + 3 years	If these minutes contain any sensitive, personal information they must be shredded.
1.1.3	Reports presented to the Governing Body	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports	SECURE DISPOSAL or retain with the signed set of the minutes

1 In this context, SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross cut shredder.

2 These are the copies which the Clerk of Governors may wish to retain so that persons making a request can view all the appropriate information without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

				should be kept permanently.	
1.1.4	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
1.1.5	Instruments of Government including Articles of Association	No		PERMANENT	These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes.
1.1.6	Trusts and Endowments managed by the Governing Body	No		PERMANENT	These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes.
1.1.7	Action plans created and administered by the Governing Body	No		Life of the action plan + 3 years	SECURE DISPOSAL
1.1.8	Policy documents created and administered by the Governing Body	No		Life of the policy + 3 years	SECURE DISPOSAL
1.1.9	Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL
1.1.10	Annual Reports created under the requirements of the Education Act 2002	No	Education Act 2002	Date of report + 10 years	SECURE DISPOSAL
1.1.11	Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies	No		Date proposal accepted or declined + 3 years	SECURE DISPOSAL

Please note that all information about the retention of records concerning the recruitment of Headteachers can be found in the Human Resources section below.

1.2 Headteacher and Senior Management Team					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.2.1	Log books of activity in the school maintained by the Headteacher (if relevant)	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then review	SECURE DISPOSAL
1.2.3	Reports created by the Headteacher or the Senior Management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then review	SECURE DISPOSAL
1.2.4	Minutes created by headteachers, deputy headteachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the minutes refers to individual pupils or members of staff		Current academic year + 6 years then review	SECURE DISPOSAL
1.2.5	Correspondence created by headteachers, deputy headteachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff		Date of correspondence + 3 years then review	SECURE DISPOSAL
1.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
1.2.7	School Development Plans	No		Life of the plan + 3 years	SECURE DISPOSAL

1.3 Admissions Process					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.3.1	All records relating to the creation and implementation of the School Admissions' Policy	No	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal panels</i> December 2014	Life of the policy + 3 years then review	SECURE DISPOSAL
1.3.2	Admissions – if the admission is successful	Yes	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal panels</i> December 2014	Date of admission + 1 year	SECURE DISPOSAL
1.3.3	Admissions – if the appeal is unsuccessful	Yes	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal panels</i> December 2014	Resolution of case + 1 year	SECURE DISPOSAL
1.3.4	Register of Admissions	Yes	<i>School Attendance: Departmental advice for maintained schools, academies, independent schools and local authorities</i> October 2014	Every entry in the admission register must be retained for a period of three years after the date on which the entry was made ³	REVIEW Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from former pupils to confirm the dates they attended the school.
1.3.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL
1.3.6	Proofs of address supplied by parents as	Yes	<i>School Admissions Code Statutory Guidance for</i>	Current year + 1 year	SECURE DISPOSAL

³ *School Attendance: Departmental advice for maintained schools, academies, independent schools and local authorities* October 2014

	part of the admissions process		<i>admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal panels</i> December 2014		
1.3.7	Supplementary Information form including additional information such as religion, medical conditions etc. (e.g. SIMS Pupil Information Collection Form)	Yes		See below	
	For successful admissions			This information should be added to the pupil file (e.g. SIMS / file)	SECURE DISPOSAL
	For unsuccessful admissions			Until appeals process completed	SECURE DISPOSAL

1.4 Operational Administration					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.4.1	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
1.4.2	Records relating to the creation and publication of the school brochure or prospectus (if relevant)	No		Current year + 3 years	STANDARD DISPOSAL
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils (if relevant)	No		Current year + 1 year	STANDARD DISPOSAL
1.4.4	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
1.4.5	Visitors' Books and Signing in Sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
1.4.6	Records relating to the creation and management of Parent Teacher Associations and/or Former Pupils Associations	No		Current year + 6 years then REVIEW	SECURE DISPOSAL

2. Human Resources

This section deals with all matters of Human Resources management within the school.

2.1 Recruitment					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.1.1	All records leading up to the appointment of a new headteacher	Yes		Date of appointment + 6 years (To be kept in Area Education Office – not be kept in the schools)	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months (Area Education Office to keep a copy – school to dispose the information securely)	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months.	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks (Employment audit information)	Yes	<i>DBS Update Service Employer Guide June 2012: Keeping children safe in education.</i> July 2015 (Statutory Guidance from the Department of Education) Sections 73, 74	Copies of DBS certificates should not be kept.	
2.1.5	Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure	Yes		Copies of identification test documents should not be kept as part of the advanced “portable” DBS disclosure check.	
2.1.6	Pre-employment vetting information – Evidence proving the	Yes	<i>An employer’s guide to right to work checks</i> [The Home Office, May 2015]	Send the information to the authority	

	right to work in the United Kingdom ⁴				
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4 Employers need to make a "clear copy" of the documents shown to them as part of this process.

2.2 Operational Staff Management					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.2.1	Staff Personal File	Yes	Limitation Act 1980 (Section 2)	Termination of employment +25 (For information: Although the IRMS Toolkit notes: Termination of employment + 6 years, Gwynedd Council has undertaken a risk assessment and has decided to retain the personal files of any staff member who requires a DBS for 25 years following termination of employment)	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal / assessment records	Yes		Current year + 5 years	SECURE DISPOSAL

2.3 Management of Disciplinary and Grievance Processes					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded ⁵	Yes	<i>“Keeping children safe in education: Statutory guidance for schools and colleges, March 2015”</i> ; <i>“Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children, March 2015”</i>	Until the person’s normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned.	SECURE DISPOSAL These records must be shredded.

5 This review took place as the Independent Inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention.

2.3.2	Disciplinary Proceedings	Yes			
	Verbal Warning			Date of warning ⁶ + 6 months	SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file]
	Written Warning – level 1			Date of warning + 6 months	
	Written Warning – level 2			Date of warning + 12 months	
	Final Warning			Date of warning + 18 months	
	Case not found			If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL

6 Where the warning relates to child protection issues see above. If the disciplinary proceedings relate to a child protection matter please contact your Safeguarding Children Officer for further advice.

2.4 Health and Safety					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.4.1	Health and Safety Policy Statements	No		Life of policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety Risk Assessments	No		Life of risk assessment + 3 years (Details below in regards to risk assessment that are sent with HS11)	SECURE DISPOSAL
2.4.3	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	SECURE DISPOSAL
2.4.4	Accident Reporting (e.g. HS11)	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
	Adults			Date of the incident + 6 years	SECURE DISPOSAL
	Children			DOB of the child + 25 years ADYaCH: Date Of Birth +35 years	SECURE DISPOSAL
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18(2)	Current year + 40 years	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL
2.4.7	Process of monitoring of areas where	No		Last action + 50 years	SECURE DISPOSAL

	employees and persons are likely to have become in contact with radiation				
2.4.8	Fire Precautions Log Books	No		Current year + 6 years	SECURE DISPOSAL

2.5 Payroll and Pensions					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.5.1	Maternity Pay Records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL
2.5.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	SECURE DISPOSAL

3 Financial Management of the School

This section deals with all aspects of the financial management of the school including the administration of school meals.

3.1 Risk Management and Insurance					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.1.1	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL

3.2 Asset Management					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.2.1	Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
3.2.2	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL

3.3 Accounts and Statements including Budget Management					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.3.1	Annual Accounts	No		Current year + 6 years	STANDARD DISPOSAL
3.3.2	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years and then REVIEW	SECURE DISPOSAL
3.3.3	Student Grant Applications	Yes		Current year + 3 years	SECURE DISPOSAL
3.3.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No		Life of the budget + 6 years (For information: Although the IRMS Toolkit notes: Life of the budget + 3 years, Gwynedd Council recommends retaining them for 6 years to correspond with the retention periods of other budgetary material)	SECURE DISPOSAL
3.3.5	Invoices, receipts, order books, delivery notes	No		The current financial year + 6 years	SECURE DISPOSAL
3.3.6	Records relating to the collection and banking of money	No		The current financial year + 6 years	SECURE DISPOSAL
3.3.7	Records relating to the identification and collection of debts	No		The current financial year + 6 years	SECURE DISPOSAL

3.4 Contracts Management					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.4.1	All records relating to management of contracts under seal	No	Limitation Act 1980	Final payment on the contract + 12 years	SECURE DISPOSAL
3.4.2	All records relating to management of contracts under hand	No	Limitation Act 1980	Final payment on the contract + 6 years	SECURE DISPOSAL
3.4.3	All records relating to management of contracts	No		Current year + 2 years	SECURE DISPOSAL

3.5 School Fund					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.1.5	School Fund - Cheque Books	No		Current year + 6 years	SECURE DISPOSAL
3.5.2	School Fund - Paying in books	No		Current year + 6 years	SECURE DISPOSAL
3.5.3	School Fund - Ledger	No		Current year + 6 years	SECURE DISPOSAL
3.5.4	School Fund - Invoices	No		Current year + 6 years	SECURE DISPOSAL
3.5.5	School Fund - Receipts	No		Current year + 6 years	SECURE DISPOSAL
3.5.6	School Fund - Bank Statements	No		Current year + 6 years	SECURE DISPOSAL
3.5.7	School Fund – School Trips	No		Current year + 6 years	SECURE DISPOSAL

3.6 School Meals Management					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.6.1	Free School Meals Registers	Yes		Current year + 6 years	SECURE DISPOSAL
3.6.2	School Meals Registers	Yes		Current year + 3 years	SECURE DISPOSAL
3.6.3	School Meals Summary Sheets	No		Current year + 3 years	SECURE DISPOSAL

4. Property Management

This section covers the management of buildings and property.

4.1 Property Management					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
4.1.1	Title deeds of properties belonging to the school	No		PERMANENT These should follow the property unless the property has been registered with the Land Registry	
4.1.2	Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold.	
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises	No		The current financial year + 6 years	SECURE DISPOSAL

4.2 Maintenance					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL
4.2.2	All records relating to the maintenance of the school carried out by school employees including maintenance log books	No		Current year + 6 years	SECURE DISPOSAL

5. Pupil Management

This section includes all records which are created during the time a pupil spends at the school. For information about accident reporting see under Health and Safety above.

5.1 Pupil's Educational Record					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.1.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
	Nursery			Retain whilst the child remains at the nursery	The file should follow the pupil when he/she leaves the nursery to the primary / relevant school
	Primary			Retain whilst the child remains at the primary school (E.g. Results, Parent Reports, Targets, National / Internal Assessments / Tests, Foundation assessment)	The file should follow the pupil when he/she leaves the primary school. This will include: <ul style="list-style-type: none"> • moving to another primary school • moving to a secondary school • moving to a pupil referral unit • if the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention period. Primary Schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the Local Authority as it is more likely that the pupil will request the record from the Local Authority.

	Secondary		Limitation Act 1980 (Section 2)	DOB of the pupil + 25 years (ADYach / Child Protection details below)	SECURE DISPOSAL
5.1.2	Examination Results – Pupil Copies	Yes			
	Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board.
	Internal			This information should be added to the pupil file	
This review took place as the Independent Inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention.					
5.1.3	Child Protection information held on pupil file	Yes	<i>“Keeping children safe in education: Statutory guidance for schools and colleges, March 2015”</i> ; <i>“Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children, March 2015”</i>	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file. (There is a need to transfer the file to the new / secondary school)	SECURE DISPOSAL – these records MUST be shredded
5.1.4	Child Protection information held in separate files	Yes	<i>“Keeping children safe in education: Statutory guidance for schools and colleges, March 2015”</i> ; <i>“Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children, March 2015”</i>	DOB of the child + 25 years. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the master copy of this information will be found on the Local Authority Social Services record	SECURE DISPOSAL – these records MUST be shredded

Retention periods relating to allegations made against adults can be found in the Human Resources section of this retention schedule.

5.2 Attendance					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.2.1	Attendance Registers	Yes	<i>School Attendance: Departmental advice for maintained schools, academies,</i>	End of the current academic year + 3 years.	SECURE DISPOSAL

			<i>independent schools and local authorities</i> October 2014	(For information, the toolkit notes: Every entry in the admission register must be retained for a period of three years after the date on which the entry was made)	
5.2.2	Correspondence relating to authorized absence		Education Act 1996 Section 7	The current financial year + 2 years	SECURE DISPOSAL

5.3 Special Educational Needs / ADYaCh					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	<p>DOB of the pupil +35</p> <p>(For information: Although the IRMS Toolkit notes: DOB of the pupil + 25 years, a decision has been made by the Integrated ADYaCh Service that it should be retained for 35 years from the pupil's date of birth)</p> <p>The information needs to be transferred from primary school to secondary school.</p>	<p>REVIEW</p> <p>NOTE: This retention period is the minimum retention 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 and this should be documented.</p>
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	<p>DOB of the pupil + 35 years [This would normally be retained on the pupil file]</p> <p>(For information: Although the IRMS Toolkit notes: DOB of the pupil + 25 years, a decision has been made by the Integrated ADYaCh Service that it should be retained for 35 years from the pupil's date of birth)</p>	<p>SECURE DISPOSAL unless the document is subject to a "legal hold".</p>
5.3.3	Advice and information provided to parents regarding educational needs (e.g. Specialist health and safety reports)	Yes	Special Educational Needs and Disability Act 2001 Section 2	<p>DOB of the pupil + 35 years [This would normally be retained on the pupil file]</p> <p>(For information: Although the IRMS Toolkit notes: DOB of the pupil + 25 years, a decision has</p>	<p>SECURE DISPOSAL unless the document is subject to a "legal hold".</p>

				been made by the Integrated ADYaCh Service that it should be retained for 35 years from the pupil's date of birth)	
5.3.4	Individual Accessibility Strategy (e. g Risk Assessments / Medical plans / PEEP)	Yes	Special Educational Needs and Disability Act 2001 Section 14	<p>DOB of the pupil + 35 years [This would normally be retained on the pupil file]</p> <p>(For information: Although the IRMS Toolkit notes: DOB of the pupil + 25 years, a decision has been made by the Integrated ADYaCh Service that it should be retained for 35 years from the pupil's date of birth)</p>	SECURE DISPOSAL unless the document is subject to a <i>“legal hold”</i> .

6. Curriculum Management

6.1 Statistical and Management Information					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
6.1.1	Curriculum Returns (E.g. End year results sheets)	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	Examination Results (Schools Copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	National Tests records	Yes			
	Results			The National Tests results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year National Tests results. These could be kept for current year + 6 years to allow suitable comparison.	SECURE DISPOSAL
	Examination Papers/ National Tests			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) Reports (<i>Access</i>)	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	Value Added and Contextual Data (E.g. . Assessments forms / monitoring progress)	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.5	Self Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL

6.2 Implementation of Curriculum					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
6.2.1	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 further retention period or SECURE DISPOSAL
6.2.2	Timetable	No		Current year + 1 year	
6.2.3	Class Record Books	No		Current year + 1 year	
6.2.4	Mark Books	No		Current year + 1 year	
6.2.5	Record of homework set	No		Current year + 1 year	

6.2.6	Pupils' Work	No		<p>The school's choice is to release examples of children's work to parents after receiving written requests from them after a period of a current year + twenty four months. The head teacher will be responsible for ensuring that such work is marked in accordance with the school's policy, and audited to ensure that it can not be used as evidence in any legal action that could be taken in the future. If this is not a policy by the school then you will be disposed of after a current year + year</p>	SECURE DISPOSAL
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7. Extra Curricular Activities

7.1 Educational Visits outside the Classroom					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 – “ <i>Legal Framework and Employer Systems</i> ” and Section 4 – “ <i>Good Practice</i> ”	Date of visit + 14 years	SECURE DISPOSAL
7.1.2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 – “ <i>Legal Framework and Employer Systems</i> ” and Section 4 – “ <i>Good Practice</i> ”	Date of visit + 10 years	SECURE DISPOSAL
7.1.3	Parental Consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time.
7.1.4	Parental Consent forms for school trips where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil involved in the incident + 25 years. The consent forms for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	

7.2 Walking Bus					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
7.2.1	Walking Bus Registers	Yes		Date of register + 3 years. This takes into account the fact that if there is an incident	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at

				requiring an accident report, the register will be submitted with the accident report and kept for the period of time required for accident reporting	the same time]
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7.3 Family Liaison Officers and Home School Liaison Assistants					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
7.3.1	Day Books	Yes		Current year + 2 years then review	
7.3.2	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then destroy	
7.3.3	Referral forms	Yes		While the referral is current	
7.3.4	Contact Data Sheets	Yes		Current year then review, if contact is no longer active then destroy	
7.3.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	
7.3.6	Group Registers	Yes		Current year + 2 years	

7.4 TRAC					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
7.4.1	Day Books	Yes	European Funding	2024	SECURE DISPOSAL
7.4.2	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		once the pupil leaves the project	SECURE DISPOSAL
7.4.3	Referral forms	Yes	European Funding	2024	SECURE DISPOSAL
7.4.4	Contact Data Sheets	Yes	European Funding	2024	SECURE DISPOSAL
7.4.5	Contact database entries	Yes	European Funding	2024	SECURE DISPOSAL
7.4.6	Group Registers	Yes	European Funding	2024	SECURE DISPOSAL

8. Central Government and Local Authority

This section covers records created in the course of interaction between the school and the local authority.

8.1 Local Authority					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
8.1.1	Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
8.1.2	Attendance Returns	Yes		Current year + 1 year	SECURE DISPOSAL
8.1.3	School Census Returns	No		Current year + 5 years	SECURE DISPOSAL
8.1.4	Circulars and any other information sent from the Local Authority	No		Operational use	SECURE DISPOSAL

8.2 Central Government					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
8.2.1	ESTYN reports and papers	No		Life of the report and then REVIEW	SECURE DISPOSAL
8.2.2	Returns to central government	No		Current year + 6 years	SECURE DISPOSAL
8.2.3	Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL

Use of Digital / Video Images

Use by school

The school will comply with Data Protection legislation and ask for parents / guardians' consent before taking photographs of pupils. When images will be published, we will also ensure that no-one will be able to identify the young people by not using their names.

Images will also be used to celebrate successes when they will be announced in newsletters, on the school website and, at times, on social media.

We will store photographs/images in a safe place for a period of xxxx years from the date of this form; images will be destroyed following this period.

You have the right to withdraw your consent at any time during this period.

Personal use by parents

In accordance with the Information Commissioner's Office, parents / guardians are welcome to take video and digital images of their children in school events for personal use (as such use is not covered by data protection legislation). In order to respect everyone's privacy, and in some protection cases, these images should not be published / made public on social network websites, and parents / guardians / carers should not make any observation on any activity that includes pupils in the digital / video images.

Parents / guardians are asked to sign the following consent form to allow the school to take photographs of their children and for the parents / guardians to agree.

Digital / Video Images Consent Form

Name of Parent / Guardian

Name of Student / Pupil

As the parent / guardian of *name of student / pupil* above, I agree to the school taking and using digital / video images of my child / children. I understand that these images will only be used to support learning activities or for publicity to celebrates success and to reasonably promote the school's work.

 Yes/
 No

If I take digital or video images in, or of, school activities which include images of children, besides my own, I agree that I will adhere to these guidelines when using the images.

 Yes/
 No

Signed

Date

Appendix 5

Use of Biometric Systems

The school uses biometric systems to identify individual children by means of the following methods (*the school should describe how it uses the biometric system here*).

Biometric technologies have specific advantages over other automatic identification systems, as there is no need for the pupils to bring anything *(to the school canteen or library)* , therefore, nothing can be lost, such as a key card.

The school has completed a privacy impact assessment and is confident that using such technologies is effective and has been justified in the school context.

Full images of *fingerprints / palm prints* will not be stored, and the original image cannot be re-created from the data. That is, a pupil's fingerprint or even an image of a fingerprint cannot be re-created using, what is in essence, a row of numbers.

Parents / guardians will be asked for their consent for their child to use biometric technology.

Name of Parent / Guardian

Name of Student / Pupil

As the parent / guardian of the above pupil / student, I agree that the school can use the biometric identification systems described above. I understand that these cannot be used to create my child's full fingerprint / palm print, and that these will not be shared with anyone outside the school.

 Yes /
 No

Signature

Date