

HARLOW FIELDS SCHOOL & COLLEGE

GENERAL DATA PROTECTION REGULATIONS (GDPR)



POLICY TITLE: **PRIVACY POLICY**

ADOPTED: November 2022

COMMITTEE: FULL GOVERNING BODY

**DATE FOR
REVIEW:** November 2024

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1. Privacy notice for parents/carers

Under UK data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **pupils**.

We, Harlow Fields School & College, are the 'data controller' for the purposes of data protection law.

Our data protection officer is Mr. John Holland – Business Manager (see 'Contact us' below). The data protection officer reports directly to the Head Teacher and Full Governing Body.

The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about pupils includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

Why we use this data

We use this data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare
- Assess the quality of our services
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing

Our legal basis for using this data

We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

Less commonly, we may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds which justify our use of this data.

Collecting this information

While the majority of information we collect about pupils is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

How we store this data

We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Our record retention schedule (Appendix A) sets out how long we keep information about pupils.

Data sharing

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

Where it is legally required or necessary (and it complies with data protection law) we may share personal information about pupils with:

- *Essex County Council (Our local authority) – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions*
- *The Department for Education – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions*
- *The pupil's family and representatives - to share certain information with it, such as supporting learning, pupil progression, safeguarding concerns and exclusions*
- *Educators and examining bodies - to share certain information with it, such as supporting learning, pupil progression*
- *Our regulator - Ofsted to meet our legal obligations*

- *Suppliers and service providers – to enable them to provide the service we have contracted them for:*
 - *Parent Pay – for ongoing administration of the ParentPay service.*
 - *RM Integris – This is the Management Information product the school uses to hold information on Staff and Pupils.*
 - *Parent Hub – This is a software / Communication program to communicate with Parents / Carers.*
 - *B-Squared – This software is to measure pupil progress.*
 - *Comstat - This is the company we use to destroy our confidential documents*
- *Central and local government to share certain information with it, such as supporting learning, pupil progression, safeguarding, Health concerns and Financial Concerns*
- *Health authorities – NHS to provide vital medical information about pupils.*
- *Health and social welfare organisations, to share certain information with it, such as supporting learning, pupil progression, safeguarding, Health concerns*
- *Professional advisers and consultants to share certain information with it, such as supporting learning, pupil progression, safeguarding, Health concerns*
- *Police forces, courts, tribunals to share certain information with it, such as supporting learning, pupil progression, safeguarding, Health concerns*
- *Professional bodies to share certain information with it, such as supporting learning, pupil progression, safeguarding, Health concerns*

National Pupil Database

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census and early year's census.

Some of this information is then stored in the National Pupil Database (NPD) <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information> , which is owned and managed by the Department and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on how it collects and shares research data <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>

You can also contact the Department for Education with any further questions about the NPD. <https://www.gov.uk/contact-dfe>

Youth support services

Once our pupils reach the age of 13, we are legally required to pass on certain information about them to our Local Authority Essex County Council, as it has legal responsibilities regarding the education or training of 13-19 year-olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Parents/carers, or pupils once aged 16 or over, can contact our data protection officer to request that we only pass the individual's name, address and date of birth to Essex County Council.

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Parents and pupils' rights regarding personal data

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

If you make a subject access request, and if we do hold information about you or your child, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances as long as it does not breach GDPR within the transfer process.

If you would like to make a request please contact our data protection officer.

Mr. John Holland
Business Manager
Harlow Fields School & College
Tendring Road
Harlow
Essex CM18 6RN:

Parents/carers also have a legal right to access to their child's **educational record**. To request access, please contact:

Mr. John Holland
Business Manager
Harlow Fields School & College
Tendring Road
Harlow, Essex CM18 6RN

Other rights

Under UK data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

Mr. John Holland
Business Manager
Harlow Fields School & College
Tendring Road
Harlow, Essex CM18 6RN

This notice is based on the Department for Education's model privacy notice <https://www.gov.uk/government/publications/data-protection-and-privacy-privacy-notices> for the school workforce, amended to reflect the way we use data in this school.

2. Privacy notice for pupils

Under UK data protection law you have a legal right to be informed about how our school uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This privacy notice explains how we collect, store and use personal data about you.

We, Harlow Fields School & College are the 'data controller' for the purposes of data protection law.

Our data protection officer is Mr. John Holland (see 'Contact us' below).

The personal data we hold

We hold some personal information about you to make sure we can help you learn and look after you at school.

For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

This information includes:

- Your contact details
- Your test results
- Your attendance records
- Your characteristics, like your ethnic background or any special educational needs
- Any medical conditions you have
- Details of any behaviour issues or exclusions
- Photographs
- CCTV images

Why we use this data

We use this data to help run the school, including to:

- Get in touch with you and your parents when we need to
- Check how you're doing in exams and work out whether you or your teachers need any extra help
- Track how well the school as a whole is performing
- Look after your wellbeing

Our legal basis for using this data

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- We need to comply with the law
- We need to use it to carry out a task in the public interest (in order to provide you with an education)

Sometimes, we may also use your personal information where:

- You, or your parents/carers have given us permission to use it in a certain way
- We need to protect your interests (or someone else's interest)

Where we have got permission to use your data, you or your parents/carers may withdraw this at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing consent.

Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

Collecting this information

While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data.

We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals

How we store this data

We will keep personal information about you while you are a pupil at our school. We may also keep it after you have left the school, where we are required to by law. Our record retention schedule (Appendix A) sets out how long we keep information about pupils.

Data sharing

We do not share personal information about you with anyone outside the school without permission from you or your parents/carers, unless the law and our policies allow us to do so.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

- *Essex County Council (Our local authority) – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions*
- *The Department for Education – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions*
- *The pupil's family and representatives - to share certain information with it, such as supporting learning, pupil progression, safeguarding concerns and exclusions*
- *Educators and examining bodies - to share certain information with it, such as supporting learning, pupil progression*
- *Our regulator - Ofsted to meet our legal obligations*
- *Suppliers and service providers – to enable them to provide the service we have contracted them for:*
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 - *B-Squared – This software is to measure pupil progress.*
 - *Comstat – This is the company we use to destroy our confidential documents*

- *Central and local government to share certain information with it, such as supporting learning, pupil progression, safeguarding, Health concerns, Financial Concerns.*
- *Health authorities – NHS to provide vital medical information about pupils.*
- *Health and social welfare organisations, to share certain information with it, such as supporting learning, pupil progression, safeguarding, Health concerns*
- *Professional advisers and consultants to share certain information with it, such as supporting learning, pupil progression, safeguarding, Health concerns*
- *Police forces, courts, tribunals to share certain information with it, such as supporting learning, pupil progression, safeguarding, Health concerns*
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The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on how it collects and shares research data <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>

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This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Your parents/carers, or you once you're 16, can contact our data protection officer to ask us to only pass your name, address and date of birth to the Local Authority Essex County Council.

Transferring data internationally

Where we share data with an organisation that is based outside the European Economic Area, we will protect your data by following data protection law.

Your rights

How to access personal information we hold about you

You can find out if we hold any personal information about you, and how we use it, by making a '**subject access request**', as long as we judge that you can properly understand your rights and what they mean.

If we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you or your parents
- Tell you who it has been, or will be, shared with
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information

You may also ask us to send your personal information to another organisation electronically in certain circumstances.

If you want to make a request please contact our data protection officer.

Your other rights over your data

You have other rights over how your personal data is used and kept safe, including the right to:

- Say that you don't want it to be used if this would cause, or is causing, harm or distress
- Stop it being used to send you marketing materials
- Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
- Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it
- Claim compensation if the data protection rules are broken and this harms you in some way

Complaints

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong.

You can make a complaint at any time by contacting our data protection officer.

You can also complain to the Information Commissioner's Office in one of the following ways:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer:

Mr. John Holland
Business Manager
Harlow Fields School & College
Tendring Road
Harlow, Essex CM18 6RN

This notice is based on the Department for Education's model privacy notice <https://www.gov.uk/government/publications/data-protection-and-privacy-privacy-notices> for the school workforce, amended to reflect the way we use data in this school.

Privacy notice for staff

Under UK data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school.

We, Harlow Fields School and College are the 'data controller' for the purposes of data protection law. Our data protection officer is Mr. John Holland (see 'Contact us' below).

The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of identification for DBS purposes i.e. driving licence, passport etc.
- Photographs
- CCTV footage
- Data about your use of the school's information and communications system

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, and sickness records

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

Why we use this data

The purpose of processing this data is to help us run the school, including to:

- a) Enable you to be paid
- b) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- c) Support effective performance management
- d) Inform our recruitment and retention policies
- e) Allow better financial modelling and planning
- f) Enable equalities monitoring
- g) Improve the management of workforce data across the sector
- h) Support the work of the School Teachers' Review Body

Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

Use of your personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals

How we store this data

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our record retention schedule (Appendix A) sets out how long we keep information about staff.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- *Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about headteacher performance and staff dismissals*
- *The Department for Education*
- *Your family or representatives*
- *Educators and examining bodies*
- *Our regulator e.g. Ofsted,*
- *Suppliers and service providers – to enable them to provide the service we have contracted them for, such as Cirvica (payroll), RM Integrus (our MIS System), ParentPay etc.*
- *Financial organisations*
- *Central and local government*
- *Our auditors – HEC, to undertake a financial and HR annual audit.*
- *Trade unions and associations*
- *Health authorities*
- *Security organisations*
- *Health and social welfare organisations*
- *Professional advisers and consultants*
- *Charities and voluntary organisations*
- *Police forces, courts, tribunals*
- *Professional bodies*
- *Employment and recruitment agencies*

Transferring data internationally

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

Your rights

How to access personal information we hold about you

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you

- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our data protection officer.

Your other rights regarding your data

Under UK data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

Mr. John Holland
 Business Manager
 Harlow Fields School & College
 Tendring Road
 Harlow, Essex CM18 6RN
 Email: businessmanager@harlowfields.essex.sch.uk

This notice is based on the Department for Education's model privacy notice <https://www.gov.uk/government/publications/data-protection-and-privacy-privacy-notice-for-the-school-workforce>, amended to reflect the way we use data in this school.

APPENDIX A RECORDS / RETENTION SCHEDULE

Data	Hard Copy	Soft Copy	Retention Period	How are the records destroyed
Pupil Data	Each pupil has their own file which holds all relevant information about that pupil as set out in this privacy policy which is stored in secure folders / cabinets / rooms	RM Integris is used to securely store pupil information as set out in this privacy policy and can only be accessed by a unique and secure username and password.	25 Years from the pupils date of birth. If there is a safeguarding concern Pupil Data is kept until the school are advised by appropriate bodies or by Law.	Hard Copy documents are all confidentially shredded to meet European standards. Soft Copy There is a process on RM Integris which will delete the file which means that it will "not" be retrievable once the final delete process has taken place
Pupil Data – Transferring Establishments	Any pupil who is transferring to another establishment their file is sent in the post or hand delivered.	A common Transfer File (CTF) is generated from RM Integris.	Files are only destroyed once confirmation has been received from the establishment the pupil has been transferred to.	Hard Copy documents are all confidentially shredded to meet European standards. Soft Copy There is a process on RM Integris which will delete the file which means that it will "not" be retrievable once the final delete process has taken place
Staff Data	Each member of staff has their own file which holds all relevant information about that staff member as set out in this privacy policy which is stored in secure folders /	RM Integris is used to securely store staff information as set out in this privacy policy and can only be accessed by a unique and secure username and	10 Years from leave date. After this the school will not be in a position to provide a reference of any means.	Hard Copy documents are all confidentially shredded to meet European standards. Soft Copy There is a

	cabinets / rooms	password.		process on RM Integris which will delete the file which means that it will “not” be retrievable once the final delete process has taken place
Recruitment of Staff	All unsuccessful candidate application documents will be securely stored.	Any soft copy applications received will be printed off and securely stored	6 Months from the date the application process closed.	Hard Copy documents are all confidentially shredded to meet European standards.
CCTV	N/A	All data captured is stored on the CCTV Hard Drive	30 days Any data required beyond 30 days and adheres to our privacy policy will be stored on a DVD and then confidentially destroyed	Soft Copy All data is overwritten within 30 days
Governors / Volunteers	N/A	RM Integris is used to securely store pupil information as set out in this privacy policy and can only be accessed by a unique and secure username and password.	Any relevant papers relating to the engagement of Governors/Trustees can be retained and must be kept for 1 year ² from the end of their term of office. <u>Records must be destroyed after 1 year².</u>	Soft Copy There is a process on RM Integris which will delete the file which means that it will “not” be retrievable once the final delete process has taken place