

CCTV
Data Protection
Freedom of Information
Publication Scheme
Privacy Notices
Records Management
Website Policy
Our Lady's Bishop Eton Primary School



This Handbook is reviewed and approved annually by Full Governors at their Spring Term meeting

INTENT

Our school aims to ensure that we:

- Follow all relevant legislation and good practice with regards to data collection and management. We are fully committed to complying with Data Protection Act 2018 legislation, including the General Data Protection Regulation (GDPR), which regulates how we process personal information.
- Provide clarity as to how requests for information can be made and how we will manage such requests

IMPLEMENTATION: Our school:

- Is transparent with regard to the information we collect and hold
- Explains how information will be made available and any fees that will be charged
- Reviews and updates information on a regular basis
- Publishes information held by the school that has been requested (unless not appropriate to do so)
- Publishes information in a digital form that is capable of being re-used (under FOI Section 19 and the Re-use of Public Sector Information Regulations (2015))

IMPACT

- All data collected by the school is collected intelligently and proportionately.
- All data is held securely and managed rigorously
- All Freedom of Information requests are responded to appropriately

DATA PROTECTION OFFICER (DPO)

The school will use the Local Authority DPO as its designated Data Protection Officer. The DPO will:

- Inform and advise the school and its employees about their obligations to comply with the GDPR and other data protection laws.
- Monitor the school's compliance with the GDPR and other laws, including managing internal data protection activities, advising on data protection impact assessments, conducting internal audits, and providing the required training to staff members.

LEGAL FRAMEWORK

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

- Regulation of Investigatory Powers Act 2000
- Protection of Freedoms Act 2012
- The UK General Data Protection Regulation
- Data Protection Act 2018
- Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- School Standards and Framework Act 1998
- Children Act 1989
- Children Act 2004
- Equality Act 2010

This policy has been created with regard to the following statutory and non-statutory guidance:

- Home Office (2013) 'The Surveillance Camera Code of Practice'
- ICO (2021) 'Guide to the UK General Data Protection Regulation (UK GDPR)'
- ICO (2017) 'In the picture: A data protection code of practice for surveillance cameras and personal information'

DEFINITIONS

For the purpose of this policy a set of definitions will be outlined, in accordance with the surveillance code of conduct:

Surveillance – monitoring the movements and behaviour of individuals; this can include video, audio or live footage. For the purpose of this policy only video and audio footage will be applicable.

Overt surveillance – any use of surveillance for which authority does not fall under the Regulation of Investigatory Powers Act 2000.

Covert surveillance – any use of surveillance which is intentionally not shared with the subjects it is recording. Subjects will not be informed of such surveillance. The school does not condone the use of covert surveillance when monitoring the school's staff, pupils and/or volunteers. Covert surveillance will only be operable in extreme circumstances. Any overt surveillance footage will be clearly signposted around the school.

ROLES AND RESPONSIBILITIES

The school uses the services of the Local Authority. The role of the data protection officer (DPO) includes:

- Dealing with freedom of information requests and subject access requests (SARs) in line with legislation, including the Freedom of Information Act 2000.
- Ensuring that all data controllers at the school handle and process surveillance and CCTV footage in accordance with data protection legislation.
- Ensuring that surveillance and CCTV footage is obtained in line with legal requirements.
- Ensuring consent is clear, positive and unambiguous. Pre-ticked boxes and answers inferred from silence are non-compliant with the UK GDPR.
- Ensuring that surveillance and CCTV footage is destroyed in line with legal requirements when it falls outside of its retention period.
- Keeping comprehensive and accurate records of all data processing activities, including surveillance and CCTV footage, detailing the purpose of the activity and making these records public upon request.
- Informing data subjects of how their data captured in surveillance and CCTV footage will be used by the school, their rights for the data to be destroyed and the measures implemented by the school to protect individuals' personal information.
- Preparing reports and management information on the school's level of risk related to data protection and processing performance.
- Reporting to the highest management level of the school, e.g. the governing board.
- Abiding by confidentiality requirements in relation to the duties undertaken while in the role.
- Monitoring the performance of the school's data protection impact assessment (DPIA) and providing advice where requested.
- Presenting reports regarding data processing at the school to senior leaders and the governing board.

The school, as the corporate body, is the data controller. The Governing Body of OLBE therefore has overall responsibility for ensuring that records are maintained, including security and access arrangements in accordance with regulations.

The SBM deals with the day-to-day matters relating to data protection and thus, for the benefit of this policy will act as the data controller.

The role of the data controller includes:

- Processing surveillance and CCTV footage legally and fairly.
- Collecting surveillance and CCTV footage for legitimate reasons and ensuring that it is used accordingly.
- Collecting surveillance and CCTV footage that is relevant, adequate and not excessive in relation to the reason for its collection.
- Ensuring that any surveillance and CCTV footage identifying an individual is not kept for longer than is necessary.
- Protecting footage containing personal data against accidental, unlawful destruction, alteration and disclosure – especially when processing over networks.

The role of the **headteacher** includes:

- Meeting with the DPO to decide where CCTV is needed to justify its means.
- Conferring with the DPO with regard to the lawful processing of the surveillance and CCTV footage.
- Reviewing the Surveillance and CCTV Policy to ensure it is compliant with current legislation.
- Monitoring legislation to ensure the school is using surveillance fairly and lawfully.
- Communicating any changes to legislation with all members of staff.

PURPOSE AND JUSTIFICATION

The school will only use surveillance cameras for the safety and security of the school and its staff, pupils and visitors. Surveillance will be used as a deterrent for violent behaviour and damage to the school. The school will only conduct surveillance as a deterrent and under no circumstances will the surveillance and the CCTV cameras be present in school classrooms or any changing facility. If the surveillance and CCTV systems fulfil their purpose and are no longer required the school will deactivate them.

THE DATA PROTECTION PRINCIPLES

Data collected from surveillance and CCTV will be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up-to-date; every reasonable step will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods, insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the UK GDPR in order to safeguard the rights and freedoms of individuals.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

OBJECTIVES

The surveillance system will be used to:

- Maintain a safe environment.
- Ensure the welfare of pupils, staff and visitors.
- Deter criminal acts against persons and property.
- Assist the police in identifying persons who have committed an offence.

PROTOCOLS

- The surveillance system will be registered with the ICO in line with data protection legislation.
- The surveillance system is a closed digital system which does not record audio.
- Warning signs have been placed throughout the premises where the surveillance system is active, as mandated by the ICO's Code of Practice.
- The surveillance system has been designed for maximum effectiveness and efficiency; however, the school cannot guarantee that every incident will be detected or covered and 'blind spots' may exist.
- The surveillance system will not be trained on individuals unless an immediate response to an incident is required.
- The surveillance system will not be trained on private vehicles or property outside the perimeter of the school.

SECURITY

- Access to the surveillance system, software and data will be strictly limited to authorised operators and will be password protected.
- The school's authorised CCTV system operators are the Headteacher and the School Business Manager
- The main control facility is kept secure and locked when not in use.
- If, in exceptional circumstances, covert surveillance is planned, or has taken place, copies of the Home Office's [authorisation forms](#) will be completed and retained.
- Surveillance and CCTV systems will be tested for security flaws half termly to ensure that they are being properly maintained at all times.
- Surveillance and CCTV systems will not be intrusive.
- The headteacher and Business Manager will decide when to record footage, continuous loop outside the school grounds to deter intruders.
- Any unnecessary footage captured will be securely deleted from the school system.
- Any cameras that present faults will be repaired immediately as to avoid any risk of a data breach.
- Visual display monitors are located in the School Office.

DATA PROTECTION BY DESIGN AND DEFAULT

- The use of surveillance cameras and CCTV will be critically analysed using a DPIA, in consultation with the DPO.
- A DPIA will be carried out prior to the installation of any surveillance and CCTV system.
- If the DPIA reveals any potential security risks or other data protection issues, the school will ensure they have provisions in place to overcome these issues.
- Where the school identifies a high risk to an individual's interests, and it cannot be overcome, the school will consult the ICO before they use CCTV, and the school will act on the ICO's advice.
- The school will ensure that the installation of the surveillance and CCTV systems will always justify its means.
- If the use of a surveillance and CCTV system is too privacy intrusive, the school will seek alternative provision.

CODE OF PRACTICE

- The school understands that recording images of identifiable individuals constitutes as processing personal information, so it is done in line with data protection principles.
- The school notifies all pupils, staff and visitors of the purpose for collecting surveillance data via notice boards
- CCTV cameras are only placed where they do not intrude on anyone's privacy and are necessary to fulfil their purpose.
- All surveillance footage will be kept for six months for security purposes; the headteacher and the Business Manager are responsible for keeping the records secure and allowing access.

- The school has a surveillance system for the purpose of the prevention and detection of crime and the promotion of the health, safety and welfare of staff, pupils and visitors.
- The surveillance and CCTV system is owned by the school and images from the system are strictly controlled and monitored by authorised personnel only.
- The school will ensure that the surveillance and CCTV system is used to create a safer environment for staff, pupils and visitors to the school, and to ensure that its operation is consistent with the obligations outlined in data protection legislation.
- The surveillance and CCTV system will:
 - Be designed to take into account its effect on individuals and their privacy and personal data.
 - Be transparent and include a contact point, the Business Manager, through which people can access information and submit complaints.
 - Have clear responsibility and accountability procedures for images and information collected, held and used.
 - Have defined policies and procedures in place which are communicated throughout the school.
 - Only keep images and information for as long as required.
 - Restrict access to retained images and information with clear rules on who can gain access.
- Consider all operational, technical and competency standards, relevant to the surveillance and CCTV system and its purpose, and work to meet and maintain those standards in accordance with the law.
- Be subject to stringent security measures to safeguard against unauthorised access.
- Be regularly reviewed and audited to ensure that policies and standards are maintained.
- Only be used for the purposes for which it is intended, including supporting public safety, the protection of pupils, staff and volunteers, and law enforcement.
- Be accurate and well maintained to ensure information is up-to-date.

ACCESS

- Under the UK GDPR, individuals have the right to obtain confirmation that their personal information is being processed.
- All disks containing images belong to, and remain the property of, the school.
- Individuals have the right to submit an SAR to gain access to their personal data in order to verify the lawfulness of the processing.
- The school will verify the identity of the person making the request before any information is supplied.
- A copy of the information will be supplied to the individual free of charge; however, the school may impose a 'reasonable fee' to comply with requests for further copies of the same information.
- Where an SAR has been made electronically, the information will be provided in a commonly used electronic format.
- Requests by persons outside the school for viewing or copying disks, or obtaining digital recordings, will be assessed by the headteacher, who will consult the DPO, on a case-by-case basis with close regard to data protection and freedom of information legislation.
- Where a request is manifestly unfounded, excessive or repetitive, a reasonable fee will be charged.
- All fees will be based on the administrative cost of providing the information.
- All requests will be responded to without delay and at the latest, within one month of receipt.
- In the event of numerous or complex requests, the period of compliance will be extended by a further two months. The individual will be informed of this extension, and will receive an explanation of why the extension is necessary, within one month of the receipt of the request.
- Where a request is manifestly unfounded or excessive, the school holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the ICO and to a judicial remedy, within one month of the refusal.
- In the event that a large quantity of information is being processed about an individual, the school will ask the individual to specify the information the request is in relation to.
- It is important that access to, and disclosure of, the images recorded by surveillance and CCTV footage is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact, should the images be required for evidential purposes.
- Releasing the recorded images to third parties will be permitted only in the following limited and prescribed circumstances, and to the extent required or permitted by law:
 - The police – where the images recorded would assist in a specific criminal inquiry
 - Prosecution agencies – such as the Crown Prosecution Service (CPS)
 - Relevant legal representatives – such as lawyers and barristers
 - Persons who have been recorded and whose images have been retained where disclosure is required by virtue of data protection legislation and the Freedom of Information Act 2000
- Requests for access or disclosure will be recorded and the Governing Body will make the final decision as to whether recorded images may be released to persons other than the police.

DATA PROTECTION APPLICABLE DATA

OLBE is required to keep and process certain information about its staff members, pupils, their families, volunteers and external contractors in accordance with its legal obligations under data protection legislation. The school may, from time to time, be required to share personal information about its staff or pupils with other organisations, mainly the LA, DfE, other schools and educational bodies, and potentially children's services. This policy is in place to ensure all staff and governors are aware of their responsibilities and outlines how the school complies with the following core principles of the UK GDPR. Organisational methods for keeping data secure are imperative, and the school believes that it is good practice to keep clear practical policies, backed up by written procedures.

LEGAL FRAMEWORK

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- The UK General Data Protection Regulation (UK GDPR)
- Freedom of Information Act 2000

- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2018)
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004
- School Standards and Framework Act 1998
- Data Protection Act 2018
- Protection of Freedoms Act

This policy also has regard to the following guidance:

- ICO (2021) 'Guide to the UK General Data Protection Regulation (UK GDPR)'
- DfE (2018) 'Data protection: a toolkit for schools'
- ICO (2012) 'IT asset disposal for organisations'

APPLICABLE DATA

For the purpose of this policy, 'personal data' refers to information that relates to an identifiable, living individual, including information such as an online identifier, e.g. an IP address. The UK GDPR applies to both automated personal data and to manual filing systems, where personal data is accessible according to specific criteria, as well as to chronologically ordered data and pseudonymised data, e.g. key-coded.

'Sensitive personal data' is referred to in the UK GDPR as 'special categories of personal data', and is defined as:

- Genetic data.
- Biometric data.
- Data concerning health.
- Data concerning a person's sex life.
- Data concerning a person's sexual orientation.
- Personal data which reveals:
 - Racial or ethnic origin.
 - Political opinions.
 - Religious or philosophical beliefs.
 - Trade union membership.
 - Principles.

'Sensitive personal data' does not include data about criminal allegations, proceedings or convictions. In the case of criminal offence data, schools are only able to process this if it is either:

- Under the control of official authority; or
- Authorised by domestic law.

The latter point can only be used if the conditions of the reason for storing and requiring the data fall into one of the conditions below:

- The processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller of the data subject in connection with employment, social security, social protection, health or social care purposes, public health, and research.

In accordance with the requirements outlined in the UK GDPR, personal data will be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Accurate and, where necessary, kept up-to-date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods, insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the UK GDPR in order to safeguard the rights and freedoms of individuals.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- The UK GDPR also requires that "the controller shall be responsible for, and able to demonstrate, compliance with" the above principles.

ACCOUNTABILITY

The school will implement appropriate technical and organisational measures to demonstrate that data is processed in line with the principles set out in the UK GDPR, and will provide comprehensive, clear and transparent privacy policies.

Records of activities relating to higher risk processing will be maintained, such as the processing of activities that:

- Are not occasional.
- Could result in a risk to the rights and freedoms of individuals.
- Involve the processing of special categories of data or criminal conviction and offence data.

Internal records of processing activities will include the following:

- Name and details of the organisation
- Purpose(s) of the processing
- Description of the categories of individuals and personal data
- Retention schedules
- Categories of recipients of personal data
- Description of technical and organisational security measures
- Details of transfers to third countries, including documentation of the transfer mechanism safeguards in place

The school will also document other aspects of compliance with the UK GDPR and Data Protection Act where this is deemed appropriate in certain circumstances by the DPO, including the following:

- Information required for privacy notices, e.g. the lawful basis for the processing
- Records of consent
- Controller-processor contracts
- The location of personal data
- Data Protection Impact Assessment (DPIA) reports
- Records of personal data breaches

The school will implement measures that meet the principles of data protection by design and data protection by default, such as:

- Minimising the processing of personal data.
- Pseudonymising personal data as soon as possible.
- Ensuring transparency in respect of the functions and processing of personal data.
- Allowing individuals to monitor processing.
- Continuously creating and improving security features.
- DPIAs will be used to identify and reduce data protection risks, where appropriate.

Data protection officer (DPO)

Schools are required to appoint a DPO who will be the central point of contact for all data subjects and others in relation to matters of data protection.

A DPO will be appointed in order to:

- Inform and advise the school and its employees about their obligations to comply with the UK GDPR and other data protection laws.
- Monitor the school's compliance with the UK GDPR and other laws, including managing internal data protection activities, advising on DPIAs, conducting internal audits, and providing the required training to staff members.
- Cooperate with the ICO and act as the first point of contact for the ICO and for individuals whose data is being processed.

The DPO is responsible for:

- Coordinating a proactive and preventative approach to data protection.
- Calculating and evaluating the risks associated with the school's data processing.
- Having regard to the nature, scope, context, and purposes of all data processing.
- Prioritising and focussing on more risky activities, e.g. where special category data is being processed.
- Promoting a culture of privacy awareness throughout the school community.
- Carrying out ad hoc reviews of data practices to ensure staff understand and are acting in accordance with relevant data protection laws.

The individual appointed as DPO will have professional experience and be highly knowledgeable about data protection law, particularly that in relation to schools. An existing employee will be appointed to the role of DPO provided that their duties are compatible with the duties of the DPO and do not lead to a conflict of interests.

The DPO will operate independently and will not be dismissed or penalised for performing their duties. Sufficient resources and appropriate access will be provided to the DPO to enable them to meet their UK GDPR obligations.

The DPO will report to the highest level of management at the school, which is the governing board.

Staff will ensure that they involve the DPO in all data protection matters closely and in a timely manner.

LAWFUL PROCESSING

The legal basis for processing data will be identified and documented prior to data being processed. Under the UK GDPR, data will be lawfully processed under the following conditions:

- The consent of the data subject has been obtained
- Processing is necessary for a contract held with the individual, or because they have asked the school to take specific steps before entering into a contract
- Processing is necessary for compliance with a legal obligation (not including contractual obligations)
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
- Processing is necessary for protecting vital interests of a data subject or another person, i.e. to protect someone's life
- Processing is necessary for the purposes of legitimate interests pursued by the controller or a third party, except where such interests are overridden by the interests, rights or freedoms of the data subject – this condition is not available to processing undertaken by the school in the performance of its tasks

The school will only process personal data without consent where any of the above purposes cannot reasonably be achieved by other, less intrusive means or by processing less data.

Sensitive data will only be processed under the following conditions:

- Explicit consent of the data subject
- Processing carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes) and provided there is no disclosure to a third party without consent
- Processing relates to personal data manifestly made public by the data subject
- Processing is necessary for:
 - Carrying out obligations under employment, social security or social protection law, or a collective agreement
 - Protecting the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent
 - The establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity
 - Reasons of substantial public interest with a basis in law which is proportionate to the aim pursued and which contains appropriate safeguards
 - The purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services with a basis in law

- Reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of healthcare and of medicinal products or medical devices
- Archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with a basis in law

- When none of the above apply, consent will be obtained by the data subject to the processing of their special category personal data.

For personal data to be processed fairly, data subjects must be made aware:

- That the personal data is being processed.
- Why the personal data is being processed.
- What the lawful basis is for that processing.
- Whether the personal data will be shared, and if so, with whom.
- The existence of the data subject's rights in relation to the processing of that personal data.
- The right of the data subject to raise a complaint with the ICO in relation to any processing.

The school has privacy notices for the following groups, which outline the information above that is specific to them:

- **Pupils and their families**
- **School workforce**
- **Third parties**
- **Trustees and governors**
- **Volunteers**

There may be circumstances where it is considered necessary to process personal data or special category personal data in order to protect the vital interests of a data subject. This may include medical emergencies where it is not possible for the data subject to give consent to the processing. In such circumstances, the DPO will be consulted and a decision made only after seeking further clarification.

Where the school relies on:

'Performance of contract' to process a child's data, the school considers the child's competence to understand what they are agreeing to, and to enter into a contract.

'Legitimate interests' to process a child's data, the school takes responsibility for identifying the risks and consequences of the processing, and puts age-appropriate safeguards in place.

Consent to process a child's data, the school ensures that the requirements outlined in the CONSENT section are met, and the school does not exploit any imbalance of power in the relationship between the school and the child.

CONSENT

Consent must be a positive indication expressly confirmed in words. It cannot be inferred from silence, inactivity, a positive action without words or pre-ticked boxes. Consent will only be accepted where it is freely given, specific, informed and an unambiguous indication of the individual's wishes. Consent can be withdrawn by the individual at any time.

Where consent is given, a record will be kept documenting how and when consent was given, and what the data subject was told.

The school ensures that consent mechanisms meet the standards of the UK GDPR. Where the standard of consent cannot be met, an alternative legal basis for processing the data must be found, or the processing must cease. Consent accepted under the DPA will be reviewed to ensure it meets the standards of the UK GDPR; however, acceptable consent obtained under the DPA will not be reobtained.

When pupils and staff join the school, the staff member or pupil (or, where appropriate, pupil's parent) will be required to complete a consent form for personal data use. This consent form deals with the taking and use of photographs and videos, amongst other things. Where appropriate, third parties may also be required to complete a consent form.

Where the school opts to provide an online service directly to a child, the child is aged 13 or over, and the consent meets the requirements outlined above, the school obtains consent directly from that child; otherwise, consent is obtained from whoever holds parental responsibility for the child, except where the processing is related to preventative or counselling services offered directly to children. In all other instances with regards to obtaining consent, an appropriate age of consent is considered by the school on a case-by-case basis, taking into account the requirements outlined above.

THE RIGHT TO BE INFORMED

Adults and children have the same right to be informed about how the school uses their data. The privacy notices supplied to individuals, including children, in regard to the processing of their personal data will be written in clear, plain, age-appropriate language which is concise, transparent, easily accessible and free of charge.

In relation to data obtained both directly from the data subject and not obtained directly from the data subject, the following information will be supplied within the privacy notice:

- The identity and contact details of the controller, the controller's representative, where applicable, and the DPO
- The purpose of, and the lawful basis for, processing the data
- The legitimate interests of the controller or third party
- Any recipient or categories of recipients of the personal data
- Details of transfers to third countries and the safeguards in place
- The retention period of criteria used to determine the retention period
- The existence of the data subject's rights, including the right to:
 - Withdraw consent at any time
 - Lodge a complaint with a supervisory authority
- The existence of automated decision making, including profiling, how decisions are made, the significance of the process and the consequences

Where data is obtained directly from the data subject, information regarding whether the provision of personal data is part of a statutory or contractual requirement, as well as any possible consequences of failing to provide the personal data, will be provided – this information will be supplied at the time the data is obtained.

Where data is not obtained directly from the data subject, information regarding the categories of personal data that the school holds, the source that the personal data originates from and whether it came from publicly accessible sources, will be provided – this information will be supplied:

- Within one month of having obtained the data.

- If disclosure to another recipient is envisaged, at the latest, before the data are disclosed.
- If the data are used to communicate with the individual, at the latest, when the first communication takes place.

THE RIGHT OF ACCESS

Individuals, including children, have the right to obtain a copy of their personal data as well as other supplementary information, including confirmation that their data is being processed, and the right to submit a subject access request (SAR) to gain access to their personal data in order to verify the lawfulness of the processing. The school will verify the identity of the person making the request before any information is supplied.

A copy of the information will be supplied to the individual free of charge; however, the school may impose a 'reasonable fee' to cover the administrative costs of complying with requests that are manifestly unfounded or excessive or if an individual requests further copies of the same information. Where a request is manifestly unfounded, excessive or repetitive, a reasonable fee will be charged. All fees will be based on the administrative cost of providing the information.

Where a SAR has been made electronically, the information will be provided in a commonly used electronic format.

Where a SAR has been made for information held about a child, the school will evaluate whether the child is capable of fully understanding their rights. If the school determines the child can understand their rights, it will respond directly to the child.

All requests will be responded to without delay and at the latest, within one month of receipt. In the event of numerous or complex requests, the period of compliance will be extended by a further two months. The individual will be informed of this extension, and will receive an explanation of why the extension is necessary, within one month of the receipt of the request.

Where a request is manifestly unfounded or excessive, the school holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the supervisory authority and to a judicial remedy, within one month of the refusal.

The school will ensure that information released in response to a SAR does not disclose personal data of another individual. If responding to the SAR in the usual way would disclose such data, the school will:

- Omit certain elements from the response if another individual's personal data would be disclosed otherwise.
- Reject requests that cannot be fulfilled without disclosing another individual's personal data, unless that individual consents or it is reasonable to comply without consent.
- Explain to the individual who made the SAR why their request could not be responded to in full.

In the event that a large quantity of information is being processed about an individual, the school will ask the individual to specify the information the request is in relation to – the time limit for responding to the request will be paused until clarification from the individual is received.

THE RIGHT TO RECTIFICATION

Individuals, including children, are entitled to have any inaccurate or incomplete personal data rectified.

Requests for rectification will be responded to within one month; this will be extended by two months where the request for rectification is complex.

Requests for rectification will be investigated and resolved, where appropriate, free of charge; however, the school may impose a 'reasonable fee' to cover the administrative costs of complying with requests that are manifestly unfounded or excessive or if an individual makes multiple requests at once. The school reserves the right to refuse to process requests for rectification if they are manifestly unfounded or excessive or if exemptions apply.

The school will take reasonable steps to ensure that data is accurate or is rectified if inaccurate, implementing a proportional response for data that has a significant impact on the individual, e.g. if significant decisions are made using that data. The school will restrict processing of the data in question whilst its accuracy is being verified, where possible.

Where the personal data in question has been disclosed to third parties, the school will inform them of the rectification where possible. Where appropriate, the school will inform the individual about the third parties that the data has been disclosed to.

Where no action is being taken in response to a request for rectification, or where the request has been investigated and the data has been found to be accurate, the school will explain the reason for this to the individual, and will inform them of their right to complain to the supervisory authority and to a judicial remedy.

THE RIGHT TO ERASURE

Individuals, including children, hold the right to request the deletion or removal of personal data where there is no compelling reason for its continued processing. Individuals, including children, have the right to erasure in the following circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected or processed
- When the individual withdraws their consent where consent was the lawful basis on which the processing of the data relied
- When the personal objects to the processing and there is no overriding legitimate interest for continuing the processing
- The personal data was unlawfully processed
- The personal data is required to be erased in order to comply with a legal obligation
- The personal data is processed in relation to the offer of information society services to a child

The school will comply with the request for erasure without undue delay and at the latest within one month of receipt of the request.

The school has the right to refuse a request for erasure where the personal data is being processed for the following reasons:

- To exercise the right of freedom of expression and information
- To comply with a legal obligation for the performance of a public interest task or exercise of official authority
- For public health purposes in the public interest
- For archiving purposes in the public interest, scientific research, historical research or statistical purposes
- The establishment, exercise or defence of legal claims

The school has the right to refuse a request for erasure for special category data where processing is necessary for:

- Public health purposes in the public interest, e.g. protecting against serious cross-border threats to health.
- Purposes of preventative or occupational medicine, the working capacity of an employee, medical diagnosis, the provision of health or social care, or the management of health or social care systems or services.

Requests for erasure will be handled free of charge; however, the school may impose a 'reasonable fee' to cover the administrative costs of complying with requests that are manifestly unfounded or excessive or if an individual makes multiple requests at once.

As a child may not fully understand the risks involved in the processing of data when consent is obtained, special attention will be given to existing situations where a child has given consent to processing and they later request erasure of the data, regardless of age at the time of the request.

Where personal data has been disclosed to third parties, they will be informed about the erasure of the personal data, unless it is impossible or involves disproportionate effort to do so. Where personal data has been made public within an online environment, the school will inform other organisations who process the personal data to erase links to and copies of the personal data in question.

THE RIGHT TO RESTRICT PROCESSING

Individuals, including children, have the right to block or suppress the school's processing of personal data.

The school will restrict the processing of personal data in the following circumstances:

- Where an individual contests the accuracy of the personal data, processing will be restricted until the school has verified the accuracy of the data
- Where an individual has objected to the processing and the school is considering whether their legitimate grounds override those of the individual
- Where processing is unlawful and the individual opposes erasure and requests restriction instead
- Where the school no longer needs the personal data but the individual requires the data to establish, exercise or defend a legal claim

In the event that processing is restricted, the school will store the personal data, but not further process it, guaranteeing that just enough information about the individual has been retained to ensure that the restriction is respected in future. The school will inform individuals when a restriction on processing has been lifted.

Where the school is restricting the processing of personal data in response to a request, it will make that data inaccessible to others, where possible, e.g. by temporarily moving the data to another processing system or unpublishing published data from a website.

If the personal data in question has been disclosed to third parties, the school will inform them about the restriction on the processing of the personal data, unless it is impossible or involves disproportionate effort to do so.

The school reserves the right to refuse requests for restricting processing if they are manifestly unfounded or excessive or if exemptions apply. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the supervisory authority and to a judicial remedy, within one month of the refusal.

THE RIGHT TO DATA PORTABILITY

Individuals, including children, have the right to obtain and reuse their personal data for their own purposes across different services. The right to data portability only applies in the following cases:

- Where personal data has been provided directly by an individual to a controller
- Where the processing is based on the individual's consent or for the performance of a contract
- When processing is carried out by automated means

Personal data can be easily moved, copied or transferred from one ICT environment to another in a safe and secure manner, without hindrance to usability. Personal data will be provided in a structured, commonly used and machine-readable form. Where feasible, data will be transmitted directly to another organisation at the request of the individual. The school will not be required to adopt or maintain processing systems which are technically compatible with other organisations.

The school will provide the information free of charge.

In the event that the personal data concerns more than one individual, the school will consider whether providing the information would prejudice the rights of any other individual.

The school will respond to any requests for portability within one month. Where the request is complex, or a number of requests have been received, the timeframe can be extended by two months, ensuring that the individual is informed of the extension and the reasoning behind it within one month of the receipt of the request.

Where no action is being taken in response to a request, the school will, without delay and at the latest within one month, explain to the individual the reason for this and will inform them of their right to complain to the supervisory authority and to a judicial remedy.

THE RIGHT TO OBJECT

The school will inform individuals, including children, of their right to object at the first point of communication, and this information will be outlined in the privacy notice and explicitly brought to the attention of the data subject, ensuring that it is presented clearly and separately from any other information. Individuals, including children, have the right to object to the following:

- Processing based on legitimate interests or the performance of a task in the public interest
- Processing used for direct marketing purposes
- Processing for purposes of scientific or historical research and statistics.

Where personal data is processed for the performance of a legal task or legitimate interests:

- An individual's grounds for objecting must relate to his or her particular situation.
- The school will stop processing the individual's personal data unless the processing is for the establishment, exercise or defence of legal claims, or, where the school can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual.
- The school will respond to objections proportionally, granting more weight to an individual's objection if the processing of their data is causing them substantial damage or distress.

Where personal data is processed for direct marketing purposes:

- The right to object is absolute and the school will stop processing personal data for direct marketing purposes as soon as an objection is received.
- The school cannot refuse an individual's objection regarding data that is being processed for direct marketing purposes.
- The school will retain only enough information about the individual to ensure that the individual's preference not to receive direct marketing is respected in future.

Where personal data is processed for research purposes:

- The individual must have grounds relating to their particular situation in order to exercise their right to object.
- Where the processing of personal data is necessary for the performance of a public interest task, the school is not required to comply with an objection to the processing of the data.

Where the processing activity is outlined above, but is carried out online, the school will offer a method for individuals to object online.

The DPO will ensure that details are recorded for all objections received, including those made by telephone or in person, and will clarify each objection with the individual making the request to avoid later disputes or misunderstandings. The school will respond to all objections without undue delay and within one month of receiving the objection; this may be extended by a further two months if the request is complex or repetitive.

Where no action is being taken in response to an objection, the school will, without delay and at the latest within one month, explain to the individual the reason for this and will inform them of their right to complain to the supervisory authority and to a judicial remedy.

AUTOMATED DECISION MAKING AND PROFILING

The school will only ever conduct solely automated decision making with legal or similarly significant effects if the decision is:

- Necessary for entering into or performance of a contract.
- Authorised by law.
- Based on the individual's explicit consent.

Automated decisions will not concern a child nor use special category personal data, unless:

- The school has the explicit consent of the individual.
- The processing is necessary for reasons of substantial public interest.

The school will conduct a DPIA for automated decision making to mitigate risk of errors, bias and discrimination.

The school will ensure that individuals concerned are given specific information about the processing and an opportunity to challenge or request a review of the decision.

Individuals have the right not to be subject to a decision when both of the following conditions are met:

- It is based on automated processing, e.g. profiling
- It produces a legal effect or a similarly significant effect on the individual

The school will take steps to ensure that individuals are able to obtain human intervention, express their point of view, and obtain an explanation of the decision and challenge it.

When automatically processing personal data for profiling purposes, the school will ensure that the appropriate safeguards are in place, including:

- Ensuring processing is fair and transparent by providing meaningful information about the logic involved, as well as the significance and the predicted impact.
- Using appropriate mathematical or statistical procedures.
- Implementing appropriate technical and organisational measures to enable inaccuracies to be corrected and minimise the risk of errors.
- Securing personal data in a way that is proportionate to the risk to the interests and rights of the individual and prevents discriminatory effects.

DATA PROTECTION BY DESIGN AND DEFAULT

The school will act in accordance with the UK GDPR by adopting a data protection by design and default approach and implementing technical and organisational measures which demonstrate how the school has considered and integrated data protection into all aspects of processing activities. In line with the data protection by default approach, the school will ensure that only data that is necessary to achieve its specific purpose will be processed.

The school will implement a data protection by design and default approach by using a number of methods, including, but not limited to:

- Considering data protection issues as part of the design and implementation of systems, services and practices.
- Making data protection an essential component of the core functionality of processing systems and services.
- Automatically protecting personal data in school ICT systems.
- Implementing basic technical measures within the school network and ICT systems to ensure data is kept secure.
- Promoting the identity of the DPO as a point of contact.
- Ensuring that documents are written in plain language so individuals can easily understand what is being done with personal data.

DATA PROTECTION IMPACT ASSESSMENTS (DPIAS)

DPIAs will be used in certain circumstances to identify the most effective method of complying with the school's data protection obligations and meeting individuals' expectations of privacy. DPIAs will allow the school to identify and resolve problems at an early stage, thus reducing associated costs and preventing damage from being caused to the school's reputation which might otherwise occur. A DPIA will be carried out when using new technologies or when the processing is likely to result in a high risk to the rights and freedoms of individuals, and will be used for more than one project, where necessary.

High risk processing includes, but is not limited to, the following:

- Systematic and extensive processing activities, such as profiling
- Large scale processing of special categories of data or personal data which is in relation to criminal convictions or offences
- The use of CCTV

The school will ensure that all DPIAs include the following information:

- A description of the processing operations and the purposes
- An assessment of the necessity and proportionality of the processing in relation to the purpose
- An outline of the risks to individuals
- The measures implemented in order to address risk

Where a DPIA indicates high risk data processing, the school will consult the ICO to seek its opinion as to whether the processing operation complies with the UK GDPR.

DATA BREACHES

The term 'personal data breach' refers to a breach of security which has led to the destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. The headteacher will ensure that all staff are made aware of, and understand, what constitutes a data breach as part of their training.

Effective and robust breach detection, investigation and internal reporting procedures are in place at the school, which facilitate decision-making in relation to whether the relevant supervisory authority or the public need to be notified.

Where the school faces a data security incident, the DPO will coordinate an effort to establish whether a personal data breach has occurred, assess the significance of any breach, and take prompt and appropriate steps to address it.

All notifiable breaches will be reported to the relevant supervisory authority within 72 hours of the school becoming aware of it. Where a breach is likely to result in a risk to the rights and freedoms of individuals, the relevant supervisory authority will be informed, and the individuals concerned will be contacted directly. A 'high risk' breach means that the threshold for notifying the individual is higher than that for notifying the relevant supervisory authority. The risk of the breach having a detrimental effect on the individual, and the need to notify the relevant supervisory authority, will be assessed on a case-by-case basis. In the event that a breach is sufficiently serious, the public will be notified without undue delay.

Within a breach notification to the supervisory authority, the following information will be outlined:

- The nature of the personal data breach, including the categories and approximate number of individuals and records concerned
- The name and contact details of the DPO
- An explanation of the likely consequences of the personal data breach
- A description of the proposed measures to be taken to deal with the personal data breach
- Where appropriate, a description of the measures taken to mitigate any possible adverse effects

Where notifying an individual about a breach to their personal data, the school will provide specific and clear advice to individuals on the steps they can take to protect themselves and their data, where possible and appropriate to do so.

The school will ensure all facts regarding the breach, the effects of the breach and any decision-making processes and actions taken are documented in line with the UK GDPR accountability principle and in accordance with the Records Management Policy.

Failure to report a breach when required to do so may result in a fine, as well as a fine for the breach itself.

The school will work to identify the cause of the breach and assess how a recurrence can be prevented, e.g. by mandating data protection refresher training where the breach was a result of human error.

DATA SECURITY

Confidential paper records will be kept in a locked filing cabinet, drawer or safe, with restricted access, and will not be left unattended or in clear view anywhere with general access.

Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed up **off-site**. Memory sticks will not be used to hold personal information unless they are password-protected and fully encrypted. All electronic devices are password-protected to protect the information on the device in case of theft. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.

Where possible, staff and governors will not use their personal laptops or computers for school purposes. All necessary members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.

If staff and governors need to use their personal laptops for school purposes, particularly if they are working from home, they will bring their device into school before using it for work to ensure the appropriate software can be downloaded and information encrypted.

Emails containing sensitive or confidential information are password-protected if there are unsecure servers between the sender and the recipient. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients. When sending confidential information staff will always check that the recipient is correct before sending.

Before sharing data, all staff will ensure:

- They are allowed to share it.
- That adequate security is in place to protect it.
- Who will receive the data has been outlined in a privacy notice.

Where personal information that could be considered private or confidential is taken off the premises, either in electronic or paper format, staff will take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.

Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times.

The physical security of the school's buildings and storage systems, and access to them, is reviewed on a **termly** basis. If an increased risk in vandalism, burglary or theft is identified, extra measures to secure data storage will be put in place.

The school will regularly test, assess and evaluate the effectiveness of any and all measures in place for data security.

The school takes its duties under the UK GDPR seriously and any unauthorised disclosure may result in disciplinary action. The SBM is responsible for continuity and recovery measures are in place to ensure the security of protected data.

When disposing of data, paper documents will be shredded and digital storage devices will be physically destroyed when they are no longer required. ICT assets will be disposed of in accordance with the ICO's guidance on the disposal of ICT assets.

The school holds the right to take the necessary disciplinary action against a staff member if they believe them to be in breach of the above security measures.

SAFEGUARDING

The school understands that the UK GDPR does not prevent or limit the sharing of information for the purposes of keeping children safe.

The school will ensure that information pertinent to identify, assess and respond to risks or concerns about the safety of a child is shared with the relevant individuals or agencies proactively and as soon as is reasonably possible. Where there is doubt over whether safeguarding information is to be shared, especially with other agencies, the DSL will ensure that they record the following information:

- Whether data was shared
- What data was shared
- With whom data was shared
- For what reason data was shared
- Where a decision has been made not to seek consent from the data subject or their parent
- The reason that consent has not been sought, where appropriate

The school will aim to gain consent to share information where appropriate; however, will not endeavour to gain consent if to do so would place a child at risk. The school will manage all instances of data sharing for the purposes of keeping a child safe in line with the Child Protection and Safeguarding Policy.

PUBLICATION OF INFORMATION

The school publishes a publication scheme on its website outlining classes of information that will be made routinely available, including:

- Policies and procedures.
- Minutes of meetings.

- Annual reports.
- Financial information.

Classes of information specified in the publication scheme are made available quickly and easily on request.

The school will not publish any personal information, including photos, on its website without the permission of the affected individual. When uploading information to the school website, staff are considerate of any metadata or deletions which could be accessed in documents and images on the site.

CCTV AND PHOTOGRAPHY

The school understands that recording images of identifiable individuals constitutes as processing personal information, so it is done in line with data protection principles.

The school notifies all pupils, staff and visitors of the purpose for collecting CCTV images via notice boards, letters and email. Cameras are only placed where they do not intrude on anyone's privacy and are necessary to fulfil their purpose. All CCTV footage will be kept for **six months** for security purposes; the SBM is responsible for keeping the records secure and allowing access.

Before the school is able to obtain the data of pupils or staff, it is required to give notification and obtain consent for this Special Category Data due to additional requirements for processing such data under the Protection of Freedoms Act 2012.

The school will always indicate its intentions for taking photographs of pupils and will retrieve permission before publishing them. If the school wishes to use images or video footage of pupils in a publication, such as the school website, prospectus, or recordings of school plays, written permission will be sought for the particular usage from the parent of the pupil. Precautions, as outlined in the Photography Policy, are taken when publishing photographs of pupils, in print, video or on the school website.

Images captured by individuals for recreational or personal purposes, and videos made by parents for family use, are exempt from the UK GDPR. Parents and others attending school events are able to take photographs and videos of those events as long as they are for domestic purposes only. Photographs or videos being used for any other purpose are prohibited to be taken by parents or visitors to the school.

The school asks that parents and others do not post any images or videos which include any child other than their own child(ren) on any social media or otherwise publish those images or videos.

DATA RETENTION

Data will not be kept for longer than is necessary. Unrequired data will be deleted as soon as practicable. Some educational records relating to former pupils or employees of the school may be kept for an extended period for legal reasons, but also to enable the provision of references or academic transcripts. Paper documents will be shredded or pulped, and electronic memories scrubbed clean or destroyed, once the data should no longer be retained.

DBS DATA

All data provided by the DBS will be handled in line with data protection legislation; this includes electronic communication. Data provided by the DBS will never be duplicated. Any third parties who access DBS information will be made aware of the data protection legislation, as well as their responsibilities as a data handler.

PROCESSING OF BIOMETRIC DATA

This statement confirms that, at OLBE, we do not store or process any form of biometric data, such as fingerprints or retina scans. The Governing Body and data protection officer (DPO) will review this statement on an annual basis. If the school does decide to store or process biometric data, a policy will be implemented for the processing of such data, which would be made available on the school website. Any changes made to the school's position on the processing of biometric data will be clearly communicated to all staff, parents and pupils.

FREEDOM OF INFORMATION

STATEMENT OF INTENT

As an educational provider, our school has an obligation to publish a freedom of information statement, outlining how we will meet our duties under the Freedom of Information Act 2000 and associated regulations. The development and effective implementation of this policy fulfils that requirement.

More specifically, this policy outlines our school's policy and procedures for:

- The release and publication of private data and public records.
- Providing applicants with advice and assistance throughout the duration of their requests.

It also clarifies our position regarding the appropriate limit to the costs incurred by the school in obtaining any requested information, and on charging fees for its provision.

LEGAL FRAMEWORK

This policy has due regard to the following legislation:

- UK GDPR
- The Data Protection Act 2018
- The Freedom of Information Act 2000
- The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004

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

- Cabinet Office (2018) 'Freedom of Information Code of Practice'
- ICO (2013) 'Definition document for the governing bodies of maintained and other state-funded schools in England'
- ICO (2015) 'Model publication scheme'
- ICO (2016) 'Duty to provide advice and assistance (section 16)'
- ICO (2015) 'Time limits for compliance under the Freedom of Information Act (section 10)'

ACCEPTING REQUESTS FOR INFORMATION

The school will only accept a request for information which meets all of the following criteria:

- It is in writing (this includes requests sent to the school's official social media accounts)
- It states the name of the applicant (not a pseudonym) and an address for correspondence
- It adequately describes the information requested

A request will be treated as made in writing if it meets all of the following requirements:

- It is transmitted by electronic means

- It is received in legible form
- It is capable of being used for subsequent reference

Where a request is submitted in a foreign language, the school is not expected to obtain a translation of the request. For the request to be processed, the school will ask the applicant to provide their request in English.

The school will publish details of its procedures for dealing with requests for information on the website which includes the following:

- A contact address and email addressA telephone number
- A named individual to assist applicants with their requests
- General rights of access to information held by the school

Provided that the request meets the requirements set out in section 2 of this policy, the school will comply with its duty to:

- Confirm or deny to any person making a request for information to the school, whether it holds information of the description specified in the request.
- Provide the documentation, if the school confirms that it holds the requested information.

This will be completed no later than 20 school days, or 60 working days if this is shorter, from receipt of the request. Where a fee is charged, the timeframe within which the school has to respond to the request begins from the day the fee is received.

The school will not comply with this duty where:

- The school reasonably requires further information to meet a freedom of information request, has informed the applicant of this requirement, but was not subsequently supplied with that further information.
- The information is no longer readily available as it is contained in files that have been placed in archive storage or is difficult to access for similar reasons.

A request for information is exempt under section 2 of the Freedom of Information Act 2000.

- The cost of providing the information exceeds the appropriate limit.
- The request is vexatious.
- The request is a repeated request from the same person made within 60 consecutive working days of the initial one.
- A fee notice was not honoured.
- The requested information is not held by the school for the purposes of the school's business.

Where information is, or is thought to be, exempt, the school will, within 20 school days, give notice to the applicant which:

- States that fact.
- Specifies the exemption in question.

If information falls within scope of a qualified exemption and the school needs additional time to consider the public interest test, the school may extend the deadline. In most cases, the extension will exceed no more than a further 20 school days; however, the actual length of the extension will be decided on a case-by-case basis.

Where a public interest test extension is required, the school will write to the applicant to inform them of this, stating the following information:

- Which exemption(s) the extension relies on and why
- A revised deadline for when the applicant will receive their response

Where a deadline has to be further extended, the school will write to the applicant again, stating the information outlined above.

Requests for information that is not recorded by the school (e.g. requests for explanations, clarification of policy and comments on the school's business) will not be considered valid requests. In these cases, the applicant will be provided with an explanation of why their request will not be treated under the Freedom of Information Act 2000 and the school will respond to the applicant through other channels as appropriate.

The information provided to the applicant will be in the format that they have requested, where possible. Where it is not possible to provide the information in the requested format, the school will assist the applicant by discussing alternative formats in which it can be provided. The information provided will also be in the language in which it is held, or another language that is legally required. If, under relevant disability and discrimination regulations, the school is legally obliged to provide the information in other forms and formats, it will do so.

In some cases, a request may be dealt with under more than one access regime, e.g. if the request involves both information about the school and personal information, it will be dealt with under the Freedom of Information Act 2000 and the Data Protection Act 2018.

Staff are made aware that it is a criminal offence to alter, deface, block, erase, destroy or conceal any information held by the school with the intention of preventing disclosure following a request.

THE APPROPRIATE LIMIT

The school will not comply with any freedom of information request that exceeds the statutorily imposed appropriate limit of £450.

When determining whether the cost of complying with a freedom of information request is within the appropriate limit, the school will take account only of the costs we reasonably expect to incur in relation to:

- Determining whether it holds the information.
- Locating the information, or a document which may contain the information.
- Retrieving the information, or a document which may contain the information.
- Extracting the information from a document containing it.
- Costs related to the time spent by any person undertaking any of the activities outlined in section 4.2 of this policy on behalf of the school, are to be estimated at a rate of £25 per person per hour.

The school is not required to search for information in scope of a request until it is within the cost limit. If responding to one part of a request would exceed the cost limit, the school does not have to respond to any other parts of the request.

Where multiple requests for information are made to the school within 60 consecutive working days of each other, either by a single person or by different persons who appear to be acting in concert, the estimated cost of complying with any of the requests is to be taken to be the total costs to the school of complying with all of them.

Charging fees

The school may, within 20 school days, give an applicant who has requested information from the school, a written notice stating that a fee is to be charged for the school's compliance.

Charges may be made for disbursements, such as the following:

- Production expenses, e.g. printing and photocopying
- Transmission costs, e.g. postage

- Complying with the applicant's preferences about the format in which they would like to receive the information, e.g. scanning to a CD

Fees charged will not exceed the total cost to the school of:

- Informing the person making the request whether we hold the information.
- Communicating the information to the person making the request.

Where a fee is to be charged, the school will not comply with [section 3](#) of this policy unless the requested fee is paid within a period of three months, beginning with the day on which the fees notice is given to the applicant.

Where a fee is paid by cheque, the school has the right to wait until the cheque is cleared before commencing work. Once a fee is received, the school will inform the applicant of the revised response deadline, i.e. an additional 20 school days (or 60 working days).

Where the school has underestimated the cost to be charged to an applicant, a second fees notice will not be issued; instead, the school will bear the additional costs. The school will not take into account any costs which are attributable to the time spent by persons undertaking any of the activities mentioned in section 5.3 above.

When calculating the 20th school day in which to respond to a freedom of information request, the period beginning the day on which the fee notice is given to the applicant and ending with the day on which the fee is received will be disregarded.

Means of communication

Where, on making a request for information, the applicant expresses a preference for communication by any one of the following means, the school will, as far as is practicable, give effect to that preference:

- The provision to the applicant of a copy of the information in permanent form or in another form acceptable to the applicant.
- The provision to the applicant of a reasonable opportunity to inspect a record containing the information.
- The provision to the applicant of a digest, or summary of the information, in permanent form or in another form acceptable to the applicant.

Where a preference is not stated by the applicant, the school will communicate by any means which are reasonable under the circumstances. For example, where an applicant uses Twitter to make a request, the school may respond via an alternative medium as Twitter restricts the length of a response.

Providing advice and assistance

The school will meet its duty to provide advice and assistance, as far as is reasonable, to any person who proposes to make, or has made, requests for information to the school.

The school may offer advice and assistance in the following circumstances:

- If an individual requests to know what types of information the school holds and the format in which it is available, as well as information on the fees regulations and charging procedures.
- If a request has been made, but the school is unable to regard it as a valid request due to insufficient information, leading to an inability to identify and locate the information.
- If a request has been refused, e.g. due to an excessive cost, and it is necessary for the school to assist the individual who has submitted the request.

The school will provide assistance for each individual on a case-by-case basis; examples of how the school will provide assistance include the following:

- Informing an applicant of their rights under the Freedom of Information Act 2000
- Assisting an individual in the focus of their request, e.g. by advising of the types of information available within the requested category
- Advising an applicant if information is available elsewhere and how to access this information
- Keeping an applicant informed on the progress of their request

Where the school wishes to ask a different public authority to deal with a request by transferring it to them, this will only be done with the agreement of the applicant.

In order to provide assistance as outlined above, the school will engage in the following good practice procedures:

- Make early contact with an individual and keep them informed of the process of their request.
- Adhere to the school's Customer Services Policy which outlines the steps included within the code.
- Accurately record and document all correspondence concerning the clarification and handling of any request.
- Give consideration to the most appropriate means of contacting the applicant, taking into account their individual circumstances.
- Discuss with the applicant whether they would prefer to receive the information in an alternative format, in cases where it is not possible to provide the information requested in the manner originally specified.
- Remain prepared to assist an applicant who has had their request denied due to an exemption.

The school will give particular consideration to what level of assistance is required for an applicant who has difficulty submitting a written request.

In circumstances where an applicant has difficulty submitting a written request, the school will:

- Make a note of the application over the telephone and then send the note to the applicant to confirm and return – the statutory time limit for a reply would begin here.
- Direct the individual to a different agency that may be able to assist with framing their request.

NB. This list is not exhaustive, and the school may decide to take additional assistance measures that are appropriate to the case.

Where an applicant's request has been refused either because the information is accessible by other means, or the information is intended for future publication or research, the school, as a matter of good practice, will provide advice and assistance.

The school will advise the applicant how and where information can be obtained, if it is accessible by other means.

Where there is an intention to publish the information in the future, the school will advise the applicant of when this publication is expected. If the request is not clear, the school will ask for more detail from the applicant in order to identify and locate the relevant information, before providing further advice and assistance.

If the school believes the applicant has not provided their real name, the school will inform the applicant that the request will not be responded to until further information is received from the applicant.

If the school is able to clearly identify the elements of a request, it will respond following usual procedures and will provide advice and assistance for the remainder of the request. If any additional clarification is needed for the remainder of a request, the school will ensure there is no delay in asking for further information.

Applicants are given two months to provide any requested clarification. If an applicant decides not to follow the school's advice and assistance and fails to provide clarification, the school is under no obligation to contact the applicant again.

If the school is under any doubt that the applicant did not receive the advice and assistance, the school will re-issue it. The school is not required to provide assistance where an applicant's request is vexatious or repeated, as defined under section 14 of the Freedom of Information Act 2000. Where the school has already sent a refusal request in relation to a previous vexatious request, the school is not obliged to send another notice for future vexatious requests.

An ongoing evidence log is kept, recording relevant correspondence or behaviour that has been taken into account when a request has been classed as vexatious.

The school is not required to provide information where the cost of complying with a request exceeds the limit outlined in the Freedom of Information Act 2000. In such cases, the school will firstly provide the applicant with advice and assistance to help them reframe or refocus their request with a view of bringing it within the cost limit. Then the school will consider whether any information can be provided free of charge if the applicant refuses to pay the fee.

If a request is refined, it will be treated as a new request.

A record will be kept by the headteacher in the school office of all the advice and assistance provided.

CONSULTATION WITH THIRD PARTIES

The school may need to consult third parties about information held in scope of a request to consider whether it would be suitable to disclose the information. Situations where third parties may need to be consulted include the following:

- When requests relate to persons or bodies who are not the applicant and/or the school
- When the disclosure of information is likely to affect the interests of persons or bodies who are not the applicant or the school

The school will consider if a third party needs to be directly consulted about a request, particularly, if there are contractual obligations that require consultation before information is disclosed.

Third parties will also be consulted where the school is proposing to disclose information relating to them or information that is likely to affect their business or private interests.

The views of third parties will be given appropriate weighting when deciding how to respond to a request. For example, if the third party created or provided the information, they may have a better understanding of its sensitivity.

It is ultimately the school's decision as to whether information in scope of a request will be released following any relevant consultation.

Where the school decides to release information following consultation with a third party, the third party will be informed in advance that the information is going to be disclosed.

Where the school intends to release information that relates to a large number of third parties, the school will consider whether it would be more appropriate to contact a representative organisation who can express views on behalf of the third parties, rather than contacting each party individually. If no representative organisation exists, the school may also consider only notifying or consulting a sample of the third parties relating to the disclosure. Decisions will be made on a case-by-case basis.

INTERNAL REVIEWS

When responding to requests for information, the details of the school's internal review process will be set out, including information about how applicants can request an internal review. Applicants will also be informed of their right to complain to the ICO if they are still dissatisfied following the outcome of the school's internal review.

Requests for an internal review should be made in writing to the school.

For a request for an internal review to be accepted, it must be made within 40 school days from the date the school issued an initial response to the request.

Upon receipt of an application, the school will acknowledge an application and inform the applicant of the intended response date. Responses will usually be delivered within 20 school days of receipt of the application.

If an internal review is complex, requires consultation with third parties or the relevant information is of high volume, the school may need to extend the usual response timeframe. In these cases, the school will inform the applicant and provide an alternative response date. In most cases, the extension will exceed no more than a further 20 school days; however, the actual length of the extension will be decided on a case-by-case basis.

Where clarification is needed from an applicant regarding the review, the normal response period will not begin until clarification is received. Wherever possible, the review will be undertaken by a different member of staff than the person who took the original decision. During a review, the school will evaluate the handling of the request; particular attention will be paid to concerns raised by the applicant.

The applicant will be informed of the outcome of the review and a record will be kept of such reviews and the final decision that is made. If the outcome of the review is to disclose information that was previously withheld, the information will be provided to the applicant at the same time they are informed of the response to the review, where possible. If this is not possible, the applicant will be informed of when the information will be provided.

Within the response to a review, the applicant will be informed again of their right to complain to the ICO.

PUBLICATION SCHEME

The school will meet its duty to adopt and maintain a publication scheme which specifies the information which it will publish on the school's website, and whether the information will be available free of charge or on payment.

The publication scheme will be reviewed and, where necessary, updated on an annual basis.

CONTRACTS AND OUTSOURCED SERVICES

The school will make clear what information is held by third party contractors on behalf of the school.

Where a contractor holds information relating to a contract held with the school on behalf of the school, this information is considered in the same way as information held by a public authority and so is subject to the Freedom of Information Act 2000.

When entering into a contract, the school and contractor will agree what information the school will consider to be held by the contractor on behalf of the school, this will be indicated in the contract.

Appropriate arrangements will be put in place for the school to gain access to information held by the contractor on the school's behalf, in the event that a freedom of information request is made. These arrangements will be set out in a **contract**, and will cover areas including the following:

- How and when the contractor should be approached for information and who the points of contact are
- How quickly information should be provided to the school
- How any disagreement about disclosure between the school and contractor will be addressed
- How requests for internal reviews and appeals to the ICO will be managed
- The contractor's responsibility for maintaining record keeping systems in relation to the information they hold on behalf of the school
- The circumstances under which the school must consult with the contractor about disclosure and the process for doing so
- The types of information which should not be disclosed and the reasons for this confidentiality, where appropriate

In some situations, the school may offer or accept confidentiality arrangements that are not set out within a contract with a third party. The school and the third party will both be aware of the legal limits placed on the enforceability of expectations of confidentiality and the public interest in transparency. Such expectations will only be created where it is appropriate to do so.

Contractors must comply with requests from the school for access to information they hold on behalf of the school. Requests for information held by a contractor on behalf of the school will be responded to by the school. If a contractor receives a request, this will be passed onto the school for consideration.

PUBLICATION SCHEME

This scheme follows the model approved by the ICO and commits our school to make information available to the public as part of its normal business activities. We will:

- Proactively publish or otherwise make available as a matter of routine, information, including environmental information, which is held by the school and falls within the classifications below.
- Specify the information which is held by the school and falls within the classifications below.
- Proactively publish or otherwise make available as a matter of routine, information in line with the statements contained within this scheme.
- Produce and publish the methods by which the specific information is made routinely available so that it can be easily identified and accessed by members of the public.
- Review and update on a regular basis the information the school makes available under this scheme.
- Produce a schedule of any fees charged for access to information which is made proactively available.
- Make this publication scheme available to the public.
- Publish any dataset held by the school that has been requested, and any updated versions it holds, unless the school is satisfied that it is not appropriate to do so; to publish the dataset, where reasonably practicable, in an electronic form that is capable of re-use; and, if any information in the dataset is a relevant copyright work and the school is the only owner, to make the information available for re-use under the terms of the Re-use of Public Sector Information Regulations 2015, if they apply, and otherwise under the terms section 19 of the Freedom of Information Act 2000. The terms 'dataset' and 'relevant copyright work' are defined in sections 11(5) and 19(8) of the Freedom of Information Act 2000 respectively.

CLASSES OF INFORMATION

Information that is available under this scheme includes:

- Who we are and what we do: Organisational information, locations and contacts, information on constitutional and legal governance.
- What we spend and how we spend it: Financial information relating to projected and actual income and expenditure, tendering, procurement and contracts.
- What our priorities are and how we are doing: Strategy and performance information, plans, assessments, inspections and reviews.
- How we make decisions: Policy proposals and decisions, decision-making processes, internal criteria and procedures, consultations.
- Our policies and procedures: Current written protocols for delivering our functions and responsibilities.
- Lists and registers: Information held in registers required by law and other lists and registers relating to the functions of the school.
- The services we offer: Advice and guidance, booklets and leaflets, transactions and media releases. A description of the services offered.

Information which will not be made available under this scheme includes:

- Information the disclosure of which is prevented by law, or exempt under the Freedom of Information Act 2000, or is otherwise properly considered to be protected from disclosure.
- Information in draft form or notes, documents in older versions, emails or other correspondence.
- Information that is no longer readily available as it is contained in files that have been placed in archive storage or is difficult to access for similar reasons.

HOW INFORMATION PUBLISHED UNDER THIS SCHEME WILL BE MADE AVAILABLE

Information covered by this scheme will, as far as possible, be published on the school website. Where this is impracticable, or you do not wish to access the information via the school website, information covered by this scheme can also be obtained by contacting our Business Manager at: businessmanager@ourladysbishopton.com 0151 722 2982. Information requested under this scheme will be delivered electronically, but paper copies can also be provided. Information will be provided in the language in which it is held or in such other language(s) that is legally required. Where we are legally required to translate any information, we will do so. Information can be translated into accessible formats where possible. Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with this scheme. To enable us to process your request quickly, please mark correspondence:

FREEDOM OF INFORMATION REQUESTS

Information that is not covered by this scheme can be requested in writing, where its provision will be considered under the Freedom of Information Act 2000. To enable us to process freedom of information requests within statutory timeframes, please mark all correspondence: “FREEDOM OF INFORMATION REQUEST”

CHARGES

The purpose of this scheme is to make the maximum amount of Information readily available at minimum inconvenience and cost to the public. Charges made by the school for routinely published material will be justified and transparent and kept to a minimum. Material which has been published and accessible on the school website is available free of charge. Charges may be made for information subject to a charging regime specified by Parliament. Charges may also be made for information provided under this scheme where they are legally authorised, eld by the school, justified and are in accordance with a published schedule or schedule of fees. Where paper copies of the information covered by this scheme are requested, a small charge may be made to cover disbursements incurred such as:

- Photocopying.
- Postage and packaging.
- The costs directly incurred as a result of viewing information.

Where a charge is to be made, confirmation of the payment due will be given before the information is provided. Payment may be requested prior to provision of the information.

Where a request is made to re-use all, or part, of a copyrighted dataset, a charge may be made – this will be in accordance with the terms of the Re-use of Public Sector Information Regulations 2015, where applicable, with regulations made under section 11B of the Freedom of Information Act 2000, or with any other statutory powers held by the school.

Single paper copies are also available free of charge to parents and prospective parents of the school.

Information to be published Class 1: Who we are and what we do Our organisational information, structures, locations and contacts	How the information can be obtained: Hard copy or website (Some information may only be available by inspection)	Cost £
Who's who in the school	School Website	Free
Who's who on the governing board, and the basis of their appointment	School Website	Free
Instrument of Government	School Website	Free
Contact details for the headteacher	School Website	Free
Contact details for the governing board	School Website	Free
The school prospectus	School Website	Free
The school's staffing structure	School Website	Free
School session times and term dates	School Website	Free
The school's address	School Website	Free
The school's contact details	School Website	Free
The school's email address	School Website	Free
The school website	School Website	Free
The names of key personnel	School Website	Free
Class 2: What we spend and how we spend it: Our financial information concerning the school's projected and actual income and expenditure, procurement, contracts and financial audit – including the current and previous financial year		
Annual budget plan and financial statements	Hard copy	Free
Capital funding	Hard copy	Free
Financial audit reports	Hard copy	Free
Details of expenditure items over £5000 including costs, supplier and transaction information.	Hard copy	Free
Procurement and contracts the school has entered into, or information relating to information held by an organisation which has entered into procurement or contracts on the school's behalf, for example, the LA	Hard copy	Free
The pay policy	Hard copy	Free
Staff allowances and expenses that can be incurred or claimed, with totals paid to individual senior staff members by reference to categories	Hard copy	Free
The staffing, pay and grading structure [As a minimum, the pay information should include salaries for senior staff – members of the SLT or equivalent – in bands of £10,000, and more junior roles by salary range.]	Hard copy	Free

Governors' allowances that can be incurred or claimed, and a record of total payments made to individual governors	Hard copy	Free
Class 3: What our priorities are and how we are doing: Our strategies and plans, performance indicators, audits, inspections and reviews		
Performance data supplied to the government	Website	Free
The latest Ofsted summary	Website	Free
The latest Ofsted full report	Website	Free
The latest post-inspection action plan	Website	Free
The performance management policy and procedures	Hard copy	Free
The latest performance data	Website	Free
The school's future plans [For example, proposals for major changes for the school such as a change in status.]	Website	Free
The safeguarding and child protection policies and procedures	Website	Free
Class 4: How we make decisions: Our decision-making processes and records of the decision we have made – including the current year and the previous three years		
Admissions policy	Website	Free
Information pertaining to admissions decisions [Not individual admission decisions.]	Hard copy	Free
The governing board and its committees' agendas and meeting minutes [This excludes information that is regarded as private to the meetings.]	Hard copy	P x 10p
Class 5: Our policies and procedures: Our current written protocols, policies and procedures for delivering our services and responsibilities		
Capability of staff policy	Hard copy	P x 10p
Charging and remissions policy	Website	Free
School behaviour policy	Website	Free
Sex education policy	Website	Free
Special educational needs (SEN) – SEN information report	Website	Free
Teacher appraisal policy	Hard copy	P x 10p
Teachers' pay policy	Hard copy	P x 10p
Data protection policy	Website	Free
Health and safety policy	Website	Free
Admissions arrangements	Website	Free
Accessibility plan	Website	Free
Behaviour principles written statement	Website	Free
Central record of recruitment and vetting checks		P x 10p
Complaints procedure statement	Website	Free
Freedom of information procedures	Website	Free
Governors' allowances (schemes for paying)	Hard copy	P x 10p
Governing board and committee meeting minutes, and papers considered at meetings	Hard copy	P x 10p
Premises management documents	Hard copy	P x 10p
Equality information and objectives statement for publication	Website	Free
Register of pupils' admission to school	Hard copy	P x 10p
Register of pupils' attendance	Hard copy	P x 10p
Register of business interests of headteachers and governors	Website	Free
Staff discipline, conduct and grievance (procedures for addressing)	Hard copy	P x 10p
Child protection policy and procedures	Website	Free
Early years foundation stage (EYFS) policy and procedures	Website	Free
Statement of procedures for dealing with allegations of abuse against staff	Website	Free
Supporting pupils with medical conditions policy	Website	Free

Any records management and personal data policies and procedures held in addition to the data protection policy and FOI procedures, including: <ul style="list-style-type: none"> Information security policies Records retention, destruction and archive policies Information sharing policies 	Website	Free
Charging regimes and policies	Hard copy	P x 10p
Class 6: Lists and registers: Our currently maintained lists and registers – this does not include our attendance registers		
Curriculum circulars and statutory instruments	Website	Free
Disclosure logs	Inspection	N/A
Asset register	Hard copy	P x 10p
Any information the school is currently legally required to hold in publicly available registers	Hard copy	P x 10p
Class 7: The services we offer: Information about the services we offer including, leaflets, guidance and newsletters produced for the public and businesses – current information only		
Extra-curricular activities	Website	Free
Out of school clubs	Website	Free
Services for which the school is entitled to recover a fee (and details of the fees)	Hard copy	P x 10p
School publications, leaflets, books and newsletters	Website	Free

PRIVACY NOTICES

PRIVACY NOTICE FOR GOVERNORS

Under data protection law, individuals have a right to be informed about how the school uses any personal data 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 working with the School in a voluntary capacity, including Governors. We, Our Lady’s Bishop Eton Primary School, are the ‘data controller’ for the purposes of data protection law. **THE**

PERSONAL DATA WE HOLD

We process data relating to those volunteering at our School. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Name
- Address
- Contact details
- Information about business and pecuniary interests

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

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Disability and access requirements

WHY WE USE THIS DATA

The purpose of processing this data is to support the School to:

- Establish and maintain effective governance
- Meet statutory obligations for publishing and sharing Governor details
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Undertake equalities monitoring
- Ensure that appropriate access arrangements can be provided for volunteers who require them **OUR LAWFUL BASIS FOR USING THIS DATA**

We process and use this information under Articles 6 and 9 of the GDPR (General Data Protection Regulations):

- Article 6.1c - Processing is necessary for compliance with a legal obligation to which the controller is subject
- Article 6.1e - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

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

- 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 our use of your data. **COLLECTING THIS INFORMATION**

While the majority of the 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.

HOW WE STORE THIS DATA

Personal data is stored in accordance with our Data Protection Policy. We maintain a file to store personal information about all Governors. The information contained in this file is kept secure and is only used for purposes directly relevant to your work with the School. When your relationship with the School has ended, we will retain and dispose of your personal information in accordance with our Data Retention Policy.

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:

- Parents – via the website
- Government departments or agencies – to meet our legal obligations to share information about governors/trustees
- Our local authority – to meet our legal obligations to share certain information with it, such as details of governors
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as governor/trustee support
- Professional advisers and consultants
- Employment and recruitment agencies
- Police forces, courts

USE OF YOUR PERSONAL INFORMATION FOR MARKETING PURPOSES

Where you have given us consent to do so, the School may send you marketing information by e-mail or text promoting School, events, campaigns, charitable causes or services that may be of interest to you. You can "opt out" of receiving these at any time by contacting our School Business Manager.

YOUR RIGHTS HOW TO ACCESS THE 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 a 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 the Headteacher or School Business Manager.

REQUESTING ACCESS TO YOUR PERSONAL DATA

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the School Business Manager or Headteacher.

You also have the right to:

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

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

PRIVACY NOTICE FOR PUPILS

HOW WE USE PUPIL INFORMATION

We, Our Lady's Bishop Eton Primary School, are a data controller for the purposes of the Data Protection Act 1998. We collect personal information from you and may receive information about you from your previous school.

WHY DO WE COLLECT AND USE PUPIL INFORMATION?

Section 537A of the Education Act 1996 requires schools to collect and provide any such individual pupil information as may be prescribed. This includes sharing of a set of named pupil records through the submission of termly school census returns to the local authority and DfE. Putting the school census on a statutory basis:

- means that schools do not need to obtain parental or pupil consent to the provision of information
- ensures schools are protected from any legal challenge that they are breaching a duty of confidence to pupils
- helps to ensure that returns are completed by schools

We also collect and share individual pupil information with the local authority - including attendance and exclusions data- each week. This is supported under The Education (Pupil Registration) (England) Regulations 2006 Regulation 12; Children's Act 2004 Section 10: co-operation to improve wellbeing; Children's Act 2004 Section 11: arrangement to safeguard and promote welfare; Education and Inspections Act 2006 Section 38 and Working together to safeguard children March 2013 Guidance. This information is used by the local authority to fulfil a number of statutory duties:

- to ensure there are sufficient school places in the area

- promote high education standards
- ensure fair access to educational opportunity and promote the fulfilment of every child's educational potential
- the need to meet the local authority's safeguarding requirements
- to facilitate the ability of partner organisations to support the learning and welfare of children and young people through the exchange of data and the use of information not otherwise available to either organisation.

For more information on how the local authority uses information we share with them go to <http://liverpool.gov.uk/schools-andlearning/requests-for-pupil-records/> We also use pupil data:

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

THE LAWFUL BASIS ON WHICH WE USE THIS INFORMATION

We collect and use pupil information under Articles 6 and 9 of the GDPR (General Data Protection Regulations):

- Article 6.1c – processing is necessary for compliance with a legal obligation to which the controller is the subject;
- Article 6.1e – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- Article 9.2g – processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

THE CATEGORIES OF PUPIL INFORMATION THAT WE COLLECT, HOLD AND SHARE INCLUDE:

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons) • Assessment information
- Special Educational Needs information
- Exclusion/behavioural information

COLLECTING PUPIL INFORMATION

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

STORING PUPIL DATA

We hold pupil data until they transfer to another setting, primary schools do not need to keep copies of any records in the pupil record file except if there is an ongoing legal action when the pupil leaves the school.

WHO DO WE SHARE PUPIL INFORMATION WITH?

We routinely share pupil information with:

- schools that the pupil's attend after leaving us
- our local authority
- the Department for Education (DfE)
- the School Nurse and NHS
- School Improvement Liverpool

WHY WE SHARE PUPIL INFORMATION

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so. We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring. We are required to share information about our pupils with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

DATA COLLECTION REQUIREMENTS:

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

THE NATIONAL PUPIL DATABASE (NPD)

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies. We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013. To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

The department may share information about our pupils from the NPD with third parties who promote the education or wellbeing of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required

- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data. For more information about the department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website: <https://www.gov.uk/government/publications/national-pupil-database-requests-received> To contact DfE: <https://www.gov.uk/contact-dfe>

REQUESTING ACCESS TO YOUR PERSONAL DATA

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact the School Business Manager at the school. You also have the right to:

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

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

PRIVACY NOTICE FOR STAFF

HOW WE USE SCHOOL WORKFORCE INFORMATION

We, Our Lady's Bishop Eton Primary School, are a Data Controller for the purposes of the 2018 General Data Protection Regulations (GDPR) and previously the Data Protection Act of 1998.

Personal data is held by the school for those employed or otherwise engaged to work at the school or at the Local Authority. This is to assist in the smooth running of the school and/or enable individuals to be paid. **WHY WE COLLECT AND USE THIS INFORMATION** We use school workforce data to:

- enable the development of a comprehensive picture of the workforce and how it is deployed • inform the development of recruitment and retention policies
- enable individuals to be paid

THE LAWFUL BASIS ON WHICH WE PROCESS THIS INFORMATION

We process and use this information under Articles 6 and 9 of the GDPR (General Data Protection Regulations):

- Article 6.1c - Processing is necessary for compliance with a legal obligation to which the controller is subject
- Article 6.1e - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller
- 9.2b - Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject

COLLECTING THIS INFORMATION

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

THE CATEGORIES OF SCHOOL WORKFORCE INFORMATION THAT WE COLLECT, PROCESS, HOLD AND SHARE INCLUDE:

- personal information (such as name, employee or teacher number, national insurance number, DOB, addresses, relevant medical information)
- special categories of data including characteristics information such as gender, age, ethnic group
- contract information (such as start dates, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- Pay and payroll information **WHO WE**

SHARE THIS INFORMATION WITH

We routinely share this information with:

- our local authority – Liverpool City Council
- the Department for Education (DfE)

WHY WE SHARE SCHOOL WORKFORCE INFORMATION Local authority – Liverpool City Council

We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Department for Education (DfE)

We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment.

Data collection requirements

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data> To contact the department: <https://www.gov.uk/contact-dfe>

REQUESTING ACCESS TO YOUR PERSONAL DATA

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the Headteacher or School Business Manager.

You also have the right to:

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

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

We hold school workforce data from termination plus 7 years.

PRIVACY NOTICE FOR VOLUNTEERS

Under data protection law, individuals have a right to be informed about how the school uses any personal data 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 working with the School in a voluntary capacity. We, Our Lady's Bishop Eton Primary School, are the 'data controller' for the purposes of data protection law. **THE PERSONAL DATA WE HOLD** We process data relating to those volunteering at our School. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Name
- Address
- Contact details

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

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Disability and access requirements

WHY WE USE THIS DATA

The purpose of processing this data is to support the School to:

- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Undertake equalities monitoring
- Ensure that appropriate access arrangements can be provided for volunteers who require them

OUR LAWFUL BASIS FOR USING THIS DATA: WE PROCESS AND USE THIS INFORMATION UNDER ARTICLES 6 AND 9 OF THE GDPR (GENERAL DATA PROTECTION REGULATIONS)

- Article 6.1c - Processing is necessary for compliance with a legal obligation to which the controller is subject
- Article 6.1e - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

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

- 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 our use of your data. **COLLECTING THIS INFORMATION**

While the majority of the 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.

HOW WE STORE THIS DATA

Personal data is stored in accordance with our Data Protection Policy. We maintain a file to store personal information about all volunteers. The information contained in this file is kept secure and is only used for purposes directly relevant to your work with the School. When your relationship with the School has ended, we will retain and dispose of your personal information in accordance with our Data Retention Policy.

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.

USE OF YOUR PERSONAL INFORMATION FOR MARKETING PURPOSES

Where you have given us consent to do so, the School may send you marketing information by e-mail or text promoting School, events, campaigns, charitable causes or services that may be of interest to you. You can "opt out" of receiving these at any time by contacting the Headteacher or School Business Manager.

YOUR RIGHTS: HOW TO ACCESS THE 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 a 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 the Headteacher or School Business Manager.

REQUESTING ACCESS TO YOUR PERSONAL DATA

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the Headteacher or School Business Manager. You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress

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

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in

the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

If you would like to discuss anything in these privacy notices, please contact the Headteacher or School Business Manager.

FURTHER INFORMATION

RECORDS MANAGEMENT

STATEMENT OF INTENT

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

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

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

LEGAL FRAMEWORK

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

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

This policy also has due regard to the following guidance:

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

RESPONSIBILITIES

The whole school has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements. The headteacher holds the overall responsibility for this policy and for ensuring it is implemented correctly.

The DPO is responsible for the management of records at the school. The DPO is responsible for promoting compliance with this policy and reviewing the policy on an annual basis, in conjunction with the headteacher. The DPO is responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of safely and correctly.

All staff members are responsible for ensuring that any records they are responsible for (including emails) are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

MANAGEMENT OF PUPIL RECORDS

Pupil records are specific documents that are used throughout a pupil's time in the education system – they are passed to each school that a pupil attends and include all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievements. The following information is stored on the front of a pupil record, and will be easily accessible:

- Forename, surname, and date of birth
- Unique pupil number
- Note of the date when the file was opened

The following information is stored inside the front cover of a pupil record, and will be easily accessible:

- Any preferred names
- Emergency contact details and the name of the pupil's doctor
- Any allergies or other medical conditions that are important to be aware of
- Names of people with parental responsibility, including their home address(es) and telephone number(s)
- Any other agency involvement, e.g. speech and language therapist
- Reference to any other linked files
- The following information is stored in a pupil record, and will be easily accessible:
- Admissions form
- Details of any SEND
- If the pupil has attended an early years setting, the record of transfer
- Data collection or data checking form
- Annual written reports to parents
- National curriculum and agreed syllabus record sheets
- Notes relating to major incidents and accidents involving the pupil
- Any information about an EHC plan and support offered in relation to the EHC plan
- Medical information relevant to the pupil's on-going education and behaviour
- Any notes indicating child protection disclosures and reports
- Any information relating to exclusions
- Any correspondence with parents or external agencies relating to major issues, e.g. mental health
- Notes indicating that records of complaints made by parents or the pupil
- Examination results – pupil copy
- SATs results

The following information is subject to shorter retention periods and, therefore, will be stored separately in a personal file for the pupil in the **school office**:

- Attendance registers and information
- Absence notes and correspondence
- Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.
- Accident forms – forms about major accidents will be recorded on the pupil record
- Consent to administer medication and administration records
- Copies of pupil birth certificates, passports etc.
- Correspondence with parents about minor issues, e.g. behaviour
- Pupil work
- Previous data collection forms that have been superseded

Hard copies of disclosures and reports relating to child protection are stored in a sealed envelope, in a securely locked filing cabinet in the **school office** – a note indicating this is marked on the pupil's file.

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

Actual copies of accident and incident information are stored separately on the school's management information system and held in line with the retention periods outlined in this policy – a note indicating this is marked on the pupil's file. An additional copy may be placed in the pupil's file in the event of a major accident or incident.

The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend. The only exception is if any records placed on the pupil's file have a shorter retention period and may need to be removed. In such cases, the DPO will remove these records.

Electronic records relating to a pupil's record will also be transferred to the pupils' next school. [Section 12](#) of this policy outlines how electronic records will be transferred.

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

The school will, wherever possible, avoid sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The school it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to the school.

RETENTION OF PUPIL RECORDS AND OTHER PUPIL-RELATED INFORMATION

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

Type of file	Retention period	Action taken after retention period ends
PERSONAL IDENTIFIERS, CONTACTS AND PERSONAL CHARACTERISTICS		
Images used for identification purposes	For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month	Securely disposed of
Images used in displays	Whilst the pupil is at school	
Images used for marketing purposes	In line with the consent period	
Biometric data	For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month	
Postcodes, names and characteristics	Whilst the pupil is at school, plus five years	
House number and road	For the duration of the event/activity, plus one month	
ADMISSIONS		
Register of admissions	Every entry in the admissions register will be preserved for a period of three years after the date on which the entry was made	Information is reviewed and the register may be kept permanently
Admissions (where the admission is successful)	Date of admission, plus one year	Securely disposed of
Admissions appeals (where the appeal is unsuccessful)	Resolution of the case, plus one year	
Proof of address (supplied as part of the admissions process)	Current academic year, plus one year	
Supplementary information submitted, including religious and medical information etc. (where the admission was successful)	Information added to the pupil file	
Supplementary information submitted, including religious and medical information etc. (where the admission was not successful)	Retained until the appeals process is complete	
All records relating to the creation and implementation of the Admissions Policy	Life of the policy, plus three years and then review	
PUPILS' EDUCATIONAL RECORDS		
Pupils' educational records	Whilst the pupil remains at the school	Transferred to the next destination – if this is an independent school, homeschooling or outside of the UK, the file will be kept by the LA and retained for the statutory period
Public examination results	Added to the pupil's record and transferred to next school	All uncollected certificates returned to the examination board
Internal examination results	Added to the pupil's record and transferred to next school	Transferred to the next school
Behaviour records	Added to the pupil's record and transferred to the next school. Copies are held whilst the pupil is at school, plus one year	Securely disposed of
Exclusion records	Added to the pupil's record and transferred to the next school. Copies are held whilst the pupil is at school, plus one year	
Child protection information held on a pupil's record	Stored in a sealed envelope for the same length of time as the pupil's record Records also subject to any instruction given by the Independent Inquiry into Child Sex Abuse (IICSA)	Securely disposed of – shredded
Child protection records held in a separate file	25 years after the pupil's date of birth. Records also subject to any instruction given by the IICSA	
Curriculum returns	Current academic year, plus three years	Securely disposed of

Schemes of work	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Timetable	Current academic year, plus one year	
Class record books	Current academic year, plus one year	
Mark books	Current academic year, plus one year	
Record of homework set	Current academic year, plus one year	
Pupils' work	Current academic year, plus one year	
ATTENDANCE		
Attendance registers	Every entry is retained for a period of three years after the date on which the entry was made	Securely disposed of
Correspondence relating to any absence (authorised or unauthorised)	Current academic year, plus two years	
MEDICAL INFORMATION AND ADMINISTRATION		
Permission slips	For the duration of the period that medication is given, plus one month	Securely disposed of
Medical conditions – ongoing management	Added to the pupil's record and transferred to the next school Copies held whilst the pupil is at school, plus one year	
Medical incidents that have a behavioural or safeguarding influence	Added to the pupil's record and transferred to the next school Copies held whilst the pupil is at school, plus 25 years	
SEND		
SEND files, reviews and EHC plans, including advice and information provided to parents regarding educational needs and accessibility strategy	The pupil's date of birth, plus 31 years	Securely disposed of
CURRICULUM MANAGEMENT		
SATs results	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of
Examination papers	Until the appeals/validation process has been completed	
Published Admission Number (PAN) reports	Current academic year, plus six years	
Valued added a contextual data	Current academic year, plus six years	
Self-evaluation forms (internal moderation)	Current academic year, plus one year	
Self-evaluation forms (external moderation)	Retained until superseded	
Pupils' work	Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year	
EXTRA-CURRICULAR ACTIVITIES		
Field file – information taken on school trips	Until the conclusion of the trip, plus one month Where a minor incident occurs, field files are added to the core system as appropriate	Securely disposed of
Financial information relating to school trips	Whilst the pupil remains at school, plus one year	
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip	Securely disposed of – shredded
Parental consent forms for school trips where a major incident occurred	25 years after the pupil's date of birth on the pupil's record (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils)	
Educational visitors in school – sharing of personal information	Until the conclusion of the visit, plus one month	
CATERING AND FREE SCHOOL MEAL MANAGEMENT		
Meal administration	Whilst the pupil is at school, plus one year	Securely disposed of

Meal eligibility	Whilst the pupil is at school, plus five years	
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RETENTION OF STAFF RECORDS

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

Type of file	Retention period	Action taken after retention period ends
OPERATIONAL		
Staff members' personnel file	Termination of employment, plus six years, unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file will be retained until the IICSA enquiries are complete	Securely disposed of
Annual appraisal and assessment records	Current academic year, plus six years	
Sickness absence monitoring (where sickness pay is not paid)	Current academic year, plus three years	
Sickness absence monitoring (where sickness pay is paid)	Current academic year, plus six years	
Staff training (where training leads to CPD)	Length of time required by the CPD professional body	
Staff training (except where the training relates to dealing with pupils, e.g. first aid or health and safety)	Retained in the personnel file	
Staff training (where the training relates to pupils, e.g. safeguarding or other pupil-related training)	Date of the training, plus 40 years	
RECRUITMENT		
Records relating to the appointment of a new headteacher (unsuccessful attempts)	Date of appointment, plus six months.	Securely disposed of
Records relating to the appointment of a new headteacher (successful appointments)	Added to personnel file and retained until the end of appointment, plus six years, except in cases of negligence or claims of child abuse, then records are retained for at least 15 years	
Records relating to the appointment of new members of staff or governors (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	
Pre-employment vetting information (successful candidates)	For the duration of the employee's employment, plus six years	
DBS certificates	Up to six months	
Proof of identify as part of the enhanced DBS check	If it is necessary to keep a copy, it will be placed in the staff member's personnel file	
Evidence of right to work in the UK	Added to staff personnel file or, if kept separately, termination of employment, plus no longer than two years	
DISCIPLINARY AND GRIEVANCE PROCEDURES		
Child protection allegations, including where the allegation is unproven	Added to staff personnel file, and until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer If allegations are malicious, they are removed from personal files If allegations are found, they are kept on the personnel file and a copy is provided to the person concerned unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file is retained until IICSA enquiries are complete	Reviewed and securely disposed of – shredded
Oral warnings	Date of warning, plus six months	Securely disposed of – if placed on staff personnel file, removed from file
Written warning – level 1	Date of warning, plus six months	
Written warning – level 2	Date of warning, plus 12 months	
Final warning	Date of warning, plus 18 months	

Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related, then it is disposed of as <u>above</u>	Securely disposed of
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RETENTION OF SENIOR LEADERSHIP AND MANAGEMENT RECORDS

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

Type of file	Retention period	Action taken after retention period ends
GOVERNING BODY		
Agendas for governing body meetings	One copy alongside the original set of minutes – all others disposed of without retention	Local archives consulted before secure disposal
Original, signed copies of the minutes of governing body meetings	Permanent – all other copies disposed of without retention	Shredded if they contain any sensitive or personal information, but the local archives will be consulted first
Reports presented to the governing body that are referred to in the minutes	Permanent – all others disposed of without retention	Local archives consulted and then securely disposed of
Meeting papers relating to the annual parents' meeting	Date of meeting, plus a minimum of six years	Securely disposed of
Instruments of government, including articles of association	Permanent	Local archives consulted and then securely disposed of
Trusts and endowments managed by the governing body	Permanent	Local archives consulted and then securely disposed of
Action plans created and administered by the governing body	Until superseded or whilst relevant	Securely disposed of
Policy documents created and administered by the governing body	Until superseded or whilst relevant	Securely disposed of
Records relating to complaints dealt with by the governing body or headteacher	Current academic year, plus six years If negligence is involved, records are retained for the current academic year, plus 15 years If child protection or safeguarding issues are involved, the records are retained for the current academic year, plus 40 years	Reviewed for further retention in case of contentious disputes, then securely disposed of
Annual reports required by the DfE	Date of report, plus 10 years	Securely disposed of
Proposals concerning changing the status of the school	Date proposal accepted or declined, plus three years	
Records relating to the appointment of co-opted governors	Date of election, plus six months	
Records relating to the election of the chair of the governing body and the vice chair	Destroyed after the decision has been recorded in the minutes	
Scheme of delegation and terms of reference for committees	Until superseded or whilst relevant	Reviewed and offered to the local archives if appropriate
Meeting schedule	Current academic year	Standard disposal
Register of attendance at full governing body meetings	Date of last meeting in the book, plus six years	Securely disposed of
Records relating to governor monitoring visits	Date of the visit, plus three years	
Correspondence sent and received by the governing body or headteacher	Current academic year, plus three years	
Records relating to the appointment of the clerk to the governing body	Date on which the clerk's appointment ends, plus six years	
Records relating to the terms of office of serving governors, including evidence of appointment	Date on which the governor's appointment ends, plus six years	

Records relating to governor declaration against disqualification criteria	Date on which the governor's appointment ends, plus six years	
Register of business interests	Date the governor's appointment ends, plus six years	
Governor code of conduct	Dynamic document – kept permanently	
Records relating to the training required and received by governors	Date the governor steps down, plus six years	
Records relating to the induction programme for new governors	Date on which the governor's appointment ends, plus six years	
Records relating to DBS checks carried out on the clerk and members of the governing board	Date of the DBS check, plus six months	
Governor personnel files	Date on which the governor's appointment ends, plus six years	
HEADTEACHER AND SLT		
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus three years	Reviewed annually and securely disposed of if not needed
Reports created by the headteacher or SLT	Date of the report, plus a minimum of three years	
Records created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Current academic year, plus six years	
Correspondence created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Date of correspondence, plus three years	
Professional development plan	Held on the individual's personnel record. If not, then it is retained for the duration of the plan, plus six years	
Correspondence created by the headteacher, deputy headteacher, heads of year and other members of staff with administrative responsibilities	Date of correspondence, plus three years	Securely disposed of
Professional development plan	Held on the individual's personnel record. If not, then it is retained for the duration of the plan, plus six years	
SDP	Duration of the plan, plus three years	

RETENTION OF HEALTH AND SAFETY RECORDS

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

Type of file	Retention period	Action taken after retention period ends
HEALTH AND SAFETY		
Health and safety policy statements	Duration of policy, plus three years	Securely disposed of
Health and safety risk assessments	Duration of risk assessment, plus three years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred	
Records relating to any reportable death, injury, disease or dangerous occurrence under RIDDOR	Date of incident, plus three years provided that all records relating to the incident are held on the personnel file	
Accident reporting – adults	Three years after the last entry in the accident reporting book	
Accident reporting – pupils	Three years after the last entry in the accident reporting book	
Records kept under the Control of		
Substances Hazardous to Health Regulations	Three years after the last entry in the accident reporting book	
Information relating to areas where employees and persons are likely to come into contact with asbestos	Date of incident, plus 40 years	
Information relating to areas where employees and persons are likely to come into contact with radiation		
(maintenance records or controls, safety features and PPE)	Date of last action, plus 40 years	

RETENTION OF FINANCIAL RECORDS

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

Type of file	Retention period	Action taken after retention period ends
PAYROLL & PENSIONS		
Maternity pay records	Current academic year, plus three years	Securely disposed of
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current academic year, plus six years	
Absence record	Current academic year, plus three years	
Income tax form P60	Current academic year, plus six years	
Insurance	Current academic year, plus six years	
Members allowance register	Current academic year, plus six years	
National insurance – schedule of payments	Current academic year, plus six years	
Overtime	Current academic year, plus three years	
Payroll awards	Current academic year, plus six years	
Payroll (gross/net weekly or monthly)	Current academic year, plus six years	
Payroll reports	Current academic year, plus six years	
Payslips (copies)	Current academic year, plus six years	
Pension payroll	Current academic year, plus six years	
Personal bank details	Until superseded, plus three years	
Sickness records	Current academic year, plus three years	
Staff returns	Current academic year, plus three years	
Superannuation adjustments	Current academic year, plus six years	
Superannuation reports	Current academic year, plus six years	
Tax forms	Current academic year, plus six years	
RISK MANAGEMENT & INSURANCE		
Employer’s liability insurance certificate	Closure of the school, plus 40 years	Securely disposed of Passed to the LA if the school closes
ASSET MANAGEMENT		
Inventories of furniture and equipment	Current academic year, plus six years	Securely disposed of
Burglary, theft and vandalism report forms	Current academic year, plus six years	
ACCOUNTS AND STATEMENTS INCLUDING BUDGET MANAGEMENT		
Annual accounts	Current academic year, plus six years	Disposed of against common standards
Loans and grants managed by the school	Date of last payment, plus 12 years	Information is reviewed then securely disposed of
All records relating to the creation and management of budgets	Duration of the budget, plus three years	Securely disposed of
Invoices, receipts, order books, requisitions and delivery notices	Current financial year, plus six years	
Records relating to the collection and banking of monies	Current financial year, plus six years	
Records relating to the identification and collection of debt	Final payment, plus six years	
CONTRACT MANAGEMENT		
All records relating to the management of contracts under seal	Last payment on the contract, plus 12 years	Securely disposed of
All records relating to the management of contracts under signature	Last payment on the contract, plus six years	
[Updated] All records relating to the monitoring of contracts	Life of the contract, plus six or 12 years	
SCHOOL FUND		

Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Securely disposed of
SCHOOL MEALS		
FSM registers (where the register is used as a basis for funding)	Current academic year, plus six years	
School meals registers	Current academic year, plus three years	
School meals summary sheets	Current academic year, plus three years	
PUPIL FINANCE		
Student grant applications	Current academic year, plus three years	Securely disposed of
Pupil premium fund records	Date the pupil leaves the school, plus six years	

RETENTION OF OTHER SCHOOL RECORDS

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

periods below:

Type of file	Retention period	Action taken after retention period ends
Title deeds of properties belonging to the school	Permanent	Transferred to new owners if the building is leased or sold
Plans of property belonging to the school	For as long as the building belongs to the school	
Leases of property leased by or to the school	Expiry of lease, plus six years	Securely disposed of
Records relating to the letting of school premises	Current financial year, plus six years	
MAINTENANCE		
All records relating to the maintenance of the school carried out by contractors	For as long as the school owns the building and then passed onto any new owners if the building is leased or sold	Securely disposed of
All records relating to the maintenance of the school carried out by school employees	For as long as the school owns the building and then passed onto any new owners if the building is leased or sold	
OPERATIONAL ADMINISTRATION		
General file series	Current academic year, plus five years	Reviewed and securely disposed of
Records relating to the creation and publication of the school brochure and/or prospectus	Current academic year, plus three years	If a copy is not preserved by the school, standard disposal
Records relating to the creation and distribution of circulars to staff, parents or pupils	Current academic year, plus one year	Disposed of against common standards
Newsletters and other items with short operational use	Current academic year, plus one year	One copy archived, other copies standard disposal
Visitors' books and signing-in sheets	Last entry in the logbook, plus six years	Reviewed then securely disposed of
Records relating to the creation and management of parent-teacher associations and/or old pupil associations	Current academic year, plus six years	
Walking bus registers	Date of register, plus six years	Securely disposed of
School privacy notice which is sent to parents	Until superseded, plus six years	Standard disposal
Consents relating to school activities	While pupil attends the school	Secure disposal

RETENTION OF EMAILS

Group email addresses will have an assigned member of staff who takes responsibility for managing the account and ensuring the correct disposal of all sent and received emails.

All staff members with an email account will be responsible for managing their inbox.

Emails can act as evidence of the school's activities, i.e. in business and fulfilling statutory duties, so all relevant emails (e.g. invoices) will be retained for at least 12 months.

Invoices received and sent in emails will be printed off and retained.

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

All emails will be automatically deleted after 12 months, unless stated otherwise.

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

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

Staff members will not, under any circumstances, create their own email archives, e.g. saving emails on to personal hard drives.

Staff members will be aware that the emails they send could be required to fulfil a SAR or freedom of information (FOI) request. Emails will be drafted carefully, and staff members will review the content before sending.

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

All SARs will be handled in accordance with the school's Data Protection Policy.

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

When handling a request for information, the DPO will speak to the requestor to clarify the scope of the request and whether emails will be required to fulfil the SAR or FOI request.

Where an SAR has been made electronically, the information will be provided in a commonly used electronic format.

All requests will be responded to without delay and at the latest, within one month of receipt.

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

Where a request is manifestly unfounded or excessive, the school holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the supervisory authority and to a judicial remedy, within one month of the refusal.

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

IDENTIFYING INFORMATION

Under the GDPR, all individuals have the right to data minimisation and data protection by design and default – as the data controller, the school ensures appropriate measures are in place for individuals to exercise this right. Wherever possible, the school uses pseudonymisation, also known as the 'blurring technique', to reduce the risk of identification. Once an individual has left the school, if identifiers such as names and dates of birth are no longer required, these are removed or less specific personal data is used, e.g. the month of birth rather than specific date – the data is blurred slightly. Where data is required to be retained over time, e.g. attendance data, the school removes any personal data not required and keeps only the data needed – in this example, the statistics of attendance rather than personal information.

STORING AND PROTECTING INFORMATION

The DPO will undertake a business impact assessment to identify which records are vital to school management and these records will be stored in the most secure manner. The DPO will conduct a back-up of information on a termly basis to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data.

Where possible, backed-up information will be stored off the school premises, using a central back-up cloud service operated by the LA. The DPO will ensure that the location of the cloud storage and the security offered is appropriate for the information and records stored on it.

Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access. Any room or area where personal or sensitive data is stored will be locked when unattended. Confidential paper records are not left unattended or in clear view when held in a location with general access.

Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed-up off-site. Where data is saved on removable storage or a portable device, the device is kept in a locked and fireproof filing cabinet, drawer or safe when not in use. Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.

All electronic devices are password-protected to protect the information on the device in case of theft. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft. Staff and governors do not use their personal laptops or computers for school purposes. All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.

Emails containing sensitive or confidential information are password-protected or sent via a secure encrypted or data transfer system to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email. Personal information is never put in the subject line of an email. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

When sending confidential information by fax, members of staff always check that the recipient is correct before sending.

Where personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with the UK GDPR, either in an electronic or paper format, staff take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.

If documents that have been taken off the school premises will be left unattended, the staff member will leave the documents in the locked boot of a car or keep them on their person. A record will be kept of any document that is taken off the school premises that logs the location of the document and when it is returned to the school site, this includes records that are digitally remotely accessed.

Before sharing data, staff always ensure that:

- They have consent from data subjects to share it.
- Adequate security is in place to protect it.
- The data recipient has been outlined in a privacy notice.

The school has data sharing agreements with all data processors and third parties with whom data is shared. These agreements are developed by the DPO and cover information about issues such as access controls and permissions.

A record is kept of what level of access each staff member has to data. This record details information including:

- What level of access each staff member has.
- Limits on how staff members access data.
- What actions staff members can perform.
- What level of access is changed or retained when a staff member changes role within the school.

- Who is able to authorise requests to change permissions and access.

All staff members implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information is stored in a securely locked filing cabinet, drawer or safe with restricted access.

Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times.

Staff are required to use their school login details to use photocopiers and printers.

The physical security of the school's buildings and storage systems, and access to them, is reviewed termly by the site manager in conjunction with the DPO. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the headteacher and extra measures to secure data storage will be put in place.

All systems that allow staff and pupils to remotely access information from the school's network whilst they are not physically at the school have strong security controls in place which are reviewed termly by the DPO.

The DPO decides what restrictions are necessary to prevent information or records being downloaded, transferred or printed while the user is not on the school site.

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

The DPO is responsible for ensuring continuity and recovery measures are in place to ensure the security of protected data. Any damage to or theft of data will be managed in accordance with the school's Data and E-Security Breach Prevention and Management Plan.

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

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

Data controllers and processors follow the EU GDPR where:

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

ACCESSING INFORMATION

We are transparent with data subjects, the information we hold and how it can be accessed.

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

Know what information the school holds and processes about them or their child and why.

Understand how to gain access to it.

Understand how to provide and withdraw consent to information being held.

Understand what the school is doing to comply with its obligations under the UK GDPR.

All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the UK GDPR, to access certain personal data being held about them or their child.

Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents. Pupils who are considered by the school to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.

The school will adhere to the provisions outlined in the school's Data Protection Policy when responding to requests seeking access to personal information.

DIGITAL CONTINUITY STATEMENT

Digital data that is retained for longer than six years will be identified by the DPO and named as part of a Digital Continuity Statement. The data will be archived to dedicated files on the school's server, which are password-protected – this will be backed-up in accordance with [Section 12](#) of this policy.

Memory sticks are never used to store digital data, subject to a Digital Continuity Statement.

The ICT technician will review new and existing storage methods annually and, where appropriate, add them to the digital continuity statement.

The following information will be included within the Digital Continuity Statement:

- A statement of the business purposes and statutory requirements for keeping the records
- The names of the individuals responsible for long term data preservation
- A description of the information assets to be covered by the digital preservation statement
- A description of when the record needs to be captured into the approved file formats
- A description of the appropriate supported file formats for long-term preservation
- A description of the retention of all software specification information and licence information
- A description of how access to the information asset register is to be managed in accordance with the UK GDPR

INFORMATION AUDIT

The school conducts information audits on an annual basis against all information held by the school to evaluate the information the school is holding, receiving and using, and to ensure that this is correctly managed in accordance with the UK GDPR. This includes the following information:

- Paper documents and records
- Electronic documents and records
- Databases
- Microfilm or microfiche
- Sound recordings
- Video and photographic records
- Hybrid files, containing both paper and electronic information
- Knowledge
- Apps and portals

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

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

The DPO is responsible for completing the information audit. The information audit will include the following:

- The school's data needs
- The information needed to meet those needs
- The format in which data is stored
- How long data needs to be kept for
- Vital records status and any protective marking
- Who is responsible for maintaining the original document

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

Once it has been confirmed that the information is accurate, the DPO will record all details on the school's Data Asset Register.

An information asset owner is assigned to each asset or group of assets. They will be responsible for managing the asset appropriately, ensuring it meets the school's requirements, and for monitoring risks and opportunities.

The information displayed on the Data Asset Register will be shared with the headteacher to gain their approval.

DISPOSAL OF DATA

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

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

Where the disposal action is indicated as reviewed before it is disposed, the DPO will review the information against its administrative value – if the information should be kept for administrative value, the DPO will keep a record of this.

If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.

Where information has been kept for administrative purposes, the DPO will review the information again after three years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every three subsequent years.

Where information must be kept permanently, this information is exempt from the normal review procedures.

Records and information that might be of relevant to the Independent Inquiry into Child Sexual Abuse (IICSA) will not be disposed of or destroyed.

WEBSITE POLICY

STATEMENT OF INTENT

Our Lady's Bishop Eton values the contribution that a website can make to the school. The purpose of our website is to:

- Promote the school.
- Provide information to prospective parents, teachers and the wider community.
- Act as the main communication channel between teachers, parents, pupils and school management.
- Develop the level of pupil learning.
- Continuously raise standards in teaching and learning.

The school is required by law to publish certain information, such as the most recent Ofsted report, to comply with The School Information (England) (Amendment) Regulations 2018. This policy outlines the school's terms of use regarding the creation, development and use of the school website.

LEGAL FRAMEWORK

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

- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Safeguarding Vulnerable Groups Act 2006
- Freedom of Information Act 2000
- Computer Misuse Act 1990 amended by Police and Justice Act 2006
- The Education (Independent School Standards) Regulations 2014
- The School Information (England) (Amendment) Regulations 2018
- The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017
- Trade Union (Facility Time Publication Requirements) Regulations 2017

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

- DfE (2021) 'What maintained schools must publish online'
- DfE (2021) 'Keeping children safe in education 2020'
- ICO (2013) 'Definition document for the governing bodies of maintained and other state-funded schools in England'

ROLES AND RESPONSIBILITIES

The Senior Leadership Team is responsible for:

- The overall management of the school website, ensuring that all content is up-to-date and relevant, and that any statutory requirements are met.
- Creating, monitoring and updating the school website content, unless otherwise agreed by the headteacher.
- Approving any content, in liaison with the headteacher, that other members of staff wish to publish on the school's website.
- Reporting any problems with the school website to the headteacher.

- Meeting regularly with the headteacher and the governing body to work together to ensure the school website is as effective as possible.

The headteacher is responsible for:

- Assisting the SLT in ensuring that the school's website meets any statutory requirements and that content is appropriate for the site.
- Ensuring that all staff who publish content on the school's website are aware of the relevant child protection, privacy, data protection, libel, defamation, harassment and copyright laws that may apply.
- Ensuring that all members of staff are aware that they are not permitted to express personal opinions on the website and are aware of the consequences of doing so.
- Authors will be accurate, fair and transparent when creating or altering online sources of information.
- Official school website accounts will not be created for trivial reasons.
- All content expressed on the school website, and any social media accounts, will not breach copyright, data protection or freedom of information legislation.

ACCESS AND APPROVAL

The SLT will create and distribute the school website terms of use, which all website content will comply with. Parents, pupils and staff will act in accordance with the terms of use at all times.

All content published on the school website must be approved by the SLT.

All links to external sites will be checked for the suitability of their content for their intended audience.

Parents are permitted to request a paper copy of any information published on the school website, and this will be provided free of charge.

STATUTORY AND RECOMMENDED CONTENT

CONTACT DETAILS

The school publishes:

The name of the school

Postal address

Telephone number

The name of the member of staff who deals with queries from parents and other members of the public

The name and contact details of the SENCO

Name of the headteacher

ADMISSION ARRANGEMENTS

The school publishes the admission arrangements at the school, which are published each year and kept on the website for the whole academic year, including the following:

- How the school considers applications for every age group
- What parents should do if they want to apply for a place at the school for their child
- The school's oversubscription criteria
- How parents can find out about admission arrangements through the LA
- Any variation to the admissions arrangements that may happen during the school year

POLICIES AND PROCEDURES

The school publishes copies of the following policies and procedures:

- Behavioural Policy
- The complaints procedure, including the number of complaints registered under this procedure during the preceding school year
- Arrangements for handling complaints from parents of children with SEND, including information about the support the school provides
- Charging and Remissions Policy
- Child Protection and Safeguarding Policy
- Freedom of Information Policy
- A statement of the school's values and ethos

FREEDOM OF INFORMATION DOCUMENTS

The school publishes:

- The publication scheme, which complies with section 19 of the Freedom of Information Act 2000.
- The 'guide to information'.
- The schedule of fees (included in the guide to information).

ASSESSMENT AND ATTAINMENT INFORMATION

The school publishes details of, or a link to, the school's most recent Ofsted report and a link to the school's performance tables on the DfE website.

The school also publishes its most recent key stage results, including the following: **[KS2]**

- Average progress scores in reading, writing and maths, including the average progress that pupils have made between KS1 and KS2 in reading, writing and maths
- Average 'scaled scores' in reading and maths
- Percentage of pupils who achieved the 'expected standard' or above in reading, writing and maths
- Percentage of pupils who achieved a high level of attainment in reading, writing and maths

CURRICULUM INFORMATION

The school publishes its curriculum information, including the following:

- Curriculum approach and content for each subject and year group, including RE even if it is taught as part of another subject or subjects, or is called something else
- How additional information about the curriculum can be obtained by parents
- The names of any phonics or reading schemes in operation

REMOTE EDUCATION

The school publishes information about its remote education provision, including:

- Curriculum expectations.
- The daily number of hours that we expect pupils to partake in remote learning for each key stage.
- How to access remote education.
- The approaches to remote education that are used in the school, e.g. live teaching.
- Expectations for pupils' engagement.
- Expectations for parental support to pupils during remote education.
- Assessment information.
- What additional support is available for pupils with particular needs.

PUPIL PREMIUM FUNDING

The school publishes its strategy for the use of pupil premium funding per academic year, including information about the following:

- The school's pupil premium allocation
- A summary of the main barriers to educational achievement faced by eligible pupils
- How the school will spend the funding to address those barriers
- How the school will measure the impact of the funding
- The date of the next review of the strategy

For the previous academic year, the school publishes:

- How the funding was spent.
- The effect of the expenditure on eligible and other pupils.

THE PE AND SPORT PREMIUM

The school publishes information surrounding the PE and sport premium, including the following:

- The allocation for the current academic year
- How the funding will be spent
- The effect of the premium on pupils' PE and sport participation and attainment
- How last year's allocation was spent
- How the funding impacted pupils
- How the school will ensure these improvements are sustainable
- How many pupils within the Year 6 cohort can swim competently, confidentially and proficiently over a distance of at least 25 metres; use a range of strokes effectively; and perform safe self-rescue in different water-based situations

SCHOOLS IN RECEIPT OF THE CORONAVIRUS (COVID-19) CATCH-UP PREMIUM ONLY] CORONAVIRUS (COVID-19) CATCH-UP PREMIUM

The school publishes details of how the grant will be spent and how the effect of this expenditure on the educational attainment of those pupils at the school will be assessed.

SEND INFORMATION:

The school publishes:

- A SEN information report on the school's SEND policy, which will be updated annually and updated during the year as a result of any changes.
- Details of how the report complies with the Children and Families Act 2014, the Equality Act 2010 and the Special Educational Needs and Disability Regulations 2014, including the following details:
 - The kinds of special educational needs for which provision is made at the school.
 - Information about the school's policies for the identification and assessment of pupils with special educational needs.
 - Information about the school's policies for making provision for pupils with special educational needs, whether or not pupils have an education, health and care plan.
 - The arrangements for the admission of disabled pupils
 - The steps the school has taken to prevent disabled pupils from being treated less favourably than other pupils
 - The facilities the school provides to help disabled pupils to access the school
 - How the school increases the extent to which disabled pupils can participate in the school's curriculum
 - Plans to improve the physical environment of the school for the purpose of increasing the extent to which disabled pupils are able to take advantage of education and benefits, facilities and services provided or offered by the school
 - Plans to improve the delivery to disabled pupils of information which is readily accessible to pupils who are not disabled

GOVERNANCE INFORMATION

The school publishes up-to-date details of the structure and responsibilities of the governing board and its committees.

The school publishes the following information about each governor:

- Name, data of appointment, terms of office, date they stepped down (where appropriate) and who appointed them
- Business and financial interests
- Governance roles in other educational institutions
- Any material interests arising from relationships between governors or relationships between governors and school staff, e.g. spouses
- Attendance record at governing board and committee meetings over the last academic year

FINANCIAL INFORMATION

The school publishes how many school employees, if any, have a gross annual salary of £100,000 or more, in increments of £10,000. The school also includes a link to its dedicated page on the [schools financial benchmarking service](#).

EQUALITY OBJECTIVES

The school publishes the following details:

- How the school is complying with the [public sector equality duty](#), which we will update every year

- The school's equality objectives, which we will update at least once every 4 years

PERFORMANCE TABLES

The school includes a link to the [school and college performance tables](#), as well as our performance tables page.

INFORMATION WE WILL NOT PUBLISH

The school will not publish information which could reveal confidential information about individual members of the school community. Information which is exempt under the Freedom of Information Act 2000, or is otherwise properly considered to be protected from disclosure, will not be published. We will not publish any information in draft form.

Information which is no longer readily available as it is contained in files that have been placed in archive storage, or is difficult to access for similar reasons, will not be published.

All information that is to be published will be checked by both the DSL and the DPO, where appropriate, to ensure that the content is in accordance with safeguarding and data protection regulations.

DATA PROTECTION

School website content will not identify any pupil by their full name nor will the school allow identifying information to be published without the written consent of a parent. Personal details of pupils or staff, such as home addresses, telephone numbers and personal email addresses, will not be hosted on the school website.

Images and videos of pupils will not be published without written consent from a parent. Any images of pupils will not be labelled with their full names. The school website does not feature any close-up pictures of individual pupils – only group photographs with two or more pupils will be published. Pupils are only shown in photos where they are suitably dressed – the DSL will be consulted before photos are published.

Permission is obtained from parents before publishing the work of any pupil. Only the pupil's first name and year group are used to identify the work. Parents have the right to refuse permission for their child's work and/or image to be published on the school website. Those wishing to exercise this right should express their wishes in writing to the headteacher, clearly stating whether they object to work, images or both being published.

The school website uses cookies, also known as internet cookies or web cookies, which are a type of message that is given to a web browser by a web server. The school has a duty to notify users if a cookie is sent to them, which may be stored by their browser on their computer's hard drive. The school may use the information obtained from the cookie in the administration of the school website, to improve the website's usability and for marketing purposes. The school may use the information gathered from the cookie to recognise a user's computer when they visit the school website, and to personalise the school's website for the user.

MODERATING AND REVIEWING WEBSITE CONTENT

All content is moderated and reviewed, using the terms of use as guidance.

The SLT review the content of the school website on a monthly basis and ensure all information is up-to-date.

All external links used on the school website site are checked and monitored to ensure that they are safe and appropriate for the intended audience.

WEBSITE DISCLAIMER

The information on the school website is provided free-of-charge, and therefore, the school believes that it would be unreasonable to hold the school liable in respect of the website and the information on the website. The school ensures that the information on the website is correct and kept up-to-date as much as possible.

To the maximum extent permitted by applicable law, the school excludes all representations, warranties and conditions.

An appropriate disclaimer features on the website, outlining the school's legal position and interests in terms of the use of the website.

The school will not be liable for any direct, indirect or consequential loss or damage arising under this disclaimer or in connection with the school website, whether arising in tort, contract, or otherwise – including, without limitation, any loss of profit, contracts, business, goodwill, data, income, revenue or anticipated savings.

The school will review and revise the disclaimer annually.

LICENSE TO USE THE WEBSITE

Parents and the public may view and download school website content for caching purposes only, and print pages from the website, provided that:

- Material is not republished or reproduced from this website (including republication on another website) in any public or private electronic retrieval system.
- Material on the school website is not reproduced, duplicated, copied, sold or otherwise exploited for a commercial purpose, without the school's express written consent.

BREACHES OF THIS POLICY

Any breach of this policy may lead to disciplinary action being taken against the staff member(s) involved, in line with the school's Disciplinary Policy and Procedure. Any action that is taken against breaches of this policy will be in accordance with the relevant disciplinary procedures. Breaches of confidentiality, defamation or damage to the reputation of the school may result in disciplinary action or dismissal.