



DATA SECURITY POLICY - July 2020

1. Data security

- 1.1. Confidential paper records will be kept in a locked filing cabinet, drawer or safe, with restricted access.
- 1.2. Confidential paper records will not be left unattended or in clear view anywhere with general access.
- 1.3. 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.
- 1.4. Where data is saved on removable storage or a portable device, the device will be kept in a locked filing cabinet, drawer or safe when not in use.
- 1.5. Memory sticks will not be used to hold personal information unless they are password-protected and fully encrypted.
- 1.6. All electronic devices are password-protected to protect the information on the device in case of theft.
- 1.7. Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- 1.8. All necessary members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.
- 1.9. Emails containing sensitive or confidential information are password-protected if there are unsecure servers between the sender and the recipient.
- 1.10. Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.
- 1.11. When sending confidential information by fax, staff will always check that the recipient is correct before sending.
- 1.12. 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.
- 1.13. Before sharing data, all staff members 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.
- 1.14. 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.
 - 1.15. 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/theft is identified, extra measures to secure data storage will be put in place.
 - 1.16. **Margaret Roper Primary School** takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action.
 - 1.17. The Senior Leadership Team is responsible for continuity and recovery measures are in place to ensure the security of protected data.

2. Data retention

- 2.1. Data will not be kept for longer than is necessary.
- 2.2. Unrequired data will be deleted as soon as practicable.
- 2.3. 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.
- 2.4. Paper documents will be shredded or pulped, and electronic memories scrubbed clean or destroyed, once the data should no longer be retained.

(Only those records where there may be a data protection issue are listed)

Basic File Description	Data Protection Issue	Retention Period	Action at end of admin life of record
Child Protection Files	Yes	Retain for time pupil in school	Transfer to new school
		If destination is unknown this is DOB +25 years.	Secure disposal
Staff Personal Files	Yes	Termination + 15 years	Secure disposal
Annual appraisal/assessment records	Yes	Current year + 5 years	Secure disposal
Health & Safety -Adults	Yes	Date of incident +7 years	Secure disposal
Records relating to injury at work		Date of injury + 12 years	
Health & Safety -Children	Yes	DOB +25 years	Secure disposal

Incident reports	Yes	Current year + 20 years	Secure disposal
Risk Assessments	Yes	Current year + 3 years	Secure disposal
Finance	Yes	Current year + 6 years	Secure disposal
Pupil Files (Primary)	Yes	Retain for time pupil in school	Transfer to new school
Recruitment application information - unsuccessful candidates	Yes	1 year after the post has been filled	Secure disposal
Complaints requiring the involvement the governing body	Yes	6 years after resolution	Secure disposal
Insurance claims against the school	Yes	2 years after the case is closed	Secure disposal
Admissions - if the applicant is unsuccessful	Yes	1 year after application (or in the case of appeals 1 year after resolution of appeal)	Secure disposal
Governing body and committee signed minutes	No	7 years	Disposal

Reviewed and Approved by Governors on _____ (date)