# Data Protection Policy

ST CLARE
Catholic Multi Academy Trust

St Wilfrid's Primary School Mission Statement:

Everybody Matters

**Adopted by St Clare Trust Board;** June 2022

**Next review by St Clare Trust Board;** December 2026

## St Clare Catholic Multi Academy Trust Data Protection Policy

This policy should be read in conjunction with the following documents:

- Privacy Notice for Pupils
- Privacy Notice for the Trust Workforce
- Privacy Notice for Governors
- Privacy Notice for Job Applicants
- Privacy Notice – Common to All
- Privacy Notice for Trust/School Trips
- Privacy Notice for Payroll
- Images Policy for Pupils
- Images Policy for the Trust/School Workforce

St Clare Multi Academy Trust is registered with the Information Commissioner's Office. The registration number is ZB288989.

The Data Protection Officer (DPO) for the trust is Adnan Bashir. The DPO can be contacted by phone on 0114 256 6401 (Ask for St Clare Multi Academy Trust) or via the contact form on the trust website https://www.stclarecmat.org.uk/contact-us/

However, our data protection lead has day-to-day responsibility for data protection issues in our Trust/School. If you have any questions, concerns or would like more information about anything mentioned in this policy, please contact Mrs Evans, enquries@stwilfridssheffield.co.uk, 0114 2365529.

### Roles and Responsibilities

Data Controller – determines the purposes and means of processing personal data. The Data Controller has an obligation to ensure that contracts with Data Processors comply with the General Data Protection Regulation.

Data Processor – responsible for processing personal data on behalf of a Data Controller. The Data Processor is required to maintain records of personal data and processing activities, and will have legal liability if the Data Processor is responsible for a breach.

### General Data Protection Regulation (GDPR) May 2018

The GDPR is European-wide legislation is an update to the 1998 Data Protection Act. As a Public Organisation, the Trust/School has a statutory duty to adhere to the GDPR.

The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way we collect information about people.

The GDPR applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria. This could include chronologically ordered sets of manual records containing personal data.

The GDPR refers to sensitive personal data, including genetic data, and biometric data where processed to uniquely identify an individual.

The principles of the GDPR state that personal data shall be:

a) Processed lawfully, fairly and in a transparent manner in relation to individuals;

b) 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;

c) Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

d) 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;

e) 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 GDPR in order to safeguard the rights and freedoms of individuals; and

f) 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.

With regards to e) above, although our privacy statements draw specific attention to the storage of particular types of personal data, unless stated otherwise in a privacy statement, the Trust/School will adhere to the Information Records Management Society Retention Schedule, which is included in Appendix A.

## Data Protection Officer (DPO)

The CEO will appoint a Data Protection Officer. As per Article 39 of the GDPR, the DPO must:

- Inform and advise the organisation and its employees about their obligations to comply with the GDPR and other data protection laws;
- Monitor compliance with the GDPR and other data protection laws, including managing internal data protection activities, advise on data protection impact assessments, train staff, and conduct internal audits;
- Be the first point of contact for supervisory authorities and for individuals whose data is processed (employees, customers etc).

The DPO keeps a record of those staff who have attended Data Protection training. The DPO reports to the CEO.

The DPO operates independently and will not be dismissed or penalised for carrying out the role.

Adequate resources are provided to enable the DPO to meet their GDPR obligations.

## Privacy Notices

The Trust/School has a Privacy Notice for Pupils, and for the Trust Workforce, outlining:

- The legal basis on which we collect and process personal data, and what we use the data for;
- The categories of personal data that we collect and process;
- Details of who we share personal data with; The length of time that we retain personal data.

The Privacy Notice makes explicit an individual's rights under the GDPR.

The Privacy Notice provides contact details for all enquiries relating to Data Protection in the trust/school.

Any documentation where we collect personal data from individuals will contain a reference that

clearly signposts the Privacy Notice.

## Sharing Personal Data

The Trust/School will share personal data with other Data Controllers where required to do so by law, only to the extent required by the relevant law. The Trust/School will only do so if there is a legal basis for the data sharing, and will include details of such data sharing in its Privacy Notices.

A Data Processor is an individual or organisation (a third party) who processes personal data on our behalf. Whenever a Data Controller uses a Data Processor, it needs to have a written contract in place, so that both parties understand their obligations, responsibilities and liabilities. The Trust/School will only appoint Data Processors who can provide 'sufficient guarantees' that the requirements of the GDPR will be met and the rights of data subjects will be protected.

Where the data sharing is not undertaken on a statutory basis, (for example pupil images for Trust/School photographs, passport details with travel companies for students on a foreign Trust/School trip), we will ensure that we have either:

- a contractual agreement for the sharing of data with the company concerned demonstrating compliance to GDPR*, or;

- in those situations where pupils are using educational websites as part of their curriculum and we are not able to obtain a signed contract from the website concerned, we will require as a minimum a copy of an up-to-date privacy statement from the company that satisfactorily demonstrates their compliance to GDPR for the purposes of the data sharing concerned.

As a matter of good practice, our contracts:

- State that nothing within the contract relieves the Data Processor of its own direct responsibilities and liabilities under the GDPR; and
- Reflect any indemnity that has been agreed.

### Data Breaches

The DPO will maintain a register of data breaches. The template for recording data breaches is provided in Appendix D.

Where a data breach is likely to result in a risk to the rights and freedoms of individuals (for example if unaddressed the breach is likely to result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage) the DPO will report the breach to the supervisory authority (currently the Information Commissioner's Office) within 72 hours of the breach.

Where a breach is likely to result in a high risk to the rights and freedoms of individuals, the DPO will notify those concerned directly. A 'high risk' means the threshold for notifying individuals is higher than for notifying the relevant supervisory authority.

### Data Retention

The Trust/School will adhere to statutory guidance relating to the retention of personal data.

The Trust/School will adhere to the operational guidance provided by the Information Records Management Society.

The Trust/School's Data Retention Schedule is contained in Appendix A.

Data destruction involves the disposal of paper copies of the personal data, and deletion of electronic files from the Trust/School system. All staff will ensure that they are not retaining paper records or electronic files containing personal data for longer than the period indicated in the Trust/School's Data Retention Schedule.

The Trust/School keeps an electronic back up of the computer systems. Back-up data may be retained in a back-up format for a longer period than recommended by the Information Records Management Society. This is unavoidable, given the finite resources of the organisation.

### Data Protection Impact Assessment (DPIA)

A Data Protection Impact Assessment will be carried out whenever an individual or group of individuals within the organisation is considering a project that:

- Involves sharing personal data with a company or organisation that is not listed in a Privacy Notice, or for a purpose different to that stated in a Privacy Notice;
- Alters a Trust/School system in such a way as to involve a substantial change to the way in which personal data is processed.

This includes sharing data with companies that are not explicitly named in a Privacy Notice (e.g. a travel company who are providing a Trust/School trip).

The first stage of the Data Protection Impact Assessment is the project leader considering the questions listed in Appendix E (DPIA Part 1).

If the answer to any of the questions in Appendix E is 'yes', the project leader will complete Appendix F (DPIA Part 2).

# Management of the Trust/School

This section contains retention periods connected to the general management of the Trust/School. This covers the work of the Directors, Local Academy Committee, Trust Executive Team (e.g. CEO and CFO), the Headteacher and the senior management team, the admissions process and operational administration.

| **1.1 Trust Board/Local Academy Committee** | | | | | | | |
|---|---|---|---|---|---|---|---|
| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
| 1.1.1 | Agendas for Trust Board/Local Academy Committee meetings | There may be data protection issues if the meeting is dealing with confidential issues relating to staff | | One copy should be retained with the master set of minutes. All other copies can be disposed of | SECURE DISPOSAL[1] | Yes | CLK |
| 1.1.2 | Minutes of Trust Board/Local Academy Committee meetings | There may be data protection issues if the meeting is dealing with confidential issues relating to staff | | | | Yes | CLK |
| | Principal Set (signed) | | | PERMANENT | If the Trust/School is unable to store these then they should be offered to the County Archives Service | | |
| | Inspection Copies[2] | | | Date of meeting + 3 years | If these minutes contain any sensitive, personal information they must be shredded. | | |

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

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

| 1.1 Trust Board/Local Academy Committee | | | | | | | |
|---|---|---|---|---|---|---|---|
| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
| 1.1.3 | Reports presented to the Trust Board/Local Academy Committee | There may be data protection issues if the report deals with confidential issues relating to staff | | Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently | SECURE DISPOSAL or retain with the signed set of the minutes | Yes | CLK |
| 1.1.4 | Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002 | No | Education Act 2002, Section 33 | Date of the meeting + a minimum of 6 years | SECURE DISPOSAL | No | |
| 1.1.5 | Instruments of Government including Articles of Association | No | | PERMANENT | These should be retained in the Trust/School whilst the Trust/School is open and then offered to County Archives Service when the Trust/School closes. | No | |
| 1.1.6 | Trusts and Endowments managed by the Trust Board/Local Academy Committee | No | | PERMANENT | These should be retained in the Trust/School whilst the Trust/School is open and then offered to County Archives Service when the | No | |
| 1.1.7 | Action plans created and administered by the Trust Board/Local Academy | No | | Life of the action plan + 3 years | SECURE DISPOSAL | No | |
| 1.1.8 | Policy documents created and administered by the Trust | No | | Life of the policy + 3 years | SECURE DISPOSAL | No | |
| 1.1.9 | Records relating to complaints dealt with by the Trust Board/Local Academy Committee | Yes | | Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes | SECURE DISPOSAL | Yes | CLK |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 1.1.10 | Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 | No | Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171 | Date of report + 10 years | SECURE DISPOSAL | No | |
| 1.1.11 | Proposals concerning the change of status of a maintained Trust/School including Specialist Status Trust/Schools and Academies | No | | Date proposal accepted or declined + 3 years | SECURE DISPOSAL | No | |

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

**1.2 CEO, CFO, Headteacher and School/Trust Senior Management Teams**

| | Basic file description | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|---|---|---|---|---|---|---|---|
| 1.2.1 | Log books of activity in the Trust/School maintained by the CEO/Head Teacher | There may be data protection issues if the log book refers to individual pupils or members of staff | | Date of last entry in the book + a minimum of 6 years then review | These could be of permanent historical value and should be offered to the County Archives Service if appropriate | Yes | PA |
| 1.2.2 | Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies | There may be data protection issues if the minutes refers to individual pupils or members of staff | | Date of the meeting + 3 years then review | SECURE DISPOSAL | Yes | PA |
| 1.2.3 | Reports created by the CEO/Head Teacher or the Management Team | There may be data protection issues if the report refers to individual pupils or members of staff | | Date of the report + a minimum of 3 years then review | SECURE DISPOSAL | Yes | PA |
| 1.2.4 | Records created by CEO, CFO, head teachers, deputy head teachers, other executive staff or school leaders and other members of staff with administrative responsibilities | There may be data protection issues if the records refer to individual pupils or members of staff | | Current academic year + 6 years then review | SECURE DISPOSAL | Yes | PA |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 1.2.5 | Correspondence created by CEO, CFO, head teachers, deputy head teachers, other executive staff or school leaders and other members of staff with administrative responsibilities | There may be data protection issues if the correspondence refers to individual pupils or members of staff | | Date of correspondence + 3 years then review | SECURE DISPOSAL | Yes | PA |
| 1.2.6 | Professional Development Plans | Yes | | Life of the plan + 6 years | SECURE DISPOSAL | Yes | PA |
| 1.2.7 | Trust/School Development Plans | No | | Life of the plan + 3 years | SECURE DISPOSAL | No | |

| 1.3 Admissions Process | | | | | | | |
|---|---|---|---|---|---|---|---|
| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
| 1.3.1 | All records relating to the creation and implementation of the Trust/School Admissions' Policy | No | Trust/School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, Trust/Schools adjudicators and admission appeals panels December 2014 | Life of the policy + 3 years then review | SECURE DISPOSAL | No | |
| 1.3.2 | Admissions – if the admission is successful | Yes | Trust/School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, Trust/Schools adjudicators and admission appeals panels December 2014 | Date of admission + 1 year | SECURE DISPOSAL | Yes | BSO |
| 1.3.3 | Admissions – if the appeal is unsuccessful | Yes | Trust/School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, Trust/Schools adjudicators and admission appeals panels December 2014 | Resolution of case + 1 year | SECURE DISPOSAL | Yes | BSO |
| 1.3.4 | Register of Admissions | Yes | Trust/School attendance: Departmental advice for maintained Trust/Schools, academies, independent Trust/Schools and local authorities October 2014 | Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made. | REVIEW<br>Trust/Schools may wish to consider keeping the admission register permanently as often Trust/Schools receive enquiries from past pupils to confirm the dates they attended the Trust/School. | Yes | BSO |
| 1.3.5 | Admissions – Secondary Trust/Schools – Casual | Yes | | Current year + 1 year | SECURE DISPOSAL | Yes | AM |

| 1.3 Admissions Process | | | | | | | |
|---|---|---|---|---|---|---|---|
| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
| 1.3.6 | Proofs of address supplied by parents as part of the admissions process | Yes | Trust/School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, Trust/Schools adjudicators and admission appeals panels December 2014 | Current year + 1 year | SECURE DISPOSAL | Yes | BSO |
| 1.3.7 | Supplementary Information form including additional information such as religion, medical conditions etc | Yes | | | | Yes | BSO |
| | For successful admissions | | | This information should be added to the pupil file | SECURE DISPOSAL | | |
| | For unsuccessful admissions | | | Until appeals process completed | SECURE DISPOSAL | | |

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



This table has been taken from guidance published as the Information Management Toolkit for

# Human Resources

This section deals with all matters of Human Resources management within the Trust/School.

| **2.1 Recruitment** | | | | | | | |
|---|---|---|---|---|---|---|---|
| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
| 2.1.1 | All records leading up to the appointment of a new CEO or Head Teacher | Yes | | Date of appointment + 6 years | SECURE DISPOSAL | Yes | HR |
| 2.1.2 | All records leading up to the appointment of a new member of staff – unsuccessful candidates | Yes | | Date of appointment of successful candidate + 6 months | SECURE DISPOSAL | Yes | HR |
| 2.13 | All records leading up to the appointment of a new member of staff – successful candidate | Yes | | All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months | SECURE DISPOSAL | Yes | HR |
| 2.1.4 | Pre-employment vetting information – DBS Checks | No | DBS Update Service Employer Guide June 2014: Keeping children safe in education. July 2015 (Statutory Guidance from | The Trust/School does not have to keep copies of DBS certificates. If the Trust/School does so the copy must NOT be retained for more than 6 months | | Yes | HR |
| 2.1.5 | Proofs of identity collected as part of the process of checking "portable" enhanced DBS disclosure | Yes | | Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff's personal file | | Yes | HR |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 2.1.6 | Pre-employment vetting information – Evidence proving the right to work in the United Kingdom[4] | Yes | An employer's guide to right to work checks [Home Office May 2015] | Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years | | Yes | HR |

[4] Employers are required to take a "clear copy" of the documents which they are shown as part of this process.

**2.2 Operational Staff Management**

| | Basic file description | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|---|---|---|---|---|---|---|---|
| 2.2.1 | Staff Personal File | Yes | Limitation Act 1980 (Section 2) | Termination of Employment + 6 years | SECURE DISPOSAL | Yes | HR |
| 2.2.2 | Timesheets | Yes | | Current year + 6 years | SECURE DISPOSAL | Yes | HR |
| 2.2.3 | Annual appraisal/ assessment records | Yes | | Current year + 5 years | SECURE DISPOSAL | Yes | HR |

| 2.3 Management of Disciplinary and Grievance Processes | | | | | | | |
|---|---|---|---|---|---|---|---|
| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data | Owner |
| 2.3.1 | Allegation of a child protection nature against a member of staff including where the allegation is unfounded[5] | Yes | "Keeping children safe in education Statutory guidance for schools and colleges March 2022"; "Working together to safeguard children. A guide to interagency working to safeguard and promote the welfare of children March 2015" | Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned | SECURE DISPOSAL<br>These records must be shredded | Yes | HR |
| 2.32 | Disciplinary Proceedings | Yes | | | SECURE DISPOSAL<br>These records must be shredded | Yes | HR |
| | Oral Warning | | | Date of warning[6] + 6 months | | | |
| | Written Warning – Level 1 | | | Date of warning[6] + 6 months | | | |
| | Written Warning – Level 2 | | | Date of warning[6] + 12 months | | | |
| | Final Warning | | | Date of warning[6] + 18 months | | | |
| | Case not found | | | If the incident is child protection related then<br>see above otherwise dispose of at the conclusion of the case | SECURE DISPOSAL | | |

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

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

| 1.4 Operational Administration | | | | | | | |
|---|---|---|---|---|---|---|---|
| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
| 2.4.1 | Health and Safety Policy Statements | No | | Life of policy + 3 years | SECURE DISPOSAL | | |
| 2.4.2 | Health and Safety Risk Assessments | No | | Life of risk assessment + 3 years | SECURE DISPOSAL | | |
| 2.4.3 | Records relating to accident/ injury at work | Yes | | Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied | SECURE DISPOSAL | Yes | HR |
| 2.4.4 | Accident Reporting | Yes | Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 | | | Yes | HR |
| | Adults | | | Date of the incident + 6 years | SECURE DISPOSAL | | |
| | Children | | | DOB of the child + 25 years | SECURE DISPOSAL | | |
| 2.4.5 | Control of Substances Hazardous to Health (COSHH) | No | Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2) | Current year + 40 years | SECURE DISPOSAL | No | |
| 2.4.6 | Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos | No | Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19 | Last action + 40 years | SECURE DISPOSAL | No | |
| 2.4.7 | Process of monitoring of areas where employees and persons are likely to have become in contact with radiation | No | | Last action + 50 years | SECURE DISPOSAL | No | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 2.4.8 | Fire Precautions log books | No | | Current year + 6 years | SECURE DISPOSAL | No | |

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

# Financial Management of the Trust/School

This section deals with all aspects of the financial management of the Trust/School including the administration of Trust/School meals.

| **3.1 Risk Management and Insurance** | | | | | | | |
|---|---|---|---|---|---|---|---|
| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
| 3.1.1 | Employer's Liability Insurance Certificate | No | | Closure of the Trust/School + 40 years | SECURE DISPOSAL | No | |

## 3.2 Asset Management

| | Basic file description | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|---|---|---|---|---|---|---|---|
| 3.2.1 | Inventories of furniture and equipment | No | | Current year + 6 years | SECURE DISPOSAL | No | |
| 3.2.2 | Burglary, theft and vandalism report forms | No | | Current year + 6 years | SECURE DISPOSAL | Yes | SBM |

## 3.3 Accounts and Statements including Budget Management

| | Basic file description | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|---|---|---|---|---|---|---|---|
| 3.3.1 | Annual Accounts | No | | Current year + 6 years | STANDARD DISPOSAL | Yes | SBM/CFO |
| 3.3.2 | Loans and grants managed by the Trust/School | No | | Date of last payment on the loan + 12 years then REVIEW | SECURE DISPOSAL | Yes | SBM/CFO |
| 3.3.3 | Student Grant applications | Yes | | Current year + 3 years | SECURE DISPOSAL | Yes | SBM/CFO |
| 3.3.4 | All records relating to the creation and management of budgets including the Annual Budget statement and background papers | No | | Life of the budget + 3 years | SECURE DISPOSAL | Yes | SBM/CFO |
| 3.3.5 | Invoices, receipts, order books and requisitions, delivery notices | No | | Current financial year + 6 years | SECURE DISPOSAL | Yes | SBM/CFO |
| 3.3.6 | Records relating to the collection and banking of monies | No | | Current financial year + 6 years | SECURE DISPOSAL | Yes | SBM/CFO |
| 3.3.7 | Records relating to the identification and collection of debt | No | | Current financial year + 6 years | SECURE DISPOSAL | Yes | SBM/CFO |

| 3.4 Contract Management | | | | | | | |
|---|---|---|---|---|---|---|---|
| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
| 3.4.1 | All records relating to the management of contracts under seal | No | Limitation Act 1980 | Last payment on the contract + 12 years | SECURE DISPOSAL | Yes | SBM/CFO |
| 3.4.2 | All records relating to the management of contracts under signature | No | Limitation Act 1980 | Last payment on the contract + 6 years | SECURE DISPOSAL | Yes | SBM/CFO |
| 3.4.3 | Records relating to the monitoring of contracts | No | | Current year + 2 years | SECURE DISPOSAL | Yes | SBM/CFO |

**3.5 Trust/School Fund**

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|---|---|---|---|---|---|---|---|
| 3.5.1 | Trust/School Fund - Cheque books | No | | Current year + 6 years | SECURE DISPOSAL | No | |
| 3.5.2 | Trust/School Fund - Paying in books | No | | Current year + 6 years | SECURE DISPOSAL | No | |
| 3.5.3 | Trust/School Fund – Ledger | No | | Current year + 6 years | SECURE DISPOSAL | Yes | SBM/CFO |
| 3.5.4 | Trust/School Fund – Invoices | No | | Current year + 6 years | SECURE DISPOSAL | Yes | SBM/CFO |
| 3.5.5 | Trust/School Fund – Receipts | No | | Current year + 6 years | SECURE DISPOSAL | Yes | SBM/CFO |
| 3.5.6 | Trust/School Fund - Bank statements | No | | Current year + 6 years | SECURE DISPOSAL | Yes | SBM/CFO |
| 3.5.7 | Trust/School Fund – Journey Books | No | | Current year + 6 years | SECURE DISPOSAL | Yes | SBM/CFO |

**3.6 Trust/School Meals Management**

| | Basic file description | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|---|---|---|---|---|---|---|---|
| 3.6.1 | Free Trust/School Meals Registers | Yes | | Current year + 6 years | SECURE DISPOSAL | Yes | BSO |
| 3.6.2 | Trust/School Meals Registers | Yes | | Current year + 3 years | SECURE DISPOSAL | Yes | BSO |
| 3.6.3 | Trust/School Meals Summary Sheets | No | | Current year + 3 years | SECURE DISPOSAL | No | |

# Property Management

This section covers the management of buildings and property.

**4.1 Property Management**

| | Basic file description | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data | Owner |
|---|---|---|---|---|---|---|---|
| 4.1.1 | Title deeds of properties belonging to the Trust/School | No | | PERMANENT<br>These should follow the property unless the property has been registered with the Land Registry | | No | |
| 4.1.2 | Plans of property belong to the Trust/School | No | | These should be retained whilst the building belongs to the Trust/School and should be passed onto any new owners if the building is leased or sold. | | No | |
| 4.1.3 | Leases of property leased by or to the Trust/School | No | | Expiry of lease + 6 years | SECURE DISPOSAL | Yes | SBM/CFP |
| 4.1.4 | Records relating to the letting of Trust/School premises | No | | Current financial year + 6 years | SECURE DISPOSAL | Yes | SBM |

**4.2 Maintenance**

| | Basic file description | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|---|---|---|---|---|---|---|---|
| 4.2.1 | All records relating to the maintenance of the Trust/School carried out by contractors | No | | Current year + 6 years | SECURE DISPOSAL | Yes | SBM/CFO |
| 4.2.2 | All records relating to the maintenance of the Trust/School carried out by Trust/School employees including | No | | Current year + 6 years | SECURE DISPOSAL | Yes | SBM/CFO |

# Pupil Management

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

**5.1 Pupil's Educational Record**

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|---|---|---|---|---|---|---|---|
| 5.1.1 | Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 | Yes | The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 | | | Yes | DSL |
| | Primary | | | Retain whilst the child remains at the primary Trust/School | The file should follow the pupil when he/she leaves the primary Trust/School. This will include: • to another primary Trust/School<br>• to a secondary Trust/School<br>• to a pupil referral unit<br>• If the pupil dies whilst at primary Trust/School the file should be returned to the Local Authority to be retained for the statutory retention period.<br>If the pupil transfers to an independent Trust/School, transfers to home Trust/Schooling or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention period. Primary Trust/Schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the | | |
| | Secondary | | Limitation Act 1980 (Section 2) | Date of Birth of the pupil + 25 years | SECURE DISPOSAL | | |
| 5.1.2 | Examination Results – Pupil Copies | Yes | | | | Yes | DSL |
| | Public | | | This information should be added to the pupil file | All uncollected certificates should be returned to the examination board. | | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| | Internal | | | This information should be added to the pupil file | | | |

**5.1 Pupil's Educational Record**

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|---|---|---|---|---|---|---|---|
| This review took place as the Independent Inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention | | | | | | | |
| 5.1.3 | Child Protection information held on pupil file | Yes | "Keeping children safe in education Statutory guidance for Trust/Schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015" | If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file. | SECURE DISPOSAL – these records MUST be shredded | Yes | DSL |
| 5.1.4 | Child protection information held in separate files | Yes | "Keeping children safe in education Statutory guidance for Trust/Schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015" | DOB of the child + 25 years then review. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record | SECURE DISPOSAL – these records MUST be shredded | Yes | DSL |

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

### 5.2 Attendance

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|---|---|---|---|---|---|---|---|
| 5.2.1 | Attendance Registers | Yes | Trust/School attendance: Departmental advice for maintained Trust/Schools, academies, independent Trust/Schools and local authorities | Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made. | SECURE DISPOSAL | Yes | DSL |
| 5.2.2 | Correspondence relating to authorized absence | | Education Act 1996 Section 7 | Current academic year + 2 years | SECURE DISPOSAL | Yes | DSL |

### 5.3 Special Educational Needs

| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
|---|---|---|---|---|---|---|---|
| 5.3.1 | Special Educational Needs files, reviews and Individual Education Plans | Yes | Limitation Act 1980 (Section 2) | Date of Birth of the pupil + 25 years | REVIEW<br>NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than | Yes | SENCO |
| 5.3.2 | Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement | Yes | Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1 | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold | Yes | SENCO |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 5.3.3 | Advice and information provided to parents regarding educational needs | Yes | Special Educational Needs and Disability Act 2001 Section 2 | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold | Yes | SENCO |
| 5.3.4 | Accessibility Strategy | Yes | Special Educational Needs and Disability Act 2001 Section 14 | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold | Yes | SENCO |

# Curriculum Management

| **6.1 Statistics and Management Information** | | | | | | | |
|---|---|---|---|---|---|---|---|
| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
| 6.1.1 | Curriculum Returns | No | | Current year + 3 years | SECURE DISPOSAL | Yes | BSO |
| 6.1.2 | Examination Results (School's Copy) | Yes | | Current year + 6 years | | Yes | N/A |
| | SATS Results | | | The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison | | | |
| | Examination Papers | | | The examination papers should be kept until any appeals/validation process is complete | | | |
| 6.1.3 | Published Admission Number (PAN) Reports | No | | Current year + 6 years | | No | BSO |
| 6.1.4 | Value Added and Contextual Data | No | | Current year + 6 years | | Yes | AS |
| 6.1.5 | Self-Evaluation Forms | No | | Current year + 6 years | | Yes | AS |

S

| 6.2 Implementation of Curriculum | | | | | | | |
|---|---|---|---|---|---|---|---|
| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
| 6.2.1 | Schemes of Work | No | | Current year + 1 year | It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL | No | |
| 6.2.2 | Timetable | No | | Current year + 1 year | | Yes | AS |
| 6.2.3 | Class Record Books | No | | Current year + 1 year | | Yes | AS |
| 6.2.4 | Mark Books | No | | Current year + 1 year | | Yes | AS |
| 6.2.5 | Record of homework set | No | | Current year + 1 year | | Yes | AS |
| 6.2.6 | Pupils' Work | No | | Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not the Trust/School's policy then current year + 1 year | SECURE DISPOSAL | Yes | AS |

# Extra Curricular Activities

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

| 7.2 Walking Bus | | | | | | | |
|---|---|---|---|---|---|---|---|
| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
| 7.2.1 | Walking Bus Registers | Yes | | Date of register + 3 years<br>This takes into account the fact that if there is an incident requiring an accident report the register will be submitted with the accident report and kept for the period of time required for accident reporting | SECURE DISPOSAL<br>[If these records are retained electronically any back up copies should be destroyed at the same time] | Yes | N/A |

| 7.3 Family Liaison Officers and Home Trust/School Liaison Assistants | | | | | | | |
|---|---|---|---|---|---|---|---|
| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Personal Data? | Owner |
| 7.3.1 | Day Books | Yes | | Current year + 2 years then review | | Yes | DSL |
| 7.3.2 | Reports for outside agencies - where the report has been included on the case file created by the outside agency | Yes | | Whilst child is attending Trust/School and then destroy | | Yes | DSL |
| 7.3.3 | Referral forms | Yes | | While the referral is current | | Yes | DSL |
| 7.3.4 | Contact data sheets | Yes | | Current year then review, if contact is no longer active then destroy | | Yes | DSL |
| 7.3.5 | Contact database entries | Yes | | Current year then review, if contact is no longer active then destroy | | Yes | DSL |
| 7.3.6 | Group Registers | Yes | | Current year + 2 years | | Yes | DSL |

# Central Government and Local Authority

This section covers records created in the course of interaction between the Trust/School and the local authority.

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

| 8.2 Central Government | | | | | | | |
|---|---|---|---|---|---|---|---|
| Basic file description | | Data Protection Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record | Person Data? | Owner |
| 8.2.1 | OFSTED reports and papers | No | | Life of the report then REVIEW | SECURE DISPOSAL | Yes | BSO |
| 8.2.2 | Returns made to central government | No | | Current year + 6 years | SECURE DISPOSAL | Yes | SBM/CFO |
| 8.2.3 | Circulars and other information sent from central government | No | | Operational use | SECURE DISPOSAL | Yes | SBM/CFO |

This section lists those personnel who have been assigned a role within this document.

| Role | Name of Personnel | Location |
|---|---|---|
| Clerk (CLK) | Learn Sheffield Governance team | Learn Sheffield |
| Business Support Officer (BSO) | Alison Clack | St Wilfrid's |
| School Business Manager (SBM) | Mrs Binns | St Wilfrid's |
| CFO | Trust Central Team | Trust |
| HR Lead * (HR)<br>*This may be the SBM in some settings | Trust Central Team | Trust |
| Designated Safeguarding Lead (DSL) | Mrs Evans | St Wilfrid's |
| SENCO | Mrs Wilde | St Wilfrid's |
| Trips and Visits Lead (TVL) | Delia Evans | St Wilfrid's |
| All Staff (AS) | All Staff | |
| | | |

Our contracts include the following compulsory details:

1. The subject matter and duration of the processing;
2. The nature and purpose of the processing;
3. The type of personal data and categories of data subject; and
4. The obligations and rights of the Data Controller.

Our contracts include the following compulsory terms:

a. The Processor must only act on the written instructions of the Controller (unless required by law to act without such instructions);

b. The Processor must ensure that people processing the data are subject to a duty of confidence;

c. The Processor must take appropriate measures to ensure the security of processing;

d. The Processor must only engage a sub-processor with the prior consent of the Data Controller and a written contract;

e. The Processor must assist the Data Controller in providing subject access and allowing data subjects to exercise their rights under the GDPR;

f. The Processor must assist the Data Controller in meeting its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessments;

g. The Processor must delete or return all personal data to the Controller as requested at the end of the contract; and

h. The Processor must suSBMit to audits and inspections, provide the Controller with whatever information it needs to ensure that they are both meeting their Article 28 obligations, and tell the Controller immediately if it is asked to do something infringing the GDPR or other data protection law of the EU or a member state.

As a matter of good practice, our contracts:

i. State that nothing within the contract relieves the Processor of its own direct responsibilities and liabilities under the GDPR; and

ii. Reflect any indemnity that has been agreed.

| **Details of the Data Protection Breach** | |
|---|---|
| Date of incident: | |
| Please describe the incident in as much detail as possible. | |
| | |
| What measures did the Trust/School have in place to prevent an incident of this nature occurring? | |
| | |
| Please provide extracts of any policies & procedures the Trust/School has in place that you consider to be relevant to this incident, and explain which of these were in existence at the time this incident occurred. Please provide the dates on which they were implemented. | |
| | |

| **Personal data placed at risk** | |
|---|---|
| What personal data has been placed at risk? | |
| | |
| How many individuals were affected? | |
| Are the affected individuals aware that the incident has occurred? | |
| | |
| Has the data placed at risk now been recovered? If so please provide details of how and when. | |
| | |
| What steps has the Trust/School taken to prevent a recurrence of this incident? | |
| | |

| **Training and Guidance** |
|---|
| Does the Trust/School provide its staff with training on the requirements of Data Protection legislation? If so, please provide any extracts relevant to this incident. |
| |
| Please confirm if training is mandatory for all staff. Had the staff members involved in this incident received training and if so when? |

| |
|---|
| |
| Does the Trust/School provide any detailed guidance to staff on the handling of personal data in relation to the |
| incident you are reporting? If so, please provide any extracts relevant to this incident here. |

Appendix D – Data Protection Breach Register

| **Previous contact with the Information Commissioner's Office (ICO)** | |
|---|---|
| Have you reported any previous incidents to the ICO in the last two years? | |
| If the answer to the above question is yes, please provide brief details, including the date that it was reported and the ICO reference number. | |
| | |

| **Miscellaneous** | |
|---|---|
| Have you notified any other data protection authorities about this incident? | |
| If the answer to the above question is yes, please provide details. | |
| | |
| Have you informed the police about this incident? | |
| If the answer to the above question is yes, please provide details. | |
| | |
| Have you informed any other regulatory authorities about this incident? | |
| If the answer to the above question is yes, please provide details. | |
| | |
| Has there been any media coverage about this incident? | |
| If the answer to the above question is yes, please provide details. | |
| | |

These questions will help you to decide whether a more detailed Data Protection Impact Assessment is necessary.

If the answer to any of the following questions is 'yes' then you **must** complete the Data Protection Impact Assessment Part 2 outlined in Appendix F, and lodge the completed Part 2 form with the Data Protection Officer.

| Brief outline of the project | |
|---|---|
| | |
| Name of the person completing this form: | |
| Date: | |

1. Will the project involve the collection of new personal data about individuals?
2. Will the project compel individuals to provide personal data about themselves?
3. Will personal data about individuals be disclosed to organisations or people who have not previously had routine access to the data? This includes different departments and other Trust/Schools (including Teaching Trust/Schools).
4. Will you be using personal data about individuals for a purpose it was not originally collected for?
5. Does the project involve you using new technology which might be perceived as being privacy intrusive?
6. Will the project result in you making decisions or taking action against individuals in ways which can have a significant impact on them?
7. Is the personal data of a kind particularly likely to raise privacy concerns or expectations? For example employees' records or pupils' educational records.
8. Will the project require you to contact individuals in ways which they may find intrusive?

If you answered 'yes' to any of the questions in Appendix E, then you must complete the table below.

If you are unsure of the process, you must speak to the Data Protection Officer.

| **Step one: Identify the need for a DPIA** |
|---|
| Explain what the project aims to achieve.<br>What are the benefits to the Trust/School, to individuals and to other parties? |
| |
| Summarise why the need for a DPIA was identified. |
| |

| **Step two: Describe the information flows** |
|---|
| Summarise how personal data will be collected, used, stored, secured and deleted during the project. |
| |
| Summarise which employees/departments/external organisations will have access to personal data during the project that would not usually be able to access the personal data. |
| |

| **Step three: Identify the privacy and related risks** | | | | | |
|---|---|---|---|---|---|
| Identify the key privacy risks and the associated compliance and corporate risks. | | | | | |
| **Privacy issue** | **Risk to individuals / Compliance Risk**[7] | **Consultation / Actions to be taken** | **Detail Privacy Solutions identified** | **Evaluate Privacy Solutions** Is the final impact on individuals a justified, compliant and proportionate response to the aims of the project? | **Detail Approved Solution** |
| | | | | | |
| | | | | | |

[7] The following are possible risks to individuals that should be considered:

- Information being shared inappropriately through inadequate disclosure controls.
- Information being used for a new purpose without the individual's knowledge.
- New surveillance methods creating an unjustified intrusion on privacy.
- Intrusive measures being taken against individuals as a result of collecting the information.
- The sharing or merging of data sets can allow organisations to collect a much wider set of information than individuals might expect.
- Enabling identifiers to be linked to anonymised data may mean it is no longer safely anonymised.





| **Step four: Integrate the DPIA outcomes into the project plan** | | |
|---|---|---|
| Detail who is responsible for integrating the DPIA outcomes back into the project plan. | | |
| **Action to be taken** | **Responsibility** | **Date for completion** |
| | | |
| | | |
| **Step eight: Post project review** | | |
| Detail the results of the post project review. | | |