Data Protection Governance Framework
Compliance with GDPR

	DATA RETENTION SCHEDULE				
Data item group	**Short term need (event +1 month)**	**Medium term need (pupil at school +1 year)**	**Long term need (pupil at school +5 years)**	**Very long term need (until pupil is aged 25 or older)**	**Justification**
Admissions	PAN 18	Only if applicants are unsuccessful in gaining a place	N/A	N/A	**Admissions files** Admissions data is used extensively from the period of the school receiving it up until the point where children enrol. It is then used for some validation and cross checking of enrolment details. Once enrolled, the child's records in the MIS become the core record. It is important to retain detailed data for a year, any appeals for which richer data about other successful/unsuccessful appeals may be relevant typically happen in the first year. **Information about admissions appeals** When dealing with appeals, having a reasonable history of any other appeals in some detail can be needed to deal with the particular appeal. The information is needed alongside the admissions policies of the time.

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Attainment and Progress			√		**Attainment & Progress** Formative assessment data (ie: informal tests and tasks) is useful to gauge next steps in learning. Once the child leaves that particular year group, it has little value in terms of retention. Summative attainment is the main outcome of what children 'attain' in school. It is important that future schools where pupils go on to learn can understand previous attainment. Whilst often that information is 'passed on' smoothly as children move phase, it is not always the case, and thus retaining the names alongside the main attainment data for 1 year after the pupil has left the school feels proportionate. Hard copies of summative tests are passed on with the pupil file when a child transfers to another school. Trend analysis is important, 3 to 5 years is often the 'trend' people look at, but longer may be relevant. Whilst this must be fully flexible in reporting small sub groups, and the data would wish to be retained at individual level, some personal data (for example, name) could be removed from the data to reduce sensitivity. After 3 to 5 years, then aggregated summaries that have no risk of identifying individuals are all that are typically are retained.

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Attendance		√			**Attendance** Attendance is related to individual attainment and tracking this whilst pupils are in our care is important. Keeping it in detailed, individual form for one year after the pupil leaves school supports conversations about detailed attendance that may be needed to best support that child. After that period, non-identifiable summary statistics are all that is required to support longer term trend analysis of attendance patterns. Paper attendance records for pupils where attendance is an issue are kept securely in the pupil personnel file until such time as the pupil transitions to another school. Paper registers of the whole class attendance are securely disposed of each year. Attendance data probably resides in some 'operational' systems, such as cashless catering. In these systems, the data should only be retained until the associated business processes have concluded (eg, payment of meals). The start of the next academic year once all bills are settled feels proportionate.
Behaviour		√			**Behaviour** This is all relevant for managing children when at our school. 1 year allows a period of 'handover' to next institution with conversations supported by rich data if relevant.

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Exclusions		√			Exclusion data is 'passed on' to subsequent settings when a child transfers. That school then has responsibility for retaining the full history of the child. The LA also holds a copy of the exclusion data.
Identity management and authentication	√				Images of children with medical/dietary needs are displayed in key areas (kitchen, staff room, medical cupboard, EYFS kitchen area) so that all staff (including supply teachers) are aware of a child's needs. All images are destroyed when child leaves the school.
Catering and free school meal management		√ (meal administration)	√ (free school meal eligibility information)		A short historic record of what a child has had may be useful in case of any food-related incidents at school, or parental queries about the types of meals their children are choosing. Keeping for up to one year also allows time to do accounting work associated with catering. Due to the way school funding works, free school meal eligibility is a financial matter, and thus keeping this data for 6+1 feels appropriate. This 7-year record also needs to be portable with the pupil, as historic dates can be used for funding.

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Trips and activities	√ (field file) √ (educational visitors into school)		√ (financial information related to trips)	√ (major medical events)	**Trips and activities** Financial information related to trips should be retained for 6 years + 1 for audit purposes. This may include enough child identifiers to be able to confirm contributions. A 'field file' is the information that is taken on a trip by a school. This can be destroyed following the trip, once any medicines administers on the trip have been entered onto the core system. If there is a minor medical incident (for example, a medical incident dealt with by staff in the way it would be dealt with 'within school') on the trip, then adding it into the core system would be done. If there is a major incident (for example, a medical incident that needed outside agency) then retaining the entire file until time that the youngest child becomes 25 would be appropriate. Permission to go on the trip slips will contain personal data, and destroying them after the trip unless any significant incident arises is appropriate, otherwise refer to the policies above. Schools sometimes share personal data with people providing 'educational visits' into school. There should be good policies in place to ensure that the sharing is proportionate and appropriately deleted afterwards.

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Medical information and administration	√ (permission slips)	√ (medical conditions and ongoing management)		√ medical incidents (potentially)	To support any handover work about effective management of medical conditions to a subsequent institution. Permission forms that parents sign should to be retained for the period that medication is given, and for 1 month afterwards if no issue is raised by child/parent. If no issue is raised in that time, this feels a reasonable window to assume all was administered satisfactorily. Medical 'incidents' that have a behavioural or safeguarding angle (including the school's duty of care) should refer to the retention periods associated with those policies.
Safeguarding/Child Protection				√	All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil file (name, address) that are needed to identify children with certainty are needed to be retained along with those records.

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Pupil basic details (incl Personal identifiers) and **pupil characteristics**	√ (images used in identity systems) √ (biometrics) √ (house number and road, Phone contact details)	√ (images used in displays in school)	√ (postcodes) √ (names) √ (characteristics)		Images are used for different reasons, and the reason should dictate the retention period. Images used purely for identification can be deleted when the child leaves the setting. Images used in displays etc. can be retained for educational purposes whilst the child is at the school. Other usages of images (for example, marketing) should be retained for and used inline with the active informed consent captured at the outset of using the photograph. Biometric data (typically facial recognition, fingerprint recognition) is not currently used in school. This should be used and retained as set out in the active informed consent gained at the outset, but typically this should not be retained long after the activity that requested its use has finished. (for example, the child no longer attends the school). As set out in other sections, names are needed for smooth handover to subsequent schools for up to one year. Postcode data is useful in analysing longer-term performance trends or how catchment/pupil populations are shifting over time, but full address data (house number and road) is not required for that activity. Schools may well provide references for pupils for up to 3 years after they leave, and so retaining the name in the core pupil record is important (this doesn't mean it needs to be retained in all systems). Keeping names attached to safeguarding files for longer than this may be entirely appropriate – see safeguarding section. Characteristics form an essential part of trend analysis, and so retention is in line with those needs.