



# Data Protection Policy – Ysgol Syr Hugh Owen DRAFT

Adopted by:

Date:

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Date of Review:

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Next Review:

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**Policy on data protection legislation covering the General Data Protection Regulation (GDPR)  
and Data Protection Act 2018 -  
Ysgol Syr Hugh Owen**

**Responsibility:** Governors are responsible for ensuring that procedures are in place to ensure the school's compliance with data protection legislation (DPL)

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## 1. Introduction

In order to operate efficiently, it is necessary for Ysgol Syr Hugh Owen (the School) to collect and use information about people it works with. These can include members of the public, former employees, current employees and future employees, pupils and suppliers. It is also possible that there will be a legal requirement to collect and use information in order to comply with central government requirements.

The School is committed to ensure personal information is dealt with appropriately, and it ensures compliance with data protection legislation. The School will make every effort to comply with its obligations in legislation and will review procedures regularly to ensure it does so.

### Definitions

**Personal Data** is defined as information relating to a living identifiable individual which is processed as data. Processing means collecting, using, disclosing, keeping or disposing of information. The principles of data protection apply to all information held electronically or in structured files which state anything concerning a living identifiable individual. The principles also encompass all information in educational records. Possible examples of this are names of staff and pupils, dates of birth, addresses, national insurance numbers, marks given in school, medical information, examination results, ALN assessments and staff development reviews.

**Special Category Data** is information relating to race or ethnicity, political opinion, religion, trade union membership, health, genetics, sexuality, sex life, biometrics. The difference between processing personal data and special category data is that the latter are subject to more legal restrictions due to their greater sensitivity.

**Criminal Data**– Article 10 of the General Data Protection Regulation (GDPR) sets out rules for the processing of criminal data.

## 2. Scope

This policy applies to all employees, governors, contractors, agencies and representatives and temporary staff working for or on behalf of the School.

This policy applies to all personal information created or held by the School irrespective of format (e.g., paper, electronic, e-mail, film) and regardless of its method of storage (e.g., ICT system/database, shared drive filing structure, e-mail, filing cabinet, personal files on shelves or in drawers).

DPL is not applicable to accessing information about deceased individuals.

## 3. Responsibilities

General responsibility for compliance with DPL lies with the Governors.

The Headteacher is responsible for ensuring compliance with DPL and this policy in the day-to-day activities of the School. The Headteacher is responsible for ensuring provision of appropriate training for all staff.

Every staff member or contractor holding or collecting personal data is responsible for their own compliance with DPL and they should ensure personal information is held and processed in line with DPL.

Every staff member is to state they have read, understood and accepted this Policy.

## **4. Requirements**

DPL requires that anyone processing personal data shall comply with six principles of good practice; these practices are legally enforceable. In the context of previous information, the principles require the following:

Article 5 of the GDPR

- a) Information shall be processed lawfully, fairly and in a transparent manner;
- b) Information shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) Information shall be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- d) Information shall be accurate and, where necessary, kept up to date;
- e) Information shall be kept no longer than is necessary for the purposes for which it is processed;
- f) Information shall be processed in a manner that ensures appropriate security of the information.

## **5. Annual fee**

The School is required to pay an annual fee to the Office of the Information Commissioner. Failure to do so may lead to a financial penalty.

## **6. Privacy Notices**

Whenever information is collected about individuals, the School will provide the following information:

- The identity of the data controller, e.g. the School;
- The purpose for which the information is collected;
- The lawful basis for collecting the information;
- Any other purposes for which it may be used;
- With whom the information will or may be shared;
- For how long the information will be kept;
- Details of any individual rights;
- Details of the Data Protection Officer

This must happen at the time that the information is first gathered on an individual.  
For example:

*Ysgol Syr Hugh Owen will gather information on pupils in order to track their educational progress. It will not be used for any other purpose.*

*This is done as part of its public duty.*

*The School will share this information with the Local Education Authority and Welsh Government.*

*The information will not be transferred to a foreign country/ The information will be transferred to a foreign country.*

*The information will be kept for ..... years.*

*You may have rights in relation to obtaining, rectifying, objecting to, erasure of or the portability of personal information. Contact the Data Protection Officer for details.*

*Contact details of the Data Protection Officer are Dr Huw Williams  
(hdw@syrhughowen.gwynedd.sch.uk)*

If information is gathered directly from the child, the privacy notice must be in language which is easily understood by the child.

## **7. Conditions on Processing**

Personal data may only be processed when one of the conditions of Article 6 of the GDPR is met. Special category data may only be processed when one of the conditions of Article 9 of the GDPR is met as well as one condition of Article 6.

See Appendix 1 for a list of conditions.

## **8. Data protection**

It is a criminal offence to knowingly or recklessly obtain or disclose information about an individual without legitimate cause. Relevant, confidential data should only be given to:

- *other staff members on a need-to-know basis;*
- *relevant Parents/Guardians;*
- *other organisations if it is necessary in the public interest e.g. prevention of crime;*
- *other authorities such as the Local Education Authority and schools to which a pupil may move, and where there are legal requirements;*
- *organisations that collaborate with the school or that are part of an information sharing protocol.*

The school should not disclose anything on a pupil's record which would be likely to cause serious harm to their physical or mental health or that of anyone else.

Advice should be sought in the case of doubt or conflict between statutory requirements.

When information is provided to an individual, especially by telephone, it is essential to confirm the identity of that individual. In the case of doubt, questions should be asked of the individual which no-one except that individual will be able to answer. Information should not be provided to other parties, even if they are related to the individual. For example, in the case of divorced parents, no information about either party should be provided to the other as they have no right to receive it.

## **9. Individual rights**

### **Access to information about themselves**

All individuals have the right to request a copy of all information held about them by the school (or information about a child they are responsible for).

On receiving a request, it must be dealt with promptly; an answer must be provided as soon as possible within one month. This period may be extended to a maximum of two months if a request is complex or if there are numerous requests.

No fee can be charged for dealing with a request. However, if a request is unfounded, excessive and has been submitted previously, the school has a right to charge an administrative fee.

In providing the information, the school must also provide individuals with the same details as those provided in a privacy notice.

See Appendix 2 for the procedure used to deal with these requests.

A maximum of £50 (on a sliding scale of charges for photocopying) may be charged for providing access to a pupil's educational record.

## **(ii) Provision of data to children**

With regard to the competence of children to make a request, guidance from the Office of the Information Commissioner states that a child who has reached the age of 12 may be expected to be sufficiently mature to understand the nature of a request. Obviously, a child may achieve sufficient maturity before that age; the competence of the child should be considered on a case-by-case basis.

If a child does not understand the nature of the request, someone who has parental responsibility for the child, or a guardian, has the right to make a request on the child's behalf and to receive a reply.

Pupils who make requests to access their educational records should have the right to do so unless it is evident that they do not understand the nature of their request.

## **(iii) Parental rights**

An adult with parental responsibility may obtain access to information about their child, if it is considered that the child does not yet have sufficient maturity. They must be able to prove that they have parental responsibility and the School has the right to request appropriate documentation to confirm this as well as proof of identity of those making the request and of the child.

Parents also have their own independent right under the Education (Pupil Information) (Wales) Regulations 2004 to have access to their children's official educational records. Learners have no right to prevent their parents from obtaining a copy of their school record.

## **10. Right to request rectification of inaccurate information**

Every individual has the right to notify the school if they believe that information about them has been inaccurately recorded.

The school will respond to a request within one month but this period may be extended up to an additional two months if the request is extensive or complex;

It may be that it is not always possible to amend or delete information, but anything that is factually inaccurate should be rectified;

In the meantime, a note should be attached to the person's file to draw attention to any doubts about accuracy.

## **11. Right to request erasure of information**

Individuals have the right in some circumstances to request the deletion of information about themselves. The school will consider each request individually.

## **12. Right to object to or restrict the processing of information**

Every individual has the right to object to the processing of their information in the following circumstances:

- Where we have processed their information on the basis of legitimate interests or fulfilling a public task or an official authorisation;
- Where public marketing is involved;
- Where the processing is connected with research or statistics.

The school will comply with the request unless:

- There are strong, lawful reasons for processing;
- The information is needed to establish, exercise or defend a legal claim.

With regard to the restriction of processing, an individual may exercise this right where they contest that data is inaccurate and therefore that processing of them should be restricted during investigation; where an individual has objected; where the processing is unlawful and where the school has no need for the data but where the individual requires them to defend a legal claim.

Any third party who has received the data will need to be informed of the need to restrict processing, and the individual will need to be informed of the identity of such third parties.

## **13. Security**

### **Paper records**

Where possible, storerooms, secure cupboards and other storage systems with locks should be used to store paper records. Papers containing confidential personal information should not be left on desktops in offices and classrooms, on tables in staff rooms nor placed on message boards where anyone may have access to them. Particular care should be taken if it is necessary to take documents out of the school.

## **Electronic records**

All portable electronic devices should be kept as securely as possible. If they contain personal information, they should be locked away when not in use.

Encryption software should be used to protect all portable devices and movable media, such as laptops and USB devices (or any other method of storing information which is not an integral part of a computer), which store personal and confidential information. All devices must be password protected.

Data must be disposed of securely once they have been transferred or when they are no longer required.

Strong passwords should be used, i.e. at least eight characters and containing special symbols if the electronic device holds confidential personal information. Different passwords should be used on different systems and devices.

## **Disposal**

If any confidential information is kept on paper records, they should be shredded; electronic memory devices should be cleaned or destroyed.

## **Data Incidents**

A data breach occurs when personal information has been compromised or lost. This may happen as a result of an incident on the web; data being left in an insecure location; data being mailed to the incorrect recipient; loss or theft of paperwork or an insecure device, etc.

The school will investigate any such incidents and take appropriate remedial action. Serious data incidents are reported to the Office of the Information Commissioner.

## **14. Retention of data**

Information which is no longer up to date should be disposed of if it is no longer relevant. Information should only be held as long as necessary, for lawful or business purposes. The relevant periods for retaining school records are set out in Appendix 3.

## **15. Recording Data**

Records should be kept in a form which allows the individual concerned to examine them. The possibility should also be borne in mind that courts or legal officials may examine data at some point in the future. Data should therefore be accurate, unbiased, unambiguous and clearly decipherable/legible. Where information is obtained from an outside source, details of the source and date obtained should be recorded.

## **16. School Website and Social Websites**

Written consent must be obtained from any person whose details or whose child's details are to be included in the school's website. When such information is included, all individuals will be fully informed of the consequences of their data being disseminated world-wide.

## **Photographs**



It may be that photographs taken for official use by the School are subject to DPL and the School will advise learners of the reason for taking them.

Photographs taken for personal use only are excluded from DPL.

An authorisation form for photography can be found in Appendix 4.

## **17. Sharing Information**

In sharing personal information, the school will ensure:

- that it has permission to share the information;
- that adequate security (taking in to account the nature of the information) is in place to protect the information;
- that it provides an outline in a privacy notice of who receives personal information from the school.

Any personal data passed to a third party for processing (namely an external company) will be covered by a data processing agreement.

## **18. Closed Circuit Television**

Capturing and/or recording images of identifiable individuals is an example of processing personal information and therefore needs to comply with DPL.

The school will notify staff, pupils and visitors why it is collecting personal information in the form of CCTV images.

The school will ensure that it has a set retention period based on the possible need to review the footage and will consider who is allowed access to this footage and why.

Individuals and law enforcement agencies will have the right to request access to the images. All such requests will be logged.

Guidelines on CCTV provided by the Office of the Information Commissioner can be found here:

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

## **19. Biometric Information (fingerprints)**

The Protection of Freedom Act 2012 contains measures relating to the use of biometric recognition systems, i.e. fingerprint and facial recognition systems.

Data of this nature are recognised under the GDPR as special category data.

- In the case of all school pupils under the age of 18 years, the school will request written consent from parents before recording and processing biometric details of their child.
- All such data must be handled appropriately and in line with the principles of DPL.
- Alternative methods of service delivery must be identified if a parent or pupil does not provide consent.

A model consent form for biometric information is provided in Appendix 5.

## **20. Breaches of Policy**

Failure by staff members to comply with DPL requirements could lead to serious action being taken by a third party against school authorities. Therefore, non-compliance by a staff member will be considered a disciplinary matter which could lead, depending on the circumstances, to dismissal. It should be noted that an individual can commit a criminal offence under the Act, for example, through obtaining or disclosing personal data for their own purposes without authorisation from the data controller.

### **Useful Resources**

Toolkit for schools provided by the Office of the Information Commissioner:

<https://ico.org.uk/for-organisations/education/>

Hwb

National resource on on-line safety:

<https://hwb.gov.wales/resources/resource/def9bffd-1fba-4902-9834-3ecca60bb7e7/cy>

Guidance for schools on information management, including retention periods:

<https://www.shropshirelg.net/media/442737/IRMS-Toolkit-for-Schools-2016.pdf>

## **Appendix 1**

### **Article 6 Conditions (summary)**

6(1)(a) – the individual has given consent;

6(1)(b) – the processing is necessary for the performance of a contract;

6(1)(c) – the processing is necessary for compliance with a legal obligation;

6(1)(d) – the processing is necessary in order to protect the vital interests of the individual;

6(1)(e) – the processing is necessary for the performance of a task carried out in the public interest;

6(1)(f) – the processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party

### **Article 9 Conditions (summary)**

9(2)(a) – the individual has given explicit consent for the processing;

9(2)(b) – the processing is necessary under law;

9(2)(c) – the processing is necessary to protect the vital interests of the individual;

9(2)(d) – the processing is carried out by a special category group (not-for-profit body with a political, religious or trade union aim);

9(2)(e) – the processing relates to information which is made public by the individual;

9(2)(f) – the processing is necessary for the establishment, exercise or defence of legal claims;

9(2)(g) – the processing is necessary for reasons of substantial public interest, on the basis of law;

9(2)(h) – the processing is necessary for addressing Occupational Health and Social Care needs;

9(2)(i) – the processing is necessary for reasons relating to Public Health;

9(2)(j) – the processing is necessary for archiving purposes in the public interest; or for scientific or historical research purposes; or for statistical purposes.

Further Special Category conditions are contained in Schedule 1 to the Data Protection Act 2018.

## **Appendix 2**

## Right of Access to information

There are two specific types of right of access to information about learners held by schools.

1. Under the GDPR and the Data Protection Act 2018, any individual has the right to make a request for access to personal information held about them.
2. The right of those with a right to access curricular and educational records as defined in Education (Pupil Information) (Wales) Regulations 2004.

## Acting on a request

1) Requests for information must be in writing (including e-mail), and be addressed to the Headteacher. If it is not clear from the initial request which information is required, further enquiries will be made.

2) Proof of identity must be provided for the person requesting the disclosure of any information, and checks should be made to confirm their relationship to the child.

A person's identity may be verified by asking them to present the following documents:

- passport
- driving licence
- utility bills showing the current address
- marriage / birth certificate
- P45/P60
- Mortgage or credit card statement

*This is not an exhaustive list.*

3) Every person has the right of access to information held about them. However, in the case of a child (usually 12 years or older), this depends on their capacity to understand the nature of the request. The Headteacher should discuss the request with the child and consider the child's opinion in coming to a decision. If a child has capacity to understand, they can refuse consent for the request to see their records. If it is decided that the child does not have the necessary capacity, an individual who has parental responsibility for the child, or a guardian, will make the decision on behalf of the child.

4) The school may charge a fee for providing the information, subject to the following:

- If the information requested contains the educational record, the fee charged will depend on the number of pages supplied.
- If the information requested is personal information, which does not contain any information included in educational records, no fee will be charged.
- if a request is one for access to the educational record only, no charge will be made for access, but the Headteacher will charge a fee for the cost of photocopying the information.

5) The period allowed for responding to a request, after it is formally accepted, is one month (**not working days or school days, but calendar days, and excluding school holidays**). However, the month will not commence until fees or an explanation of the information requested are received.

If the request is considered complex or if a number of requests are made, the school will inform the applicant within one month that the time period for responding to the request is to be extended and give the reason for this. The response period can be extended by up to a further two months in these circumstances.

If a request is manifestly unfounded or excessive (especially if it is submitted repetitively), the school will charge a reasonable fee for administrative costs or refuse to deal with the request.

6) DPL permits exemptions from providing certain information; **therefore, all information will be reviewed before disclosure.**

7) Third party information is defined as information provided by others, such as the Police, Local Authority, Health Care professional or another school. Consent is usually required before disclosing third party information. The same response period must be adhered to.

8) No information should be disclosed which could cause substantial harm to the physical or mental health or emotional state of the pupil or any other individual. Neither should information be disclosed which would show that the child is at risk of abuse, nor any information relating to legal proceedings.

9) Further advice should be sought if there is any concern about disclosing information.

10) Where information has been edited (redacted or deleted), a complete copy of the information provided should be kept in order to confirm what has been edited and for what reason, in case a complaint is brought.

11) Information disclosed should be clear, so any codes or technical terms will need to be explained. If the information included is difficult to read or illegible, it should be retyped.

12) Information may be provided in the school with a staff member at hand to help explain any matters if necessary, or provided by relaying the information face to face. The applicant's opinion should be considered in deciding how to provide information. If postal systems must be used, this should be done by registered mail.

## **Complaints**

Complaints relating to the above procedures should be presented to the Chair of the Governing Body who will decide whether it is appropriate to deal with the complaint through the school's complaints procedure, or otherwise. The Information Commissioner will deal with complaints where it is considered inappropriate to do so through the school's complaints procedure. Contact details of both will be included with disclosed information.

## **Contacts**

If you have any queries or concerns relating to these policies / procedures, please contact the Headteacher.

Further advice and information are available from the Office of the Information Commissioner (ICO), [www.ico.gov.uk](http://www.ico.gov.uk)

## Appendix 3

# 1. School Management

This section contains information on retention periods applicable to the general management of the school. This includes the activities of the Governing Body, Headteacher and senior management team, the access process and executive administration.

1.1 The Governing Body					
	General Description of File	Data Protection Issues	Legal Requirements	[Operational] Retention Period	Action at end of administrative lifetime of record
1.1.1	Agendas of meetings of the Governing Body	Data protection issues may arise if the meeting deals with confidential matters concerning staff		One copy should be kept of the main series of minutes. All other copies may be disposed of.  Ongoing	SECURE DISPOSAL <sup>1</sup>
1.1.2	Minutes of meetings of the Governing Body:	Data protection issues may arise if the meeting deals with confidential matters concerning staff		See below	
	Main Series (signed)			ONGOING	If the school cannot store them, they can be offered to the County Archive Service
	Inspection Copies <sup>2</sup>			Date of meeting + 3 years	If minutes contain any personal, sensitive information, they must be shredded.
1.1.3	Reports presented to the Governing Body	Data protection issues may arise if the meeting deals with		Reports should be retained for at least 6 years. However, if minutes refer directly to	SECURE DISPOSAL or retained with a copy of the signed minutes

<sup>1</sup> In this context, SECURE DISPOSAL should be taken to mean disposal through use of confidential waste bins, or shredding of information using a cross-cutting shredding machine if such a facility is available in the school.

<sup>2</sup> These are copies which the Clerk of the Governing Body may wish to retain so that there will be no need to print and collate edited copies of the minutes every time a request is made to access all appropriate information.

		confidential matters concerning staff		specific reports, the reports should be permanently retained.	
1.1.4	Papers of meetings concerning the annual parent meeting held under section 33 of the Education Act 2002	No	Education Act 2002, Section 33	Date of meeting + at least 6 years	SECURE DISPOSAL
1.1.5	Instruments of Government including Articles of Association	No		ONGOING	These should be retained in the school while the school is open and then offered to the County Archive Service when school closes.
1.1.6	Trusts and Endowments managed by the Governing Body	No		ONGOING	These should be retained in the school while the school is open and then offered to the County Archive Service when school closes.
1.1.7	Action plans created and administered by the Governing Body	No		Period of action plan + 3 years	SECURE DISPOSAL
1.1.8	Policy documents created and administered by the Governing Body	No		Period of policy + 3 years	SECURE DISPOSAL
1.1.9	Minutes concerning complaints dealt with by the Governing Body	Yes		Date of resolution of complaint + at least 6 years followed by a review regarding further retention in the case of contentious disputes	SECURE DISPOSAL
1.1.10	Annual Reports created in accordance with the requirements of the Education Act 2002	No	Education Act 2002	Date of report + 10 years	SECURE DISPOSAL
1.1.11	Proposals concerning a change in status of	No		Date of acceptance or rejection of	SECURE DISPOSAL

	a maintained school, including Specialist Status Schools and Academies			proposal + 3 years	
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Please note that all information concerning the retention of minutes relating to the recruitment of Headteachers can be found in the section on Human Resources below.



1.2 Headteacher and Senior Management Team					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
1.2.1	Logbooks of activities in the school kept by the Headteacher (if applicable)	Data protection issues may arise if the logbook refers to individual pupils or staff members		Date of final entry in logbook + at least 6 years followed by review	These may be of lasting historical value and should be offered to the County Archive Service if appropriate
1.2.2	Minutes of meetings of the Senior Management Team and other internal administrative bodies	Data protection issues may arise if the minutes refer to individual pupils or staff members		Date of meeting + 3 years followed by review	SECURE DISPOSAL
1.2.3	Reports created by Headteacher or Senior Management Team	Data protection issues may arise if the report refers to individual pupils or staff members		Date of report + at least 3 years followed by review	SECURE DISPOSAL
1.2.4	Records created by headteachers, deputy headteachers, heads of year and other staff members with administrative responsibilities	Data protection issues may arise if the records refer to individual pupils or staff members		Current academic year + 6 years followed by review	SECURE DISPOSAL
1.2.5	Correspondence created by headteachers, deputy headteachers, heads of year and other staff members with administrative responsibilities	Data protection issues may arise if the correspondence refers to individual pupils or staff members		Date of correspondence + 3 years followed by review	SECURE DISPOSAL
1.2.6	Professional Development Plans	Yes		Period of plan + 6 years	SECURE DISPOSAL
1.2.7	School Development Plans	No		Period of plan + 3 years	SECURE DISPOSAL

1.3 Admissions Process					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
1.3.1	All records concerning the creation and operation of the School's Admissions Policy	No	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal panels December 2014</i>	Period of policy + 3 years followed by review	SECURE DISPOSAL
1.3.2	Admission – if admission was gained	Yes	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal panels December 2014</i>	Date of admission + 1 year	SECURE DISPOSAL
1.3.3	Admission – if admission was not gained	Yes	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal panels December 2014</i>	Conclusion of case + 1 year	SECURE DISPOSAL
1.3.4	Admissions Register	Yes	<i>School Attendance: Departmental advice for maintained schools, academies, independent schools and</i>	Every entry in the admissions register must be kept for a period of 3 years after the date of the entry <sup>3</sup>	REVIEW Schools may wish to consider retaining the admissions register permanently as schools often receive enquiries from past pupils to confirm their dates

<sup>3</sup> *School Attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014*

			<i>local authorities</i> October 2014		of attendance at the school.
1.3.5	Admissions – Secondary Schools – Additional	Yes		Current year + 1 year	SECURE DISPOSAL
1.3.6	Evidence of postal address provided by parents as part of the admissions process	Yes	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal panels</i> December 2014	Current year + 1 year	SECURE DISPOSAL
1.3.7	Supplementary Information Form containing additional information such as religion, medical conditions, etc. (e.g. SIMS Pupil Data Collection Form)	Yes		See below	
	If admission was gained			Information should be added to pupil's file (e.g. in SIMS / pupil's paper file)	SECURE DISPOSAL
	If admission was not gained			Until the completion of the appeal process	SECURE DISPOSAL

1.4 Executive Administration					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
1.4.1	General series of files	No		Current year + 5 years followed by REVIEW	SECURE DISPOSAL
1.4.2	Records concerning the creation and publication of school handbook or prospectus (if applicable)	No		Current year + 3-years	STANDARD DISPOSAL
1.4.3	Records concerning the creation and distribution of circulars to staff, parents or pupils (if applicable)	No		Current year + 1 year	STANDARD DISPOSAL
1.4.4	Circulars and other items with short active life	No		Current year + 1 year	STANDARD DISPOSAL
1.4.5	Visitor Book and Signing-in Sheets	Yes		Current year + 6 years followed by REVIEW	SECURE DISPOSAL
1.4.6	Records concerning the creation and management of Parent Teacher Associations and/or Past Pupils Associations	No		Current year + 6 years followed by REVIEW	SECURE DISPOSAL

## 2. Human Resources

This section contains all matters concerning Human Resources management in the school.

2.1 Recruitment					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
2.1.1	All records leading up to the appointment of a new headteacher	Yes		Date of appointment + 6 years  (to be retained in the Area Education Office – no copy in school)	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new staff member – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months  (Area Education Office to retain copy – Schools to dispose of these securely)	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new staff member – successful candidate	Yes		All relevant information to be added to the personal file of the staff member (see below) and all other information to be retained for 6 months.	SECURE DISPOSAL
2.1.4	Information from background checks prior to appointment – DBS Checks (Employment audit information)	Yes	<i>DBS Update Service Employer Guide June 2012: Keeping children safe in education. July 2015 (Statutory guidance from the Department of Education) Sections 73, 74</i>	Copies of DBS certificates should not be retained.	
2.1.5	Proof of identity gathered as part of the process of verifying an enhanced	Yes		Copies of proof of identity documents gathered as part of the	

	"portable" DBS disclosure			process of verifying an enhanced "portable" DBS disclosure should not be retained	
2.1.6	Information from background checks prior to appointment – Evidence confirming right to work in the United Kingdom <sup>4</sup>	Yes	<i>An employer's guide to right to work checks</i> [Home Office, May 2015]	Information to be forwarded to the authority	

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<sup>4</sup> Employers need to make a "clear copy" of documents presented to them as part of this process.

2.2 Management of Operational Staff					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
2.2.1	Personal file of staff member	Yes	Limitation Act 1980 (Section 2)	Termination of employment + 25 years (For information: Although the IRMS Toolkit states: Termination of employment + 6 years, Gwynedd Council has made a risk assessment and decided to retain the personal file of all staff members requiring a DBS check for 25 years following termination of employment)	SECURE DISPOSAL
2.2.2	Salary Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal / assessment records	Yes		Current year + 5 years	SECURE DISPOSAL

2.3 Managing Disciplinary and Grievance Processes					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
2.3.1	Allegation of a child protection nature against a member of staff including where the allegation is unfounded <sup>5</sup>	Yes	<i>"Keeping children safe in education: Statutory guidance for schools and colleges, March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and</i>	Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer followed by REVIEW. Note: allegations that are found to be malicious should be	SECURE DISPOSAL These records must be shredded.

<sup>5</sup> This review was held as the Independent Inquiry into Child Sexual Abuse was proceeding. It is therefore recommended that all records concerning child abuse should be retained until the conclusion of the Review. This section will then be reviewed again to consider any recommendations which the Inquiry may make regarding retention of records.

			<i>promote the welfare of children, March 2015"</i>	removed from personnel files. If founded, they are to be kept on the file and a copy provided to the person concerned	
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2.3.2	Disciplinary Action	Yes			
	Verbal Warning			Date of warning <sup>6</sup> + 6 months	SECURE DISPOSAL [If warnings are placed on personal files, they must be weeded from the file]
	Written Warning – level 1			Date of warning + 6 months	
	Written Warning – level 2			Date of warning + 12 months	
	Final Warning			Date of warning + 18 months	
	Unfounded case			If the matter relates to child protection, see above. Otherwise, dispose of at the conclusion of the case	SECURE DISPOSAL

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<sup>6</sup> If the warning concerns a child protection matter, see above. If disciplinary action is connected with a child protection matter, contact your Child Safeguarding Officer for further advice.

2.4 Health and Safety					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
2.4.1	Health and Safety Policy Statements	No		Period of policy + 3 years	SECURE DISPOSAL
2.4.2	Health and Safety Risk Assessments	No		Period of risk assessment + 3 years  (Details below regarding risk assessment forms sent with HS11)	SECURE DISPOSAL
2.4.3	Records related to accidents / injuries at work	Yes		Date of incident + 12 years. In the case of serious accidents, an additional retention period will apply	SECURE DISPOSAL
2.4.4	Accident Reporting (e.g. HS11)	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
	Adults			Date of incident + 6 years	SECURE DISPOSAL
	Children			Child's date of birth + 25 years  ALN and Inclusion: Child's date of birth + 35 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 retained under the 1994 and 1999 Regulations to be kept as if	Current year + 40 years	SECURE DISPOSAL

			the 2002 Regulations had not been made. Regulation 18(2)		
2.4.6	Process for monitoring areas where employees and persons are likely to have come into contact with asbestos	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL
2.4.7	Process for monitoring areas where employees and persons are likely to have come into contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
2.4.8	Fire Precaution Logbooks	No		Current year + 6 years	SECURE DISPOSAL

2.5 Payroll and Pensions					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
2.5.1	Maternity Pay Records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960), revised 1999 (SI 1999/567)	Current year + 3 years	SECURE DISPOSAL
2.5.2	Records retained under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	SECURE DISPOSAL

### 3 Financial management of the School

This section deals with all aspects of the financial management of the school including administration of school meals.

3.1 Risk Management and Insurance					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
3.1.1	Employer's Liability Insurance Certificate	No		School closure + 40 years	SECURE DISPOSAL

3.2 Asset Management					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
3.2.1	Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
3.2.2	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL

3.3 Accounts and Statements including Budget Management					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
3.3.1	Annual Accounts	No		Current year + 6 years	STANDARD DISPOSAL
3.3.2	Loans and grants managed by the school	No		Date of last payment on loan + 12 years followed by REVIEW	SECURE DISPOSAL
3.3.3	Student Grant Applications	Yes		Current year + 3 years	SECURE DISPOSAL
3.3.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No		Period of budget + 6 years  (For information: Although the IRMS Toolkit states: Budget period + 3 years, Gwynedd Council recommends retaining them for 6 years to correspond with the retention periods of other budgetary material)	SECURE DISPOSAL
3.3.5	Invoices, receipts, order books, delivery notes	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.6	Records related to the collection and banking of money	No		Current financial year + 6 years	SECURE DISPOSAL
3.3.7	Records relating to the identification and collection of debts	No		Current financial year + 6 years	SECURE DISPOSAL

### 3.4 Contracts Management

	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
3.4.1	All records relating to management of contracts under seal	No	Limitation Act 1980	Final payment on contract + 12 years	SECURE DISPOSAL
3.4.2	All records relating to management of contracts under hand	No	Limitation Act 1980	Final payment on contract + 6 years	SECURE DISPOSAL
3.4.3	Records relating to management of contracts	No		Current year + 2 years	SECURE DISPOSAL

3.5 School Fund					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
3.1.5	School Fund – Cheque books	No		Current year + 6 years	SECURE DISPOSAL
3.5.2	School Fund – Paying-in books	No		Current year + 6 years	SECURE DISPOSAL
3.5.3	School Fund – Ledger	No		Current year + 6 years	SECURE DISPOSAL
3.5.4	School Fund – Invoices	No		Current year + 6 years	SECURE DISPOSAL
3.5.5	School Fund – Receipts	No		Current year + 6 years	SECURE DISPOSAL
3.5.6	School Fund – Bank Statements	No		Current year + 6 years	SECURE DISPOSAL
3.5.7	School Fund – School trips	No		Current year + 6 years	SECURE DISPOSAL

3.6 School Meals Management					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
3.6.1	Free School Meals Registers	Yes		Current year + 6 years	SECURE DISPOSAL
3.6.2	School Meals Registers	Yes		Current year + 3 years	SECURE DISPOSAL
3.6.3	School Meals Summary Sheets	No		Current year + 3 years	SECURE DISPOSAL

## 4. Property Management

This section deals with the management of buildings and property.

4.1 Property Management					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
4.1.1	Title deeds of properties owned by the school	No		PERMANENT These should follow the property unless the property has been registered with the Land Registry	
4.1.2	Plans of properties owned by the school	No		These should be retained whilst the property is in the ownership of the school and should be passed on to any new owners if the building is leased or sold.	
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.1.4	Records relating to the leasing of school property	No		Current financial year + 6 years	SECURE DISPOSAL



4.2 Maintenance					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL
4.2.2	All records relating to the maintenance of the school carried out by school staff including maintenance logbooks	No		Current year + 6 years	SECURE DISPOSAL

## 5. Pupil Management

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

5.1 Pupil's Educational Record					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
5.1.1	Pupil's Educational Record as required by the Education (Pupil Information) (England) Regulations 2005	Yes	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437		
	Nursery			Retain whilst the child remains in the nursery class.	The file should follow the pupil when he/she leaves the nursery class for the primary / relevant school.
	Primary			Retain whilst the child remains at the primary school.  (E.g. Results, Parent Reports, Targets, National / Internal Assessments / Tests, Foundation assessment)	The file should follow the pupil when he/she leaves the primary school. This will include: <ul style="list-style-type: none"> <li>• moving to another primary school</li> <li>• moving to a secondary school</li> <li>• moving to a pupil referral unit</li> <li>• if the child dies whilst at primary school, the file should be returned to the Local Authority to be retained for the statutory retention period.</li> </ul> <p>If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the file should be returned to the Local Authority to be retained for the statutory retention period. Primary Schools do not ordinarily have sufficient storage space to store records for pupils who have</p>

					not transferred in the usual way. It makes more sense to transfer the record to the Local Authority as it is more likely that the pupil will request the record from the Local Authority.
	Secondary		Limitation Act 1980 (Section 2)	Date of birth of pupil + 25 years (ALN and Inclusion/Child Protection details below)	SECURE DISPOSAL
5.1.2	Examination Results – Pupil Copies	Yes			
	Public			This information should be added to the pupil's file	All uncollected certificates should be returned to the examination board.
	Internal			This information should be added to the pupil's file	
<b>This review was held as the Independent Inquiry into Child Sexual Abuse was proceeding. It is therefore recommended that all records concerning child abuse should be retained until the conclusion of the Review. This section will then be reviewed again to consider any recommendations which the Inquiry may make regarding retention of records.</b>					
5.1.3	Child Protection information held on pupil file	Yes	<i>“Keeping children safe in education: Statutory guidance for schools and colleges, March 2015”</i> ; <i>“Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children, March 2015”</i>	If any records relating to child protection issues are placed on the pupil file, these should be in a sealed envelope and then retained for the same period of time as the pupil file. (And the file transferred to the new / secondary school)	SECURE DISPOSAL – these records MUST be shredded
5.1.4	Child Protection information held in separate files	Yes	<i>“Keeping children safe in education: Statutory guidance for schools and colleges, March 2015”</i> ; <i>“Working together to safeguard children. A guide to inter-</i>	Date of birth of child + 25 years. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the master	SECURE DISPOSAL – these records MUST be shredded

			<i>agency working to safeguard and promote the welfare of children, March 2015"</i>	copy of this information will be found on the Local Authority Social Services record.	
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See Human Resources section of this retention schedule for retention periods relating to allegations made against adults.

5.2 Attendance					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
5.2.1	Attendance Registers	Yes	<i>School Attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014</i>	End of the current academic year + 3 years.  (For information, the toolkit notes: Every entry in the admission register must be retained for a period of three years after the date on which the entry was made)	SECURE DISPOSAL
5.2.2	Correspondence relating to authorised absence		Education Act 1996 Section 7	Current financial year + 2 years	SECURE DISPOSAL

5.3 Special Educational Needs / Additional Learning Needs and Inclusion					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
5.3.1	Special Educational Needs / Additional Learning Needs and Inclusion files and reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	Date of birth of pupil + 35 years  (For information: Although the IRMS Toolkit notes: DOB of the pupil + 25 years, a decision has been made by the Integrated ALN & I Service that it should be retained for 35 years from the pupil's date of birth.)  The information needs to be transferred from primary school to secondary school.	REVIEW NOTE: This retention period is the minimum period for retaining any pupil file. Some authorities choose to keep ALN 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 the minimum retention period and this should be documented.
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 pupil + 35 years [This would normally be retained on the pupil file]  (For information: Although the IRMS Toolkit notes: DOB of the pupil + 25 years, a decision has been made by the Integrated ALN & I Service that it should be retained for 35 years from the pupil's date of birth)	SECURE DISPOSAL unless the document is subject to a "legal hold".
5.3.3	Advice and information	Yes	Special Educational	Date of birth of pupil + 35 years	SECURE DISPOSAL unless the document

	provided to parents regarding educational needs (e.g. specialist reports on health and services)		Needs and Disability Act 2001 Section 2	<p>[This would normally be retained on the pupil file]</p> <p>(For information: Although the IRMS Toolkit notes: DOB of the pupil + 25 years, a decision has been made by the Integrated ALN &amp; I Service that it should be retained for 35 years from the pupil's date of birth)</p>	is subject to a "legal hold".
5.3.4	Individual Accessibility Strategy (e.g. Risk Assessments / Medical plans / PEEP)	Yes	Special Educational Needs and Disability Act 2001 Section 14	<p>Date of birth of pupil + 35 years [This would normally be retained on the pupil file]</p> <p>(For information: Although the IRMS Toolkit notes: DOB of the pupil + 25 years, a decision has been made by the Integrated ALN &amp; I Service that it should be retained for 35 years from the pupil's date of birth)</p>	SECURE DISPOSAL unless the document is subject to a "legal hold".

## 6. Curriculum Management

6.1 Statistical and Management Information					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
6.1.1	Curriculum Returns (E.g. end of year results sheets)	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	Examination Results (Schools Copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	National Tests records	Yes			
	Results			The National Tests 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 National Tests results. These could be kept for current year + 6 years to allow suitable comparison.	SECURE DISPOSAL
	Examination Papers/ National Tests			The examination papers should be kept until any appeals/ validation process is complete	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) Reports (Access)	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	Value Added and Contextual Data (E.g. Assessment forms / progress monitoring)	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.5	Self-Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL

## 6.2 Implementation of Curriculum

	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
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 specify a further retention period or SECURE DISPOSAL
6.2.2	Timetable	No		Current year + 1 year	
6.2.3	Class Record Books	No		Current year + 1 year	
6.2.4	Mark Books	No		Current year + 1 year	
6.2.5	Record of homework set	No		Current year + 1 year	
6.2.6	Pupils' Work	No		It is at the school's discretion to release examples of children's work to parents after receiving written requests from them after a period of a current year + 24 months. The headteacher will be responsible for ensuring that such work is marked in accordance with the school's policy and audited to ensure that it cannot be used as evidence in any legal action that could be taken in the future. If this is not the school's policy, then it should be disposed of after the current year + 1 year	SECURE DISPOSAL



## 7. Extra-Curricular Activities

7.1 Educational Visits outside the Classroom					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Outdoor Education Advisers' Panel National Guidance website <a href="http://oeapng.info">http://oeapng.info</a> specifically Section 3 – “Legal Framework and Employer Systems” and Section 4 – “Good Practice”	Date of visit + 14 years	SECURE DISPOSAL
7.1.2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Outdoor Education Advisers' Panel National Guidance website <a href="http://oeapng.info">http://oeapng.info</a> specifically Section 3 – “Legal Framework and Employer Systems” and Section 4 – “Good Practice”	Date of visit + 10 years	SECURE DISPOSAL
7.1.3	Parental Consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although consent forms could be retained for Date of birth + 22 years, the expectation of their being needed is low and most schools do not have sufficient storage space to retain every consent form issued by the school for this period of time.
7.1.4	Parental Consent forms for school trips where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB of pupil involved in the incident + 25 years. The consent forms for all pupils on the trip are to be retained to show that the rules had been followed for all pupils	

7.2 Walking Bus					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
7.2.1	Walking Bus Registers	Yes		Date of register + 3 years. 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 [If these records are retained electronically, any back-up copies should be destroyed at the same time]

7.3 Family Liaison Officers and Home Education Liaison Assistants					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
7.3.1	Day Books	Yes		Current year + 2 years followed by review	
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 school and then destroy	
7.3.3	Referral forms	Yes		While the referral is current	
7.3.4	Contact Details Sheets	Yes		Current year followed by review. If contact is no longer active, then destroy	
7.3.5	Contact database entries	Yes		Current year followed by review. If contact is no longer active, then destroy	
7.3.6	Group Registers	Yes		Current year + 2 years	

## 7.4 TRAC

	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
7.4.1	Day Books	Yes	European Project	2024	SECURE DISPOSAL
7.4.2	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		Secure disposal following the pupil's departure from the project.	SECURE DISPOSAL
7.4.3	Referral forms	Yes	European Project	2024	SECURE DISPOSAL
7.4.4	Contact Details Sheets	Yes	European Project	2024	SECURE DISPOSAL
7.4.5	Contact database entries	Yes	European Project	2024	SECURE DISPOSAL
7.4.6	Group Registers	Yes	European Project	2024	SECURE DISPOSAL

## 8. Central Government and Local Authority

This section covers records created in the course of interaction between the school and the local authority.

8.1 Local Authority					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
8.1.1	Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
8.1.2	Attendance Returns	Yes		Current year + 1 year	SECURE DISPOSAL
8.1.3	School Census Returns	No		Current year + 5 years	SECURE DISPOSAL
8.1.4	Circulars and any other information sent from the Local Authority	No		Operational use	SECURE DISPOSAL

8.2 Central Government					
	General Description of File	Data Protection Issues	Statutory Provisions	[Operational] Retention Period	Action at end of administrative lifetime of record
8.2.1	ESTYN reports and papers	No		Period of report followed by REVIEW	SECURE DISPOSAL
8.2.2	Returns to central government	No		Current year + 6 years	SECURE DISPOSAL
8.2.3	Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL

## Tynnu lluniau / Ffilmio Disgyblion

Weithiau byddwn yn tynnu lluniau o'r disgyblion yn yr ysgol. Rydym yn defnyddio'r lluniau fel rhan o arddangosfeydd yr ysgol a weithiau mewn dogfennau printiedig eraill. Byddwn hefyd yn eu defnyddio ar wefan yr ysgol. Os ydym yn defnyddio lluniau o ddisgyblion unigol, ni fyddwn yn defnyddio enw llawn y plentyn ochr yn ochr â'r llun. Os yw plentyn wedi ennill gwobr byddwn fel arfer yn cynnwys enw a llun y disgybl a disgrifiad o'r wobwr.

Cynhelir Prom Ysgol a Seremoni Cofnodi Cyrhaeddiad er mwyn dathlu llwyddiant eich plentyn trwy gydol ei gyfnod yn yr ysgol. Mae posib y bydd lluniau o unigolion, grwpiau a dosbarthiadau o blant yn ymddangos yn y digwyddiadau hyn.

Ar adegau, efallai bydd y cyfryngau yn ymweld â'r ysgol a byddant yn tynnu lluniau neu'n ffilmio digwyddiadau pwysig. Efallai bydd plant yn ymddangos yn y lluniau a'r ffilmiau hyn, fydd weithiau'n cael eu cyhoeddi mewn papur newydd lleol neu genedlaethol, ar wefannau sydd wedi eu cymeradwyo neu ym mhrospectws yr ysgol.

Er mwyn cydymffurfio â'r Ddeddf Diogelu Data 1988, rydym angen eich caniatad cyn i ni dynnu unrhyw lun neu recordiad o'ch plentyn. Os gwelwch yn dda atebwch y cwestiynau isod, yna arwyddwch a dyddiwch y ffurflen, cyn dychwelyd y ffurflen wedi ei chwblhau i'r ysgol.

	Ydw/Nac ydw
Rwyf yn rhoi fy nghaniatad i lun o fy mhientyn gael ei ddefnyddio yn yr ysgol mewn arddangosfeydd.	
Os yw fy mhientyn yn ennill gwobr, rwyf yn rhoi fy nghaniatad i lun o fy mhientyn gael ei ddefnyddio fydd yn cynnwys enw fy mhientyn a disgrifiad o'r wobwr .	
Rwyf yn rhoi caniatad i lun o fy mhientyn gael ei ddefnyddio mewn cofnod o daith ddysgu / Cofnodi Cyrhaeddiad / Prom fydd yn cael ei rannu gyda disgyblion eraill.	
Rwyf yn rhoi fy nghaniatad i lun fy mhientyn gael ei ddefnyddio mewn deunyddiau a gyhoeddir.	
Rwyf yn rhoi caniatad i lun fy mhientyn gael ei ddefnyddio ar wefan yr ysgol.	
Rwyf yn rhoi caniatad i fy mhientyn ymddangos ar y cyfryngau.	
Rwyf yn deall fel rhan o weithdrefnau amddiffyn plant, bydd llun o bob disgybl yn cael ei dynnu ar gyfer ein cofnodion MIS ac i'w cynnwys ar gardiau adnabod. Deallaf y gall y llun digidol/wedi ei argraffu gael ei brynu gan rieni.	
Rwyf wedi darllen ac rwyf yn deall yr amodau a nodir isod.	

## Amodau o'r defnydd

Mae'r ffurflen hon yn parhau'n ddilys tan mae'r disgybl wedi gadael yr ysgol o'r dyddiad rydych yn ei arwyddo, oni bai eich bod yn tynnu eich caniatad yn ôl.

Ni fyddwn yn ail-ddefnyddio unrhyw lun neu recordiad, blwyddyn ar ôl i'ch plentyn adael yr ysgol hon. Bydd lluniau hanesyddol yn parhau ar ein gwefan.

Ni fyddwn yn defnyddio manylion personol nac enwau llawn (sy'n golygu enw cyntaf a chyfenw) unrhyw blentyn neu oedolyn mewn llun na fideo, ar ein gwefan, yn ein prospectws ysgol nac yn unrhyw un o'n deunyddiau cyhoeddadedig eraill.

Os ydym yn defnyddio lluniau o ddisgyblion unigol, ni fyddwn yn defnyddio enw llawn plentyn o fewn y testun sy'n cyd-fynd â'r llun.

Efallai y byddwn yn defnyddio llun neu fideo o grwp neu ddsbarth o ddisgyblion gyda label cyffredinol iawn, fel 'gwera wyddoniaeth' neu 'digwyddiad chwaraeon'.

Byddwn ond yn defnyddio lluniau o ddisgyblion sydd wedi gwisgo'n addas, er mwyn lleihau'r risg o ddefnydd anaddas o lun o'r fath.

Gall gwefannau a llwyfannau cyfryngau cymdeithasol gael eu gweld ar draws y byd ac nid yn y Deyrnas Unedig yn unig ble mae cyfraith y DU yn weithredol.

Printiwch enw'r disgybl: \_\_\_\_\_ Dosbarth: \_\_\_\_\_

Printiwch enw'r rhiant: \_\_\_\_\_

Llofnod Rhiant / Gwarchodwr: \_\_\_\_\_ Dyddiad: \_\_\_\_\_

**FFURFLEN GANIATÂD AR GYFER DEFNYDDIO GWYBODAETH FIOMETREG YN YSGOL SYR HUGH OWEN**

Enw'r Plentyn: \_\_\_\_\_ Dosbarth: \_\_\_\_\_

Dyddiad Geni: \_\_\_\_\_

Cwblhewch y bonyn yma os ydych yn caniatáu i'ch plentyn ddefnyddio systemau biometrig nes iddo ef/hi adael yr ysgol.

Unwaith bod eich plentyn yn gorffen defnyddio'r system adnabod biometrig, bydd ei (g)wybodaeth fiometreg yn cael ei ddileu yn ddiogel ac yn barhaol gan yr ysgol.

Rhoddaf ganiatâd i Ysgol \_\_\_\_\_ ddefnyddio biometrig fy mhlentyn fel rhan o system adnabod fel y disgrifiwyd uchod.

Rwyf yn deall y gallaf dynnu'r caniatâd hwn yn ôl, yn ysgrifenedig, ar unrhyw adeg,

Enw'r Rhiant: \_\_\_\_\_ Llofnod: \_\_\_\_\_ Dyddiad: \_\_\_\_\_