Legend

As required: Only those who have a reason for access to data ('need to know') are granted access either by system permissions for soft records or by physical security for paper records.

Admiss: Admissions Cont: Contract Con: Contract FOI: Freedom of Information Act Fin: Finance Hard: Paper records secured. Info: Information LI: Legitimate Interest LO: Legal Obligation Mgr: Management Offr: Officer PI: Public Interest Sig: Signature(s) Soft: IT server with back up and physical security, password access as required, staff directives on data protection

VI: Vital Interests

Serial	Type of record	Why held	Legal base		How data stored and protected	How processed	Distributed to and why?	Owner/ controller	Access by?	Retention period	Reason for length of period
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)
1	Pupil Records (including on Bromcom and SIMS).	Pupil Management	LO	PP	Soft some Hard archived	Bromcom SIMS (archive)	Staff 'need to know'	Student Information Officer		The later of: 6 years after the pupil has left the School or he/she reaches age 25.	<ol> <li>To provide exam results where lost by pupil.</li> <li>In order that any very late complaints may be investigated</li> </ol>
	Pupil Disciplinary Records that include permanent exclusion, permanent removal, exclusion when a Governors' panel is required to sit or any other case where there is a reasonable supposition that issues may be raised later. Governors' panel papers also to be retained. All other Pupil Disciplinary Records are to be treated as Pupil Records.	Pupil Management	LO	During disciplinary cases	Soft some Hard archived	Bromcom SIMS (archive)	Staff, governors, parents as required	Student Information Officer; School Secretary	As required	15 years	For appeals and later queries. (NB a pupil raised issues about his exclusion 10 years after he left the School
3	GCSE/ 'A' Level results	Initially for pupil management & statistical reasons then as a service to pupils	LO PI		Hard, copied to Bromcom, performance data	Bromcom SIMS (archive)	Pupils & teaching Staff, support staff as required.	Exams Officer	As required	For 50 years	As a service for ex pupils who have lost their own.
	Assessment materials collected from students to support teacher assessed gradings at GCSE and 'A' level	Pupil Management	LO	Classroom assessments	Hard	Manually	Staff 'need to know' Examination board on appeal	Departmental head		3 months 12 months if appealed 24 months if appeal declined	For appeals and later queries.
4	Admiss Appeals – successful	Admiss Management	LO	Appeal Panel	Hard	Manually	Admissions Officer, HM, as required	Admission Appeals Officer	Admissions Officer, HM, as required	One year after admission	Any queries
5	Admiss Appeals – unsuccessful	Admiss Management	LO	Appeal Panel	Hard	Manually	Admissions Officer, HM, as required	Admission Appeals Officer		Two years after appeal	Any further action

6	Register of Admission	Pupil Management	LO	Initial pupil forms, common transfer form from primary school	Soft	As required		Student Information Officer	As required	Reduced record Permanent	For historic queries
7	Daily register	Pupil Management	LO	By staff on daily registers	Soft	Attendance for each pupil generated in Bromcom	Stats to census, as required	Attendance Officer	As required	As for Pupil Records above	As for Pupil Records above
8	Parental Data	Pupil Management	LO	Application, new pupil forms, parental letters etc	Soft, Hard	Basic data to Bromcom. Letters etc to pupil file	As required	Student Information Officer	As required	One year after the pupil leaves the school.	For any follow up action after the pupil has left.
9	Pupil Medical: permissions	Pupil Management & safeguarding	LO, VI	New pupil forms & parental letters etc	Soft, hard	Data to Bromcom. Letters etc to pupil file As required		Student Information Officer	Reception & as required	One month after event	For short term reference
10	Pupil Medical: Specific conditions	Pupil Management & safeguarding	LO, VI	New pupil forms & parental letters etc	Soft, hard	Data to Bromcom. Letters etc to pupil file As required		Student Information Officer	Reception & as required	One year after end of condition	For short term reference
11	Pupil Medical: Incidents	Pupil Management & safeguarding	LO, VI	New pupil forms & parental letters etc	Soft, hard	Data to Bromcom. Letters etc to pupil file As required		Student Information Officer	Reception & as required	As for Pupil Records above	To track whole pupil history
12	Pupil & parental data from pupil applications to join the School	Pupil Management	LO	Application forms	Soft (on line) hard (v unusual)	To Bromcom (Y7-11) or Applicaa (6F)	Admiss Offr for Lower & Mid school plus Network Mgr 6th form pastoral Offr SENCO for Spec Req	Admissions Officer	6th Form Pastoral	20 school days after results of 11+ or other entry test	Latest date for appeals
										6th Form	2 months after admission refused.
13	Child Projection and Safeguarding records.	Safeguarding	LO	By all staff, especially pastoral staff, parents and any other agencies involved with a case	Soft, (CPOMS) hard,	Appropriate action by DSL	DSL & staff as required	DSL	By all staff, especially pastoral staff, parents and any other agencies involved with a case	See Child Protection & Safeguarding Policy	
14	Biometric Data (thumb prints for cashless catering and registration). Neither is compulsory.	Staff/ Pupil Management	Con, Ll	Pupils	Soft	Purchased S/W system	Nil	DPO	IT operation only	Deleted immediately pupil leaves the School or opts out of payment by this means	No longer required
15	Record of Dining Room purchases	Meal charging	Cont, LI	Isometric identification	Soft	Purchased S/W system, Insight	Fin for accounting	Fin	Pupil & parental access	6 Months	So parents can enquire
16	Trip and Visit Details	Pupil & Trip Management	LO, LI	Pupils and parents	Soft	For permissions as required by Policy for trip	Staff notified of pupil absence Stats to Governors	Fin	Staff involved with the visit	6 years	For accounting purposes
17	11+ Familiarisation And Study Skills Classes	Class management & success analysation	Cont, LI	Parents	Soft	By Admin Sp	Tutors Fin	Admin Sp, Trips, Finance	Admin Sp	2 years	To correlate class attendance with 11+ exam results
18	Other extra-curricular/ evening classes: Pupils	Class management	Cont, LI	Applicants	Soft	By Admin Sp	Tutors Fin	Admin Sp, Trips, Finance	Admin Sp	6 months after class unless advised will re-enrol.	For queries

19	Other extra-curricular/ evening classes: Tutors	Tutor Management	Cont, LI	Tutors	Soft	Admin Sp	Admin Sp	Admin Sp, Trips, Finance	Admin Sp	Later of date tutor advises will no longer take classes or 2 years from last class	For further employment
20	Sports Hall Lettings by individuals or representing organisations	Letting Management	Cont, LI	Letting application form	Soft, hard	Sports Hall Mgr makes bookings prog, to Fin for billing	Admin Sp, Fin	Admin Sp, Trips, Finance	Fin	7 years after last letting	For accounting compliance
21	Other lettings for adult language classes, sewing club etc	Letting Management	Cont, LI	Letting application form	Soft, hard	Admin Sp records, allocates rooms, infos Fin	Admin Sp, Trips, Finance	Bursar	Fin	7 years after last letting	For accounting compliance
22	Basic employee record: start date, end date, reason for leaving, job roles.	Staff management	LO	New staff form	Soft (Bromcom)	To personnel file	As required	HR	Payroll	20 years.	Provision of references, statistical historical purposes.
23	Personnel files including training records and notes of staffing, disciplinary and grievance hearings.	Staff management	LO	Collated from course etc	Soft, Hard	To personnel file	As required	HR		6 years from the end of employment	References and potential litigation.
24	Staff Health Questionnaire (at start of employment)	Staff management	LO, VI	New staff form-	Soft	To personnel file	As required	HR		6 years after employment terminates	For reference
25	Staff Application forms/ interview notes.	Recruitment management	Cont	Applications		Interview panels		HR		6 months after interview (unsuccessful) 6 months after employment terminates (successful)	Time limits on litigation.
26	Facts relating to redundancies.	Staff management	LO	Staff redundancy forms	Soft, Hard	By HR, Payroll, Pensions, Redundancy panel processes & Fin Payroll, Pensions, Fin, Panel members, TU officials or other 'friends'		HR	Panel members and secretary	6 years from the date of redundancy.	Time limits on litigation.
27	Facts relating to redundancies where 20 or more redundancies.	Staff management	LO	Staff redundancy forms	Soft, Hard	By HR, Payroll, Pensions, Redundancy panel processes & Fin Payroll, Pensions, Fin, Panel members, TU officials or other 'friends',		HR	Panel members and secretary	12 years from the date of the redundancies.	Limitation Act 1980.
28	Statutory Maternity, Paternity Pay records and calculations.	Staff management	LO	Staff, GP	Soft, Hard	HR Input to payroll system, processed by Payroll	Nil	HR	Nil	6 years from the end of the tax year to which they relate.	Statutory Maternity Pay (General) Regulations 1986.
29	Staff Parental/ Adoption Leave.	Staff management	LO	Staff, GP (Adoption Agency/Social Services for adoption)	Soft, Hard	HR Input to payroll system, processed by Payroll	Nil	HR	Nil	6 years from birth/adoption of the child or 18 years if the child receives a disability allowance.	Time limits on litigation.
30	Statutory Sick Pay records and calculations.	Staff management	LO	Staff, GP etc	Soft, Hard	HR Input to payroll system, processed by Payroll	Nil	HR	Occupational Health if required	6 years from the end of employment.	Time limits on litigation
31	Wages and salary records (including overtime, bonuses and expenses).	Staff management	LO	HR, Staff	Soft, Hard	HR Input to payroll system, processed by Payroll	Fin	HR	Fin	6 years from end of employment	Taxes Management Act 1970.
	Accident books, and records and reports of accidents.	Staff management	LO	All staff	Hard	Analysed for trends		Bursar	Stats to governors, no access to personal data unless specific issue then as required	Books: later of 3 years after the date of the last entry or until age 21. Major Accident Reports: 10 years Minor Accident reports: 5 years Medical under COSH or asbestos: 40 years. Medical under ionising radiations Regs: later of 50 yrs or age 75	Social Security (Claims and Payments) Regulations 1979; RIDDOR 1985. Legal action
	Staff Health Records where reason for termination of employment is connected with health.	Staff Management	LO	Staff	Soft, Hard	Stats, for Governor's panels if nec		HR	Governors medical panels if necessary	6 years from the end of employment.	Time limits on litigation.

34	Records relating to working time	Staff Management	LO	Absence notified to HR		Stats for HM & Govs. To Fin for sick pay		HR	Fin		The Working Time Regulations 1998 (SI 1998/1833)
35	Medical records kept by reason of the Control of Substances Hazardous to Health Regulations 1999.	Staff Management	LO	Heads of Depts storing/using such substances		Stored on staff personal files only accessed for relevant health issues		HR, Student Information Officer		40 years.	Control of Substances Hazardous to Health Regulations1999
36	Disclosure and Barring Service (DBS) records.	Staff Management	LO	DBS	Soft, Hard	Accessed for new employees, governors, helpers etc		HR	Access only if required	6 months after recruitment decision	
37	Governor Records	Governor management	LO	Governors	Soft, hard		For Company's House, DfE	Co Sec		6 years but basic details: name, contact details, dates as governor, committees served on retained for historical purposes.	To allow for a request for references
38	Board Meeting Minutes	Governance	LO	At Committee meetings	Hard with chairs' sigs, soft	Accessed as required.	Committee members and those in attendance	Company Secretary	Anybody unless confidential under FOI	Ad infinitum	As required by Law
39	Board Meeting documentation	Governance	LO	As per Agenda requirements	Hard, Soft	Accessed as required.	Committee members and those 'in attendance	Company Secretary	confidential under FOI	Ad infinitum if supporting strategic decisions taken. As for personnel files if support authority for pay rises, pay regrading or any other HR issue.	
40	Company Records, Membership Certificates and Members' Meetings Minutes	Governance	LO	Company registration, on becoming a member, As per Agenda requirements	Hard, Soft	Accessed as required.	Committee members and those 'in attendance	Company Secretary	Anybody unless confidential under FOI	Ad infinitum	As required by Law
41	Annual Reports	Governance	LO		Hard, Soft	Accessed as required.	Companies House, DfE, Website	Company Secretary	Anybody	Ad Infinitum	For historical research
42	CCTV Videos/ Images	Safeguarding & security	LO, PI	Cameras	Soft	Not unless required to be	Staff, Police etc if required	IT Mgr	As required	30 days unless required for longer for a specific incident e.g. an offence being committed	To allow any incidents recorded to be viewed and retained if appropriate

November 2023