



SOMERHILL

# INFORMATION GOVERNANCE POLICY

**Owner: Data Protection Officer**

**Reviewed: September 2024**

**Next Review: September 2025**



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## 1. Introduction to Information Governance

1.1 This document constitutes Somerhill Charitable Trust's (Somerhill) Information Governance Policy. It details Somerhill's obligations and compliance with relevant legislation in relation to its handling of data. It also sets out Somerhill's commitment to providing appropriate training and increasing awareness in this area.

1.2 This Policy pulls together all the requirements for information governance so that all School information is processed legally, securely, efficiently and effectively. Information plays a key part in Somerhill's day to day operations and governance. Accordingly, this Policy sets out the requirements, standards and best practice that apply to the handling of all information.

1.3 Information governance is a key responsibility of each and every member of Somerhill's community. It is essential that School staff and Governors familiarise themselves with this Policy and the attached appendices. This Policy and the governance it sets are also expected of any third parties handling School information.

1.4 The aim of this Policy is to:

- support Somerhill to comply with its legal, regulatory and contractual obligations
- maintain robust corporate governance and deliver high quality education
- deliver value for money and to protect funds
- improve the way Somerhill handles, utilises and protects its information
- increase Somerhill's openness, transparency and engagement with the general public.

1.5 Somerhill holds and processes standard and sensitive data, (as described in 2.3 below) for the purposes of education provision, performance monitoring, commercial engagement, contractual obligations, research and the safeguarding of pupils.

## 2. Scope

2.1 This Policy covers all information held by Somerhill or on behalf of Somerhill whether in electronic or physical format including (but not limited to):

- electronic data stored on and processed by fixed and portable computers and storage devices;
- data transmitted on networks;
- all paper records;
- visual and photographic materials including slides and CCTV;

2.2 The following are expected to comply with the Policy:

- all staff and governors/trustees of Somerhill;
- any third parties handling, or having access to School information including, for example, consultants, service providers and contractors, visitors and volunteers.



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2.3 The following is the classification template with which most School data can be classified:

2.3.1 **personal data** - this is defined in Article 4 of the General Data Protection Regulation as any information relating to an identified or identifiable natural person (referred to as a 'data subject'), where an identifiable person is one who can be identified directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person. The collection, use and retention of personal data must comply with strict conditions and such data requires special measures of protection as more particularly described in Somerhill's Records Retention Policy.

2.3.2 **sensitive personal data** (also known as special categories of data) is a subset of personal data - this is defined in Article 8 of the General Data Protection Regulation as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, data concerning health or sex life and sexual orientation, genetic data or biometric data. Medical research data for example is likely to include some sensitive personal data. The processing of sensitive personal data is subject to additional requirements and requires additional protections which are described in more detail in this Policy.

2.3.3 **non-personal data** (organisational data) which can be:

- i) sensitive organisational data which includes commercially sensitive planning administrative or research data, data protected by confidentiality agreements, legally privileged information, etc. This data should be protected by appropriate protection measures; and
- ii) non-sensitive organisational data which is data pertaining to School not published by default, but which may be disclosed (subject to legal advice) in response to requests made under the Freedom of Information Act.

## 3. INFORMATION GOVERNANCE STRATEGY

### 3.1 Purpose

3.1.1 The aim of this document is to enable Somerhill to meet its information management and security responsibilities so that customers, businesses, partners and suppliers have the confidence that information is handled and stored with due regard to its value and risk. Individuals must understand the importance of using information correctly, of sharing it lawfully and of protecting it from improper use.

3.1.2 The intention of this strategy is also to enable Somerhill to meet its legal and ethical obligations in terms of:

- the use and security of personal identifiable information;
- appropriate disclosure of information when required;
- regulatory Policies for the management of information;
- professional codes of conduct for consent to the recording, sharing and uses of information;



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- operating procedures and codes of practice adopted by Somerhill;
- information exchanged with third parties.

3.1.3 The strategy recognises the high standards expected of Somerhill as well as the ongoing task of maintaining appropriate standards of security in the area of information governance and of embedding a security culture fully throughout Somerhill.

## 3.2 Strategic objectives

3.2.1 These are the overarching information governance objectives of Somerhill. We want:

- the infrastructure and processes for service delivery to provide the right information to the right people at the right time for the right purpose and promote the provision of high quality services by promoting the ethical, legal, effective and appropriate use of information;
- to promote information governance ensuring that it is embedded throughout Somerhill and to direct cultural change so that information is regarded as a key asset;
- to build into staff competencies and job descriptions specific requirements around the governance of information;
- to encourage staff to work closely together, preventing duplication of effort and enabling more efficient use of resources;
- to work to achieve required standards to comply with legislative, regulatory and contractual obligations and relevant policies;
- to identify and manage information assets across School;
- to implement and operate proportionate controls that apply best practice standards to protect information assets and give confidence to all interested parties;
- to provide adequate training to all staff, increase awareness and embed a culture of care and responsibility in the handling of all information throughout Somerhill.

## 3.3 Approach

3.3.1 Information governance and assurance are integrated into all aspects of School operations. In delivering information governance services, four key elements of School operations will be considered:

1. people
2. process
3. information
4. technology

3.3.2 All information governance, improvement and assurance activities will consider how these factors need to operate in combination to achieve our strategic objectives.



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## **3.4 Benefits**

3.4.1 The following benefits (which are not an exhaustive list) provide an overview of the main benefits that should be derived through the delivery of this strategy:

- consistent and effective management of information across Somerhill;
- increased understanding of and compliance with relevant legislation;
- reduced number of information security incidents;
- reduced staff time and effort;
- improved data quality;
- clear responsibilities in relation to Information Governance and Assurance;
- effective management of information risks;
- greater confidence that information risks are effectively managed;

## **3.5 Governance**

3.5.1 Somerhill Governors, along with the Headmaster are responsible for implementing this policy.

## **4. Policies**

4.1 This Information Governance Policy incorporates the following individual policies:

- Data Protection Policy
- Breach Policy
- Records Management Policy
- CCTV Policy
- Information Asset Register

## **5. Training and development**

5.1 Information governance training and development is essential for the development and improvement of staff knowledge and skills relating to information governance across Somerhill.

5.2 Information governance training must extend beyond basic confidentiality and security awareness in order to develop and follow best practice. Staff must understand the value of information and their responsibility for it, which includes data quality, information security and records management.

5.3 Information governance basic awareness is a mandatory requirement for all new staff as part of their induction.



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## 6. DATA PROTECTION

6. Somerhill collects and uses certain types of personal information about staff, pupils, parents and other individuals who come into contact with Somerhill in order provide education and associated functions. Somerhill may be required by law to collect and use certain types of information to comply with statutory obligations related to employment, education and safeguarding, and this policy is intended to ensure that personal information is dealt with properly and securely and in accordance with the General Data Protection Regulation and other related legislation.

6.1 GDPR applies to all computerised data and manual files if they come within the definition of a filing system. Broadly speaking, a filing system is one where the data is structured in some way that it is searchable on the basis of specific criteria (so you would be able to use something like the individual's name to find their information), and if this is the case, it does not matter whether the information is located in a different physical location.

## 7. Personal Data

7.1 Somerhill is the Data Controller for personal data (as defined in 2.3.1) and special category data (as defined in 2.3.2).

7.2 Information relating to criminal convictions will only be held and processed where there is legal authority to do so.

7.3 Somerhill does not intend to seek or hold sensitive personal data about staff or students except where Somerhill has been notified of the information or it comes to Somerhill's attention via legitimate means (e.g., a grievance) or needs to be sought and held in compliance with a legal obligation or as a matter of good practice. Staff, Parents/Carers, Students and Governors are under no obligation to disclose to Somerhill their race or ethnic origin, political or religious beliefs, whether or not they are a trade union member or details of their sexual life (save to the extent that details of marital status and/or parenthood are needed for other purposes, e.g., pension entitlements).

## 8. The Data Protection Principles

8.1 The **six data protection principles** as laid down in the GDPR are followed by Somerhill at all times:

- **First Principle** - personal data shall be processed fairly, lawfully and in a transparent manner and processing shall not be lawful unless one of the processing conditions can be met;
- **Second Principle** - personal data shall be collected for specific, explicit, and legitimate purposes and shall not be further processed in a manner incompatible with those purposes;
- **Third Principle** - personal data shall be adequate, relevant and limited to what is necessary for the purpose(s) for which it is being processed;
- **Fourth Principle** - personal data shall be accurate and, where necessary, kept up to date;



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- **Fifth Principle** - personal data processed for any purpose(s) shall not be kept for longer than is necessary for that purpose/those purposes;
- **Sixth Principle** - personal data shall be processed in such a way that ensures appropriate security of the data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

8.2 In addition to this, Somerhill is committed to ensuring that at all times, anyone dealing with personal data shall be mindful of the individual's rights under the law (as explained in more detail in sections 14 and 16).

8.3 Somerhill is committed to complying with the principles in 8.1 at all times. This means that Somerhill will:

- inform individuals as to the purpose of collecting any information from them, as and when we ask for it;
- be responsible for checking the quality and accuracy of the information;
- regularly review the records held to ensure that information is not held longer than is necessary and that it has been held in accordance with the Records Retention Policy;
- ensure that when information is authorised for disposal it is done appropriately;
- ensure appropriate security measures to safeguard personal information whether it is held in paper files or on our computer system, and follow the Data Security Policy requirements at all times;
- share personal information with others only when it is necessary and legally appropriate to do so;
- set out clear procedures for responding to requests for access to personal information known as subject access requests;
- report any breaches of the GDPR in accordance with the procedure in section 9 below.

## 9. Conditions for Processing Data under the First Principle

9.1 Somerhill will ensure that when processing data under the first Data Protection Principle, they meet one of the following conditions:

- The individual has given consent that is specific to the particular type of processing activity and that consent is informed, unambiguous and freely given.
- The processing is necessary for the performance of a contract, to which the individual is a party or is necessary for the purpose of taking steps with regards to entering into a contract with the individual at their request.
- The processing is necessary for the performance of a legal obligation to which we are subject.
- The processing is necessary to protect the vital interests of the individual or another.
- The processing is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority vested in us.





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## **10. Use of Personal Data by Somerhill**

10.1 Somerhill holds personal data on pupils, staff and other individuals such as visitors. In each case, the personal data must be treated in accordance with the data protection principles as outlined in section 8.1 above.

### **Pupils**

10.2 The personal data held regarding pupils includes contact details, assessment/examination results, attendance information, characteristics such as ethnic group, special educational needs, any relevant medical information and photographs.

10.3 The data is used in order to support the education of the pupils, to monitor and report on their progress, to provide appropriate pastoral care, and to assess how well as a whole they are doing, together with any other uses normally associated with this provision in a school environment.

10.4 Somerhill may make use of limited personal data (such as contact details) relating to pupils and their parents or guardians for fundraising, marketing or promotional purposes and to maintain relationships with pupils of Somerhill but only where consent has been provided to this.

10.5 In particular Somerhill may:

- transfer information to any association society or club set up for the purpose of maintaining contact with pupils or for fundraising, marketing or promotional purposes relating to but only where consent has been obtained first;
- make personal data, including sensitive personal data, available to staff for planning curricular or extra-curricular activities;
- Use photographs of pupils in accordance with the Use of Images of Children Policy.
- Any wish to limit or object to any use of personal data should be notified to the Data Protection Officer (DPO) in writing, which will be acknowledged in writing. If, in the view of the DPO the objection cannot be maintained, the individual will be given written reasons why Somerhill cannot comply with their request.

### **Staff**

10.6 The personal data held about staff will include contact details, employment history, information relating to career progression, information relating to DBS checks and photographs.

10.7 The data is used to comply with legal obligations placed on Somerhill in relation to employment and the education of children in a school environment. Somerhill may pass information to other regulatory authorities where appropriate and may use names and photographs of staff in publicity and promotional material. Personal data will also be used when giving references.

10.8 Staff should note that information about disciplinary action may be kept for longer than the duration of the sanction. Although treated as “spent” once the period of the sanction has expired,  
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the details of the incident may need to be kept for a longer period.

10.9 Any wish to limit or object to the uses to which personal data is to be utilised should be notified to the Data Protection Officer (DPO) who will ensure that this is recorded and adhered to if appropriate. If the DPO is of the view that it is not appropriate to limit the use of personal data in the way specified, the individual will be given written reasons why Somerhill cannot comply with their request.

## **Other Individuals**

10.10 Somerhill may hold personal information in relation to other individuals who have contact with Somerhill, such as volunteers and visitors. Such information shall be held only in accordance with the data protection principles and shall not be kept longer than necessary.

## **11. Security of Personal Data**

11.1 Somerhill will take reasonable steps to ensure that members of staff will only have access to personal data where it is necessary for them to carry out their duties. All staff will be made aware of this and their duties at induction.

11.2 Somerhill will take all reasonable steps to ensure that all personal information is held securely and is not accessible to unauthorised persons.

## **12. Disclosure of Personal Data to Third Parties**

12.1 The following list includes the most usual reasons that Somerhill will authorise disclosure of personal data to a third party:

- to give a confidential reference relating to a current or former employee, volunteer or pupil;
- for the prevention or detection of crime;
- for the assessment of any tax or duty;
- where it is necessary to exercise a right or obligation conferred or imposed by law upon (other than an obligation imposed by contract);
- for the purpose of, or in connection with, legal proceedings (including prospective legal proceedings);
- for the purpose of obtaining legal advice;
- for research, historical and statistical purposes (so long as this neither supports decisions in relation to individuals, nor causes substantial damage or distress);
- to publish the results of public examinations or other achievements of pupils;
- to disclose details of a pupil's medical condition where it is in the pupil's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips;
- to provide information to another educational establishment to which a pupil is transferring;
- to provide information to the Examination Authority as part of the examination process; and
- to provide information to the relevant Government Department concerned with national education. At the time of the writing of this Policy, the Government Department concerned



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with national education is the Department for Education (DfE). The Examination Authority may also pass information to the DfE.

12.2 The DfE uses information about pupils for statistical purposes, to evaluate and develop education policy and to monitor the performance of the nation's education service as a whole. The statistics are used in such a way that individual pupils cannot be identified from them. On occasion, the DfE may share the personal data with other Government Departments or agencies strictly for statistical or research purposes.

12.3 Somerhill may receive requests from third parties (i.e., those other than the data subject or their representative) to disclose personal data it holds about pupils, their parents or guardians, staff or other individuals. This information will not generally be disclosed unless one of the specific exemptions under data protection legislation which allow disclosure applies; or where necessary for the legitimate interests of the individual concerned.

12.4 All requests for the disclosure of personal data must be sent to the Data Protection Officer who will review and decide whether to make the disclosure, ensuring that reasonable steps are taken to verify the identity of that third party before making any disclosure.

## **13 Confidentiality of Pupil Concerns**

13.1 Where a pupil seeks to raise a concern confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents or guardian, Somerhill will maintain confidentiality unless it has reasonable grounds to believe that the pupil does not fully understand the consequences of withholding their consent, or where Somerhill believes disclosure will be in the best interests of the pupil or other pupils.

## **14 Subject Access Requests**

14.1 Anybody who makes a request to see any personal information held about them by Somerhill is making a subject access request. All information relating to the individual, including that held in electronic or manual files should be considered for disclosure, provided that they constitute a "filing system".

14.2 All requests should be sent to the Data Protection Officer within 3 working days of receipt and must be dealt with in full, without delay and at the latest within one month of receipt.

14.3 Where a child or young person does not have sufficient understanding to make his or her own request (usually those under the age of 13, or over 13 but with a special educational need which makes understanding their information rights more difficult), a person with parental responsibility can make a request on their behalf. The Data Protection Officer must, however, be satisfied that:

- i) the child or young person lacks sufficient understanding; and
- ii) the request made on behalf of the child or young person is in their interests.



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14.4 Any individual, including a child or young person with ownership of their own information rights, may appoint another person to request access to their records. In such circumstances Somerhill must have written evidence that the individual has authorised the person to make the application and the Data Protection Officer must be confident of the identity of the individual making the request and of the authorisation of the individual to whom the request relates.

14.5 Access to records will be refused in instances where an exemption applies, for example, information sharing may place the individual at risk of significant harm or jeopardise police investigations into any alleged offence(s).

14.6 An individual only has the automatic right to access information about themselves and care needs to be taken not to disclose the personal data of third parties where consent has not been given, or where seeking consent would not be reasonable, and it would not be appropriate to release the information. Particular care must be taken in the case of any complaint or dispute to ensure confidentiality is protected.

14.7 All files must be reviewed by the Data Protection Officer before any disclosure takes place. Access will not be granted before this review has taken place.

14.8 Where all the data in a document cannot be disclosed a permanent copy should be made and the data obscured or retyped if this is more sensible. A copy of the full document and the altered document should be retained, with the reason why the document was altered.

## **15 Exemptions to Access by Data Subjects or their Representative**

15.1 Where a claim to legal professional privilege could be maintained in legal proceedings, the information is likely to be exempt from disclosure unless the privilege is waived.

15.2 There are other exemptions from the right of subject access. If we intend to apply any of them to a request, then we will usually explain which exemption is being applied and why.

## **16 Other Rights of Individuals**

16.1 Somerhill has an obligation to comply with the rights of individuals under the law and takes these rights seriously. The following section sets out how Somerhill will comply with the rights to:

- object to processing;
- rectification;
- erasure; and
- data portability.

### **16.2 Right to object to processing**

16.2.1 An individual has the right to object to the processing of their personal data on the grounds of pursuit of a public interest or legitimate interest where they do not believe that those grounds



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are made out.

16.2.2 Where such an objection is made, it must be sent to the Data Protection Officer (DPO) within 2 working days of receipt, and the DPO will assess whether there are compelling legitimate grounds to continue processing which override the interests, rights and freedoms of the individuals, or whether the information is required for the establishment, exercise or defence of legal proceedings.

16.2.3 The Data Protection Officer shall be responsible for notifying the individual of the outcome of their assessment within fourteen working days of receipt of the objection.

## **16.3 Right to rectification**

16.3.1 An individual has the right to request the rectification of inaccurate data without undue delay. Where any request for rectification is received, it should be sent to the Data Protection Officer within 2 working days of receipt and where adequate proof of inaccuracy is given, the data shall be amended as soon as reasonably practicable and the individual notified.

16.3.2 Where there is a dispute as to the accuracy of the data, the request and reasons for refusal shall be noted alongside the data and communicated to the individual. The individual shall be given the option of a review under the data protection complaints procedure, or an appeal direct to the Information Commissioner.

16.3.3 An individual also has a right to have incomplete information completed by providing the missing data and any information submitted in this way shall be updated without undue delay.

## **16.4 Right to erasure**

16.4.1 Individuals have a right, in certain circumstances, to have data permanently erased without undue delay. This right arises in the following circumstances:

- where the personal data is no longer necessary for the purpose or purposes for which it was collected and processed;
- where consent is withdrawn and there is no other legal basis for the processing;
- where an objection has been raised under the right to object and found to be legitimate;
- where personal data is being unlawfully processed (usually where one of the conditions for processing cannot be met);
- where there is a legal obligation on Somerhill to delete.

16.4.2 The Data Protection Officer will make a decision regarding any application for erasure of personal data and will balance the request against the exemptions provided for in the law. Where a decision is made to erase the data and this data has been passed to other data controllers, and/or has been made public, reasonable attempts to inform those controllers of the request shall be made.



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## **16.5 Right to restrict processing**

16.5.1 In the following circumstances, processing of an individual's personal data may be restricted:

- where the accuracy of data has been contested, during the period when Somerhill is attempting to verify the accuracy of the data;
- where processing has been found to be unlawful and the individual has asked that there be a restriction on processing rather than erasure;
- where data would normally be deleted but the individual has requested that their information be kept for the purpose of the establishment, exercise or defence of a legal claim;

## **16.6 Right to portability**

16.6.1 If an individual wants to send their personal data to another organisation they have a right to request that Somerhill provides their information in a structured, commonly used and machine readable format. As this right is limited to situations where Somerhill is processing the information on the basis of consent or performance of a contract, the situations in which this right can be exercised will be quite limited. If a request for this is made, it should be forwarded to the Data Protection Officer (DPO) within 2 working days of receipt and the DPO will review and revert as necessary.

## **17 DATA BREACHES**

17.1 GDPR aims to protect the rights of individuals about whom data is obtained, stored, processed or supplied and requires that organisations take appropriate security measures against unauthorised access, alteration, disclosure or destruction of personal data.

17.2 GDPR places obligations on staff to report actual or suspected data breaches and Somerhill's procedure for dealing with breaches is set out below.

17.3 Third parties who process data on behalf of Somerhill will be required to notify Somerhill of any data breach immediately they become aware of one.

17.4 Failure to notify the relevant individuals of a breach or suspected breach in line with this policy may be considered a disciplinary offence and appropriate action will be taken.

## **18. Responsible Parties**

18.1 Somerhill's Data Protection Officer (DPO) has overall responsibility for breach notification within Somerhill. They are responsible for ensuring the breach notification processes are adhered to by all staff and is the designated point of contact for personal data breaches.

18.2 Somerhill's Bursar is the first point of contact at Somerhill in the event of a suspected breach within Somerhill.



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## 19 Procedure

19.1 A data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data or special category data transmitted, stored or otherwise processed.

19.1.1 Examples of a data breach could include the following (but are not exhaustive):

- Loss or theft of data or equipment on which data is stored, for example, loss of a laptop or a paper file (this includes accidental loss);
- Inappropriate access controls allowing unauthorised use;
- Equipment failure;
- Human error (for example sending an email or SMS to the wrong recipient);
- Unforeseen circumstances such as a fire or flood;
- Hacking, phishing and other “blagging” attacks where information is obtained by deceiving whoever holds it.

19.2 Somerhill must notify the Information Commissioner's Office (ICO) of a data breach where it is likely to result in a risk to the rights and freedoms of individuals. This means that the breach needs to be more than just losing personal data and if unaddressed the breach is likely to have a significant detrimental effect on individuals.

19.2.1 Examples of where the breach may have a significant effect includes:

- potential or actual discrimination;
- potential or actual financial loss;
- potential or actual loss of confidentiality;
- risk to physical safety or reputation;
- exposure to identity theft (for example through the release of non-public identifiers such as passport details);
- the exposure of the private aspect of a person's life becoming known by others.

19.2.2 If the breach is likely to result in a high risk to the rights and freedoms of individuals then the individuals must also be notified directly.

19.3 If you know or suspect a personal data breach has occurred or may occur which meets the criteria above, you should contact the named contact for Somerhill identified in 18.2.

19.4 Breach reporting is encouraged throughout Somerhill and staff are expected to seek advice if they are unsure as to whether the breach should be reported and/or could result in a risk to the rights and freedom of individuals.

19.5 Once reported, you should not take any further action in relation to the breach. In particular you must not notify any affected individuals or regulators or investigate further.



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19.6 On being notified of a suspected personal data breach, the named contact for Somerhill identified in 18.2 will notify the Data Protection Officer (DPO). The DPO will take immediate steps to establish whether a personal data breach has in fact occurred. If so, they will take steps to:

- Where possible, contain the data breach;
- As far as possible, recover, rectify or delete the data that has been lost, damaged or disclosed;
- Assess and record the breach in Somerhill's Data Breach Register;
- Notify the ICO;
- Notify data subjects affected by the breach;
- Notify other appropriate parties to the breach;
- Take steps to prevent future breaches.

19.7 The Data Protection Officer will notify the Information Commissioner's Office (ICO) when a personal data breach has occurred which is likely to result in a risk to the rights and freedoms of individuals. This will be done without undue delay and, where possible, within 72 hours of becoming aware of the breach. If Somerhill are unsure of whether to report a breach, the assumption will be to report it.

19.8 Where the notification is not made within 72 hours of becoming aware of the breach, written reasons will be recorded as to why there was a delay in referring the matter to the Information Commissioner's Office (ICO).

19.9 Where the data breach is likely to result in a high risk to the rights and freedoms of data subjects, the Data Protection Officer will notify the affected individuals without undue delay including the name and contact details of the Information Commissioner's Office (ICO), the likely consequences of the data breach and the measures Somerhill have (or intended) to take to address the breach.

19.10 When determining whether it is necessary to notify individuals directly of the breach, the named contact for Somerhill identified in 18.2 will work with the Data Protection Officer, the Information Commissioner's Office and any other relevant authorities (such as the police).

19.11 If it would involve disproportionate effort to notify the data subjects directly (for example, by not having contact details of the affected individual) then Somerhill will consider alternative means to make those affected aware (for example by making a statement on Somerhill website).

## **20. Notifying Other Authorities**

20.1 Somerhill will need to consider whether other parties need to be notified of the breach. For example:

- Insurers
- Parents





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- Third parties (for example when they are also affected by the breach)
- Local authority
- The police (for example if the breach involved theft of equipment or data). This list is non-exhaustive.

## **21. Assessing The Breach**

21.1 Once initial reporting procedures have been carried out, Somerhill will carry out all necessary investigations into the breach.

21.2 Somerhill will identify how the breach occurred and take immediate steps to stop or minimise further loss, destruction or unauthorised disclosure of personal data. We will identify ways to recover, correct or delete data (for example notifying our insurers or the police if the breach involves stolen hardware or data).

21.3 Having dealt with containing the breach, Somerhill will consider the risks associated with the breach. These factors will help determine whether further steps need to be taken (for example notifying the Information Commissioner's Office and/or data subjects as set out above). These factors include:

- What type of data is involved and how sensitive it is
- The volume of data affected
- Who is affected by the breach (i.e., the categories and number of people involved)
- The likely consequences of the breach on affected data subjects following containment and whether further issues are likely to materialise
- Are there any protections in place to secure the data (for example, encryption, password protection, pseudonymisation)
- What has happened to the data
- What could the data tell a third party about the data subject
- What are the likely consequences of the personal data breach on Somerhill
- Any other wider consequences which may be applicable.

## **22. Preventing Future Breaches**

22.1 Once the data breach has been dealt with, Somerhill will consider its security processes with the aim of preventing further breaches. In order to do this, we will:

- Establish what security measures were in place when the breach occurred
- Assess whether technical or organisational measures can be implemented to prevent the breach happening again
- Consider whether there is adequate staff awareness of security issues and look to fill any gaps through training or tailored advice
- Consider whether it's necessary to conduct a privacy or Data Protection Impact Assessment (DPIA)



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- Consider whether further audits or data protection steps need to be taken
- To update the Data Breach Register
- To debrief governors/management following the investigation.

## **23. Reporting Data Protection Concerns**

23.1 If an individual has a concern in relation to the way data is processed within Somershill or by a third party Somershill has a contract with, it is important that these concerns are raised the named contact for Somershill identified in 18.2.

## **24. RECORDS MANAGEMENT**

24.1 Records disposal is the process by which the Somershill manages the 'records' held, whether in electronic format or paper.

## **25. Retention Periods**

25.1 In line with Article 5(1)(e) of the GDPR Somershill will not retain Data in an identifiable form for any longer than necessary. In determining an appropriate retention period Somershill will take into account any applicable statutory limitation periods and any relevant guidance documents.

25.2 Somershill will undertake an annual review of electronic and paper records to ensure they are retained in line with the Somershill Records Retention Policy.

## **26 Default Periods**

26.1 The default period is the minimum period for which Somershill will retain Data. At the conclusion of the default period Somershill will review the Data being held and determine whether it can be destroyed.

26.2 The standard default period for retaining Data will be as set out in Somershill Record Retention Policy and will be recorded on Somershill Information Asset Register.

26.3 Somershill will take into account the matters set out in Section 27 below in determining whether Data will be retained beyond the default period.

## **27 Exceptions to the Default Period**

27.1 In the majority of cases Data will be securely disposed of when it reaches the end of the retention period. When assessing whether Data should be retained beyond the retention period, Somershill will consider whether:

- The Data is subject to a current request pursuant to the GDPR
- Somershill is the subject of, or involved in ongoing legal action to which the Data is or may be



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relevant

- The Data is or could be needed in connection with an ongoing investigation
- The Data is processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes and Somerhill has put in place appropriate technical and organisational measures
- There are changes to the regulatory or statutory framework which require the Data to be retained for a longer period
- The Data subject has exercised their right to restrict the processing of the Data in accordance with Article 18 of the GDPR

## **28. Disposal of Data**

28.1 When Data identified for disposal is destroyed, a register of the Data destroyed will be kept (see Appendices). The destruction of Data is an irreversible act and must be clearly documented. All Data identified for disposal will be destroyed under confidential conditions by Somerhill.

28.2 Somerhill may sub-contract to another organisation its obligations to dispose of Data under confidential conditions. Somerhill satisfy itself of the sub-contractor/third party's experience and competence to do so.

## **29. Manual Records**

29.1 Where Data is held in paper or other manual form, where the default period for retaining Data has expired and none of the exceptions for retaining Data beyond the default period as set out in Section 26 are satisfied, Somerhill will ensure the Data is shredded or otherwise confidentially disposed of by Somerhill or by a person duly authorised by Somerhill to confidentially destroy the Data.

## **30 Electronic Records**

30.1 Where Data is held in an electronic format Somerhill will, where feasible, use its reasonable endeavours to:

- Put the Data beyond use so that the Data is no longer on a live electronic system and cannot be accessed by a Data Processor.
- Permanently delete the Data from Somerhill's electronic systems when and where this becomes possible Somerhill will only engage Data Processors that are able to provide sufficient guarantees in relation to the secure disposal of Data.

## **31. CCTV**

31.1 At Somerhill, we take our responsibility towards the safety of staff, visitors and pupils very seriously. To that end, we use surveillance cameras to monitor any instances of aggression or physical damage to our school and its members.



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31.2 The images that are captured are only used for the purposes we require them for and a Data Impact Assessment has been undertaken to ensure compliance with GDPR.

31.3 We reassure those persons whose images are being captured, that the images are being handled in accordance with data protection legislation.

31.4 Somerhill's use of CCTV will capture moving and still images of people who could be identified, as well as information relating to individuals for any of the following purposes:

- Observing what an individual is doing
- Taking action to prevent a crime
- Using images of individuals that could affect their privacy

## 32 Legal framework

32.1 The use of CCTV has due regard to legislation and statutory guidance, including but not limited to the following:

- The Regulation of Investigatory Powers Act 2000
- The Protection of Freedoms Act 2012
- The General Data Protection Regulation (GDPR)
- The Data Protection Act 2018
- The Freedom of Information Act 2000
- The Education (Pupil Information) (England) Regulations 2005 (as amended in 2016)
- School Standards and Framework Act 1998
- The Children Act 1989
- The Children Act 2004
- The Equality Act 2010

## 33. Definitions

33.1 For the purpose of the use of CCTV a set of definitions will be outlined, in accordance with the surveillance code of conduct:

- Surveillance – monitoring the movements and behaviour of individuals; this can include video, audio, or live footage. For the purpose of this policy only video and audio footage will be applicable.
- Covert surveillance – any use of surveillance which is intentionally not shared with the subjects it is recording. Subjects will not be informed of such surveillance.

33.2 Somerhill does not condone the use of covert surveillance when monitoring any visitors to Somerhill.



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33.3 Somerhill is the data controller. The governing board of Somerhill therefore has overall responsibility for ensuring that records are maintained, including security and access arrangements in accordance with regulations.

33.4 The role of the data controller includes:

- Processing surveillance and CCTV footage legally and fairly
- Collecting surveillance and CCTV footage for legitimate reasons and ensuring that it is used accordingly
- Collecting surveillance and CCTV footage that is relevant, adequate and not excessive in relation to the reason for its collection
- Ensuring that any surveillance and CCTV footage identifying an individual is not kept for longer than is necessary
- Protecting footage containing personal data against accidental, unlawful destruction, alteration and disclosure – especially when processing over networks

## **34. Purpose and justification**

34.1 Somerhill will only use surveillance cameras for the safety and security of Somerhill and its staff, pupils and visitors.

34.2 Surveillance will be used as a deterrent for violent behaviour and damage to Somerhill.

34.3 Somerhill will only conduct surveillance as a deterrent and under no circumstances will the surveillance and the CCTV cameras be used for routine monitoring of staff.

34.4 Somerhill will only collect CCTV in line with the Data Protection Principles as set out in Section 8.

## **35 Objectives of the use of CCTV**

35.1 The surveillance system will be used to:

- Maintain a safe environment
- Ensure the welfare of pupils, staff and visitors
- Deter criminal acts against persons and property
- Assist the police in identifying persons who have committed an offence

## **36. Protocols**

36.1 The surveillance system will be registered with the ICO in line with data protection legislation.

36.2 The surveillance system is a closed digital system which does not record audio.



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36.3 Warning signs have been placed at the entrances to the premises where the surveillance system is active, as mandated by the ICO's Code of Practice.

36.4 The surveillance system has been designed for maximum effectiveness and efficiency; however, Somerhill cannot guarantee that every incident will be detected or covered and 'blind spots' may exist.

36.5 The surveillance system will not be trained on individuals unless an immediate response to an incident is required.

36.6 The surveillance system will not be trained on private vehicles or property outside the perimeter of Somerhill.

## **37. Security**

37.1 Access to the surveillance system, software and data will be strictly limited to authorised operators and will be password protected.

37.2 The main control facility is kept secure and locked when not in use.

37.3 Surveillance and CCTV systems will be tested for security flaws regularly to ensure that they are being properly maintained at all times.

37.4 Any cameras that present faults will be repaired immediately as to avoid any risk of a data breach.

37.5 The CCTV system can only be accessed by identified members of staff in the course of their employment.

## **38. Privacy by design**

38.1 Any changes to the use of surveillance cameras and CCTV will be subject to a Data Privacy Impact Assessment (DPIA)

38.2 A DPIA will be reviewed prior to the installation of any additional surveillance and CCTV system equipment.

38.3 If the DPIA reveals any potential security risks or other data protection issues, Somerhill will ensure they have provisions in place to overcome these issues.

38.4 Somerhill will ensure that the installation of the surveillance and CCTV systems will always justify its means.

38.6 If the use of a surveillance and CCTV system is too privacy intrusive, Somerhill will seek an



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alternative provision.

## **39. Code of practice**

39.1 Somerhill understands that recording images of identifiable individuals constitutes as processing personal information, so it is done in line with data protection principles.

39.2 Somerhill notifies all pupils, staff and visitors of the purpose for collecting surveillance data via signs in Somerhill grounds where cameras are based.

39.3 CCTV cameras are only placed where they do not intrude on anyone's privacy and are necessary to fulfil their purpose.

39.4 All surveillance footage will be kept for a maximum of one month depending on the volume of recording for security purposes.

39.5 The surveillance and CCTV system is owned by Somerhill and images from the system are strictly controlled and monitored by authorised personnel only.

39.6 Somerhill will ensure that the surveillance and CCTV system is used to create a safer environment for staff, pupils and visitors to Somerhill and to ensure that its operation is consistent with the obligations outlined in data protection legislation.

## **40. Access**

40.1 Under the GDPR, individuals have the right to obtain confirmation that their personal information is being processed as detailed in Section 14

40.2 All disks containing images belong to and remain the property of Somerhill.

40.3 If appropriate a copy of the information will be supplied to the individual free of charge; however, Somerhill may impose a 'reasonable fee' to comply with requests for further copies of the same information.

40.4 Releasing the recorded images to third parties will be permitted only in the following limited and prescribed circumstances, and to the extent required or permitted by law:

- The police – where the images recorded would assist in a specific criminal inquiry
- Prosecution agencies – such as the Crown Prosecution Service (CPS)
- Relevant legal representatives – such as lawyers and barristers
- Persons who have been recorded and whose images have been retained where disclosure is required by virtue of Data Protection Legislation and the Freedom of Information Act 2000

Somerhill's Data Protection Officer is Louise Manthorpe, [dpo@specialistredactionservice.co.uk](mailto:dpo@specialistredactionservice.co.uk)



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## Appendix 1

### Retention Guidelines

#### 1 Governing Body

This section contains retention periods connected to the work and responsibilities of the governing body.

For further information about governing body records please see: “The constitution of governing bodies of maintained schools Statutory guidance for governing bodies of maintained schools and local authorities in England August 2017”

1.1 Management of Governing Body					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
1.1.1	Instruments of government		For the life of the school	Consult local archives before disposal	
1.1.2	Trusts and endowments		For the life of the school	Consult local archives before disposal	
1.1.3	Records relating to the election of parent and staff governors not appointed by the governors		Date of election + 6 months	SECURE DISPOSAL	Yes
1.1.4	Records relating to the appointment of co-opted governors		Provided that the decision has been recorded in the minutes, the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office (except where there have been allegations concerning children). In this case retain for 25 years	SECURE DISPOSAL	Yes





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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
1.1.5	Records relating to the election of chair and vice chair		Once the decision has been recorded in the minutes, the records relating to the election can be destroyed	SECURE DISPOSAL	Yes
1.1.6	Scheme of delegation and terms of reference for committees		Until superseded or whilst relevant [Schools may wish to retain these records for reference purposes in case decisions need to be justified]	These could be offered to the archives if appropriate	
1.1.7	Meetings schedule		Current year	STANDARD DISPOSAL	
1.1.8	Agendas - principal copy		Where possible the agenda should be stored with the principal set of the minutes	Consult local archives before disposal	Potential
1.1.9	Minutes - principal set (signed)		Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting	Consult local archives before disposal	Potential



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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
1.1.10	Reports made to the governors' meeting which are referred to in the minutes		Although generally kept for the life of the organisation, the Local Authority is only required to make these available for 10 years from the date of the meeting	Consult local archives before disposal	Potential
1.1.11	Register of attendance at Full governing board meetings		Date of last meeting in the book + 6 years	SECURE DISPOSAL	Yes
1.1.12	Papers relating to the management of the annual parents' meeting		Date of meeting + 6 years	SECURE DISPOSAL	Yes
1.1.13	Agendas - additional copies		Date of meeting	STANDARD DISPOSAL	
1.1.14	Records relating to Governor Monitoring Visits		Date of the visit + 3 years	SECURE DISPOSAL	Yes
1.1.15	Annual Reports required by the DoE		Date of report + 10 years	SECURE DISPOSAL	
1.1.16	All records relating to the conversion of schools to Academy status		For the life of the organisation	Consult local archives before disposal	



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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
1.1.17	Records relating to complaints made to and investigated by the governing body or head teacher		Major complaints: current year + 6 years. If negligence involved then: current year + 15 years If child protection or safeguarding issues are involved then: current year + 40 years	SECURE DISPOSAL	Yes
1.1.18	Correspondence sent and received by the governing body or head teacher		General correspondence should be retained for current year + 3 years	SECURE DISPOSAL	Potential
1.1.19	Action plans created and administered by the governing body		Until superseded or whilst relevant	SECURE DISPOSAL	
1.1.20	Policy documents created and administered by the governing body		Until superseded [The school should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the IICSA has issued its recommendations.]		



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1.2 Governor Management					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
1.2.1	Records relating to the appointment of a clerk to the governing body		Date on which clerk appointment ceases + 6 years	SECURE DISPOSAL	Yes
1.2.2	Records relating to the terms of office of serving governors, including evidence of appointment		Date appointment ceases + 6 years		Yes
1.2.3	Records relating to governor declaration against disqualification criteria		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes
1.2.4	Register of business interests		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes
1.2.5	Governors Code of Conduct		This is expected to be a dynamic document; one copy of each version should be kept for the life of the organisation		
1.2.6	Records relating to the training required and received by Governors		Date Governor steps down + 6 years	SECURE DISPOSAL	Yes



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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
1.2.7	Records relating to the induction programme for new governors		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes
1.2.8	Records relating to DBS checks carried out on clerk and members of the governing body		Date of DBS check + 6 months	SECURE DISPOSAL	Yes
1.2.9	Governor personnel files		Date appointment ceases + 6 years	SECURE DISPOSAL	Yes

## 2 Management of the School

This section contains retention periods connected to the processes involved in managing the school, including Human Resources, Financial Management, Payroll and Property Management.

2.1 Head Teacher and Senior Management Team					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.1.1	Log books of activity in the school maintained by the Head Teacher		Date of last entry in the book + minimum of 6 years, then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate	Potential
2.1.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies		Date of the meeting + 3 years then review annually, or as required if not destroyed	SECURE DISPOSAL	Potential
2.1.3	Reports created by the Head Teacher or the Management Team		Date of the report + a minimum of 3 years then review annually or as required if not destroyed	SECURE DISPOSAL	Potential



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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.1.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities which do not fall under any other category		Current academic year + 6 years then review annually, or as required if not destroyed	SECURE DISPOSAL	Potential
2.1.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities		Current year + 3 years	SECURE DISPOSAL	Potential
2.1.6	Professional development plans		These should be held on the individual's personnel record. If not then termination of employment + 6 years	SECURE DISPOSAL	Potential
2.1.7	School development plans		Life of the plan + 3 years	SECURE DISPOSAL	



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2.2 Operational Administration					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.2.1	General file series which do not fit under any other category		Current year + 5 years, then review	SECURE DISPOSAL	Potential
2.2.2	Records relating to the creation and publication of the school brochure or prospectus		Current academic year + 3 years	The school could preserve a copy for their archive otherwise STANDARD DISPOSAL	
2.2.3	Records relating to the creation and distribution of circulars to staff, parents or pupils		Current academic year + 1 year	STANDARD DISPOSAL	
2.2.4	School Privacy Notice which is sent to parents as part of GDPR compliance		Until superseded + 6 years		
2.2.5	Consents relating to school activities as part of GDPR compliance (for example, consent to be sent circulars or mailings)		Consent will last whilst the pupil attends the school, it can therefore be destroyed when the pupil leaves	SECURE DISPOSAL	Yes
2.2.6	Newsletters and other items with a short operational use		Current academic year + 1 year [Schools may decide to archive one copy]	STANDARD DISPOSAL	
2.2.7	Visitor management systems (including electronic systems, visitors books and signing-in sheets)		Last entry in the visitors book + 6 years (in case of claims by parents or pupils about various actions).	SECURE DISPOSAL	Yes
2.2.8	Walking bus registers		Date of register + 6 years	SECURE DISPOSAL	Yes



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2.3 Human Resources					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Recruitment</b>					
2.3.1	All records leading up to the appointment of a headteacher		Unsuccessful attempts. Date of appointment plus 6 months. Add to personnel file and retain until end of appointment + 6 years, except in cases of negligence or claims of child abuse then at least 15 years	SECURE DISPOSAL	Yes
2.3.2	All records leading up to the appointment of a member of staff/governor – unsuccessful candidates		Date of appointment of successful candidate + 6 months	SECURE DISPOSAL	Yes
2.3.3	Pre-employment vetting information – DBS Checks – successful candidates	DBS Update Service Employer Guide June 2014; Keeping Children Safe in Education.2018 (Statutory Guidance from DoE) Sections 73, 74	Application forms, references and other documents – for the duration of the employee's employment + 6 years	SECURE DISPOSAL	Yes





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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Recruitment</b>					
2.3.4	Forms of proof of identity collected as part of the process of checking “portable” enhanced DBS disclosure		Where possible this process should be carried out using the on-line system. If it is necessary to take a copy of documentation then it should be retained on the staff personal file.	SECURE DISPOSAL	Yes
2.3.5	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom – successful candidates	An Employer’s Guide to Right to Work Checks [Home Office, May 2015]	Where possible these documents should be added to the staff personnel file [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of employment + not less than 2 years	SECURE DISPOSAL	Yes
<b>Operational Staff Management</b>					
2.3.6	Staff personnel file	Limitation Act 1980 (Section 2)	Termination of Employment + 6 years, unless the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete	SECURE DISPOSAL	Yes
2.3.7	Annual appraisal/assessment records		Current year + 6 years	SECURE DISPOSAL	Yes



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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Operational Staff Management</b>					
2.3.8	Sickness absence monitoring		<p>Sickness records are categorised as sensitive data. There is a legal obligation under statutory sickness pay to keep records for sickness monitoring. Sickness records should be kept separate from accident records.</p> <p>It could be argued that where sickness pay is not paid then current year + 3 years is acceptable, whilst if sickness pay is made then it becomes a financial record and current year + 6 years applies. The actual retention may depend on the internal auditors. Most seem to accept current year + 3 years as being acceptable as this gives them, 'benefits' and Inland Revenue have time to investigate if they need to</p>	SECURE DISPOSAL	Yes
2.3.9	Staff training – where the training leads to continuing professional development		Length of time required by the professional body	SECURE DISPOSAL	Yes
2.3.10	Staff training – except where dealing with children, e.g. first aid or health and safety		This should be retained on the personnel file [see 2.3.1 above]	SECURE DISPOSAL	Yes



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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Operational Staff Management</b>					
2.3.11	Staff training – where the training relates to children (e.g. safeguarding or other child related training)		Date of the training + 40 years [This retention period reflects that the IICSA may wish to see training records as part of an investigation]	SECURE DISPOSAL	Yes
<b>Disciplinary and Grievance Processes</b>					
Where schools are in any doubt as to which categories disciplinary records fall under, then HR or legal advice should be sought from the Local Authority.					
2.3.12	Records relating to any allegation of a child protection nature against a member of staff	“Keeping children safe in education Statutory guidance for schools and colleges September 2018”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018”	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 UNLESS the member of staff is part of any case which falls under the terms of reference of IICSA. If this is the case then the file will need to be retained until IICSA enquiries are complete	SECURE DISPOSAL These records must be shredded	Yes
2.3.13	Disciplinary proceedings				Yes



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Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
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## Disciplinary and Grievance Processes

**Note:**

The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period.

Any disciplinary proceedings data will be a record of an important event in the course of the employer’s relationship with the employee. Should the same employee be accused of similar misconduct five years down the line, and then defend him- or herself by saying “I would never do something like that”, reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had “fifteen years of unblemished service”, the record of the disciplinary proceedings would be effective evidence to counter this claim.

Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be “removed from the file”. This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.

Oral warning		Date of warning + 6 months	SECURE DISPOSAL [If warnings are placed on personal files then 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		
Case not found		If the incident is related to child protection then see above, otherwise dispose of at the conclusion of the case	SECURE DISPOSAL	



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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Payroll and Pensions</b>					
2.3.14	Absence record		Current year + 3 years	SECURE DISPOSAL	Yes
2.3.15	Batches	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.16	Bonus sheets	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL	Yes
2.3.17	Car allowance claims	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL	Yes
2.3.18	Car loans	Taxes Management Act 1970 Income and Corporation Taxes 1988	Completion of loan + 6 years	SECURE DISPOSAL	Yes
2.3.19	Car mileage output	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.20	Elements		Current year + 2 years	SECURE DISPOSAL	Yes
2.3.21	Income tax form P60		Current year + 6 years	SECURE DISPOSAL	Yes



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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Payroll and Pensions</b>					
2.3.22	Insurance	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.23	Maternity payment		Current year + 3 years	SECURE DISPOSAL	Yes
2.3.24	Members allowance register	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.25	National Insurance – schedule of payments	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.26	Overtime	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 3 years	SECURE DISPOSAL	Yes
2.3.27	Part time fee claims	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.28	Pay packet receipt by employee		Current year + 2 years	SECURE DISPOSAL	Yes
2.3.29	Payroll awards		Current year + 6 years	SECURE DISPOSAL	Yes



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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Payroll and Pensions</b>					
2.3.30	Payroll – gross/net weekly or monthly	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.31	Payroll reports	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.32	Payslips – copies	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.33	Pension payroll	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.34	Personal bank details	If employment ceases then end of employment + 6 years	Until superseded + 3 years	SECURE DISPOSAL	Yes
2.3.35	Sickness records		Current year + 3 years	SECURE DISPOSAL	Yes
2.3.36	Staff returns		Current year + 3 years	SECURE DISPOSAL	Yes
2.3.37	Superannuation adjustments	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes



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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Payroll and Pensions</b>					
	Superannuation reports	Taxes Management Act 1970 Income and Corporation Taxes 1988	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.38	Tax forms P6/P11/ P11D/P35/P45/P46/ P48	The minimum requirement - as stated in Inland Revenue Booklet 490 - is for at least 3 years after the end of the tax year to which they apply. Originals must be retained in paper/ electronic format. It is a corporate decision to retain for current year + 6 years. Employees should retain records for 22 months after current tax year	Current year + 6 years	SECURE DISPOSAL	Yes
2.3.39	Time sheets/clock cards/flexitime		Current year + 3 years	SECURE DISPOSAL	Yes





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2.4 Health and Safety					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.4.1	Health and safety policy statements		Life of policy + 3 years	SECURE DISPOSAL	
2.4.2	Health and safety risk assessments		Life of risk assessment + 3 years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred	SECURE DISPOSAL	
2.4.3	Accident reporting records relating to individuals who are over 18 years of age at the time of the incident	<p>Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980</p> <p>Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628</p> <p>Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 1979 No 628</p> <p>Social Security Administration Act 1992 Section 8.</p> <p>Social Security (Claims and Payments) Amendment (No 30) Regulations 1993 SI 1993 No 2113</p> <p>Allows the information to be kept electronically</p>	<p>The Accident Book – BI 510 - 3 years after last entry in the book</p> <p>This includes the new format to be used from 1/1/04</p> <p>This means that, if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry</p> <p>Completed pages must be kept secure with restricted access. Data Protection Act 2018 and GDPR</p>	SECURE DISPOSAL	Yes



# SOMERHILL

2.4 Health and Safety					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.4.4	Accident reporting records relating to individuals who are under 18 years of age at the time of the incident	<p>Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980</p> <p>Social Security (Claims and Payments) Regulations 1979. SI 1979 No 628</p> <p>Social Security (Claims and Payments) Regulations SI 1987 No 1968 Revokes all but Part 1 of SI 1979 No 628</p> <p>Social Security Administration Act 1992 Section 8.</p> <p>Social Security (Claims and Payments) Amendment (No 30 Regulations 1993 SI 1993 No 2113</p> <p>Allows the information to be kept electronically</p>	<p>The Accident Book – BI 510 - 3 years after last entry in the book</p> <p>This includes the new format to be used from 1/1/04</p> <p>This means that, if it takes 5 years to complete, the book must be retained for a further 3 years from the last entry</p> <p>Completed pages must be kept secure with restricted access. Data Protection Act 2018 and GDPR</p>	SECURE DISPOSAL	Yes
2.4.5	Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR). For more information see <a href="http://www.hse.gov.uk/RIDDOR/">http://www.hse.gov.uk/RIDDOR/</a>	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12(2)	Date of incident + 3 years provided that all records relating to the incident are held on personnel file [see 2.4.2 above]	SECURE DISPOSAL	Yes



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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.4.6	Control of Substances Hazardous to Health (COSHH)	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)	Date of incident + 40 years	SECURE DISPOSAL	
2.4.7	Process of monitoring of areas where employees and persons are likely to have come into contact with asbestos	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL	
2.4.8	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation. Maintenance records or controls, safety features and PPE ----- Dose assessment and recording	The Ionising Radiation Regulations 2017. SI 2017 No 1075 Regulation 11  As amended by SI 2018 No 390 Personal Protective Equipment (Enforcement) Regulations 2018	2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination. ----- To keep the records made and maintained (or a copy of these records) until the person to whom the record relates has or would have attained the age of 75 years, but in any event for at least 30 years from when the record was made	SECURE DISPOSAL	
2.4.9	Fire Precautions log books		Current year + 3 years	SECURE DISPOSAL	



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2.4 Health and Safety					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
2.4.10	Health and safety file to show current state of building, including all alterations (wiring, plumbing, building works, etc.), to be passed on in the case of change of ownership		Pass to new owner on sale or transfer of building		
2.5 Financial Management					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
Risk Management and Insurance					
2.5.1	Employer's Liability Insurance Certificate		Closure of the school + 40 years [May be kept electronically]	SECURE DISPOSAL To be passed to the Local Authority if the school closes	
Asset Management					
2.5.2	Inventories of furniture and equipment		Current year + 6 years	SECURE DISPOSAL	
2.5.3	Burglary, theft and vandalism report forms		Current year + 6 years	SECURE DISPOSAL	
Accounts and Statements (including budget management)					
2.5.4	Annual accounts		Current year + 6 years	STANDARD DISPOSAL	
2.5.5	Loans and grants managed by the school		Date of last payment on the loan + 12 years then review	SECURE DISPOSAL	



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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Accounts and Statements (including budget management)</b>					
2.5.6	All records relating to the creation and management of budgets, including the annual budget statement and background papers		Life of the budget + 3 years	SECURE DISPOSAL	
2.5.7	Invoices, receipts, order books and requisitions, delivery notices		Current financial year + 6 years	SECURE DISPOSAL	
2.5.8	Records relating to the collection and banking of monies		Current financial year + 6 years	SECURE DISPOSAL	
2.5.9	Records relating to the identification and collection of debt		Final payment of debt + 6 years	SECURE DISPOSAL	
<b>Pupil Finance</b>					
2.5.10	Student Grant applications		Current year + 3 years	SECURE DISPOSAL	Yes
2.5.11	Pupil Premium Fund records		Date pupil leaves the provision + 6 years	SECURE DISPOSAL	Yes
<b>Contract Management</b>					
2.5.12	All records relating to the management of contracts under seal	Limitation Act 1980	Last payment on the contract + 12 years	SECURE DISPOSAL	
2.5.13	All records relating to the management of contracts under signature	Limitation Act 1980	Last payment on the contract + 6 years	SECURE DISPOSAL	
2.5.14	Records relating to the monitoring of contracts		Life of contract + 6 or 12 years	SECURE DISPOSAL	



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2.5 Financial Management					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>School Fund</b>					
2.5.15	School Fund - Cheque books		Current year + 6 years	SECURE DISPOSAL	
2.5.16	School Fund - Paying in books		Current year + 6 years	SECURE DISPOSAL	
2.5.17	School Fund – Ledger		Current year + 6 years	SECURE DISPOSAL	
2.5.18	School Fund – Invoices		Current year + 6 years	SECURE DISPOSAL	
2.5.19	School Fund – Receipts		Current year + 6 years	SECURE DISPOSAL	
2.5.20	School Fund - Bank statements		Current year + 6 years	SECURE DISPOSAL	
2.5.21	School Fund – Journey Books		Current year + 6 years	SECURE DISPOSAL	
<b>School Meals Management</b>					
2.5.22	Free school meals registers (where the register is used as a basis for funding)		Current year + 6 years	SECURE DISPOSAL	Yes
2.5.23	School meals registers		Current year + 3 years	SECURE DISPOSAL	Yes
2.5.24	School meals summary sheets		Current year + 3 years	SECURE DISPOSAL	Yes



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2.6 Property Management					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Property Management</b>					
2.6.1	Title deeds of properties belonging to the school		These should follow the property unless the property has been registered with the Land Registry		
2.6.2	Plans of property belonging to the school		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10		
2.6.3	Leases of property leased by or to the school		Expiry of lease + 6 years	SECURE DISPOSAL	
2.6.4	Records relating to the letting of school premises		Current financial year + 6 years	SECURE DISPOSAL	
<b>Maintenance</b>					
2.6.5	All records relating to the maintenance of the school carried out by contractors		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10	SECURE DISPOSAL	
2.6.6	All records relating to the maintenance of the school carried out by school employees, including maintenance log books		These should be retained whilst the building belongs to the school and should be passed on to any new owners if the building is leased or sold. See 2.4.10	SECURE DISPOSAL	



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## 3 Pupil Management

This section contains retention periods connected to the processes involved in managing a pupil's journey through school, including the admissions process.

3.1 Admissions Process					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
3.1.1	All records relating to the creation and implementation of the School Admissions Policy	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Life of the policy + 3 years then review	SECURE DISPOSAL	
3.1.2	Admissions – if the admission is successful	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Date of admission + 1 year	SECURE DISPOSAL	Yes
3.1.3	Admissions – if the appeal is unsuccessful	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Resolution of case + 1 year	SECURE DISPOSAL	Yes
3.1.4	Register of Admissions	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 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 Schools may wish to consider keeping the admission register permanently as an archive record as often schools receive enquiries from past pupils to confirm the dates they attended the school or to transfer these records to the appropriate County Archives Service	





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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
3.1.5	Admissions – Secondary Schools – Casual		Current year + 1 year	SECURE DISPOSAL	Yes
3.1.6	Proofs of address supplied by parents as part of the admissions process	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014	Current year + 1 year	SECURE DISPOSAL	Yes
3.1.7	Supplementary information form including additional information such as religion, medical conditions etc.				Yes
3.1.7.1	For successful admissions		This information should be added to the pupil file	SECURE DISPOSAL	
3.1.7.2	For unsuccessful admissions		Until appeals process completed (GDPR)	SECURE DISPOSAL	



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3.2 Pupil's Educational Record					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<p><b>Please note</b> that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.</p>					
3.2.1	Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 As amended by SI 2018 No 688			Yes
3.2.1.1	Primary		Retain whilst the child remains at the primary school	The file should follow the pupil when he/she leaves the primary school. This will include: <ul style="list-style-type: none"> <li>• To another primary school</li> <li>• To a secondary school</li> <li>• To a pupil referral unit</li> </ul>	
3.2.1.2	Secondary	Limitation Act 1980 (Section 2)	Date of birth of the pupil + 25 years	REVIEW	
3.2.2	Examination Results – pupil copies				Yes
3.2.2.1	Public		This information should be added to the pupil file	All uncollected certificates should be returned to the examination board after reasonable attempts to contact the pupil have failed	
3.2.2.2	Internal		This information should be added to the pupil file		



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	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
3.2.3	Child protection information held on pupil file	“Keeping children safe in education Statutory guidance for schools and colleges 2018”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018”	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. Note: These records will be subject to any instruction given by IICSA	SECURE DISPOSAL These records must be shredded	Yes
3.2.4	Child protection information held in separate files	“Keeping children safe in education Statutory guidance for schools and colleges 2018”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018”	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 Note: These records will be subject to any instruction given by IICSA	SECURE DISPOSAL These records must be shredded	Yes



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3.3 Attendance					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<p>Please note that any record containing pupil information may be subject to the requirements of the IICSA. Schools should implement any instruction which has been received from IICSA. The instructions from IICSA will override any guidance given in this Retention Schedule. If any school is unsure about what records should be retained, they should seek the advice of their own local authority or take independent legal advice.</p>					
3.3.1	Attendance Registers	School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities October 2014	Every entry in the attendance register must be preserved for a period of 3 years after the date on which the entry was made.	SECURE DISPOSAL	Yes
3.3.2	Correspondence relating to any absence (authorised/unauthorised)	Education Act 1996 Section 7	Current academic year + 2 years	SECURE DISPOSAL	Potential
3.4.1	Special Educational Needs files, reviews and Education, Health and Care Plan, including advice and information provided to parents regarding educational needs and accessibility strategy	Children and Family's Act 2014; Special Educational Needs and Disability Act 2001 Section 14	Date of birth of the pupil + 31 years [Education, Health and Care Plan is valid until the individual reaches the age of 25 years – the retention period adds an additional 6 years from the end of the plan in line with the	SECURE DISPOSAL	Yes



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## 4 Curriculum and Extra Curricular Activities

This section contains retention periods connected to the processes involved in managing the curriculum and extra-curricular activities.

4.1 Statistics and Management Information					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
4.1.1	Curriculum returns		Current year + 3 years	SECURE DISPOSAL	No
4.1.2	Examination Results (school's copy)		Current year + 6 years	SECURE DISPOSAL	Yes
4.1.2.1	SATS records				Yes
4.1.2.2	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 of the whole year's SATs results. These could be kept for current year + 6 years to allow suitable comparison
4.1.2.3	Examination Papers		The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL	
4.1.3	Published Admission Number (PAN) Reports		Current year + 6 years	SECURE DISPOSAL	Yes



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4.1 Statistics and Management Information					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
4.1.4	Value Added and Contextual Data		Current year + 6 years	SECURE DISPOSAL	Yes
4.1.5	Self-Evaluation Forms			SECURE DISPOSAL	Yes
4.1.5.1	Internal moderation		Academic year plus 1 academic year	SECURE DISPOSAL	Yes
4.1.5.2	External moderation		Until superseded	SECURE DISPOSAL	Yes
4.2 Implementation of Curriculum					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
4.2.1	Schemes of work		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	
4.2.2	Timetable		Current year + 1 year		
4.2.3	Class record books		Current year + 1 year		
4.2.4	Mark books		Current year + 1 year		
4.2.5	Record of home-work set		Current year + 1 year		
4.2.6	Pupil's work		Where possible, the pupil's work should be returned to the pupil at the end of the academic year. If this is not the school's policy then current year + 1 year	SECURE DISPOSAL	



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For information relating to records concerning the running of educational visits outside the classroom please see the guidance provided by <https://oeapng.info/>

4.3 School Trips					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
4.3.1	Parental consent forms for school trips where there has been no major incident		Although the consent forms could be retained for Date of birth + 22 years, the school may wish to complete a risk assessment to assess whether the forms are likely to be required and could make a decision to dispose of the consent forms at the end of the trip (or at the end of the academic year). This is a pragmatic approach and if in doubt the school should seek legal advice	SECURE DISPOSAL	Yes
4.3.2	Parental permission slips for school trips – where there has been a major incident	Limitation Act 1980 (Section 2)	Date of birth of the pupil involved in the incident + 25 years 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	SECURE DISPOSAL	Yes



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4.4 School Support Organisations					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
<b>Family Liaison Officers and Home School Liaison Assistants</b>					
4.4.1	Day books		Current year + 2 years then review	SECURE DISPOSAL	Yes
4.4.2	Reports for outside agencies - where the report has been included on the case file created by the outside agency		Whilst child is attending school and then destroy	SECURE DISPOSAL	Yes
4.4.3	Referral forms		While the referral is current	SECURE DISPOSAL	Yes
4.4.4	Contact data sheets		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL	Yes
4.4.5	Contact database entries		Current year then review, if contact is no longer active then destroy	SECURE DISPOSAL	Yes
4.4.6	Group registers		Current year + 2 years	SECURE DISPOSAL	Yes
<b>Parent Teacher Associations and Old Pupils Associations</b>					
4.4.7	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations		Current year + 6 years then review	SECURE DISPOSAL	





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## 5 Central Government and Local Authority

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

5.1 Local Authority					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
5.1.1	Secondary Transfer Sheets (primary)		Current year + 2 years	SECURE DISPOSAL	Yes
5.1.2	Attendance returns		Current year + 1 year	SECURE DISPOSAL	Yes
5.1.3	School census returns		Current year + 5 years	SECURE DISPOSAL	
5.1.4	Circulars and other information sent from the local authority		Operational use	SECURE DISPOSAL	
5.2 Central Government					
	Basic file description	Statutory Provisions	Retention Period [Operational]	Action at end of the administrative life of the record	Personal Information
5.2.1	OFSTED reports and papers where a physical copy is held		Life of the report then review	SECURE DISPOSAL	
5.2.2	Returns made to central government		Current year + 6 years	SECURE DISPOSAL	
5.2.3	Circulars and other information sent from central government		Operational use	SECURE DISPOSAL	



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## Appendix 2

Schedule of Records  
Destroyed/Deleted by  
Somerhill

Unique Identifier	File Title/ Brief Description	Covering Dates	Quantity/ No. of Vols	Retention Policy Ref.	Authorising Officer	Date Approved for Disposal	Date Destroyed	Disposal Method	Place of Disposal	Destroying Officer/Contractor



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## Appendix 3 - Information Asset Register

Academic Year 2024 to 2025

<b>Data Controller</b>	Somerhill Charitable Trust Limited
	Somerhill
	Tonbridge
	Kent
	TN11 0NJ
<b>ICO Registration No.</b>	Z7862695
<b>Data Protection Officer</b>	Louise Manthorpe
	Specialist Redaction Service
	Chessington
	Surrey
<b>ICO Registration No.</b>	ZB318581



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## Lawfulness of processing

### **Article 6 of GDPR states**

1. Processing shall be lawful only if and to the extent that at least one of the following applies:

- a) **Consent.** The data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- b) **Contract.** Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- c) **Legal Obligation.** Processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) **Vital Interests.** Processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- e) **Public Tasks.** Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- f) **Legitimate Interests.** processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

### Processing of special categories of personal data Article 9 of GDPR states:

1. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.

2. Paragraph 1 shall not apply if one of the following applies:

- a) **Explicit consent.** The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;
- b) **Employment, social security and social protection (if authorised by law)** Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;
- c) **Vital interests** Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
- d) **Not-for-profit bodies** Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;
- e) **Made public by the data subject.** Processing relates to personal data which are manifestly



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made public by the data subject;

f) **Legal claims or judicial acts.** Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

g) **Reasons of substantial public interest (with a basis in law).** Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;

h) **Health or social care (with a basis in law).** Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;

i) **Public health (with a basis in law).** Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy.

j) **Archiving, research and statistics (with a basis in law).** Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

## Archives

**1. Financial records and legal records relating to School assets and the School estate. These may include the personal data of individuals involved in managing the School assets and estate, witnesses and parties to legal documents.**

Purpose of processing: -	To maintain a historic record of School finances and assets.
Location: -	Archive Room
Format of Data: -	Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff/ Members of the public
Retention schedule: -	Current year + 6 Years
Article 6 lawful basis for processing personal data: -	Legitimate interests

**2. Personal papers and collections donated to the School archive. These may consist of correspondence and documents relating to and/or referring to the donor or third parties.**

Purpose of processing: -	As part of the School archive we accept and maintain papers and collections of significance to the School or which are otherwise of importance as an archive.
Location: -	Archive Room



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Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff/Students/Visitors/Members of the Public
Retention schedule: -	Permanent
Article 6 lawful basis for processing personal data: -	Legitimate interests

**3. Records of School life: including photographs, pictures, written records, trophies, other memorabilia, teams, choirs, clubs and societies, plays and performances, of participation in events and sporting fixtures and of the outcomes. This may include written correspondence and minute books relating to these matters.**

Purpose of processing: -	To maintain a historic record of school life and what has been achieved by staff and students over time.
Location: -	Archive Room
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff/Students/Visitors/Members of the Public
Retention schedule: -	Permanent
Article 6 lawful basis for processing personal data: -	Legitimate interests

## Finance, Commercial and related Administration

### 1. First aid Records

Purpose of processing: -	Provides the school a safe a secure system location to record accidents and relevant incidents that occur on school premises
Location: -	External Server
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	Bursar
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Date of incident + 12 years in the case of serious accidents a further retention period will need to be applied
Additional relevant legislation (Outside of DPA/GDPR):-	Accident Book report and Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR). Woolfe Reforms
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category data: -	Legitimate Activities

### 2. Contractor information, Insurance, members of what bodies, business details

Purpose of processing: -	To ensure contractors on site have the appropriate qualifications and insurance for works
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## SOMERHILL

Location: -	Internal Server, Restricted Drive/ Folder
Source of the data (If applicable): -	Data Subject
Format of Data: -	Data Subject Paper and Electronic (word, excel etc.)
Responsible person: -	Other
Categories of individuals: -	Visitors
Retention schedule: -	Current year + 6 Years
Additional relevant legislation (Outside of DPA/GDPR): -	Health and Safety at Work etc Act 1974
Article 6 lawful basis for processing personal data: -	legal obligation

**3. Records generated for legal or statutory compliance purposes that contain names and/or associated personal data. For example, copies of data supplied pursuant to requests made under data protection and/or freedom of information legislation, records made to comply with safeguarding, health and safety or counter- terrorism legislation, in connection with legal advice or claims, or to comply with auditors' requirements.**

Purpose of processing: -	So that we have a record of information supplied, both in the interests of good administration and to meet legal and regulatory requirements.
Location: -	Internal Server, Restricted Drive/ Folder
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper and Electronic (word, excel etc.)
Responsible person: -	Finance Officer
Categories of individuals: -	Staff/Students/Visitors
Retention schedule: -	Current year + 6 Years
Article 6 lawful basis for processing personal data: -	legal obligation

### 4. Service Level Agreements

Purpose of processing: -	Company info, contracts/ agreements
Location: -	Server and Paper File
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Current year + 6 Years
Article 6 lawful basis for processing personal data: -	legal obligation

**5. Supplier and contractor information including names, contact details, communications with contractors, details of contracts, tender information, works undertaken, items purchased, invoicing arrangements, VAT numbers and payments made, banking details, information about the selection of contractors/suppliers, including information about the quality and/or value of the work or products.**





## SOMERHILL

Purpose of processing: -	As part of the School's normal operations and dealings with its suppliers and contractors.
Location: -	Server and Paper File
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Visitors
Retention schedule: -	Current year + 6 Years
Article 6 lawful basis for processing personal data: -	legal obligation

### **6. Title documents, transfers, leases and contracts which include the names of parties, signatories and witnesses.**

Purpose of processing: -	In order to execute and retain title documents, transfers, leases and contracts.
Location: -	Finance Office
Format of Data: -	Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Current year + 6 Years
Article 6 lawful basis for processing personal data: -	legal obligation

### **7. Bank account records, including names of payees and transaction details.**

Purpose of processing: -	In the normal course of operating the School bank accounts.
Location: -	Internal Server, Restricted Drive/ Folder
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Current year + 6 Years
Article 6 lawful basis for processing personal data: -	legal obligation

### **8. Budget documents, audit and accounting documents, management accounts, investment documents and communications relating to such records, all of which may include names and contact details of individuals responsible for or involved with the budgets/accounts/investments.**

Purpose of processing: -	As a normal part of the School's budgetary and accounting processes.
Location: -	Internal Server, Restricted Drive/ Folder
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate



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Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Retention schedule: -	Current year + 6 Years
Article 6 lawful basis for processing personal data: -	legal obligation

**9. Name; address; National Insurance number; date of birth; bank account; tax and salary details; attachment of earnings payments and court orders; pension details; names of personal pension beneficiaries; salary sacrifice arrangements; on- line and paper pension records; P45/P60 details; statutory payments (SMP etc.).**

Purpose of processing: -	Process payroll; collect tax, NI and pension contributions on behalf of HMRC and the pension schemes; administer pension schemes; administer the bus pass scheme and childcare scheme. Data held on computer drives, payroll software.
Location: -	Server and Paper File
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper and Electronic (word, excel etc.)
Responsible person: -	Finance Officer
Name and contact details of joint controller (if applicable): -	Firefly Payroll Ltd.
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	legal obligation

**10. Finance Data**

Purpose of processing: -	To enable appropriate accounts to be recorded and maintained for TAX and Transparency purposes
Location: -	Internal Server, Restricted Drive/ Folder
Format of Data: -	Paper and Electronic (word, excel etc.)
Responsible person: -	Finance Officer
Name and contact details of joint controller (if applicable): -	Firefly Payroll Ltd.
Categories of individuals: -	Staff/Students/Visitors
Retention schedule: -	Current year + 6 Years

**Governance**

**1. Instruments of Government**

Purpose of processing: -	An Instrument of Government is the legal document for Local Authority schools that records the constitution of the governing body and the term of office for each category of governor as well as the name of the school.
Location: -	External and Internal Server
Format of Data: -	Electronic (word, excel etc.) only



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Responsible person: -	Bursar
Categories of individuals: -	Students/Parents/Carers/Staff
Retention schedule: -	Closure of the school + 40 years
Additional relevant legislation (Outside of DPA/GDPR): -	School Governance (Constitution) (England) Regulations 2012
Article 6 lawful basis for processing personal data: -	Legal obligation

## 2. Governor Agendas

Purpose of processing: -	Agendas are produced for all Governor meetings so that the chair and headteacher have a basis for determining how the meetings are conducted. The chair, of course, will have the final say on what goes on the agenda and where.
Location: -	External Server/Third Party Cloud
Source of the data (If applicable): -	Data Subject/Representative, External Organisation (as appropriate)
Format of Data: -	Data Subject/Representative, External Organisation (as appropriate) Paper, Electronic and Database
Responsible person: -	Other
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Current Year + 6 Years
Additional relevant legislation (Outside of DPA/GDPR): -	DofE The Governance Handbook
Article 6 lawful basis for processing personal data: -	Public task

## 3. Governor Reports

Purpose of processing: -	Reports are produced to enable Governors to have sufficient information to be able to perform their task
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative, External Organisation (as appropriate)
Format of Data: -	Data Subject/ Representative, External Organisation (as appropriate) Paper, Electronic and Database
Responsible person: -	Other
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Current Year + 6 Years
Additional relevant legislation (Outside of DPA/GDPR): -	DofE The Governance Handbook
Article 6 lawful basis for processing personal data: -	Public task

## 4. Governor's Action Plans

Purpose of processing: -	Actions plans record agreements made during Governor meetings in relation to specific tasks that require attention
Location: -	External Server/ Third Party Cloud



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Source of the data (If applicable): -	Data Subject/ Representative, External Organisation (as appropriate)
Format of Data: -	Data Subject/ Representative, External Organisation (as appropriate) Paper, Electronic and Database
Responsible person: -	Other
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Current Year + 6 Years
Additional relevant legislation (Outside of DPA/GDPR): -	DofE The Governance Handbook
Article 6 lawful basis for processing personal data: -	Public task

## 5. Complaints Log

Purpose of processing: -	If a complaint is made about the way the way a person/child has been treated the school needs to record the details of the complaint, any investigation undertaken and the outcome.
Location: -	Internal Server, Restricted Drive/ Folder
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Electronic (word, excel etc.) only
Responsible person: -	Headmaster
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Date of resolution of complaint + 6 years
Article 6 lawful basis for processing personal data: -	Public task

## 6. Policy documents

Purpose of processing: -	Policy documents specify the rules, guidelines and regulations that the school requires employees to follow. Policies also reflect the values and ethics of the School
Location: -	Internal Server, Unrestricted Drive/Folder
Format of Data: -	Electronic (word, excel etc.) only
Responsible person: -	Headmaster
Categories of individuals: -	Staff
Retention schedule: -	Expiry of policy
Article 6 lawful basis for processing personal data: -	Public task

## 7. Accessibility Strategy

Purpose of processing: -	An accessibility strategy details the way the school promotes better access for disabled pupils at school The school is required by The Equality Act 2010 to have an accessibility strategy. Schools must publish their Disability Equality Scheme and Accessibility Plan with links to their SEN Information report that are available on the Local Offer
Location: -	Internal Server, Unrestricted Drive/Folder
Format of Data: -	Electronic (word, excel etc.) only
Responsible person: -	Headmaster



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Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Closure + 12 years
Additional relevant legislation (Outside of DPA/GDPR): -	Special Educational Needs and Disability Act 2001 Section 14. The Equality Act 2010
Article 6 lawful basis for processing personal data: -	Legal obligation

## 8. Appointment records: Equality monitoring data

Purpose of processing: -	For equality or monitoring purposes.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Governors
Retention schedule: -	Current Year + 6 Years
Additional relevant legislation (Outside of DPA/GDPR): -	DofE The Governance Handbook
Article 6 lawful basis for processing personal data: -	Legal Obligation

## 9. Conflict of interest declarations.

Purpose of processing: -	To enable us to identify when your personal or family interests and/or loyalties conflict with those of the School.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Governors
Retention schedule: -	Current Year + 6 Years
Additional relevant legislation (Outside of DPA/GDPR): -	DofE The Governance Handbook
Article 6 lawful basis for processing personal data: -	Legal Obligation

## 10. Contact details (name, addresses, telephone numbers), as amended from time to time.

Purpose of processing: -	In order to be able to contact you in your role as an employee at the School, and (where applicable) to comply with immigration law. These details will also appear on documents and materials held in the School archive.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Governors
Retention schedule: -	Current Year + 6 Years
Additional relevant legislation (Outside of DPA/GDPR): -	DofE The Governance Handbook



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Article 6 lawful basis for processing personal data: -	Legal Obligation
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## Premises/ School Security and CCTV

### 1. Accident Records relating to accident/injury on the premises.

Purpose of processing: -	Under the Woolf Reforms of civil procedure, the defendant can be asked for disclosure of relevant records. For an injury this includes the following documents: the Accident Book report and Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) reports, if applicable. treatment records
Location: -	Internal Server, Unrestricted Drive/Folder
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Date of incident + 12 years in the case of serious accidents a further retention period will need to be applied
Additional relevant legislation (Outside of DPA/GDPR): -	Accident Book report and Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR). Woolfe Reforms
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category data: -	Legitimate Activities

### 2. CCTV recordings and still images taken from recordings, records of who has accessed the CCTV images and recordings and the reason for accessing them.

Purpose of processing: -	We hold recordings of CCTV footage for a limited period for the purpose of providing safety and security on campus and to assist with the prevention and detection of crime or other unlawful activity. Where an incident is recorded, we may need to capture images for the purposes of any investigation by the School or police.
Location: -	Internal Server, Restricted Drive/ Folder
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Images (Photographic video and CCTV)
Responsible person: -	Estates Manager
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Until overwritten
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category data: -	Legitimate Activities

### 3. COSHH Risk Assessments

Purpose of processing: -	By completing a COSHH risk assessment, you will be able to decide which control measures are needed to prevent or control the exposure of employees to substances hazardous to health.
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Location: -	Paper Subject Specific File
Format of Data: -	Paper only
Responsible person: -	Other
Categories of individuals: -	Staff
Retention schedule: -	Until Superseded
Additional relevant legislation (Outside of DPA/GDPR):-	Control of Substances Hazardous to Health Regulations (COSHH Regulations). Management of Health and Safety at Work Regulations (MHSWR)
Article 6 lawful basis for processing personal data: -	Legal obligation

#### 4. Staff/ Visitor Accident records containing information about the date and nature of the accident, who was involved, who witnessed it and any steps taken concerning it.

Purpose of processing: -	So that we have a record of accidents occurring on School premises. In some cases, the School also has a legal obligation to record and report accidents to the relevant regulatory authority. Under the Woolf Reforms of civil procedure, the defendant can be asked for disclosure of relevant records. For an injury this includes the following documents: the Accident Book report and Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) reports, if applicable, treatment records
Location: -	Internal Server, Unrestricted Drive/Folder
Source of the data (If applicable):	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Date of incident + 12 years in the case of serious accidents a further retention period will need to be applied
Additional relevant legislation (Outside of DPA/GDPR):-	Accident Book report and Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR). Woolfe Reforms
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category data: -	Legitimate Activities

#### 5. Student Accident records containing information about the date and nature of the accident, who was involved, who witnessed it and any steps taken concerning it.

Purpose of processing: -	So that we have a record of accidents occurring on School premises. In some cases, the School also has a legal obligation to record and report accidents to the relevant regulatory authority. Under the Woolf Reforms of civil procedure, the defendant can be asked for disclosure of relevant records. For an injury this includes the following documents: the Accident Book report and Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR) reports, if applicable. treatment records
Location: -	Internal Server, Unrestricted Drive/Folder
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)



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Responsible person: -	Bursar
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Date of incident + 12 years in the case of serious accidents a further retention period will need to be applied
Additional relevant legislation (Outside of DPA/GDPR): -	Accident Book report and Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR). Woolfe Reforms
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category data: -	Legitimate Activities

## 6. Emergency medical information about students.

Purpose of processing: -	Where we are informed of a student's medical condition and/or disability that might be of assistance to us if they have a medical emergency.
Location: -	Server and Paper File
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Students
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	contract

## 7. Fire Precautions logbooks

Purpose of processing: -	The register provides compliance with legal obligations in relation to fire safety.
Location: -	Paper Subject Specific File
Format of Data: -	Paper only
Responsible person: -	Other
Categories of individuals: -	Staff
Retention schedule: -	Date of Certificate + 3 Years
Additional relevant legislation (Outside of DPA/GDPR): -	Regulatory Reform (Fire Safety) Order 2005
Article 6 lawful basis for processing personal data: -	Legal obligation

## 8. Incident reports

Purpose of processing: -	A record of any incident, actions taken and lessons learnt is kept in the relevant filing system.
Location: -	Internal Server, Restricted Drive/ Folder
Format of Data: -	Paper only
Responsible person: -	Headmaster
Categories of individuals: -	Staff / Students/Parents/Carers/Governors





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Retention schedule: -	Current Year + 6 Years
Article 6 lawful basis for processing personal data: -	Legal obligation

## 9. Inventories of equipment and furniture

Purpose of processing: -	The Inventories record exactly what equipment the school owns, where it's stored or when it was last updated.
Location: -	External Server/ Third Party Cloud
Format of Data: -	Database only
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Permanent
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category data: -	Legitimate Activities

## 10. Process of monitoring areas where employees and persons are likely to have become in contact with asbestos.

Purpose of processing: -	Asbestos Monitoring is a legal requirement
Location: -	Paper Subject Specific File
Format of Data: -	Paper only
Responsible person: -	Other
Categories of individuals: -	Staff/Students/Visitors
Retention schedule: -	Closure of the school + 40 years
Additional relevant legislation (Outside of DPA/GDPR): -	Control of Asbestos Regulations 2012 (CAR 2012) refers to air monitoring
Article 6 lawful basis for processing personal data: -	Legal obligation

## 11. Records of keys and access cards/fobs issued, including the name of the person to whom the key/fob has been issued and the identity number of the fob.

Purpose of processing: -	So that we have a record of who holds keys and access cards/fobs to support School security arrangements.
Location: -	Paper Subject Specific File
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	contract

## 12. Risk Assessments



## SOMERHILL

Purpose of processing: -	A risk assessment is simply a careful examination of what, in your work, could cause harm to people, so that you can weigh up whether you have enough precautions or whether you should do more.
Location: -	Paper Subject Specific File
Format of Data: -	Paper only
Responsible person: -	Headmaster
Categories of individuals: -	Staff/Students/Visitors
Retention schedule: -	Current year + 3 years
Additional relevant legislation (Outside of DPA/GDPR) :-	Management of Health and Safety at Work Regulations 1999
Article 6 lawful basis for processing personal data: -	Legal obligation

### 13. School security holds contact details for contractors working on School premises, and information about the contract they are working on.

Purpose of processing: -	So that we may contact those working on School premises to discuss the work they are undertaking, or in an emergency.
Location: -	Paper Subject Specific File
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff/Students/Visitors
Retention schedule: -	Current year + 6 Years
Article 6 lawful basis for processing personal data: -	contract

### 14. Security access records for staff, students and visitors. This includes your name and DBS Number and/or vehicle registration number. We also hold records of the access rights that individual key holders have.

Purpose of processing: -	We process this information to assist with security of School premises, so that we have records of who is on the premises in the event of a fire or similar emergency, to prevent unauthorised access to School premises and to assist with issuing replacement keys, cards and fobs.
Location: -	Internal Server, Restricted Drive/ Folder
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff/Students/Visitors
Retention schedule: -	Current year + 1 Year
Article 6 lawful basis for processing personal data: -	contract



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## 15. The School holds contact information for students, emergency contacts (e.g. parents of students) and staff.

Purpose of processing: -	So that we can contact staff, students or their nominated emergency contacts in case of an emergency.
Location: -	Paper Subject Specific File
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Students/Parents/Carers/ Staff
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	contract

### Safeguarding

#### 1. Allegation of a child protection nature against a member of staff, including where the allegation is unfounded.

Purpose of processing: -	Clear and detailed records must be kept of the allegations, the actions taken by the investigating managers, and by whom and how the allegations were resolved, including clear outlines of the decision-making process
Location: -	Paper Subject Specific File
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper only
Responsible person: -	Headmaster
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer
Additional relevant legislation (Outside of DPA/GDPR) :-	Employment Practices Code: Supplementary Guidance 2.13.1 (Records of Disciplinary and Grievance) Education Act 2002 guidance "Dealing with Allegations of Abuse against Teachers and Other Staff" November 2005
Article 6 lawful basis for processing personal data: -	Vital interests
Article 9 condition for processing special category data: -	Employment and social security and social protection law

#### 2. Smoothwall Safeguard

Purpose of processing: -	Online safeguarding database Allows us to track safeguarding concerns and incidents reported
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative, Third Party Individuals, External Organisation (as appropriate)



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Format of Data: -	Data Subject/ Representative, Third Party Individuals, External Organisation (as appropriate) Database only
Responsible person: -	Bursar
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Additional relevant legislation (Outside of DPA/GDPR) :-	Childrens Act 1989, Childrens Act 2004, Working Together to Safeguard Children
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## School IT Functions

### 1. Egress

Purpose of processing: -	To provide a facility to securely send electronic communication externally
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative, External Organisation (as appropriate)
Format of Data: -	Data Subject/ Representative, External Organisation (as appropriate) Electronic (word, excel etc.) only
Responsible person: -	School IT Manager
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Termination of Employment + up to 6 months
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category data: -	Legitimate Activities

### 2. Facebook/ Instagram

Purpose of processing: -	Facebook products provide a social media platform to enable the school to engage with families and the local communities
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	Facebook Ireland Ltd. 4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland
Categories of individuals: -	Staff/Students/Parents/Carers/Governors
Retention schedule: -	Current Year + 6 Years
Article 6 lawful basis for processing personal data:-	Consent

### 3. Twitter

Purpose of processing: -	Twitter products provide a social media platform to enable the school to engage with families and the local communities
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative



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Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	Twitter UK, 20 Air St, London, W1B 5AG
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Current Year + 6 Years
Article 6 lawful basis for processing personal data: -	Consent

## 4. Google

Purpose of processing: -	Google provides the school with an online sever, providing and efficient method of sharing data securely
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative, External Organisation (as appropriate)
Format of Data: -	Data Subject/ Representative, External Organisation (as appropriate) Electronic (word, excel etc.) only
Responsible person: -	Bursar
Name and contact details of joint controller (if applicable): -	Google, Pancras Square, London
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task

## 5. YouTube

Purpose of processing: -	YouTube provides the school the facility to share video images
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/Representative, External Organisation (as appropriate)
Format of Data: -	Data Subject/Representative, External Organisation (as appropriate) Electronic (word, excel etc.) only
Responsible person: -	Bursar
Name and contact details of joint controller (if applicable): -	Google, Pancras Square, London
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task

## 6. Adobe

Purpose of processing: -	Adobe provides multiple tools to enhance the digital experiences.
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	Other



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Name and contact details of joint controller (if applicable): -	Market House Maidenhead SL6 8AG
Categories of individuals: -	Staff
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 7. Apple Products

Purpose of processing: -	Apple provide a number of educational and digital apps to support the school
Location: -	External Server/Internal Server
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	Apple Distribution International Ltd. Hollyhill Industrial Estate, Hollyhill, Cork, Republic of Ireland
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Current Year + 6 Years
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 8. Microsoft

Purpose of processing: -	Microsoft provides a number of educational and digital apps, alongside PC operation software to support the school
Location: -	External Server/Third Party Cloud
Source of the data (If applicable): -	Data Subject/Representative
Format of Data: -	Data Subject/Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	Microsoft Campus, Thames Valley Park, Reading. RG6 1WG
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Retention schedule: -	Current Year + 6 Years
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 9. Firewall, security and PC misuse incident log files consisting of the date and time of incident, which user (name and/or username), details of the incident and any consequential action taken.

Purpose of processing: -	In the course of maintaining the School's networks, protecting their integrity, investigating computer misuse and to minimise the risk of misuse recurring. Such records might also be used for disciplinary purposes where staff or students have breached security
Location: -	Smoothwall
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper and Electronic (word, excel etc.)
Responsible person: -	School IT Manager
Categories of individuals: -	Staff/Students
Retention schedule: -	Termination + 7 Years



# SOMERHILL

Article 6 lawful basis for processing personal data: -	contract
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**10. IT support logs and records consisting of usernames/contact information, dates and times of requests/problems, details of requests and details of steps taken and resolution of requests.**

Purpose of processing: -	In the normal course of operating and maintaining our systems
Location: -	Freshdesk
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper and Electronic (word, excel etc.)
Responsible person: -	School IT Manager
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	contract

**11. Login information for students, staff, and visitors consisting of: time, date and duration of login; username and name of person logging in; IP and MAC addresses associated with login; records of which users have printed documents and at what time/date.**

Purpose of processing: -	As a necessary part of the management and operation of our systems and controlling who has access to them. In cases of misconduct or copyright abuse such records might also be used as part of any investigation or staff/student disciplinary action.
Location: -	Domain Controllers
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper and Electronic (word, excel etc.)
Responsible person: -	School IT Manager
Categories of individuals: -	Students/Staff/Visitors
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	contract

## School Performance

### 1. Schemes of work

Purpose of processing: -	Schemes of work define work to be done in the classroom. Involving learners in defining a scheme of work, whether for a short project or a long course, is an important step towards motivation and involvement. Before starting a project, a group works on defining a scheme of work for it.
Location: -	Internal Server, Unrestricted Drive/Folder
Format of Data: -	Electronic (word, excel etc.) only
Responsible person: -	Headmaster
Categories of individuals: -	Staff
Retention schedule: -	Current year + 1 year



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Article 6 lawful basis for processing personal data: -	Legal obligation
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## 2. School development plans

Purpose of processing: -	The School Development Plan enables the school's vision to be shared and understood by the whole school community.
Location: -	Internal Server, Restricted Drive/ Folder
Format of Data: -	Paper and Electronic (word, excel etc.)
Responsible person: -	Headmaster
Categories of individuals: -	staff
Retention schedule: -	Until Superseded
Article 6 lawful basis for processing personal data: -	Legal obligation

## 3. Annual Reports required by the Department for Education

Purpose of processing: -	The Department for Education (DfE) has legal powers to collect pupil, child and workforce data that schools, local authorities and awarding bodies hold
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Electronic (word, excel etc.) only
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Date of report + 10 years
Additional relevant legislation (Outside of DPA/GDPR):-	section 114 of the Education Act 2005 section 537A of the Education Act 1996 section 83 of the Children Act 1989
Article 6 lawful basis for processing personal data: -	Public task

## 4. Internal Examination results

Purpose of processing: -	The School retains all examination results which may be published
Location: -	Server and Paper File
Format of Data: -	Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Students
Retention schedule: -	Year of Examination + 5 Years
Article 6 lawful basis for processing personal data:-	Public task

## 5. Public Exam Results

Purpose of processing: -	The School retains all examination results which may be published
Location: -	Server and Paper File
Format of Data: -	N/A Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Students
Retention schedule: -	Year of Examination + 8 Years
Article 6 lawful basis for processing personal data: -	Public task





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## 6. School brochure/prospectus

Purpose of processing: -	The School should have a prospectus to hand out that sells them and gives prospective parents all the information they need to choose to decide to invest in their child's education with them
Location: -	Internal Server, Unrestricted Drive/Folder
Format of Data: -	Electronic (word, excel etc.) only
Responsible person: -	Marketing Officer
Categories of individuals: -	Staff/Students
Retention schedule: -	Until Superseded
Article 6 lawful basis for processing personal data: -	Legitimate interests

## Staff

### 1. Absence records (including but not limited to holiday, maternity/paternity/shared parental leave, time off for dependents, career breaks, etc.)

Purpose of processing: -	To record, monitor, plan for and respond to absences.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	employment and social security and social protection law

### 2. Appointment records: criminal conviction and Disclosure and Barring Service information.

Purpose of processing: -	As part of the application process to assist us in making recruitment decisions.
Location: -	Paper Name Specific File
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

### 3. Appointment records: Equality monitoring data

Purpose of processing: -	For equality or monitoring purposes.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative



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Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

#### 4. Appointment records: medical/health and disability information

Purpose of processing: -	To enable us to make reasonable adjustments on commencement of your employment by the School.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

#### 5. Appointment records: role details, negotiations, probation period and contract details.

Purpose of processing: -	To record the terms under which staff are engaged by the School.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

#### 6. Appraisal information, including objectives, feedback given to and received about you, records of appraisal discussions and Personal Development Plans

Purpose of processing: -	To monitor, assist in and record your professional development.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff



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Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	employment and social security and social protection law

## 7. Bank account, sort code, BACS ID, National Insurance number, salary details, payslips, tax forms, tax codes and payments information.

Purpose of processing: -	Processing is necessary for the operation of the School payroll.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar/Finance Manager
Name and contact details of joint controller (if applicable): -	Firefly Payroll Ltd.
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 8. Capability procedure records, including reasons for commencing the process, relevant performance indicators, records of review meetings and feedback, decisions and outcomes.

Purpose of processing: -	To support the development of our employees and to appropriately manage under-performance.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 9. Computer and email information, including login, username and password information for School IT systems, IP addresses of devices you connect to School IT systems, equipment allocated to you, and details of when you connected or logged in to our network.

Purpose of processing: -	For the proper management of School IT resources.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff



# SOMERHILL

Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 10. Conflict of interest declarations.

Purpose of processing: -	To enable us to identify when your personal or family interests and/or loyalties conflict with those of the School.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/Representative
Format of Data: -	Data Subject/Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff, Governors
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 11. Contact details (name, addresses, telephone numbers), as amended from time to time.

Purpose of processing: -	In order to be able to contact you in your role as an employee at the School, and (where applicable) to comply with immigration law. These details will also appear on documents and materials held in the School archive.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff, Governors
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 12. Details of your attendance at, and participation in, School administrative meetings, including Governing Body, sub-committees and working groups.

Purpose of processing: -	As a formal record of matters relating to the administration and management of School business. Copies of the records are also provided to and stored by the School Archives.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff, Governors
Retention schedule: -	Termination + 7 Years



# SOMERHILL

Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

**13. Disciplinary or harassment records: if a disciplinary, harassment or similar complaint is made to the School in relation to you, including records of any investigation and / or decision that we take, dismissal records, settlements, and of any appeals procedures.**

Purpose of processing: -	To investigate, consider and reach conclusions in relation to employee and office holder disciplinary matters.
Location: -	Paper Name Specific File
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

**14. Email contact information used in ad hoc mailing lists, for example for School events.**

Purpose of processing: -	To enable employee to participate in School events.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 9 condition for processing special category data: -	Employment and social security and social protection law

**15. End of employment records, including details of exit interviews, relevant correspondence, and redundancy records or termination records.**

Purpose of processing: -	To understand the reasons that employees leave, to identify trends and issues, and to enable us to make improvements going forward. Where employees have left due to redundancy or their contracts have been terminated, we keep records to ensure we can respond to queries.
Location: -	Paper Name Specific File
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law



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**16. Grievances and related investigations raised with the School and relating to you, including records of any investigation and/or decision that we take, and of any subsequent appeal of resolution.**

Purpose of processing: -	As an employer we are required to make appropriate records as part of the handling of grievances and related investigations.
Location: -	Paper Name Specific File
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

**17. Health and Safety Assessments.**

Purpose of processing: -	To enable us to make appropriate adjustments to your working environment and duties to accommodate changes in your physical and/or mental condition.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

**18. Learning and development records, including your attendance, completions, and certifications.**

Purpose of processing: -	As part of an accurate and up to date record of your employment by the School.
Location: -	Paper Name Specific File
Source of the data (If applicable) :-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar/HR Manager
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

**19. Medical questionnaires, notes and occupational health reports, including specifics of health issues, records of consequent adjustments, and communications relating thereto.**



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Purpose of processing: -	For Occupational Health purposes and in compliance with our obligations under equality legislation.
Location: -	Paper Name Specific File
Source of the data (If applicable):	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar/HR Manager
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special	Employment and social security and social protection law

## 20. Next of kin/emergency contact data.

Purpose of processing: -	To enable us to contact appropriate individuals in the event that you are injured, become unwell, or there is other relevant cause for concern regarding your well-being.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar/HR Manager
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	employment and social security and social protection law

## 21. Opinions and comments made by you on student's academic and other reports and expressed during or in relation to School meetings (to the extent recorded).

Purpose of processing: -	As part of School records and minutes concerning teaching, management and administration.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 22. Data relating to your pension scheme, including: (a) death in service benefit nominations; (b) health information about you (as a result of incapacity retirement benefit); (c) information about your spousal or other relationships which might identify your personal information.

Purpose of processing: -	In order to be able to provide required information to your pension scheme provider.
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# SOMERHILL

Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar/Finance Manager
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 23. Passport, right to work and visa information.

Purpose of processing: -	To enable us to assess your right to work in the United Kingdom and take steps to meet immigration requirements.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar/HR Manager
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 24. Photographs (formal).

Purpose of processing: -	To enable visual identification of staff for security purposes. To publish images of staff and officeholders to enable identification by students, colleagues and third parties.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar/IT Manager
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 25. Photographs (informal)

Purpose of processing: -	Photographic records of School life, including attendance at events and society memberships, are created on an ongoing basis. The School archives collect and store copies of such materials.
Location: -	Paper Name Specific File
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff





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Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data:-	Employment and social security and social protection law

**26. Probation period records, including dates, duration, feedback and evaluations, and materials relating to any decisions made.**

Purpose of processing: -	To manage the probationary period in line with your contract with the School and School procedures.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

**27. Records generated for legal or statutory compliance purposes that contain names and/or associated personal data. For example, copies of data supplied pursuant to requests made under data protection and/or freedom of information legislation.**

Purpose of processing: -	So that we have a record of information supplied, both in the interests of good administration and also to meet legal and regulatory requirements.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

**28. Records of information security incidents and of PC misuse incidents**

Purpose of processing: -	To ensure that our systems are appropriately updated and secure, and in case records are required for subsequent disciplinary or police investigations.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar/IT Manager
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract



# SOMERHILL

Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 29. Recruitment records: communications regarding our decisions (rejections, shortlists, interview invitations, offers)

Purpose of processing: -	To document the process under which applicants are considered for positions, and successful applicants are engaged as employees or office-holders at the School.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	HR Manager
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 30. Recruitment records: equality monitoring data. This may consist of data relating to equality strands including health, sexuality, ethnicity or religious beliefs.

Purpose of processing: -	For equality or monitoring purposes.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	HR Manager
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 31. Recruitment records: medical/health and disability information

Purpose of processing: -	To enable us to make appropriate adjustments during the recruitment process.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	HR Manager
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law



# SOMERHILL

## 32. Recruitment records: your personal contact details, application paperwork, evidence of qualifications, references, requests for special arrangements, immigration status information.

Purpose of processing: -	To enable us to consider whether to enter into a contract of employment with you. Certain parts of the record are also held as part of School compliance with immigration law.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	HR Manager
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 33. References provided by, or in relation to you.

Purpose of processing: -	References in relation to you are provided for a number of reasons, including enabling you to seek alternative employment or take up voluntary posts.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	HR Manager
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 34. Security records, including CCTV, access control records and access logs. Security incidents, accident reports and health and safety records.

Purpose of processing: -	To monitor the attendance of people on School premises, as part of the School's safety and security arrangements.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar/Estates Manager
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law



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## 35. Sickness records and related documentation, including sickness absence forms, employee 'Fit' notes, return to Work documentation.

Purpose of processing: -	To comply with our obligations as an employer in the management of employees suffering ill health, to monitor reasons for absences, to consider relevant Health and Safety issues arising and to assist in scheduling of employee time.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	HR Manager
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 36. Staff Personal files

Purpose of processing: -	Personnel files are kept for the growth of the school and the development of the individual employee, so everyone benefits from accurate, up-to-date records. At the same time, employee records can also help minimise any potential disputes
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	HR Manager
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 years
Article 6 lawful basis for processing personal data: -	Contract
Article 9 condition for processing special category data: -	Employment and social security and social protection law

## 37. Pre-employment vetting information (including DBS checks)

Purpose of processing: -	The School has an obligation to assess the suitability of all applicants for positions of trust.
Location: -	Internal Server, Restricted Drive/ Folder
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Electronic (word, excel etc) only
Responsible person: -	HR Manager
Categories of individuals: -	Staff
Retention schedule: -	Where possible these should be checked, and a note kept of what was seen and what has been checked.
Additional relevant legislation (Outside of DPA/GDPR): -	The Safeguarding Vulnerable Groups Act 2006
Article 6 lawful basis for processing personal data: -	Legal obligation
Article 9 condition for processing special category data: -	Employment and social security and social protection law



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## 38. Interview notes and recruitment records

Purpose of processing: -	Interviewees are entitled to obtain feedback for any unsuccessful interviews. Retaining notes for a short period facilitates this feedback
Location: -	Paper Subject Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper only
Responsible person: -	HR Manager
Categories of individuals: -	Members of the Public
Retention schedule: -	Date of interview + 6 months
Article 6 lawful basis for processing personal data: -	Contract

## 39. Professional development plans

Purpose of processing: -	A Professional Development Plan (PDP), is used to document career goals and set out a strategy on how to meet them
Location: -	Paper Name/ Subject Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Electronic (word, excel) etc) only
Responsible person: -	Headmaster
Name and contact details of joint controller (if applicable): -	Schools Support Limited, Kenilworth, Warwickshire
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract

## 40. Timesheets, sick pay

Purpose of processing: -	Employers must have a system to enable them to measure "the duration of time worked each day by each worker".
Location: -	Paper Subject Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper only
Responsible person: -	HR Manager/Finance Manager
Categories of individuals: -	Staff
Retention schedule: -	Current year + 6 years
Article 6 lawful basis for processing personal data: -	Contract

## 41. EPM (Personnel online portal)

Purpose of processing: -	Personnel online portal Allows us to manage staff contracts and communicate with EPM for HR purposes
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/Representative, External Organisation (as appropriate)
Format of Data: -	Data Subject/Representative, External Organisation (as appropriate) Electronic (word, excel etc.) only
Responsible person: -	HR Manager
Name and contact details of joint controller (if applicable): -	EPM Ltd. St Johns House, Spitfire Close, Ermine Business Park, Huntingdon, Cambridgeshire PE29 6EP
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years



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Article 6 lawful basis for processing personal data: -	contract
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## Students

### 1. Absence books

Purpose of processing: -	Absence books record all student absence and reasons The School must maintain an accurate record of any absence
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Admin/ Office Staff
Categories of individuals: -	Students
Retention schedule: -	Placement at School + 1 Year
Additional relevant legislation (Outside of DPA/GDPR) :-	Section 7 Education Act 1996
Article 6 lawful basis for processing personal data: -	Legal obligation
Article 9 condition for processing special category data: -	Legitimate Activities

### 2. Admission Registers

Purpose of processing: -	The Admission Register contains a note of any child who attended the school and those who left, including reasons why they left and where they left for. The school must maintain a list of all students at the school and forwarding details. Books are held for historical reasons for past students to access if required.
Location: -	Internal Server, Unrestricted Drive/Folder
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Database
Responsible person: -	Admissions Officer
Categories of individuals: -	Students
Retention schedule: -	Placement at School + 1 Year
Additional relevant legislation (Outside of DPA/GDPR): -	Section 7 Education Act 1996
Article 6 lawful basis for processing personal data: -	Legal obligation
Article 9 condition for processing special category data: -	Legitimate Activities

### 3. MIS System

Purpose of processing: -	MIS System allows the school to securely record information relating to students
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	IT Manager
Categories of individuals: -	Students
Retention schedule: -	Placement at School + 1 Year



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Additional relevant legislation (Outside of DPA/GDPR): -	Section 7 Education Act 1996
Article 6 lawful basis for processing personal data: -	Legal obligation
Article 9 condition for processing special category data: -	Legitimate Activities

#### 4. Pupil Files Retained in Schools - primary.

Purpose of processing: -	Pupil files provide evidence for protecting the legal rights and interests of the school, and provide an audit trail of all interactions with the pupil
Location: -	Paper Name Specific File
Source of the data (If applicable):-	Data Subject/Representative, External Organisation (as appropriate)
Format of Data: -	Data Subject/ Representative, External Organisation (as appropriate) Paper only
Responsible person: -	Admissions Manager
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category data: -	Legitimate Activities

#### 5. You/ Your Family's Home Office status (e.g., home, EU, or international)

Purpose of processing: -	In order to determine whether you meet the requirements for free education in the UK
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	HR Manager
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task

#### 6. Special Educational Needs files, reviews and Individual Education Plans

Purpose of processing: -	SEN Files are required by law and keep all information in a searchable format
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Department of Health, Other (as appropriate)
Format of Data: -	Data Subject/ Representative, Local Authority, Department of Health, Other (as appropriate) Paper and Electronic (word, excel etc.)
Responsible person: -	SENCO
Categories of individuals: -	Students
Retention schedule: -	Placement at School + 1 Year
Additional relevant legislation (Outside of DPA/GDPR): -	Special Educational Needs and Disability Act 2001 Section 1
Article 6 lawful basis for processing personal data: -	Public task



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Article 9 condition for processing special category data: -	Legitimate Activities
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## 7. Parental permission slips for school trips – where there has been a major incident.

Purpose of processing: -	Forms are provided to all parents or carers before a student can attend a trip
Location: -	Paper Subject Specific File
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper only
Responsible person: -	Bursar
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Date of birth of pupil involved in the incident + 25 years
Article 6 lawful basis for processing personal data: -	Consent
Article 9 condition for processing special category data: -	explicit consent
If Consent based, location of consent:	iSAMS

## 8. Parental permission slips for school trips – where there has been no major incident.

Purpose of processing: -	The School must retain copies of consent forms following an off-site trip
Location: -	Paper Subject Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper only
Responsible person: -	Trip Leader
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Conclusion of the trip
Article 6 lawful basis for processing personal data: -	Consent
Article 9 condition for processing special category data: -	explicit consent
If Consent based, location of consent:	iSAMS

## 9. Student Images

Purpose of processing: -	To enhance school environment and in reflect student engagement and achievement in internal and external communication where appropriate
Location:-	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Images and Voice (Photographic, video and CCTV)
Responsible person: -	Bursar
Categories of individuals: -	Students
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Consent
Article 9 condition for processing special category data: -	explicit consent
If Consent based, location of	iSAMS





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## 10. All records relating to the organization of school residential trips.

Purpose of processing: -	The school will retain all relevant documents including any risk assessments
Location: -	Internal Server, Restricted Drive/ Folder
Source of the data (If applicable): -	Data Subject/ Representative, External Organisation (as appropriate)
Format of Data: -	Data Subject/ Representative, External Organisation (as appropriate) Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar/Trip Organiser
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Additional relevant legislation (Outside of DPA/GDPR): -	Health and Safety at Work etc. Act 1974
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category data: -	explicit consent
If Consent based, location of consent: -	iSAMS

## 11. Student/ Parent Demographic Information (age, Race, religion) - primary

Purpose of processing: -	To ensure correct information is retained for DofE reports
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Admissions Manager
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category data: -	Employment and social security and social protection law
If Consent based, location of consent: -	iSAMS

## 12. Records generated for legal or statutory compliance purposes that contain names and/or associated personal data. For example, copies of data supplied pursuant to requests made under data protection and/or freedom of information legislation.

Purpose of processing: -	So that we have a record of information supplied, both in the interests of good administration and also to meet legal and regulatory requirements.
Location: -	Paper Subject Specific File
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate
Format of Data: -	Data Subject/ Representative, Local Authority, Other External Organisation as appropriate Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Staff/Students/Visitors/Members of the Public
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	contract



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## 13. Student/ Parent Health Information

Purpose of processing: -	To enable the school to comply with relevant Disability Legislation where appropriate
Location: -	Paper Name Specific File
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Admissions Manager
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Additional relevant legislation (Outside of DPA/GDPR):-	Public task
Article 6 lawful basis for processing personal data: -	employment and social security and social protection law

## 14. Permission to collect forms.

Purpose of processing: -	To ensure that students are only collected by nominated individuals
Location: -	Internal Server, Unrestricted Drive/Folder
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Bursar
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data:-	Consent

## 15. Admissions - if the admission is successful.

Purpose of processing: -	To maintain an accurate record of pupils admitted to the school to ensure accurate records are maintained to reflect successful admissions
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative, Local Authority
Format of Data: -	Data Subject/ Representative, Local Authority Paper only
Responsible person: -	Admissions Manager
Categories of individuals: -	Students
Retention schedule: -	Date of Admission + 1 year
Additional relevant legislation (Outside of DPA/GDPR):-	The Education Act 1996 - sections 434(1)(3)(4) & (6) and 458(4) &(5) The Education (Pupil Registration) (England) Regulations 2006 The Education (Pupil Registration) (England) (Amendment) Regulations 2010 The Education (Pupil Registration) (England)
Article 6 lawful basis for processing personal data: -	Public task

## 16. Attendance registers

Purpose of processing: -	The School has a legal obligation to record school attendance, this assists with the monitoring poor attendance, but also so they can be certain of who is on-site in an emergency.
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only



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Responsible person: -	Attendance Manager
Name and contact details of joint controller (if applicable): -	RM Ltd, 142B Park Drive, Milton Park, Abingdon, Oxfordshire. OX14 4SE
Categories of individuals: -	Students
Retention schedule: -	Date of register + 3 years
Additional relevant legislation (Outside of DPA/GDPR): -	Section 7 Education Act 1996
Article 6 lawful basis for processing personal data: -	Public task

**17. Disciplinary, harassment or grievance records if a disciplinary, harassment, grievance or other complaint is made by you (or your representative) or about you to the School, including records of any investigation and / or decision that we take**

Purpose of processing:-	So that the School can maintain appropriate standards of conduct and behaviour for the benefit of all its members and visitors.
Location:-	Paper Name Specific File
Source of the data (If applicable) :-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	HR Manager
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task

**18. Groupcall Xporter**

Purpose of processing: -	Progress reporting facility Synchs with our MIS system (G2) for the purpose of managing progress reporting with 3rd party (Classroom Monitor)
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable):-	Data Subject/ Representative, External Organisation (as appropriate)
Format of Data: -	Data Subject/ Representative, External Organisation (as appropriate)
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	2 Darker Street, Leicester, United Kingdom, LE1 4SL
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task

**19. Information about your ethnicity, health, religion or philosophical beliefs and/or sexuality processed for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment.**

Purpose of processing: -	For equality monitoring purposes
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ representative Paper and Electronic (word, excel etc.)
Responsible person:-	Admissions Manager
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year



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Article 6 lawful basis for processing personal data: -	Public task
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## 20. Information about your health, dietary requirements and/or disabilities, and records of decisions we make taking that information into account.

Purpose of processing: -	When we consider what reasonable adjustments to make to our provision of accommodation, catering or teaching or we need to take account of any dietary requirements you have (whether for medical or belief reasons), or where there is a medical emergency, and any decisions that we take as a result.
Location: -	Paper Name Specific File
Source of the data (If applicable) :-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Admissions Manager
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task

## 21. Letters authorising absence from parents.

Purpose of processing: -	Audio communication from parents evidencing reasons for absence from school
Location:-	Paper Subject Specific File
Source of the data (If applicable) :-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Images and Voice (Photographic, video and CCTV)
Responsible person: -	Attendance Officer
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task

## 22. Records of open days: these include attendees names and contact details.

Purpose of processing: -	So that the School can maintain attendance list and contact for marketing purposes
Location: -	Paper Name Specific File
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Admissions Manager
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data:-	Public task



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## 23. Records of School cultural life: photographs and written records of teams, choirs, clubs and societies, plays and performances, of participation in events and sporting fixtures and of the outcomes.

Purpose of processing: -	To allow the School's cultural life to function and flourish, and in order to maintain a record of School life, which may be relevant to you individually (for example if you later request a reference from us), and which is also part of the School's own archive record of what its members have achieved over time.
Location: -	Paper Name Specific File
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Marketing Manager
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task

## 24. Records of student performance and attendance, including records of student self-assessment.

Purpose of processing: -	To help develop and guide you during your studies, our tutors monitor and assess your contributions in tutorials, including your written work, provide feedback and may ask you to self- assess your progress.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Attendance Officer
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task

## 25. Requests for assistance with academic matters, such as applications for special examination arrangements. Decision-making about such requests and records of actions taken.

Purpose of processing: -	We process this information and make decisions about you when you ask us to, and in accordance with the School's policies relating to such requests.
Location: -	Paper Name Specific File
Source of the data (If applicable) :-	Data Subject/ Representative
Format of Data: -	Data Subject/ representative Paper and Electronic (word, excel etc.)
Responsible person: -	Deputy Head Academic
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task

## 26. SAMS – Schools admissions module

Purpose of processing: -	SAMS – Schools admissions module Allows us to communicate with LBTH to monitor and manage pupil admissions
Location: -	External Server/ Third Party Cloud



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Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	Admissions Manager/IT Manager
Categories of individuals: -	Students/Parents/Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task

## 27. Student Education History

Purpose of processing: -	To ensure correct information is retained for DofE reports and to evidence student progress during placement
Location: -	Paper Name Specific File
Source of the data (If applicable) :-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Deputy Head Academic
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task

## 28. Student/ Parent Contact Information (Name Address)

Purpose of processing: -	To ensure updated information is retained in case of emergency, business continuity and to comply with placement requirements
Location: -	Paper Name Specific File
Source of the data (If applicable) :-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Admissions Manager
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task

## 29. Your dates of attendance, course of study and outcome of your studies, results of internal & external School examinations, School assessments, awards, headshot/passport style photograph.

Purpose of processing: -	So that we have a record of your results, as a record of your academic progression and if we are later asked for a reference or verification of your attendance. So that we can administer and provide your course.
Location: -	Paper Name Specific File
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Paper and Electronic (word, excel etc.)
Responsible person: -	Deputy Head Academic
Categories of individuals: -	Students and Parents/ Carers
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task



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## External Services Providers

### 1. Payroll Provider

Purpose of processing: -	Processing is necessary for the operation of the School payroll.
Location: -	External Server/ Third Party Cloud
Format of Data: -	Paper, Electronic and Database
Responsible person: -	Other
Name and contact details of joint controller (if applicable): -	Firefly Payroll Ltd.
Categories of individuals: -	Staff
Retention schedule: -	Termination + 7 Years
Article 6 lawful basis for processing personal data: -	Contract

### 2. DPO Provider

Purpose of processing: -	Ensure the School comply with all GDPR legislation
Location: -	External Server/ Third Party Cloud
Format of Data: -	Data Subject/ Representative
Responsible person: -	School Business/Office Manager
Name and contact details of joint controller (if applicable): -	Specialist Redaction Service, Chessington, Surrey
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Article 6 lawful basis for processing personal data: -	Contract

### 3. Legal Services Provider -VWV

Purpose of processing: -	Ensure the School complies with all legal legislation
Location: -	External Server/ Third Party Cloud
Format of Data: -	Data Subject/ Representative
Responsible person: -	School Business/Office Manager
Categories of individuals: -	Staff / Students/Parents/Carers/Governors
Article 6 lawful basis for processing personal data: -	Contract

### 4. Speech and Language

Purpose of processing:-	Educational wellbeing of pupils
Location: -	External Server/ Third Party Cloud
Format of Data: -	Word/Excel documents
Responsible person: -	SENCO
Categories of individuals: -	Students
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category	Legitimate Activities

### 5. Photographic Services Provider - Gillman & Soame Photographers

Purpose of processing: -	For the purposes of providing a professional photography service
Location: -	External Server/ Third Party Cloud
Format of Data: -	Paper and Electronic (word, excel etc.)
Responsible person:-	Office Manager
Name and contact details of joint controller (if applicable):-	Gillman & Soame Photographers
Categories of individuals: -	Staff and Students



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Retention schedule: -	1 year
Article 6 lawful basis for processing personal data: -	Consent
If Consent based, location of consent:	iSAMS

## 6. Music Lessons

Purpose of processing: -	Education of pupils
Location: -	External Server/ Third Party Cloud
Format of Data: -	Word/Excel Documents
Responsible person: -	Head of Music/HR Manager
Categories of individuals: -	Students
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Legitimate Activities
If Consent based, location of consent: -	iSAMS

## 7. Sport Lessons

Purpose of processing: -	Education of pupils
Location: -	External Server/ Third Party Cloud
Format of Data: -	Word/Excel Documents
Responsible person: -	Head of Sports/HR Manager
Categories of individuals: -	Students
Retention schedule: -	Placement at School + 1 Year
Article 6 lawful basis for processing personal data: -	Legitimate Activities
If Consent based, location of consent: -	iSAMS

## 8. Residential Organisations

Purpose of processing: -	Residential Organisations allow us to communicate information required when our children attend residential trips
Location: -	External Server/ Third Party Cloud
Format of Data: -	Paper and Electronic (word, excel etc.)
Responsible person: -	Trips Leader
Name and contact details of joint controller (if applicable): -	Halsbury Ski, 35, Churchill Park, Colwick, Nottingham NG4 2HF
Categories of individuals: -	Staff and Students
Retention schedule: -	1 year
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category	Legitimate Activities

## 9. Residential Organisations

Purpose of processing: -	Residential Organisations allow us to communicate information required when our children attend residential trips
Location: -	External Server/ Third Party Cloud
Format of Data: -	Paper and Electronic (word, excel etc.)
Responsible person: -	Trips Leader
Name and contact details of joint controller (if applicable): -	UK Sailing Academy, Arctic Rd, Cowes PO31 7PQ
Categories of individuals: -	Staff and Students
Retention schedule: -	1 year





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Article 6 lawful basis for processing personal data:-	Public task
Article 9 condition for processing special category data:-	Legitimate Activities

## 10. Residential Organisations

Purpose of processing:-	Residential Organisations allow us to communicate information required when our children attend residential trips
Location: -	External Server/ Third Party Cloud
Format of Data: -	Paper and Electronic (word, excel etc.)
Responsible person: -	Trips Leader
Name and contact details of joint controller (if applicable): -	PGL, HB Education Limited ,Alton Court, Penyard Lane, Ross-on-Wye, Herefordshire, HR9 5GL
Categories of individuals: -	Staff and Students
Retention schedule: -	1 year
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category data: -	Legitimate Activities

## 11. Residential Organisations

Purpose of processing:-	Residential Organisations allow us to communicate information required when our children attend residential trips
Location: -	External Server/ Third Party Cloud
Format of Data: -	Paper and Electronic (word, excel etc.)
Responsible person: -	Trips Leader
Name and contact details of joint controller (if applicable): -	Land & Wave, Prospect Business Park, Unit 14 Jaden Centre, Victoria Ave, Swanage BH19 1EJ
Categories of individuals: -	Staff and Students
Retention schedule: -	1 year
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category data: -	Legitimate Activities

## 12. Residential Organisations

Purpose of processing:-	Residential Organisations allow us to communicate information required when our children attend residential trips
Location: -	External Server/ Third Party Cloud
Format of Data: -	Paper and Electronic (word, excel etc.)
Responsible person: -	Trips Leader
Name and contact details of joint controller (if applicable): -	Diverse School Travel, 21 Bennetts Hill, Birmingham B2 5QP



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Categories of individuals: -	Staff and Students
Retention schedule: -	1 year
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category data: -	Legitimate Activities

## 13. Residential Organisations

Purpose of processing: -	Residential Organisations allow us to communicate information required when our children attend residential trips
Location: -	External Server/ Third Party Cloud
Format of Data: -	Paper and Electronic (word, excel etc.)
Responsible person: -	Trips Leader
Name and contact details of joint controller (if applicable): -	Undiscovered Mountains, Quartier L'Oratoire, 05130 Jarjayes, France
Categories of individuals: -	Staff and Students
Retention schedule: -	1 year
Article 6 lawful basis for processing personal data: -	Public task
Article 9 condition for processing special category	Legitimate Activities

## School and Educational Apps

### 1. Purple Mash

Purpose of processing: -	Math's program providing skills in basic numeracy, including addition, subtraction, multiplication and division of numbers
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	2Simple Software, 2-10 Baron Street, LONDON N1 9LL
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

### 2. School Cloud System

Purpose of processing: -	Parents' evenings, clubs & events and room booking
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	The Albus, Glasgow G40 3AP
Categories of individuals: -	Staff and Students



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Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

### 3. Sketch Up

Purpose of processing: -	SketchUp is a 3D modeling computer program for a wide range of drawing applications such as architectural, interior design, landscape architecture, civil and mechanical engineering, film and video game design
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	4730 Walnut St, Boulder, CO, US
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

### 4. Word Shark 5

Purpose of processing:-	Wordshark provides a fun and effective games-based solution for students learning to spell and read. The program is especially useful for those with dyslexia and other special educational needs
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable) :-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	White Space, 1 Lochaline Street, London, W6 9SJ
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

### 5. accessIT Library

Purpose of processing: -	A library management system designed to support the school , streamlining workflows and helping us to build a connected community of learners
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	Accessit Library, 1 Brunel Way, Slough SL1 1FQ
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests



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## 6. AtomLearning

Purpose of processing: -	Provides additional resources to enhance the children's learning
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	Atom Learning, Tagwright House, 35-41 Westland Pl, London N1 7LP
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 7. CodeTwo Email signature

Purpose of processing: -	Enables the school to ensure consistency across all emails
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	Code Two, Rybacka 9 53-656
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 8. EducationCity

Purpose of processing:-	Provides educators with rigorous assessments, actionable data and personalised learning for every student.
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	Education City, Education City Ltd, 8/9 Saddlers Court, Oakham, Rutland LE15 7GH
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 9. FreshDesk/ FreshService

Purpose of processing: -	Enables the school to deliver fast and consistent customer service across email, phone, chat, WhatsApp Business, and other social media channels from a single view.
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager



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Name and contact details of joint controller (if applicable): -	Freshworks Inc., 2950 S. Delaware Street, Suite 201, San Mateo, CA 94403
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests



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## 10. iAPS iLearning

Purpose of processing: -	Provides a wide selection of flexible high-quality courses - a one-stop shop for all staff CPD and compliance training needs.
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	The Independent Association of Prep Schools (IAPS), Bishop's House, Artemis Drive, Tachbrook Park, Warwick CV34 6UD
Categories of individuals: -	Staff
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 11. iSAMS

Purpose of processing: -	Provides the school with an MIS system to maintain student and staff records
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	iSAMS Ltd, 4th Floor Heathrow Approach, 470 London Road, Slough. SL3 8QY
Categories of individuals: -	Staff/ Students/ Parents/ Carers
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 12. Kerboodle

Purpose of processing: -	Provides additional resources to enhance the children's learning
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	Oxford University Press, Educational Supply Section, North Kettering Business Park, Hipwell Road, Kettering, Northamptonshire. NN14 1UA
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 13. LanguageNut

Purpose of processing: -	Provides additional resources to enhance the children's learning
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Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	Languenut Ltd, Nile House, Nile St, Brighton, Brighton and Brighton BN1 1HW
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 14. MyMaths

Purpose of processing: -	A subscription-based mathematics website which can be used on interactive whiteboards or by students and teachers at home
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of controller (if applicable): -	Oxford University Press, Educational Supply Section, North Wing Business Park, Hipwell Road, Kettering, Northamptonshire. 1UA
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 15. Planet eStream

Purpose of processing: -	Powerfully simple and secure video platform, making media more accessible and engaging for students and educators across secondary, further, and higher education
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	Planet eStream, The Old School, 690 Bradford Rd, Birkenshaw, Bradford BD11 2DR
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 16. Metis

Purpose of processing: -	Enhanced, paperless experiences for online registration, management of scholarships, online acceptances, marketing data and more. Offer parents your own branded portal to project the right impression
Location: -	External Server/ Third Party Cloud



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Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	ITQ Metis, Unit 12, Fulton Court, Greenham Business Park, Thatcham, RG19 6HD
Categories of individuals: -	Staff/ Students/ Parents/ Carers
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 17. Classroom Cloud

Purpose of processing: -	To support remote working and remote access
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	Classroom Cloud, NetSupport House, Towngate East, Market Deeping, Peterborough, PE6 8NE
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 18. SendGrid

Purpose of processing: -	Provides an email add on to create forms, templates and statistics
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data:-	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	Twilio Ireland Limited, 3 Dublin Landings, North Wall Quay, Dublin 1, Ireland
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 19. Smoothwall Safeguard

Purpose of processing: -	Observes digital devices to check for any signs of risk to children. Record keeping systems such as Smoothwall Safeguard Record Manager allow both online and offline safeguarding incidents to be logged and tracked within an individual pupil's safeguarding
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager





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Name and contact details of joint controller (if applicable) :-	Smoothwall, Qoria, 945 Wellington Street, West Perth WA, Australia,
Categories of individuals: -	Staff/ Students/ Parents/ Carers
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data:-	Legitimate interests

## 20. SoCS Calendar

Purpose of processing: -	Provides the school with an integrated calendar to enable access to all
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	SCHOOLS' SPORTS LIMITED, Cedar House, Hazell Drive, Newport, Wales, NP10 8FY
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 21. TimeTable RockStars

Purpose of processing:-	A maths programme that takes all the worry out of learning times tables and has a proven track record of boosting children's fluency and recall in multiplication and division.
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable):-	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable) :-	Maths Circle Ltd, Ossory Offices, Hazlewood Lane, Ampthill. MK45 2HF
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests

## 22. Vipre Email Security

Purpose of processing: -	Provides the school with email protection
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	VIPRE Security Limited, 18 Mansell Street, Level 3, London, E1
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract



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Article 6 lawful basis for processing personal data: -	Legitimate interests
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## 23. VocabExpress

Purpose of processing: -	Provides an engaging environment in which students can build their vocabulary whilst their progress is being monitored and tracked by their teachers.
Location: -	External Server/ Third Party Cloud
Source of the data (If applicable): -	Data Subject/ Representative
Format of Data: -	Data Subject/ Representative Database only
Responsible person: -	School IT Manager
Name and contact details of joint controller (if applicable): -	HarperCollins Publishers, The News Building, 1 London Bridge Street. London
Categories of individuals: -	Staff and Students
Retention schedule: -	Until end of contract
Article 6 lawful basis for processing personal data: -	Legitimate interests