



Connaught House School

Name : Appropriate Policy Document

Purpose : As required under Schedule 1, Part 4, Data Protection Act 2018

Date Approved :

Revision History :

Version	Date	Amendment Details	Author
0.1	1/1/21	First Draft	Mrs V Hampton
0.2	28/3/24	Second draft	DPO
0.3	4/11/24	Addition of clarity around optional data; addition of UK GDPR Article 9 as well as Schedule 1 of DPA 2018.	
0.4	18/3/26	Full review and update	DPO

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Contents



Connaught House School

1. Introduction	3
2. Description of the data processed	3
3. Schedule 1 Conditions for Processing	4
4. How we comply with the data protection principles in Article 5 of the UK GDPR	4
4.1 Lawful, fair and transparent processing	4
4.2 Purpose limitation	4
4.3 Data minimisation	5
4.4 Accuracy	5
4.5 Storage limitation	5
4.6 Integrity and Confidentiality (Security)	5
5. Retention and erasure policies	5
6. Accountability	5
Annex A: Sensitive Data Retention & Erasure Schedule	6



1. Introduction

This document outlines Connaught House School procedures for securing compliance with the principles of the UK GDPR and DPA 2018 in relation to the processing of Special Category (SC) and Criminal Offence (CO) data.

It satisfies the requirements of Schedule 1, Part 4 of the DPA 2018, which necessitates and “appropriate policy document” to be in place when relying on specific conditions for processing sensitive data.

2. Description of the data processed

We process the following categories of sensitive data:

- Health and disability: Managing pupil medical needs, SEND requirements and staff occupational health.
- Ethnicity and Religion: For statutory census returns and ensuring equality of opportunity
- Criminal offence data: For safeguarding purposes and safer recruitment (DBS checks)

3. Schedule 1 Conditions for Processing

We process SC and CO data under the following conditions from Schedule 1 of the DPA 2018:

- Employment, Social Security and Social Protection: (Para 1) For managing staff contracts and statutory benefits
- Health or Social Care: (Para 2) For the provision of health care and support to individuals
- Substantial Public Interest Conditions
 - Statutory and Government Purposes: (Para 6) To meet Department for Education (DfE) requirements
 - Equality of Opportunity or Treatment: (Para 8) To monitor and promote diversity
 - Preventing or Detecting Unlawful Acts: (Para 10) For school security and integrity
 - Counselling etc.: (Para 17) For pupil pastoral support



Connaught House School

- Safeguarding of Children and Individuals at Risk: (Para 18) To protect pupils from harm

4. How we comply with the data protection principles in Article 5 of the UK GDPR

4.1 Lawful, fair and transparent processing

- We provide clear and transparent information to individuals about why we process their personal data, including our lawful basis, in our Privacy Notices.
- We identify a valid Article 6 (UK GDPR) lawful basis and a Schedule 1 (DPA 2018) condition before processing

4.2 Purpose limitation

- Data is collected for specified, explicit and legitimate school purposes, and is not processed in a manner incompatible with those purposes.

4.3 Data minimisation

We only collect the minimum sensitive data necessary.

4.4 Accuracy

We perform annual data collection exercises to ensure health records and contact details are up to date. Staff and parents are regularly reminded to report changes immediately.

4.5 Storage limitation

SC and CO data are retained only as long as necessary. Retention periods are stated in our Article 30 document Retention schedule 4.6 Integrity and Confidentiality (Security)

- Electronic sensitive data is stored in encrypted systems (e.g. Bromcom and CPOMS).
- Hard copies are kept in locked cabinets in secure offices. Access is granted on a "need to know" basis.



Connaught House School

5. Retention and erasure policies

We maintain a Retention Policy. When SC or CO data reaches the end of its retention period, it is:

- Securely shredded (if physical); or
- Permanently deleted from our servers and backup systems.

6. Accountability

We maintain a Record of Processing Activities under Article 30. We carry out Data Protection Impact Assessments (DPIAs) for high-risk processing, such as the implementation of new biometric systems, changes to software that we use to process sensitive data, or changes to our CCTV system.



Annex A: Sensitive Data Retention & Erasure Schedule

Category	Example of Record	Retention Period	Lawful Basis / Condition
Safeguarding	CP files, records of concern, body maps	DOB + 25 years (75 years if relating to sexual abuse/IICTSA)	Substantial Public Interest (Safeguarding)
Health & SEND	SEND reports, EHCPs	DOB + 25 years	Health or Social Care
Child Criminality	Records of Youth offending or police involvement	DOB + 25 years	Substantial Public Interest (Unlawful Acts)
Staff Health	Sickness records, Occupational Health reports	Termination + 6 years	Employment and Social Protection
Safer Recruitment/Criminal Offence (Staff)	DBS certificate numbers, date of check, sensitive recruitment notes, recruitment risk assessments	Termination + 6 years	Employment and Social Protection
Equality monitoring	Ethnicity, religion or disability data	Current Year + 3 years unless on pupil file	Substantial Public Interest (Equality)