



DATA RETENTION POLICY

This policy applies to teachers, pupils and parents and is published to all

The School needs to create and maintain accurate records in order for it to function efficiently. The policy for managing records at Yarm School and Yarm School Trading Limited has been drawn up in conformity with legislation and regulations affecting schools. This policy has been amended to comply with the General Data Protection Regulation 2018 (GDPR) and relevant superseding legislation.

Yarm School Trading Limited (which includes the uniform shop and the Princess Alexandra Auditorium; the latter having its own policies which can be accessed at <https://www.thepaaonline.org/>) may also hold client data, which includes names, addresses and other contact details, records of enquiries, purchases made and any correspondence.

CURRENT PUPILS

Pupil Records

In most instances, pupil information is retained on iSAMS and CPOMS as the main digital sources of data retention. However, there are also paper/hard files for each pupil in the School Office and these are protected by an access security code. The file contains the registration and acceptance form, (the parent contract) and the academic record of a pupil as he or she progresses through the School. It will also include records of all significant conversations and correspondence (both posted and emailed) between parents and members of staff about any academic or pastoral issues, School reports, references from previous schools and references prepared for universities and other institutions. It will contain details of any disciplinary sanctions imposed on a pupil. The School retains such information as it is necessary to perform its contractual obligations within the parent contract and it is in our legitimate interests to keep information relating to the pupil, including correspondence, to ensure the School offers the appropriate level of care and education to each individual pupil. In rarer circumstances, it may also be necessary to retain details of a recorded lesson conducted on a one-to-one basis (one teacher; one pupil) during a lockdown period arising from the Pandemic.

The information held on the school's electronic systems (iSAMS, CPOMS, SOCS, Evolve, Google Workspace) covers: the pupil's name, address, email addresses for the pupil and parents, Form, House, and emergency contact details, formative/summative academic

performance, pastoral information, safeguarding information where relevant, disciplinary sanctions imposed, subjects studied, certain SEN details and daily attendance.

In addition it may also contain reports of any significant conversations and emailed correspondence between parents and members of staff about any academic or pastoral issues, as well as the academic record of a pupil as he or she progresses through the School and school reports. The School relies on the same basis as identified in the above paragraph to process such data.

Special Educational Needs, Learning Support and EAL

A confidential record of the support provided to a pupil within School is maintained by the Director of Learning Skills on iSAMS and is available to teaching staff to assist with the provision of the support and education which is appropriate to that pupil. You can email the Director of Learning Skills [elizabeth.bridle@yarmschool.org] if you have any questions in this regard. In addition, The Director of Learning Skills may also retain as a paper copy documents regarding pupils' learning profiles. This could include: external assessment reports, emails/letters, assessment booklets and reports, screening reports, work samples, observation records, meeting records. These are kept in locked filing cabinets.

The School may also receive reports and information regarding any learning support provided to the pupil outside of the school, external specialist assessment reports (e.g. Educational Psychologist reports, Speech & Language Therapy action plans etc) as well as full details from the relevant authorities when a pupil has an EHCP (Education Health Care Plan) in place. These details will also be disseminated to all relevant staff by the Director of Learning Skills, primarily through iSAMS but also occasionally by email, or when INSET/training is delivered. Such information may include personal data, such as the pupil's name, contact details, parents' names and/or specific details related to their SEND/learning support context. Such information will only be disseminated if necessary and in the legitimate interests of the School (i.e. the supply of an education) and to the benefit of the pupil.

Medical Records

A confidential medical record on each pupil is kept securely in a separate file and elements may also be copied onto the pupil's main file and recorded on iSAMS/CPOMS if necessary and if in the pupil's legitimate interests. The medical record contains: the medical questionnaire which the parents completed when the pupil joined the School together with any updates; records of illnesses/injuries sustained at the Senior School as well as any medical information shared from outside agencies which is relevant to the pupils needs at school.

Details of treatment received by the pupil at the Senior School and any accidents in which the pupil is involved are also recorded in the Medical Centre in iSAMS. Single sheet accident reports are copied and sent home for children in the Pre Prep and Prep School. All medications administered are recorded in the Medication Record Book. Please also see the Health and Safety Policy for details of the paperwork processed in the event of an accident and how long such data is kept for.

The School First Aid Lead provides each staff room with a list of the names of current pupils with serious medical conditions, or social information of a sensitive nature that may be of relevance to staff in their dealings with pupils, for example, when arranging trips and visits. iSAMS/CPOMS will also contain these details so that the teaching staff will know that they should consult the School First Aid Lead or make appropriate arrangements when arranging an activity/trip. Details of the medical and social information will be limited to what is necessary to ensure that the individual pupils' medical conditions are accounted for and it will only be shared in these circumstances when it is in their interests to do so.

The School First Aid Lead liaises with the local Health Authority regarding health screening and immunisations and keeps appropriate records in accordance with our legal obligations to offer such services to our pupils and retain records of the same. Such records will be kept in accordance with the Retention Schedule.

Financial Records

The Finance Department holds financial records on all parents whilst their children attend the School, holding all financial records for 6 years following the end of the current financial year, which is in effect 7 years. 'Relevant data' begins when an application is received and ends when all accounts have been settled in full, which is usually following the pupil's final term. The financial records cover: a record of the deposit, the acceptance form, bank details for direct debit payments, bills for tuition fees and extras throughout a pupil's time at the School.

If a pupil receives a bursary or scholarship, this will form part of the record, along with records of annual assessments and awards. Any correspondence between the Finance Department/Headmaster and the parents relating to the payment of fees and outstanding balances is also retained by the Finance Department/Headmaster in accordance with the Retention Schedule.

Such financial information may be shared with third parties, with no recourse to the parents/guardians, when it is in the School's legitimate interests to do so. This will include debt recovery agencies.

ACCESS BY STAFF

All teaching and office staff are able to access the School's iSAMS, although access permission levels are set according to the needs of the specific post. CPOMS access is arranged on a narrower, 'need to know' basis, taking into account such factors as the employee's role and the sensitivity of the data recorded. Teaching staff may consult the pupil records held in the School Office. Access to medical records is restricted to the School Nurse and the pastoral staff as well as the first aid trained office staff, although details of allergies/ongoing medical conditions are also detailed on iSAMS and are requested on Parental Consent Forms for trips which are then accessed by all adults accompanying the trip.

Parental Consent forms are retained with paperwork for trips. Access to financial records is restricted to the Headmaster and the Finance Department.

STAFF INDUCTION

All new teaching and office staff will be given training in accessing and managing school records (including iSAMS and CPOMS), as part of their induction into the Yarm School “style” for marking work, report-writing and written and electronic communications with pupils and parents.

All current staff have been given training in accessing and managing school records (including iSAMS) and the Yarm School “style” for marking work, report-writing and written and electronic communications with pupils and parents.

DATA PROTECTION – EXTERNAL PRIVACY NOTICE FOR PUPILS AND PARENTS

Parents accept a place for their child at Yarm School in the knowledge that data about pupils and their parents will be collected periodically and stored and processed in order to allow for the efficient operation of the school and in accordance with our contractual obligations. This is covered in the Yarm School Terms and Conditions and in our External Privacy Notice found on the School website.

Parents who accept a place for their child at Yarm School are invited to agree to the School using anonymous and named photographs and video footage of their child and information relating to his or her achievements for promotional purposes, which may be published in the prospectus, on the web site and in news pieces.

While we ask parents to think carefully about the implications of doing so, it is also possible for parents to opt out of any photographs or video footage of their child being used in any promotional material. Parents can also write to the School’s Data Privacy Officer (School Manager at catherine.evans@yarmschool.org) at any time to opt out.

Each year a list of all pupils who are not to appear in such material is provided to the office staff, the Marketing Manager and any relevant teaching staff. Parents should note all Newsletters are uploaded to the School website.

Yarm School’s Pupil Data Protection policy (available on the School website), describes its duties and obligations under the Data Protection Act, including parents’ rights and the rights of pupils aged 12 or over to have access to their personal data. It also covers the circumstances under which data would be disclosed to a third party.

FAIR PROCESSING NOTICE

Yarm School will comply with a Fair Processing Notice legally issued by a public body or other authority which is a data controller and is subject to the same legal constraints regarding the manner in which it handles data.

RECORDS OF FORMER PUPILS AND STAFF

If requested, when pupils transfer to another school, their records are forwarded to the new school and copies of salient documents and records are retained. We keep all pupil records of past pupils until a pupil is 25 years old. While there is not strict statutory requirement for a retention period, we have elected to retain information until the end of the year in which a pupil turns 25, so that they have access to school records for their university education, and potentially for a short period of employment thereafter, when they may be called on to provide their school records.

At that point, we securely destroy: all disciplinary, medical and financial records. Records can either be shredded using the machines available in School. It is the responsibility of the file owner to ensure that all information has been shredded securely. Alternatively, the School uses the services of a company (Shreddit) which disposes of confidential waste securely, and there are bags available from the School Office for that purpose.

We retain records of results in public examinations, lists of school prizes and other significant achievements, together with information relating to former pupils' subsequent academic and other achievements. These form part of the School Archive for historical and statistical purposes.

A separate alumni database is held, for those former pupils who elect to remain in contact with the School. We always keep a record of former pupils' basic data (on the school and alumni data base): we need first and last names and dates of birth to verify they are a former pupil. The database information is held indefinitely, or until such a time as the former pupil elects not to be contacted again by School. Such contact details relating to former pupils are stored in the Marketing Manager's office.

We keep all records of former staff for 7 years after their leaving date for legal purposes (for example, for the defence of potential legal claims). At that point, we securely destroy all disciplinary, medical and financial records. Data on the Single Central Register in relation to former members of staff will be retained for as long as is required by the DfE and ISI. In addition, staff who leave the school should be aware that their personal data as it appears in the current version of handbooks and policies will be retained until the next annual review (which is usually undertaken in the summer holidays), when it will be removed and information updated appropriately.

Data of parents who request a prospectus are kept on iSAMS and by the Headmaster's PA and used only for the purpose of invitation to Open Mornings. These are subject to periodic review and retained until it becomes clear that parents are either no longer interested in a place for their child or their child becomes a pupil and is recorded elsewhere on iSAMS.

Data of pupils who apply (whether they sit an entrance assessment or not) but are either not offered a place at the School or who decline a place is held on iSAMS and the paper file by the Headmaster's PA. This is because there can be some late changes to the numbers on roll in any particular year group, and we may need to re-contact particular families to offer them a place, should one become available. This information category and data are subject to periodic review before a decision to delete or retain is taken.

For SEN pupils, data is retained by calculating the normal leaving date + 25¹ years.

EYFS

The regulations regarding the EYFS curriculum, the Local Authority requirements and the Nursery Education Grant require the School to retain electronic and paper copies of the pupils' daily progress and their attendance. These records identify the pupil, are required to be shared with the Local Authority and are retained on the pupils' files. The Early Learning Goals are also shared with the parents of the pupil at the end of their Reception Year. Records of registered sessions are also retained and forwarded to the Local Authority for the Nursery Education Grant.

NLB August 2010

Reviewed: April/July 2021, July 2022, July 2023, July 2024, July 2025

Next review: July 2026

¹ NOTE: This retention period is the minimum period that any SEN pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.