

**Walter Halls Primary and Early Years School: Record of Data Processing**

<b>Data</b>	<b>Is it sensitive data?</b>	<b>Why is it collected?</b>	<b>Who is it processed by?</b>	<b>Who is it shared with?</b>	<b>How long is it kept?</b>	<b>How is it disposed?</b>	<b>Measures taken to keep the data secure</b>
<b>Pupil Personal Information: Date of Birth, Name, Ethnicity, Gender, Medical Details, Address, GP Details, Parental Details, Sibling Details, Religion.</b>	Yes	School requires pupil records so that: <ul style="list-style-type: none"> <li>- Pupils can be enrolled and identified.</li> <li>- To contact parents in an emergency or to share information on their child education.</li> <li>- They know the medical history and can keep pupils safe.</li> <li>- To analyse pupil progress across school under different categories to ensure that all pupils are making progress and receiving a fair and equal education e.g. gender, ethnicity.</li> </ul>	The school office staff  Teachers	Teachers and Teaching Assistants  Educational Professionals e.g. on school to school reviews  Governors  Teaching Students  OFSTED	For as long as the pupil remains at Walter Halls.	It is removed from SIMs (Local Authority data storage system) by the school administrative staff once pupils have left school.  Teaching staff must shred assessment or pastoral records at the end of every academic year.	The data is kept on SIMs which is a Local Authority database.  Staff computers have bit locks.  Staff must shut down screens before leaving them.  Office staff should have screens facing away from the view of the public.  Assessment and Pastoral Data is kept securely by staff and kept electronically wherever possible.  When sharing data with governors or external reviewers names are anonymised when they are not needed for the purpose of understanding or analysis.
<b>Class lists with names</b>	Yes	<ul style="list-style-type: none"> <li>- To organise groups for trips.</li> <li>- To discuss with staff during transition.</li> <li>- For fire drills.</li> <li>- To use to create labels for organisational purposes.</li> <li>- To set children up on educational APPS</li> <li>- To organise pupils for events</li> </ul>	Teachers  Office Staff  Teaching Assistants	Teachers and teaching assistants  Office staff  External Educational APP providers: Marvellous Me, Ixcel, Athletics  Other schools for co-sporting events or secondary transition.	Class lists are used on an ongoing basis whilst children are at Walter Halls	Teachers to shred lists once used.  Marvellous Me, Ixcel, Athletics have own data protection policy to remove once subscription has ended. Names reviewed annually linking into school database.	Staff to keep class lists secure and in one place.  Staff to only take as many copies as they need.  Staff to restrict access to class lists to those individuals who need to use them.
<b>Pupil Progress Information</b> SIMs Excel Word LA Data Governor Reports Staff Action Plans Phonics Records	Yes	<ul style="list-style-type: none"> <li>- To ensure that all children are making academic progress in school. To ensure that no individual or group is disadvantaged.</li> </ul>	Teachers  Office Staff  Teaching Assistants	Teachers  Office Staff  Teaching Assistants  Governors  External Review: OFSTED, HMI, Local Authority, NST Trust CEO's, School Improvement Partner	School analysis is kept for the duration of the academic year and one year afterwards (by the HT).	Teachers to shred.	Staff to use online versions unless necessary.  Staff to keep data confidential from any non-school party / non external review partner.  Staff to keep any paper copies securely and to avoid looking at them in public or open places where parents or children may be able to read the information.  Names anonymised for governors.
<b>Class lists with names and medical information</b>	Yes	<ul style="list-style-type: none"> <li>- For trips and visits to ensure pupil safety in the event of an emergency.</li> <li>- To ensure staff are aware of any allergies.</li> </ul>	Teachers  Office Staff  Teaching Assistants	Staff only	For the duration of the trip or visit.  Allergy lists are kept throughout pupils time at school and renewed termly / annually.	Teachers to shred on return.	Staff to keep lists secure in a folder and designated place during trip.  Staff to limit number of copies to those needed.  If medical needs e.g. allergy lists are up in shared areas these should be school areas away from view of parents and children e.g. midday notice board. They should not be large and initials or first names may be used if possible.

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<b>Pastoral transfer records</b>	Yes	- To ensure important information regarding pupil needs are passed on between educational professionals.	Teachers Teaching Assistants Office Staff	Teachers Teaching Assistants Office Staff Other educational providers (on transfer) Safeguarding and Special Needs Leads at Secondary Transfer.	For the academic year of transfer.	In school it is disposed of by shredding the information. Any information passed to a new secondary will be disposed of according to their policy.	Shared on one drive or by encrypted emails. Hard copies to be kept securely by staff and not left on display or in reach. Hard copies limited to number needed. Transfers to secondary made via CTF on Local Authority System. (Local Authority GDPR)
<b>Safeguarding Information</b>	Yes	- To keep children safe and for legal reasons e.g. should a child's records ever be required for child protection or legal purposes.	DSLs Family Support worker Staff (Only individual staff on needs to know for safeguarding)	Social Care DSL's Health, family support workers, police, social care, youth offending team and other professionals at multi agency or child in need / child protection meetings. (where meetings are held for particular cases)	For seven years after pupil departs from school or until they are 18.	We use a non-paper based system called My concern which is GDPR compliant. We ask them to dispose of the records. Paper records are shredded.	My concern online GDPR system. No more paper records unless internet is down. (If paper copies are made in an emergency these are scanned to My concern later and shredded)  Historical archives are locked securely in an area of school not accessible to staff or pupils other than senior staff and DSL's.  Zip locked bags for meetings.  Notes at meetings to be carried in zip locked bags and shredded once they are typed onto My Concern.  Parental or agency copies to be stamped / water marked as such.
<b>Attendance Information</b>	Yes	- Legal record of school attendance. To keep children safe and ensure they are receiving entitled education. To promote positive attendance in school.	Attendance admin / office staff Teachers	Parents Social Care and Agencies (where child is subject to social care involvement) Local Authority OFSTED EWO (for referrals) Secondary Schools or Primary Schools on transition or move to another school.	Until pupil leaves Walter Halls.	Deleted from the school system once pupil has left school.	Attendance Records kept online and registers completed online unless systems are down.  Paper copies to be disposed of after use by shredding.  Parental or agency copies to be stamped / water marked as such.  Names of attendance winders displayed on school notices only and with reference to consent forms agreed by parents.
<b>SEN (Additional Needs) Information</b>	Yes	- To ensure appropriate support and provision for all pupils with additional needs. - To monitor progress and ensure equality of educational opportunity for those pupils.	Teachers SEN TA Team	Agencies such as behaviour support, exclusions, autism support, educational psychology, speech and language service etc.	For the time pupil is in school.	Paper shredded Files deleted from computer.	SEN Folders in room with locked or key coded door. Minimal paper e.g. if document arrives that requires more than one staff sign off SENCo asks staff to read and return signed rather than copying.
<b>Pupil Premium Information</b>	Yes	- To ensure that pupil premium funding is allocated fairly and correctly.	SLT Teachers	Not shared outside of school other than general % and figures but no names attached.	For the time pupil is in school.	Paper shredded Files deleted from computer.	Pupil Premium info kept on SIMs. Staff asked to keep any printed copies of PP info securely. All staff given lockable storage. Minimal printing requested.

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<b>Photographs</b>	Yes	<ul style="list-style-type: none"> <li>- For displays.</li> <li>- Used on SIMs database to identify pupils e.g. if staff member needs to find a pupil in school.</li> </ul>	Staff	Photographs inside school only visible to parents and visitors in school who are passing displays.	For the time the pupil is in school.	Deleted from SIMs Displays shredded.	SIMs password protected for school users only. Photographs inside school only unless parent consent given. Consent list updated by office and shared with all staff. No mobile phones used by parents around school.
<b>Play therapy Information (case studies, notes and reports)</b>	Yes	<ul style="list-style-type: none"> <li>- For playtherapist use to support pupils and use to prepare and discuss in supervision sessions to ensure sessions are tailor made for the child and effective.</li> </ul>	Play therapist Supervisor to Play therapist.	Only with play therapist supervisor who is registered professional.	7 years after leaving school or until pupil is 18.	Shredded.	Play therapist locked storage and door to office.
<b>Behaviour Records</b>	Yes	<ul style="list-style-type: none"> <li>- To monitor patterns in individuals and groups so school can be proactive in supporting any key issues within school or individuals.</li> </ul>	Staff	Reports to governors but anonymised and general %.	For the time the pupil is in school.	Deleted by My Concern online system.	Online recording system to minimise paper info. White logs by middays taken to the main office – in tray kept behind door of the office and passed to SLT.
<b>Exclusion Information</b>	Yes	<ul style="list-style-type: none"> <li>- Fair access and equality and to monitor levels of exclusions to ensure they are reduced levels.</li> </ul>	SLT Office Staff	Safeguarding Governor and Chair of Governors	For the time the pupil is in school.	Online files deleted and paper shredded.	Minimal paper. Copies to file (pupil) and also online on SIMS.
<b>Staff personal details: gender, next of kin, address, telephone number.</b>	Yes	<ul style="list-style-type: none"> <li>- For emergencies and to send any correspondence.</li> </ul>	Office Staff	SLT have access and Office Staff only. Not shared unless it is an emergency e.g. medical and may be shared with health.	For the time staff are in school.	Deleted form SIMs database.	Restricted access – office and senior staff (Head, Deputy). Online storage. Screens have time out systems.
<b>Staff files: HR records, contracts and job descriptions, quality assurance records.</b>	Yes	<ul style="list-style-type: none"> <li>- For reference to contract and job spec for HR reasons.</li> <li>- For quality assurance purposes – patterns in school, support for staff.</li> </ul>	Office Staff Senior Staff (Head, Deputy, SST (Q/A only - SST))	Local Authority HR Team may look at some documentation if relevant to HR advice. Chair of Governors.	For the time staff are in school.	Emails deleted. Files shredded.	Locked storage and room for files. Restricted access.
<b>Reports</b>	Yes	<ul style="list-style-type: none"> <li>- Record of progress.</li> </ul>	Office Staff Teacher Senior Staff	Parents of child only.	For the time pupil is in school.	Pupil files shredded.	Locked storage and room for files. Restricted access.
<b>Dinner Monies, Breakfast Club Monies and Trip Monies (Records and online payment)</b>	Yes	<ul style="list-style-type: none"> <li>- For payment and refunds.</li> </ul>	Office Staff	No one.	For the time pupil is in school.	Files and spreadsheets deleted.	Online system. Cashless office.
<b>Class Dojo Home learning Pupil and parent names Contact details Photographs and videos</b>	Yes	<ul style="list-style-type: none"> <li>- Communication between teachers, parents and children outside of normal school hours or during school closure</li> <li>- Setting and completion of home work</li> <li>- Informing parents of positive behaviours within school.</li> </ul>	Class Teachers Office Staff	Parents and children	For the time the pupil is in school	Accounts deleted	Online system, access is granted by the school, accounts are password protected.