



APPENDIX A

GDPR - DOCUMENT HANDLING PROTOCOL

The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

This protocol relates to the handling of any physical document within the Learn to Live Federation which contains the personal data of any individual.

It is expected that physical documents will only be produced when there is no other practical alternative. Electronic storage of personal information is the preferred method.

Examples of personal information are:

- Name
- DOB
- Contact details
- Medical conditions
- Initials

Documents will be classified depending on the amount and type of personal data they contain and should be produced, stored and disposed of appropriately. Categories are:

LEVEL ONE

Limited personal information, for example lesson plans with pupil's initials, names, Home School Diaries.

LEVEL TWO

More detailed personal information, including anything with full personal information along with contact details.

LEVEL THREE

Full personal information, including medical details, behaviour plans, manual handling plans, staff personal files and any information that falls into the "special categories" of data defined by the GDPR, these being:

- race;
- ethnic origin;
- politics;
- religion;
- trade union membership;
- genetics;
- biometrics (where used for ID purposes);
- health;
- sex life; or
- sexual orientation.

If you are unsure of the classification of a document, you should classify it in the highest category you think appropriate.

The following table details how different categories of data will be produced, handled and disposed of:

Category	LEVEL ONE	LEVEL TWO	LEVEL THREE
Who can produce/print document?	Any member of staff who has a reasonable reason to produce this type of document.	Teachers and any admin/support staff who has a reasonable reason to produce this document.	These documents can only be produced by authorised staff.
How should production be recorded?	Production does not need to be recorded but staff need to be aware that personal information is contained in the document.	Production does not need to be recorded but staff should try and avoid producing a hard copy unless there is no alternative. Staff also need to be aware that this document contains more detailed personal information.	Production will be recorded in a log, this log will detail the distribution of these documents.
How should document be stored?	The document can be stored anywhere in the school but consideration should be given to any other users of the school, for example hirers of the hall, after school club etc.	Document should be in a locked container when not in use.	Document should be in a locked container when not in use.
How should the document be disposed of?	Document should be disposed of as confidential waste.	Document should be disposed of as confidential waste.	Document should be returned to the producer when no longer required so that its destruction can be recorded.
What to do in the event of a data breach?	If it is known that a document has been lost this should be reported to the DPO.	If it is known that a document has been lost this should be reported to the DPO who will decide if the breach needs to be reported to the ICO.	If a document is lost the DPO will carry out an investigation and report the loss to the ICO.

DPO = Dave O'Loughlin; ICO = Information Commissioner's Office



DOCUMENT FILING

A key requirement of the GDPR is the right to the return of or destruction of any personal data which is held on an individual. To facilitate this, documents are to be held in a way which allows us to easily identify all the information we hold on a pupil or member of staff. The easiest way to achieve this is to have a single file on each pupil or member of staff. However, it is recognised this may not always be a practical solution in which case information can be held in separate files as long as they are easily identifiable. In the event of a separate file no longer being necessary, the information contained within it should be returned to the pupil or staff member's main record.