

Policy for the transfer of pupil data between schools

Where should files be transferred when a child leaves the school?

Whenever a child transfers to a new school, all files and information pertaining to that child should be transferred to their new school. In the event of a child moving to an independent school, leaving the country, becoming missing from education or becoming home-schooled, the data should be forwarded to the Local Authority to be held.

The last school attended when a child leaves education should hold the complete records in accordance with the data retention schedule.

Checks to be undertaken prior to the issue of pupil data

Where the new school is a maintained school outside of West Sussex, or is an Academy, checks should be undertaken to ensure that the school has the following:

- Registration with the ICO as a Data Controller (<https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>)
- A Privacy Notice and any other Data Protection information published on their website.

Process for the transfer of data

Pupil Educational Files which need to be transferred from one school to another should be physically transported in one of the following ways:

- West Sussex CC Courier Service
- Delivery in person by a member of staff
- Royal Mail Special Delivery.

The most appropriate method should be selected by the sending school based on the circumstances: numbers of files involved, transport distances, sensitivity of data etc. It is anticipated that Royal Mail Special Delivery will be used when files need to be transferred out of the area.

It is not recommended that schools use private courier firms for the transport of Educational Files as it is not possible to guarantee the security of their handling of the package.

In all cases, the package containing the file(s) should be sent with a receipt enclosed, listing the files provided, to be signed by the recipient and then returned to the sending school, by a stated deadline. In the event of the signed receipt not being received at the sending school by the deadline, it will be their responsibility to contact the recipient to confirm receipt. *If the receiving school fail to respond to a reminder, the sending school will assume that the package has been received.*

In addition to this, the following specific procedures should be followed for each method of transport:

West Sussex CC Courier Service:

- A receipt should be signed by the courier on collection of the package confirming that it has been accepted, and that it will be stored securely during transit and not left unattended unless stored out of sight, locked in the rear of the van.

Delivery in Person:

- Delivery of files in person must only be undertaken by a member of staff with authorisation from the school to use their vehicle on School business, and with appropriate Business Use insurance cover.
- The member of staff must drive directly to the destination school(s), without making any additional stops. The file(s) must be kept securely locked in the boot of the vehicle. The vehicle must not be left unattended with file(s) on board for any longer than necessary to make the deliveries.
- The member of staff delivering should sign for the files upon departing their school, and obtain a signed receipt of delivery from the receiving school.

Royal Mail Special Delivery:

- Package must be securely wrapped in suitable, durable packaging for the journey so that it cannot be damaged in transit.
- Addresses should be checked for completeness and accuracy, including the post code, and clearly marked on the package in indelible, waterproof ink. The sending school's address should be marked on the reverse of the package as a return address.
- The package should be sent from a Post Office branch and a full receipt with the item's tracking number should be obtained from the clerk at time of posting. This should be retained by the sending school.

In the event of a file not arriving at the intended destination, the sending school will be responsible for reporting and investigating the data breach and should use any means available to them (eg. package tracking) to attempt to identify the whereabouts of any missing package.