

Polisi Diogelu Data

Rheoliad Diogelu Data Cyffredinol (GDPR) a Deddf Diogelu Data 2018

Data Protection Policy

General Data Protection Regulation (GDPR) and the Data Protection Act 2018

Ysgol Babanod Morfa Nefyn



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1. Cyflwyniad

Er mwyn gweithredu'n effeithlon, mae'n rhaid i Ysgol Babanod Morfa Nefyn gasglu a defnyddio gwybodaeth am bobl y mae'n gweithio â hwy. Gall y rhain gynnwys y cyhoedd, cyn-weithwyr, gweithwyr cyfredol a gweithwyr y dyfodol, disgyblion a chyflenwyr. Hefyd, efallai y bydd y gyfraith yn ei gwneud yn ofynnol i gasglu a defnyddio gwybodaeth er mwyn cydymffurfio â gofynion llywodraeth ganolog.

Mae'r ysgol wedi ymrwmo i sicrhau yr ymdrinnir â gwybodaeth bersonol yn briodol, ac mae'n sicrhau cydymffurfiaeth â deddfwriaeth diogelu data. Bydd yr Ysgol yn gwneud pob ymdrech i fodloni ei rhwymedigaethau o dan y deddfwriaeth a bydd yn adolygu gweithdrefnau yn gyson er mwyn sicrhau ei bod yn gwneud hynny.

Diffiniadau

Data Personol yw gwybodaeth sy'n ymwneud ag unigolyn byw y gellir ei adnabod sy'n cael ei phrosesu fel data. Mae prosesu yn golygu casglu, defnyddio, datgelu, cadw neu waredu gwybodaeth. Mae'r egwyddorion diogelu data yn berthnasol i'r holl wybodaeth a ddelir yn electroneg neu mewn ffeiliau strwythuredig sy'n dweud rhywbeth wrthych am unigolyn byw y gellir ei adnabod.

Mae'r egwyddorion hefyd yn ymestyn at yr holl wybodaeth yng nghofnodion addysg. Enghreifftiau o hyn fyddai enwau staff a disgyblion, dyddiadau geni, cyfeiriadau, rhifau yswiriant cenedlaethol, marciau ysgol, gwybodaeth feddygol, canlyniadau arholiadau, asesiadau ADY ac adolygiadau datblygiad staff.

Data Categori Arbennig yw gwybodaeth sydd yn ymwneud â hil neu ethnigrwydd, barn wleidyddol, crefydd, aelodaeth undebau llafur, iechyd, geneteg, rhywioldeb, bywyd rhywiol, biometrig.

Y gwahaniaeth rhwng prosesu data personol a data categori arbennig yw bod mwy o gyfyngiadau cyfreithiol ar yr olaf gan eu bod yn fwy sensitif.

Data Troseddol – mae Erthygl 10 y Rheoliad Diogelu Data Cyffredinol (GDPR) yn gosod allan y rheolau ar gyfer prosesu data troseddol.

2. Sgôp

Mae'r polisi hwn yn berthnasol i holl weithwyr, llywodraethwyr, contractwyr, asiantaethau a chynrychiolwyr a staff dros dro sy'n gweithio i, neu ar ran yr ysgol.

Mae'r polisi hwn yn berthnasol i'r holl wybodaeth bersonol a grëwyd neu a ddaliwyd gan yr Ysgol ym mha bynnag fformat (e.e. papur, electronig, e-bost, ffilm) a pha bynnag fodd y mae'n cael ei storio (er enghraifft, system/cronfa ddata TGCh, strwythur ffeilio gyriant a rennir, e-bost, cabinet ffeilio, silffoedd a droriau ffeilio personol).

Nid yw DDD yn berthnasol i fynediad at wybodaeth am unigolion sydd wedi marw.

3. Cyfrifoldebau

Y Llywodraethwyr sydd gan y cyfrifoldeb cyffredinol dros gydymffurfio gyda DDD.

Mae'r Pennaeth yn gyfrifol am sicrhau cydymffurfiaeth gyda DDD a'r polisi hwn o fewn gweithgareddau dyddiol yr ysgol. Mae'r Pennaeth yn gyfrifol am sicrhau y darperir hyfforddiant priodol ar gyfer yr holl staff.

Mae pob aelod staff neu gontractwr sydd yn dal neu'n casglu data personol yn gyfrifol am eu cydymffurfiaeth eu hunain gyda DDD a dylent sicrhau y cedwir ac y prosesir gwybodaeth bersonol yn unol â DDD.

Dylai pob aelod o staff fynegi ei fod wedi darllen, deall a derbyn y Polisi hwn.

4. Y Gofynion

Mae DDD yn mynnu fod yn rhaid i unrhyw un sy'n prosesu data personol gydymffurfio a chwech egwyddor arfer da; gorfodir yr arferion hyn yn gyfreithiol. Mae'r egwyddorion yn mynnu'r hyn a ganlyn yng nghyswllt gwybodaeth bersonol:

Erthygl 5 GDPR

- a) Dylid prosesu'r wybodaeth yn gyfreithlon, yn deg, ac yn dryloyw
- b) Dim ond ar gyfer un neu ragor o ddibenion penodol, amlwg a chyfreithlon y dylid cael gafael ar yr wybodaeth ac ni ddylid ei phrosesu ymhellach mewn unrhyw ffordd nad yw'n cyd-fynd â'r diben neu'r dibenion hynny;
- c) Bydd y wybodaeth yn ddiogol, yn berthnasol ac nid yn ormodol o'i gymharu â diben neu ddibenion ei phrosesu;
- d) Bydd y wybodaeth yn fanwl gywir a, pan fo hynny'n briodol, yn hollol gyfredol;
- e) Ni ddylid cadw'r wybodaeth am yn hwy nag sydd rhaid ar gyfer y diben neu'r dibenion hynny;
- f) Bydd y wybodaeth yn cael ei phrosesu'n ddiogel, h.y. ei gwarchod gan radd briodol o ddiogelwch.

5. Ffi flynyddol

Mae gofyn talu ffi flynyddol i Swyddfa'r Comisiynydd Gwybodaeth. Mae methu â gwneud hynny yn medru arwain at gosb ariannol.

6. Hysbysiadau Preifatrwydd

Pryd bynnag y cesglir gwybodaeth am unigolion, bydd yr ysgol yn darparu'r wybodaeth a ganlyn:

- Pwy yw'r rheolydd data, e.e. yr ysgol;
- Diben casglu'r wybodaeth;
- Sail gyfreithiol dros gasglu'r wybodaeth
- Unrhyw ddibenion eraill y gellid eu defnyddio ar eu cyfer;
- Gyda phwy y bydd, neu gellir, rhannu'r wybodaeth;
- Pa mor hir cedwir y wybodaeth
- Manylion am hawliau unigolion
- Manylion y Swyddog Diogelu Data

Rhaid i hyn ddigwydd ar yr amser y dechreuir casglu gwybodaeth am unigolyn.

Er enghraifft:

Bydd Ysgol yn casglu gwybodaeth am ddisgyblion er mwyn tracio eu cynnydd addysgol. Ni fydd yn cael ei defnyddio ar gyfer unrhyw bwrpas arall.

Gwneir hyn fel rhan o'i ddyletswydd cyhoeddus.

Bydd yn rhannu'r wybodaeth efo'r Awdurdod Addysg Lleol a Llywodraeth Cymru.

Ni fydd y wybodaeth yn cael ei throsglwyddo dramor / Bydd y wybodaeth yn cael ei throsglwyddo dramor. Cedwir y wybodaeth am mlynedd.

Gall fod gennych hawliau mewn perthynas a chael, cywiro, gwrthwynebu, dileu neu gludo gwybodaeth bersonol. Cysylltwch a'r Swyddog Diogelu Data am fanylion.

Manylion cyswllt y Swyddog Diogelu Data ydi

Os cesglir gwybodaeth yn uniongyrchol gan blentyn, rhaid i'r hysbysiad preifatrwydd fod mewn iaith sy'n ddealladwy i'r plentyn.

7. Amodau ar gyfer Prosesu

Gellir ond prosesu data personol pan fo un o amodau Erthygl 6 y GDPR wedi cael ei bodloni.

Gellir ond prosesu data categori arbennig pan fo un amod yn Erthygl 9 y GDPR wedi cael ei fodloni yn ogystal ag un yn Erthygl 6.

Gweler [Atodiad 1](#) am restr o'r amodau.

8. Datgelu Data

Mae hi'n drosedd cael gafael ar neu ddatgelu gwybodaeth am unigolyn, boed hynny'n fwriadol neu'n fyrbwyll heb achos cyfiawn. Ni ddylid ond rhoi data perthnasol, cyfrinachol i:

- *aelodau staff eraill ar sail angen gwybod;*
- *Rhieni/Gwarcheidwaid perthnasol;*
sefydliadau eraill os yw hynny'n angenrheidiol er lles y cyhoedd, e.e. atal trosedd;
- *awdurdodau eraill, megis yr Awdurdod Addysg Lleol ac ysgolion pan fydd disgyblion yn symud iddynt a lle mae gofynion cyfreithiol*
- *sefydliadau mae'r ysgol yn cydweithio a hwy neu sy'n rhan o brotocol rhannu gwybodaeth*

Ni ddylai'r ysgol ddatgelu unrhyw beth am gofnod y disgybl fyddai'n debygol o beri niwed sylweddol i'w iechyd corfforol neu feddyliol nac i iechyd corfforol neu feddyliol unrhyw berson arall.

Dylid ceisio cyngor os oes amheuaeth neu fod gwrthdaro rhwng gofynion statudol.

Wrth roi gwybodaeth i unigolyn, yn enwedig ar y ffôn, yn bwysicaf oll, rhaid gwirio pwy yw'r unigolyn hwnnw. Os oes amheuaeth, dylid gofyn cwestiynau i'r unigolyn, rhai na all neb ond ef/hi eu hateb. Ni ddylid darparu gwybodaeth i bartïon eraill, hyd yn oed os ydynt yn perthyn. Er enghraifft: yn achos rhieni sydd wedi ysgaru, mae'n bwysig nad yw gwybodaeth ynghylch y naill barti yn cael ei rhoi i'r llall am nad oes ganddynt hawl i'w derbyn.

9. Hawliau unigolion

Mynediad at wybodaeth amdanynt eu hunain

Mae gan unrhyw un yr hawl, i ofyn am gopi o'r holl wybodaeth a gedwir amdanynt gan yr ysgol (neu wybodaeth am blentyn y maent yn gyfrifol amdano).

Pan dderbynnir cais, rhaid ymdrin ag o'n brydlon; rhaid cyflwyno ateb cyn gynted â phosib o fewn un mis. Ceir ymestyn y cyfnod i hyd at ddau fis os ydi cais yn gymhleth neu 'n niferus.

Ni ellir codi ffi am. Fodd bynnag os ydi cais yn ddi-sail, ormodol ac wedi ei gyflwyno o'r blaen mae hawl i godi ffi weinyddol.

Wrth ddarparu'r wybodaeth, rhaid i'r ysgol hefyd ddarparu'r un manylion i'r unigolion ag a roddir mewn hysbysiad preifatrwydd.

Gweler [Atodiad 2](#) ar gyfer y weithdrefn ar sut i ymdrin â'r ceisiadau hyn.

Gellir codi hyd at £50 (ar raddfa symudol ar gyfer ffioedd llungopïo) am fynediad at gofnod addysgol disgybl.

(ii) Darparu data i blant

O ran gallu plentyn i wneud cais, yn ôl arweiniad Swyddfa'r Comisiynydd Gwybodaeth, erbyn iddo gyrraedd 12 oed gellir disgwyl i blentyn fod yn ddigon aeddfed i ddeall natur y cais. Wrth gwrs, gall plentyn fod yn ddigon aeddfed yn gynt; dylid ystyried pob plentyn ar sail bob achos unigol.

Os nad yw'r plentyn yn deall natur y cais, mae rhywun sydd â chyfrifoldeb rhiant am y plentyn, neu warcheidwad, yn meddu ar yr hawl i wneud cais ar ran y plentyn a derbyn ymateb.

Dylai disgyblion sy'n cyflwyno ceisiadau i gael mynediad at eu cofnodion addysgol gael yr hawl i wneud hynny oni bai ei bod yn amlwg nad ydynt yn deall yr hyn y maent yn gofyn amdano.

(iii) Hawliau rhieni

Gall oedolyn sydd â chyfrifoldeb rhiant gael mynediad i wybodaeth am eu plentyn, os ystyrir nad yw'r plentyn eto'n ddigon aeddfed. Rhaid iddynt fedru profi eu cyfrifoldeb fel rhiant ac mae gan yr Ysgol hawl i ofyn am y ddogfennaeth briodol i brofi hyn yn ogystal â phrawf o bwy yw'r sawl sy'n gofyn a phwy yw'r plentyn.

Yn ogystal, mae gan rhieni eu hawl annibynnol eu hunain dan Reoliadau Addysg (Gwybodaeth am Ddisgyblion) (Cymru) 2004 i gael mynediad at gofnodion addysgol swyddogol eu plant. Nid oes gan fyfyrwyr hawl i atal eu rhieni rhag cael copi o'u cofnod ysgol.

10. Hawl i ofyn i gywiro gwybodaeth sy'n anghywir

Mae gan pob unigolyn yr hawl i roi gwybod i'r ysgol os ydynt yn credu bod gwybodaeth amdanynt wedi ei chofnodi yn anghywir.

Caniateir hyd at un mis i ateb ceisiadau ond gellir ymestyn hyn i hyd at deu fis ychwanegol os yw'r cais yn swmpus neu'n gymhleth;

Mae'n bosib nad yw'n bosib newid na dileu'r wybodaeth bob amser, ond dylid cywiro unrhyw beth sy'n ffeithiol anghywir;

Yn y cyfamser, dylid nodi rhybudd ar ffeil y person i nodi fod amheuaeth am y cywirdeb.

11. Hawl i ofyn am gael dileu gwybodaeth

Mae hawl gan unigolion, mewn rhai amgylchiadau, i wneud cais i ddileu gwybodaeth amdanynt eu hunain. Bydd yr ysgol yn ystyried pob cais yn unigol.

12. Hawl i wrthwynebu neu gyfyngu prosesu gwybodaeth

Mae gan pob unigolyn yr hawl i wrthwynebu i'w gwybodaeth gael ei brosesu o dan yr amgylchiadau a ganlyn:

- Rydym wedi prosesu eu gwybodaeth ar sail buddion cyfreithlon neu dasg gyhoeddus/awdurdod swyddogol;
- Lle mae marchnata cyhoeddus;
- Prosesu oherwydd ymchwil neu ystadegau.

Bydd yr ysgol yn cydymffurfio efo'r cais oni bai:

- Fod rhesymau cryf, cyfreithlon dros brosesu;
- Bod angen sefydlu, gweithredu neu amddiffyn hawliadau cyfreithiol.

O ran cyfyngu prosesu, ceir yr hawl i wneud hyn os yw unigolyn yn mynnu bod data yn anghywir ac felly rhaid cyfyngu yn ystod yr ymchwiliad; lle mae unigolyn wedi gwrthwynebu; lle mae'r prosesu yn anghyfreithlon a lle nad oes ar yr ysgol angen y data ond mae'r unigolyn angen y data er mwyn amddiffyn hawliad cyfreithiol.

Bydd angen hysbysu unrhyw drydydd partïon sydd wedi derbyn y data am yr angen i gyfyngu prosesu, a hysbysu'r unigolyn pwy ydi'r trydydd partïon yma.

13. Diogelwch

Cofnodion papur

Pan fo hynny'n bosib, dylid defnyddio ystafelloedd storio, cypyrddau cryf a systemau storio eraill sydd â chloeon i storio cofnodion papur. Ni ddylid gadael papurau sy'n cynnwys gwybodaeth bersonol gyfrinachol ar ddesgiau mewn swyddfeydd ac ystafelloedd dosbarth, ar fyrrddau ystafelloedd staff nac wedi'u gosod ar hysbysfyrddau lle mae gan bawb fynediad atynt. Dylid bod yn arbennig o ofalus os oes rhaid mynd â dogfennau allan o'r ysgol

Cofnodion Electronig

Dylid cadw pob dyfais gludadwy electroneg mor ddiogel â phosib. Os oes gwybodaeth bersonol ynddynt, dylid eu cadw dan glo oni bai eu bod yn cael eu defnyddio.

Dylid defnyddio meddalwedd amgryptio i amddiffyn pob dyfais gludadwy a chyfryngau symudadwy, megis gliwiaduron a dyfeisiadau USB (neu ffurf arall i gadw gwybodaeth nad ydyw'n rhan o'r cyfrifiadur ei hun), sy'n cadw gwybodaeth bersonol a chyfrinachol. Rhaid gwarchod pob dyfais gyda chyfrinair.

Rhaid cael gwared ar ddata yn ddiogel cyn gynted ag y caiff ei drosglwyddo neu phan nad oes ei angen mwyach.

Dylid annog defnyddio cyfrineiriau cryf, h.y. o leiaf wyth nod a chynnwys symbolau arbennig os yw unrhyw gyfarpar electroneg yn dal gwybodaeth bersonol gyfrinachol. Dylid defnyddio gwahanol gyfrineiriau ar gyfer gwahanol systemau a dyfeisiadau.

Gwaredu

Os cedwir unrhyw wybodaeth gyfrinachol ar gofnodion papur, dylid eu llarpio; dylid glanhau cofau electronig neu eu dinistrio.

Digwyddiad Data

Mae tramgwydd data yn golygu fod gwybodaeth bersonol wedi cael ei chyfaddawdu neu ei cholli, a allai fod wedi digwydd o ganlyniad i ddigwyddiad ar y we; data wedi ei adael mewn lleoliad anniogel; data wedi ei bostio at y derbynydd anghywir; colli neu ddwyn gwaith papur neu ddyfais anniogel, ac ati.

Bydd yr ysgol yn ymchwilio unrhyw ddigwyddiadau ac yn cymryd camau adferol priodol. Adroddir am ddigwyddiadau data difrifol i Swyddfa'r Comisiynydd Gwybodaeth.

14. Cadw data

Dylid cael gwared ar wybodaeth sydd ddim yn gyfredol bellach os nad yw'n berthnasol mwyach. Ni ddylid ond cadw gwybodaeth cyn hired ag y bo angen, ar gyfer dibenion cyfreithiol neu fusnes.

Mae [Atodiad 3](#) yn gosod y cyfnodau perthnasol ar gyfer cofnodion ysgol.

15. Cofnodi Data

Dylid cadw cofnodion mewn modd fel y gallai'r unigolyn dan sylw eu hymchwilio. Dylid hefyd gadw mewn cof ei bod yn bosib y bydd y llysoedd neu unrhyw swyddog cyfreithiol yn ymchwilio'r data rywdro yn y dyfodol. Felly, dylai fod yn gywir, yn ddiuedd, yn ddiamwys ac yn hawdd ei ddehongli/darllen. Pan ceir gwybodaeth gan ffynhonnell allanol, dylid cofnodi manylion y ffynhonnell a'r dyddiad y derbyniwyd y wybodaeth.

16. Gwefan

Bydd unrhyw berson sydd â'u manylion, neu fanylion plentyn, i'w cynnwys ar wefan yr ysgol angen rhoi caniatâd ysgrifenedig. Ar yr adeg y bydd y wybodaeth yn cael ei chynnwys, bydd yr holl unigolion yn cael gwybod yn iawn am ganlyniadau eu data yn cael ei ledaenu'n fyd-eang.

17. Ffotograffau

Mae'n bosib y bydd ffotograffau a gymerir er defnydd ysgol swyddogol yn destun y DDD a bydd yr Ysgol yn cynghori disgyblion a myfyrwyr am y rheswm y maent yn cael eu cymryd.

Mae ffotograffau a gymerir er defnydd personol yn unig yn eithriedig o'r DDD.

Darperir ffurflen ganiatâd ar gyfer ffotograffau yn [Atodiad 4](#).

18. Rhannu Gwybodaeth

Wrth rannu gwybodaeth bersonol, bydd yr ysgol yn sicrhau bod:

- ganddi ganiatâd i'w rannu;
- diogelwch digonol (gan gymryd natur y wybodaeth i ystyriaeth) mewn lle i'w amddiffyn; ac
- yn darparu amlinelliad mewn datganiad preifatrwydd am bwy sydd yn derbyn gwybodaeth bersonol gan yr ysgol.

Bydd unrhyw ddata personol a anfonir at drydydd parti er prosesu (sef cwmni allanol) yn cael ei gwmpasu gan gytundeb prosesu data.

19. Teledu Cylch Cyfyng

Mae dal a/neu gofnodi delweddau o unigolion y gellir eu hadnabod yn enghraifft o brosesu gwybodaeth bersonol ac felly mae angen cydymffurfio â'r DDD.

Bydd yr ysgol yn hysbysu staff, disgyblion ac ymwelwyr am y rheswm y mae'n casglu gwybodaeth bersonol ar ffurf delweddau TCC.

Bydd yr ysgol yn sicrhau fod ganddo gyfnod cadw penodol ar sail yr angen posib i adolygu'r deunydd a bydd yn ystyried pwy sydd yn cael mynediad at y deunydd hwn a pham.

Bydd gan unigolion ac asiantaethau gorfodi'r gyfraith yr hawl i ofyn am weld y delweddau. Bydd holl geisiadau o'r fath yn cael eu cofnodi.

Wele yma, ganllaw Swyddfa'r Comisiynydd Gwybodaeth ar deledu cylch cyfyng:

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

20. Gwybodaeth Fiomereg (olion bysedd) - DEWISOL

Mae Deddf Diogelu Rhyddid 2012 yn cynnwys mesurau yn ymwneud â'r defnydd o systemau adnabod biometreg, h.y. systemau olion bysedd ac adnabyddiad wynebol (*facial recognition*).

O dan y GDPR cydnabyddir bod data o'r math yn ddata categori arbennig

- Ar gyfer bob disgybl ysgol o dan 18 mlwydd oed, bydd yr ysgol yn gofyn am ganiatâd ysgrifenedig y rhieni cyn cofnodi a phrosesu manylion biometreg eu plentyn.
- Rhaid i'r holl ddata o'r fath gael ei drin yn briodol ac yn unol ag egwyddorion y DDD.

- Rhaid adnabod dulliau eraill o ddarpariaeth gwasanaeth os yw rhiant neu ddisgybl yn gwrthod rhoi caniatâd.

Darperir ffurflen ganiatâd enghreifftiol ar gyfer gwybodaeth fiometreg yn [Atodiad 5](#).

21. Torri'r polisi

Gall diffyg cydymffurfiaeth â gofynion y DDD gan aelodau staff arwain at drydydd parti yn cymryd camau difrifol yn erbyn awdurdodau'r ysgol. Felly, mae diffyg cydymffurfiaeth gan aelod staff yn cael ei ystyried yn fater disgyblu a all, yn ddibynnol ar yr amgylchiadau, arwain at ddiswyddiad. Dylid nodi y gall unigolyn gyflawni trosedd o dan y Ddeddf, er enghraifft, wrth gael gafael ar/neu ddatgelu data personol er ei ddibenion ei hun heb ganiatâd y rheolydd data.

Adnoddau Defnyddiol

Pecyn gan Swyddfa'r Comisiynydd Gwybodaeth yn benodol i ysgolion:

<https://ico.org.uk/for-organisations/education/>

Hwb

Adnoddau cenedlaethol ar ddiogelwch ar-lein:

<https://hwb.gov.wales/resources/resource/def9bffd-1fba-4902-9834-3ecca60bb7e7/cy>

Arweiniad ar reoli gwybodaeth i ysgolion, gan gynnwys cyfnodau cadw:

<https://www.shropshirelg.net/media/442737/IRMS-Toolkit-for-Schools-2016.pdf>

Atodiad 1

Amodau Erthygl 6 (crynodeb)

- 6(1)(a) – Caniatâd yr unigolyn;
- 6(1)(b) – Prosesu yn angenrheidiol ar gyfer contract;
- 6(1)(c) – Prosesu yn angenrheidiol i gydymffurfio â dyletswydd gyfreithiol;
- 6(1)(d) – Prosesu yn angenrheidiol er budd hanfodol yr unigolyn;
- 6(1)(e) – Prosesu yn angenrheidiol am ei fod yn ymgymryd â thasg sydd er budd cyhoeddus
- 6(1)(f) – Prosesu yn angenrheidiol ar gyfer buddion cyfreithlon y rheolwr data neu drydydd parti

Amodau Erthygl 9 (crynodeb)

- 9(2)(a) – Prosesu gyda chaniatâd penodol yr unigolyn;
- 9(2)(b) – Prosesu yn angenrheidiol o dan gyfraith cyflogaeth;
- 9(2)(c) – Prosesu yn angenrheidiol er mwyn amddiffyn budd hanfodol yr unigolyn;
- 9(2)(d) – Prosesu at ddefnydd grŵp categori arbennig (Sefydliad dielw gyda nôd wleidyddol, crefyddol neu undeb llafur);
- 9(2)(e) – Prosesu'n perthyn i wybodaeth wedi ei wneud yn gyhoeddus gan yr unigolyn;
- 9(2)(f) – Prosesu yn angenrheidiol i'r sefydliad amddiffyn hawliadau cyfreithiol;
- 9(2)(g) – Prosesu yn angenrheidiol er budd cyhoeddus sylweddol wedi ei seilio ar gyfraith;
- 9(2)(h) – Prosesu yn angenrheidiol ar gyfer ymateb i anghenion Iechyd Galwedigaethol a Gofal Cymdeithasol;
- 9(2)(i) – Prosesu'n angenrheidiol am resymau Iechyd Cyhoeddus;
- 9(2)(j) – Prosesu yn angenrheidiol ar gyfer pwrpas Archifol er budd y Cyhoedd; neu ar gyfer pwrpas ymchwil gwyddonol neu hanesyddol; neu i bwrpas ystadegol.

Mae rhagor o amodau Categori Arbennig yn Atodlen 1 Deddf Diogelu Data 2018.

Atodiad 2

Hawl i gael Mynediad at wybodaeth

Mae dau fath penodol o hawl i gael mynediad at wybodaeth a ddelir gan ysgolion am fyfyrwyr.

1. O dan y GDPR a Ddeddf Diogelu Data 2018, mae gan unrhyw unigolyn yr hawl i wneud cais i weld y wybodaeth bersonol a gedwir amdanynt.
2. Hawl y rhai hynny sydd â hawl i gael mynediad at gofnodion cwricwlaidd ac addysgol fel y'i diffinnir o fewn Rheoliadau Addysg (Gwybodaeth am Ddisgyblion) (Cymru) 2004.

Gweithredu cais

- 1) Rhaid i geisiadau am wybodaeth fod yn ysgrifenedig, sydd yn cynnwys e-bost, ac wedi'i gyfeirio at y Pennaeth. Os nad yw'r cais cyntaf yn adnabod y wybodaeth sydd ei angen yn glir, yna gwneir ymholiadau pellach.
- 2) Mae'n rhaid cael prawf o bwy yw'r sawl sy'n gofyn cyn datgelu unrhyw wybodaeth, a dylid cynnal gwiriadau ynghylch profi eu perthynas i'r plentyn.

Gellir profi pwy yw'r person trwy ofyn iddynt:

- Pasbort
- trwydded yrru
- biliau gwasanaeth gyda'r cyfeiriad presennol
- Tystysgrif Priodas / Geni
- P45/P60
- Datganiad Morgais neu Gerdyn Credyd

Nid yw'r rhestr yn gyflawn.

3) Mae gan bawb hawl i gael mynediad at wybodaeth a gedwir amdanynt. Fodd bynnag, o ran plant, mae hyn yn ddibynnol ar eu gallu i ddeall ac ar natur y cais (12 oed neu hŷn fel arfer). Dylai'r Pennaeth Ysgol drafod y cais gyda'r plentyn ac ystyried ei farn wrth wneud penderfyniad. Gall plentyn sydd â'r gallu i ddeall, wrthod cytuno i'r cais am ei gofnodion. Os penderfynir nad oes gan y plentyn y gallu sydd ei angen, bydd unigolyn sydd â chyfrifoldeb rhiant am y plentyn, neu warcheidwad, yn gwneud y penderfyniad ar ran y plentyn.

4) Gall yr ysgol godi am ddarparu'r wybodaeth, yn ddibynnol ar yr hyn a ganlyn:

- Os yw'r wybodaeth y gofynnir amdani'n cynnwys y cofnod addysgol, bydd y ffi a godir yn ddibynnol ar nifer y tudalennau a ddarperir.
- Pe bai'r wybodaeth y gofynnir amdani yn wybodaeth bersonol, nad yw'n cynnwys unrhyw wybodaeth sydd wedi'i chynnwys mewn cofnodion addysgol, ni chodir ffi.
- os yw rhywun ond yn gofyn am y cofnod addysgol, bydd modd ei weld am ddim, ond bydd y Pennaeth Ysgol yn codi ffi i dalu am gost llungopio'r wybodaeth.

5) Y cyfnod a ganiateir i ymateb i gais, wedi iddo gael ei dderbyn yn ffurfiol, yw un mis (**nid dyddiau gwaith na dyddiau ysgol, ond dyddiau calendr, heb ystyried cyfnod gwyliau ysgol**). Fodd bynnag, ni fydd y mis yn dechrau hyd y derbynnir y ffioedd neu eglurhad o'r wybodaeth y gofynnir amdani.

Os credir bod y cais yn gymhleth neu mae nifer o geisiadau, bydd yr ysgol yn hysbysu'r ymgeisydd o fewn un mis fod cyfnod y cais yn mynd i gael ei ymestyn a'r rheswm pam. Caniateir hyd at dau fis yn ychwanegol i ateb y cais o dan amgylchiadau o'r math.

Os yw ceisiadau yn amlwg yn ddi-sail neu'n ormodol (yn arbennig os ydynt yn rhai ailadroddus), bydd yr ysgol yn codi ffi rhesymol am y costau gweinyddol neu yn gwrthod delio efo'r cais.

6) Mae DDD yn caniatáu eithriadau o ran darparu gwybodaeth benodol; **felly bydd yr holl wybodaeth yn cael ei hadolygu cyn ei datgelu.**

7) Mae gwybodaeth trydydd parti yn wybodaeth sydd wedi cael ei darparu gan eraill, megis yr Heddlu, yr Awdurdod Lleol, gweithiwr proffesiynol Gofal Iechyd neu ysgol arall. Fel arfer, rhaid cael caniatâd cyn datgelu gwybodaeth gan drydydd parti. Mae angen cadw at yr amserlen yr un fath.

8) Ni ddylid datgelu unrhyw wybodaeth all beri niwed sylweddol i iechyd corfforol neu feddyliol neu gyflwr emosiynol y disgybl nac unrhyw unigolyn arall. Ni ddylid ychwaith ddatgelu gwybodaeth fyddai'n dangos fod y plentyn mewn peryg o gael ei gam-drin, neu unrhyw wybodaeth sy'n ymwneud ag achosion llys.

9) Dylid ceisio mwy o gyngor os oes unrhyw bryder ynghylch datgelu gwybodaeth.

10) Pan fo gwybodaeth wedi cael ei golygu (ei duo neu ei dileu), dylid cadw copi cyflawn o'r wybodaeth a ddarparwyd i sefydlu beth gafodd ei olygu a pham, rhag ofn i rywun gyflwyno cwyn.

11) Dylai'r wybodaeth a ddatgelir fod yn eglur, felly bydd angen egluro unrhyw godau neu dermau technegol. Os yw'r wybodaeth a gynhwysir yn anodd i'w darllen neu'n annarllenadwy, dylid ei theipio eto.

12) Gellir darparu gwybodaeth yn yr ysgol gydag aelod staff ar gael i helpu ac egluro materion pe bai angen, neu gellid ei ddarparu wrth drosglwyddo'r wybodaeth wyneb yn wyneb. Dylid ystyried barn yr ymgeisydd wrth benderfynu sut i ddarparu'r wybodaeth. Os oes rhaid defnyddio systemau'r post yna rhaid defnyddio post cofrestredig.

Cwynion

Dylid cyflwyno cwynion am y gweithdrefnau uchod i Gadeirydd y Corff Llywodraethu fydd yn penderfynu a yw hi'n briodol ymdrin â'r gŵyn yn unol â gweithdrefn gwynion yr ysgol ai peidio. Bydd y Comisiynydd Gwybodaeth yn ymdrin â chwynion nad ydynt yn briodol i gael eu hystyried dan weithdrefn gwynion yr ysgol. Bydd manylion cyswllt y ddau yn cael eu cynnwys gyda'r wybodaeth sy'n cael ei datgelu.

Cysylltiadau

Os oes gennych unrhyw ymholiadau neu bryderon ynghylch y polisïau / gweithdrefnau hyn, cysylltwch â'r Pennaeth Ysgol.

Gellir dod o hyd i ragor o gyngor a gwybodaeth gan Swyddfa'r Comisiynydd Gwybodaeth ('ICO'), www.ico.gov.uk

Atodiad 3

1. Rheolaeth yr Ysgol

Mae'r adran hon yn cynnwys cyfnodau cadw sy'n gysylltiedig â rheolaeth gyffredinol yr ysgol. Mae hyn yn ymdrin â gwaith y Corff Llywodraethu, y Pennaeth a'r tîm uwch reolwyr, y broses fynediad a gweinyddiaeth weithredol.

1.1 Y Corff Llywodraethu					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Gofynion Cyfreithiol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
1.1.1	Rhaglenni ar gyfer cyfarfodydd y Corff Llywodraethu	Efallai y bydd materion diogelu data os yw'r cyfarfod yn ymdrin â materion cyfrinachol sy'n ymwneud â staff		Dylid cadw un copi â'r brif gyfres o gofnodion. Gellir gwaredu pob copi arall. Parhaus	GWAREDU'N DDIOGEL ¹
1.1.2	Cofnodion cyfarfodydd y Corff Llywodraethu:	Efallai y bydd materion diogelu data os yw'r cyfarfod yn ymdrin â materion cyfrinachol sy'n ymwneud â staff		Gweler isod	
	Prif Gyfres (wedi'u llofnodi)			PARHAUS	Os nad oes modd i'r ysgol eu storio yna gellir eu cynnig i'r Gwasanaeth Archifau Sirol
	Copiau Archwilio ²			Dyddiad y cyfarfod + 3 blynedd	Os yw'r cofnodion hyn yn cynnwys unrhyw wybodaeth sensitif, bersonol, rhaid iddynt gael eu llarpio.
1.1.3	Adroddiadau a gyflwynwyd i'r Corff Llywodraethu	Efallai y bydd materion diogelu data os yw'r cyfarfod yn ymdrin â		Dylid cadw adroddiadau am o leiaf 6 blynedd. Fodd bynnag, os yw'r cofnodion yn	GWAREDU'N DDIOGEL neu gadw â'r copi o'r cofnodion sydd wedi'i lofnodi

¹ Yn y cyd-destun hwn, dylid ystyried fod GWAREDU'N DDIOGEL yn golygu gwaredu gan ddefnyddio biniau gwastraff cyfrinachol, neu larpio'r wybodaeth gan ddefnyddio llarpiwr sy'n trawstorri os oes cyfleuster o'r fath ar gael yn yr ysgol.

² Dyma'r copiau y gallai Clerc y Llywodraethwyr ddymuno ei gadw fel y gall unrhyw un sy'n gwneud cais weld yr holl wybodaeth briodol heb fod angen i'r clerch argraffu a choladu copiau wedi'u golygu o'r cofnodion bob tro y derbynnir cais.
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		materion cyfrinachol sy'n ymwneud â staff		cyfeirio'n uniongyrchol at adroddiadau unigol, yna dylid cadw'r adroddiadau yn barhaus.	
1.1.4	Papurau cyfarfod sy'n ymwneud â'r cyfarfod rhieni blynyddol a gynhaliwyd dan adran 33 Deddf Addysg 2002	Nag oes	Deddf Addysg 2002, Adran 33	Dyddiad y cyfarfod + o leiaf 6 blynedd	GWAREDU'N DDIOGEL
1.1.5	Offerynnau'r Llywodraeth yn cynnwys Erthyglau Cyweithio	Nag oes		PARHAUS	Dylid cadw'r rhain yn yr ysgol tra bo'r ysgol ar agor ac yna'u cynnig i'r Gwasanaeth Archifau Sirol pan fo'r ysgol yn cau.
1.1.6	Ymddiriedolaethau a Chynhyrsgaethau a reolir gan y Corff Llywodraethu	Nag oes		PARHAUS	Dylid cadw'r rhain yn yr ysgol tra bo'r ysgol ar agor ac yna'u cynnig i'r Gwasanaeth Archifau Sirol pan fo'r ysgol yn cau.
1.1.7	Cynlluniau gweithredu a grëwyd ac a weinyddwyd gan y Corff Llywodraethu	Nag oes		Oes y cynllun gweithredu + 3 blynedd	GWAREDU'N DDIOGEL
1.1.8	Dogfennau polisi a grëwyd ac a weinyddwyd gan y Corff Llywodraethu	Nag oes		Oes y polisi + 3 blynedd	GWAREDU'N DDIOGEL
1.1.9	Cofnodion sy'n ymwneud â chwynion yr ymdriniwyd â hwy gan y Corff Llywodraethu	Oes		Dyddiad datrysiaid y gŵyn + o leiaf 6 blynedd ac yna adolygu o ran cadw pellach pan fo anghydfod cynhennus	GWAREDU'N DDIOGEL
1.1.10	Adroddiadau Blynyddol a grëwyd yn unol â gofynion yr Deddf Addysg 2002	Nag oes	Deddf Addysg 2002	Dyddiad yr adroddiad + 10 mlynedd	GWAREDU'N DDIOGEL
1.1.11	Cynigion sy'n ymwneud â newid statws ysgol a gynhelir yn cynnwys Ysgolion Statws Arbenigol ac Academiâu	Nag oes		Dyddiad derbyn neu wrthod y cynnig + 3 blynedd	GWAREDU'N DDIOGEL

Noder y gellir canfod yr holl wybodaeth am gadw cofnodion sy'n ymwneud â recriwtio Penaethiaid yn yr adran Adnoddau Dynol isod.

1.2 Y Pennaeth a'r Tîm Uwch Reolwyr

	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
1.2.1	Llyfrau log o weithgarwch yn yr ysgol yn cael eu cadw gan y Pennaeth (Os yn berthnasol)	Efallai y bydd materion diogelu data os yw'r llyfr log yn cyfeirio at ddisgyblion neu aelodau staff unigol		Dyddiad y cofnod diwethaf yn y llyfr + o leiaf 6 blynedd ac yna adolygu	Gall rhain fod â gwerth hanesyddol parhaol a dylid eu cynnig i'r Gwasanaeth Archifau Sirol os yw'n briodol
1.2.2	Cofnodion cyfarfodydd y Tîm Uwch Reolwyr a chyfarfodydd cyrff gweinyddol mewnol eraill	Efallai y bydd materion diogelu data os yw'r cofnodion yn cyfeirio at ddisgyblion neu aelodau staff unigol		Dyddiad y cyfarfod + 3 blynedd ac yna adolygu	GWAREDU'N DDIOGEL
1.2.3	Adroddiadau a grëwyd gan y Pennaeth neu'r Tîm Uwch Reolwyr	Efallai y bydd materion diogelu data os yw'r adroddiad yn cyfeirio at ddisgyblion neu aelodau staff unigol		Dyddiad yr adroddiad + o leiaf 3 blynedd ac yna adolygu	GWAREDU'N DDIOGEL
1.2.4	Cofnodion a grëwyd gan benaethiaid, dirprwy benaethiaid, penaethiaid blwyddyn ac aelodau staff eraill sydd â chyfrifoldebau gweinyddol	Efallai y bydd materion diogelu data os yw'r cofnodion yn cyfeirio at ddisgyblion neu aelodau staff unigol		Blwyddyn academaidd gyfredol + 6 blynedd ac yna adolygu	GWAREDU'N DDIOGEL
1.2.5	Gohebiaeth a grëwyd gan benaethiaid, dirprwy benaethiaid, penaethiaid blwyddyn ac aelodau staff eraill sydd â chyfrifoldebau gweinyddol	Efallai y bydd materion diogelu data os yw'r ohebiaeth yn cyfeirio at ddisgyblion neu aelodau staff unigol		Dyddiad yr ohebiaeth + 3 blynedd ac yna adolygu	GWAREDU'N DDIOGEL
1.2.6	Cynlluniau Datblygu Proffesiynol	Oes		Oes y cynllun + 6 blynedd	GWAREDU'N DDIOGEL
1.2.7	Cynlluniau Datblygu Ysgol	Nag oes		Oes y cynllun + 3 blynedd	GWAREDU'N DDIOGEL

1.3 Y Broses Fynediad					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
1.3.1	Holl gofnodion sy'n ymwneud â chreu a gweithredu'r Polisi Mynediad Ysgolion	Nag oes	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal panels</i> Rhagfyr 2014	Oes y polisi + 3 blynedd ac yna adolygu	GWAREDU'N DDIOGEL
1.3.2	Mynediad – os llwyddwyd i gael mynediad	Oes	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal panels</i> Rhagfyr 2014	Dyddiad y mynediad + blwyddyn	GWAREDU'N DDIOGEL
1.3.3	Mynediad – os na lwyddwyd i gael mynediad	Oes	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal panels</i> Rhagfyr 2014	Datrysiaid yr achos + blwyddyn	GWAREDU'N DDIOGEL
1.3.4	Y Gofrestr Fynediad	Oes	<i>School Attendance: Departmental advice for maintained schools, academies, independent schools and local authorities</i> Hydref 2014	Rhaid cadw pob cofnod yn y gofrestr fynediad am gyfnod o dair blynedd wedi dyddiad y cofnod ³	ADOLYGU Efallai y bydd ysgolion yn dymuno ystyried cadw'r gofrestr fynediad yn barhaol gan fod ysgolion yn aml yn derbyn ymholiadau gan gyn-ddisgyblion er mwyn cadarnhau'r

³ *School Attendance: Departmental advice for maintained schools, academies, independent schools and local authorities* Hydref 2014
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					dyddiadau pan fuont yn mynychu'r ysgol.
1.3.5	Mynediadau – Ysgolion Uwchradd – Achlysurol	Oes		Y flwyddyn gyfredol + blwyddyn	GWAREDU'N DDIOGEL
1.3.6	Prawf o'u cyfeiriad wedi'i ddarparu gan rieni fel rhan o'r broses fynediad	Oes	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal panels Rhagfyr 2014</i>	Y flwyddyn gyfredol + blwyddyn	GWAREDU'N DDIOGEL
1.3.7	Ffurflen Wybodaeth Ategol yn cynnwys gwybodaeth ychwanegol megis crefydd, cyflyrau meddygol, ac ati (e.e. Ffurflen Casglu Gwybodaeth Disgyblion SIMS)	Oes		Gweler isod	
	Os llwyddwyd i gael mynediad			Dylid ychwanegu'r wybodaeth i ffeil y disgybl (e.e. i SIMS / ffeil bapur y disgybl)	GWAREDU'N DDIOGEL
	Os na lwyddwyd i gael mynediad			Hyd nes i'r broses apêl gael ei chwblhau	GWAREDU'N DDIOGEL

1.4 Gweinyddiaeth Weithredol					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
1.4.1	Cyfres gyffredinol o ffeiliau	Nag oes		Y flwyddyn gyfredol + 5 mlynedd ac yna ADOLYGU	GWAREDU'N DDIOGEL
1.4.2	Cofnodion yn ymwneud â chreu a chyhoeddi llawlyfr neu brosbectws yr ysgol (Os yn berthnasol)	Nag oes		Y flwyddyn gyfredol + 3 blwyddyn	GWAREDU SAFONOL
1.4.3	Cofnodion yn ymwneud â chreu a dosbarthu cylchlythyrau i staff, rhieni neu ddisgyblion (Os yn berthnasol)	Nag oes		Y flwyddyn gyfredol + blwyddyn	GWAREDU SAFONOL
1.4.4	Cylchlythyrau ac eitemau eraill ag oes weithredol fyr	Nag oes		Y flwyddyn gyfredol + blwyddyn	GWAREDU SAFONOL
1.4.5	Llyfr Ymwelwyr a Thafleuni Arwyddo i Mewn	Oes		Y flwyddyn gyfredol + 6 blynedd ac yna ADOLYGU	GWAREDU'N DDIOGEL
1.4.6	Cofnodion sy'n ymwneud â chreu a rheoli Cymdeithasau Rhieni ac Athrawon a/neu Cymdeithasau Cyn-ddisgyblion	Nag oes		Y flwyddyn gyfredol + 6 blynedd ac yna ADOLYGU	GWAREDU'N DDIOGEL

2. Adnoddau Dynol

Mae'r adran hon yn ymdrin â'r holl faterion rheoli Adnoddau Dynol yn yr ysgol.

2.1 Recriwtio					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
2.1.1	Holl gofnodion sy'n arwain at benodi pennaeth newydd	Oes		Dyddiad y penodiad + 6 blynedd (i'w gadw yn y Swyddfa Addysg Ardal – dim copi yn yr ysgol)	GWAREDU'N DDIOGEL
2.1.2	Holl gofnodion sy'n arwain at benodi aelod newydd o staff – ymgeiswyr aflwyddiannus	Oes		Dyddiad penodi'r ymgeisydd llwyddiannus + 6 mis (Swyddfa Addysg Ardal i gadw copi - Ysgolion i waredu yn ddiogel)	GWAREDU'N DDIOGEL
2.1.3	Holl gofnodion sy'n arwain at benodi aelod newydd o staff – ymgeisydd llwyddiannus	Oes		Dylid ychwanegu'r holl wybodaeth berthnasol i ffeil bersonol yr aelod staff (gweler isod) a dylid cadw'r holl wybodaeth arall am 6 mis.	GWAREDU'N DDIOGEL
2.1.4	Gwybodaeth archwilio cefndir cyn cyflogi - Gwiriadau DBS (Gwybodaeth archwilio cyflogaeth)	Oes	<i>DBS Update Service Employer Guide June 2012: Keeping children safe in education.</i> Gorffennaf 2015 (Canllawiau Statudol gan yr Adran Addysg) Adrannau 73, 74	Ni ddylid cadw copïau o dystysgrifau DBS.	
2.1.5	Casglu prawf adnabod fel rhan o'r broses o wirio datgeliad DBS uwch "portable"	Oes		Ni ddylid cadw copïau o dogfennau prawf adnabod fel rhan o'r broses o wirio datgeliad	

				DBS uwch "portable"	
2.1.6	Gwybodaeth archwilio cefndir cyn cyflogi – Tystiolaeth sy'n profi'u hawl i weithio yn y Deyrnas Gyfunol ⁴	Oes	<i>An employer's guide to right to work checks</i> [Swyddfa Gartref, Mai 2015]	Anfon yr wybodaeth i'r awdurdod	

⁴ Mae angen i gyflogwyr wneud "copi clir" o'r dogfennau a ddangosir iddynt fel rhan o'r broses hon.
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2.2 Rheoli Staff Gweithredol					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
2.2.1	Ffeil Bersonol yr Aelod Staff	Oes	Deddf Cyfyngiadau 1980 (Adran 2)	Terfyn y gyflogaeth +25 (Er gwybodaeth: Er bod Toolkit yr IRMS yn nodi: Terfyn y gyflogaeth + 6 blynedd, mae Cyngor Gwynedd wedi gwneud asesiad risg ac wedi penderfynu cadw ffeiliau personol unrhyw aelod staff sydd angen DBS am 25 mlynedd yn dilyn terfyn y gyflogaeth)	GWAREDU'N DDIOGEL
2.2.2	Amserlenni Cyflog	Oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL
2.2.3	Gwerthusiad blynyddol / cofnodion asesu	Oes		Y flwyddyn gyfredol + 5 mlynedd	GWAREDU'N DDIOGEL
2.3 Rheoli'r Prosesau Disgyblu a Chwynion					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
2.3.1	Honiad o natur amddiffyn plant yn erbyn aelod o staff, yn cynnwys honiadau di-sail ⁵	Oes	<i>"Keeping children safe in education: Statutory guidance for schools and colleges, March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children, March 2015"</i>	Hyd oedran ymdeol arferol person neu 10 mlynedd o ddyddiad yr honiad, pa un bynnag fo hiraf ac yna ADOLYGU. Noder y dylid tynnu honiadau y canfyddir eu bod yn faleisus o'r ffeiliau Personél. Os oes sail iddynt, dylid eu cadw ar y ffeil a darparu copi i'r person dan sylw.	GWAREDU'N DDIOGEL Rhaid llarpio'r cofnodion hyn.

⁵ Cynhaliwyd yr adolygiad hwn fel yr oedd yr Ymchwiliad Annibynnol i Gam-drin Plant yn Rhywiol yn mynd rhagddo. Oherwydd hyn, argymhellir y dylid cadw'r holl gofnodion sy'n ymwneud â cham-drin plant hyd nes i'r Ymchwiliad gael ei gwblhau. Yna, bydd yr adran hon yn cael ei hadolygu eto i roi ystyriaeth i unrhyw argymhellion y gallai'r Ymchwiliad ei wneud o ran cadw cofnodion.

2.3.2	Camau Disgyblu	Oes			
	Rhybudd Llafar			Dyddiad y rhybudd ⁶ + 6 mis	GWAREDU’N DDIOGEL [Os rhoddir rhybuddion ar ffeiliau personol, yna rhaid eu chwynnu o’r ffeil]
	Rhybudd Ysgrifenedig – lefel 1			Dyddiad y rhybudd + 6 mis	
	Rhybudd Ysgrifenedig – lefel 2			Dyddiad y rhybudd + 12 mis	
	Rhybudd Terfynol			Dyddiad y rhybudd + 18 mis	
	Achos di-sail			Os yw’r mater yn ymwneud ag amddiffyn plant yna gweler uchod, fel arall, gwaredu ar derfyn yr achos	GWAREDU’N DDIOGEL

⁶ Pan fo’r rhybudd yn ymwneud â materion amddiffyn plant, gweler uchod. Os yw’r camau disgyblu’n ymwneud â mater amddiffyn plant, cysylltwch â’ch Swyddog Diogelu Plant am gyngor pellach.
Polisi Diogelu Data Ysgolion 2018 v1-0
Ysgol Babanod Morfa Nefyn

2.4 Iechyd a Diogelwch					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
2.4.1	Datganiadau Polisi Iechyd a Diogelwch	Nag oes		Oes y polisi + 3 blynedd	GWAREDU'N DDIOGEL
2.4.2	Asesiadau Risg Iechyd a Diogelwch	Nag oes		Oes yr asesiad risg + 3 blynedd (Manylion isod ynglŷn â ffurflenni asesiadau risg sydd yn cael ei yrru gyda HS11)	GWAREDU'N DDIOGEL
2.4.3	Cofnodion sy'n ymwneud â damwain / anaf yn y gwaith	Oes		Dyddiad y digwyddiad + 12 mlynedd. O ran damweiniau difrifol, bydd angen gweithredu cyfnod cadw ychwanegol	GWAREDU'N DDIOGEL
2.4.4	Adrodd am Ddamweiniau (e.e. HS11)	Oes	Rheoliadau Nawdd Cymdeithasol (Hawliadau a Thaliadau) 1979 Rheoliad 25. Deddf Gweinyddu Nawdd Cymdeithasol 1992 Adran 8. Deddf Cyfyngiadau 1980		
	Oedolion			Dyddiad y digwyddiad + 6 blynedd	GWAREDU'N DDIOGEL
	Plant			Dyddiad geni'r plentyn + 25 mlynedd ADYaCH: Dyddiad Geni'r plentyn + 35 mlynedd	GWAREDU'N DDIOGEL
2.4.5	Rheoli Sylweddau sy'n Beryglus i Iechyd (COSHH)	Nag oes	Rheoliadau Rheoli Sylweddau sy'n Berygl i Iechyd 2002. OS 2002	Y flwyddyn gyfredol + 40 mlynedd	GWAREDU'N DDIOGEL

			Rhif 2677 Rheoliad 11; Dylid cadw cofnodion a gedwir dan Reoliadau 1994 a 1999 fel pe na byddai Rheoliadau 2002 wedi dod i rym. Rheoliad 18(2)		
2.4.6	Proses o fonitro ardaloedd ble mae'n debygol fod gweithwyr a phobl wedi dod i gysylltiad ag asbestos	Nag oes	Rheoliadau Rheoli Asbestos yn y Gwaith 2012 OS 1012 Rhif 632 Rheoliad 19	Gweithred olaf + 40 mlynedd	GWAREDU'N DDIOGEL
2.4.7	Proses o fonitro ardaloedd ble mae'n debygol fod gweithwyr a phobl wedi dod i gysylltiad ag ymbelydredd	Nag oes		Gweithred olaf + 50 mlynedd	GWAREDU'N DDIOGEL
2.4.8	Llyfrau Log Rhagofalon Tân	Nag oes		Y flwyddyn gyfredol + 6 mlynedd	GWAREDU'N DDIOGEL

2.5 Cyflogres a Phensiynau					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
2.5.1	Cofnodion Tâl Mamolaeth	Oes	Rheoliadau Tâl Mamolaeth (Cyffredinol) Statudol 1986 (OS1986/1960), adolygwyd 1999 (OS1999/567)	Y flwyddyn gyfredol + 3 blynedd	GWAREDU'N DDIOGEL
2.5.2	Cofnodion a gedwir dan Reoliadau Cynlluniau Buddion Ymddeol (Pwerau Gwybodaeth) 1995	Oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL

3 Rheolaeth Ariannol yr Ysgol

Mae'r adran hon yn ymdrin â holl agweddau rheolaeth ariannol yr ysgol yn cynnwys gweinyddu prydau ysgol.

3.1 Rheoli Risg ac Yswiriant					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
3.1.1	Tystysgrif Yswiriant Atebolrwydd Cyflogwr	Nag oes		Cau'r ysgol + 40 mlynedd	GWAREDU'N DDIOGEL

3.2 Rheoli Asedau					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
3.2.1	Rhestrau eiddo o ddodrefn ac offer	Nag oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL
3.2.2	Ffurflenni adrodd am fwrqleriaeth, dwyn a fandaliaeth	Nag oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL

3.3 Cyfrifon a Chyfriflenni yn cynnwys Rheoli Cyllideb					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
3.3.1	Cyfrifon Blynyddol	Nag oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU SAFONOL
3.3.2	Benthyciadau a grantiau a reolir gan yr ysgol	Nag oes		Dyddiad y taliad diwethaf ar y benthyciad + 12 mlynedd ac yna ADOLYGU	GWAREDU'N DDIOGEL
3.3.3	Ceisiadau am Grantiau Myfyrwyr	Oes		Y flwyddyn gyfredol + 3 blynedd	GWAREDU'N DDIOGEL
3.3.4	Holl gofnodion sy'n ymwneud â chreu a rheoli cyllidebau yn cynnwys y datganiad Cyllideb Blynyddol a'r papurau cefndirol	Nag oes		Oes y gyllideb + 6 blynedd (Er gwybodaeth: Er bod Toolkit yr IRMS yn nodi: Oes y gyllideb + 3 blynedd, mae Cyngor Gwynedd yn argymhell eu cadw am 6 blynedd i gyd-fynd a chyfnodau cadw deunyddiau cyllidol arall)	GWAREDU'N DDIOGEL
3.3.5	Anfonebau, derbynebau, llyfrau archeb, nodiadau danfon	Nag oes		Y flwyddyn ariannol gyfredol + 6 blynedd	GWAREDU'N DDIOGEL
3.3.6	Cofnodion sy'n ymwneud â chasglu a bancio arian	Nag oes		Y flwyddyn ariannol gyfredol + 6 blynedd	GWAREDU'N DDIOGEL
3.3.7	Cofnodion sy'n ymwneud ag adnabod a chasglu dyledion	Nag oes		Y flwyddyn ariannol gyfredol + 6 blynedd	GWAREDU'N DDIOGEL

3.4 Rheoli Cytundebau					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
3.4.1	Holl gofnodion sy'n ymwneud â rheoli contractau dan sêl	Nag oes	Deddf Cyfyngiadau 1980	Taliad olaf ar y contract + 12 mlynedd	GWAREDU'N DDIOGEL

3.4.2	Holl gofnodion sy'n ymwneud â rheoli contractau dan lofnod	Nag oes	Deddf Cyfyngiadau 1980	Taliad olaf ar y contract + 6 blynedd	GWAREDU'N DDIOGEL
3.4.3	Cofnodion sy'n ymwneud â rheoli contractau	Nag oes		Y flwyddyn gyfredol + 2 flynedd	GWAREDU'N DDIOGEL

3.5 Cronfa'r Ysgol

	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
3.1.5	Cronfa'r Ysgol – Llyfrau Sic	Nag oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL
3.5.2	Cronfa'r Ysgol – Llyfrau Talu i Mewn	Nag oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL
3.5.3	Cronfa'r Ysgol – Cyfriflyfr	Nag oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL
3.5.4	Cronfa'r Ysgol – Anfonebau	Nag oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL
3.5.5	Cronfa'r Ysgol – Derbynebau	Nag oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL
3.5.6	Cronfa'r Ysgol – Cyfriflenni Banc	Nag oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL
3.5.7	Cronfa'r Ysgol – Teithiau ysgol	Nag oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL

3.6 Rheoli Prydau Ysgol

	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
3.6.1	Cofrestrai Prydau Ysgol am Ddim	Oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL
3.6.2	Cofrestrai Prydau Ysgol	Oes		Y flwyddyn gyfredol + 3 blynedd	GWAREDU'N DDIOGEL
3.6.3	Taflenni Crynhoi Prydau Ysgol	Nag oes		Y flwyddyn gyfredol + 3 blynedd	GWAREDU'N DDIOGEL

4. Rheoli Eiddo

Mae'r adran hon yn ymdrin â rheoli adeiladau ac eiddo.

4.1 Rheoli Eiddo					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
4.1.1	Gweithredoedd eiddo mae'r ysgol yn berchen arnynt	Nag oes		PARHAOL Dylai'r rhain ddilyn yr eiddo oni bai bod yr eiddo wedi'i gofrestru gyda'r Gofrestrfa Dir	
4.1.2	Cynlluniau eiddo mae'r ysgol yn berchen arnynt	Nag oes		Dylid cadw'r rhain tra bod yr eiddo yn berchen i'r ysgol a dylid eu trosglwyddo i unrhyw berchnogion newydd os bydd yr adeilad yn cael ei osod neu'i werthu.	
4.1.3	Les eiddo sy'n cael ei lesu i'r ysgol neu gan yr ysgol	Nag oes		Terfyn y les + 6 blynedd	GWAREDU'N DDIOGEL
4.1.4	Cofnodion sy'n ymwneud â lesu eiddo ysgol	Nag oes		Y flwyddyn ariannol gyfredol + 6 blynedd	GWAREDU'N DDIOGEL

4.2 Cynnal a Chadw					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
4.2.1	Holl gofnodion sy'n ymwneud â gwaith cynnal a chadw ar yr ysgol a gwblheir gan gontractwyr	Nag oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL
4.2.2	Holl gofnodion sy'n ymwneud â gwaith cynnal a chadw ar yr ysgol a gwblheir gan staff yr ysgol yn cynnwys llyfrau log cynnal a chadw	Nag oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL

5. Rheoli Disgyblion

Mae'r adran hon yn cynnwys yr holl gofnodion a grëwyd yn ystod yr amser mae disgybl yn ei dreulio yn yr ysgol. Am wybodaeth ynghylch adrodd am ddamweiniau, gweler Iechyd a Diogelwch uchod.

5.1 Cofnod Addysgiadol y Disgybl					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
5.1.1	Cofnod Addysgiadol y Disgybl yn ofynnol dan Reoliadau Addysg (Gwybodaeth Disgybl) (Lloegr) 2005	Oes	Rheoliadau Addysg (Gwybodaeth Disgybl) (Lloegr) 2005 OS 2005 Rhif 1437		
	Meithrin			Cadw tra mae'r plentyn yn y dosbarth meithrin.	Dylai'r ffeil ddilyn y disgybl pan fydd ef/hi'n gadael y dosbarth meithrin i'r ysgol gynradd / perthnasol.
	Cynradd			Cadw tra mae'r plentyn yn yr ysgol gynradd (E.e. Canlyniadau, Adroddiadau Rhieni, Targedau, Aseidiadau / Profion Cenedlaethol / Mewnol, Aseiad sylfaen)	Dylai'r ffeil ddilyn y disgybl pan fydd ef/hi'n gadael yr ysgol gynradd. Bydd hyn yn cynnwys: <ul style="list-style-type: none"> • symud i ysgol gynradd arall • symud i ysgol uwchradd • symud i uned cyfeirio disgyblion • os fydd y plentyn yn marw yn ystod ei gyfnod yn yr ysgol gynradd, dylid dychwelyd y ffeil i'r Awdurdod Lleol er mwyn ei chadw am y cyfnod cadw statudol. <p>Os bydd y disgybl yn trosglwyddo i ysgol annibynnol, yn trosglwyddo i addysg gartref neu'n gadael y wlad, dylid dychwelyd y ffeil i'r Awdurdod Lleol er mwyn ei chadw am y cyfnod cadw statudol. Fel arfer, nid oes gan Ysgolion Cynradd ddigon o ofod storio i</p>

					gadw.cofnodion ar gyfer disgyblion nad ydynt wedi trosglwyddo yn y ffordd arferol. Mae'n gwneud mwy o synnwyr i drosglwyddo'r cofnod i'r Awdurdod Lleol gan ei bod yn fwy tebygol y bydd y disgybl yn gwneud cais am y cofnod i'r Awdurdod Lleol.
	Uwchradd		Deddf Cyfyngiadau 1980 (Adran 2)	Dyddiad geni'r disgybl + 25 mlynedd (Manylion ADYaCh / Amddiffyn Plant isod)	GWAREDU'N DDIOGEL
5.1.2	Canlyniadau Arholiadau – Copïau'r Disgybl	Oes			
	Cyhoeddus			Dylid ychwanegu'r wybodaeth hon i ffeil y disgybl	Dylid dychwelyd yr holl dystysgrifau na chasglwyd i'r bwrdd arholi.
	Mewnol			Dylid ychwanegu'r wybodaeth hon i ffeil y disgybl	
<p>Cynhaliwyd yr adolygiad hwn fel yr oedd yr Ymchwiliad Annibynnol i Gam-drin Plant yn Rhywiol yn mynd rhagddo. Oherwydd hyn, argymhellir y dylid cadw'r holl gofnodion sy'n ymwneud â cham-drin plant hyd nes i'r Ymchwiliad gael ei gwblhau. Yna, bydd yr adran hon yn cael ei hadolygu eto i roi ystyriaeth i unrhyw argymhellion y gallai'r Ymchwiliad ei wneud o ran cadw cofnodion.</p>					
5.1.3	Gwybodaeth Amddiffyn Plant ar ffeil y disgybl	Oes	<i>“Keeping children safe in education: Statutory guidance for schools and colleges, March 2015”;</i> <i>“Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children, March 2015”</i>	Os rhoddir unrhyw gofnodion sy'n ymwneud â materion amddiffyn plant ar ffeil y disgybl, dylent gael eu gosod mewn amlen dan sêl ac yna'u cadw am yr un cyfnod o amser â ffeil y disgybl. (A throsglwyddo'r ffeil i'r ysgol)	GWAREDU'N DDIOGEL – RHAID llarpio'r cofnodion hyn

5.3 Anghenion Addysgol Arbennig / ADYaCh (Anghenion Dysgu Ychwanegol a Chynhwysiad)					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
5.3.1	Ffeiliau ac adolygiadau Anghenion Addysgol Arbennig / ADYach a Chynlluniau Addysg Unigol	Oes	Deddf Cyfyngiadau 1980 (Adran 2)	<p>Dyddiad geni'r disgybl +35</p> <p>(Er gwybodaeth: Er bod Toolkit yr IRMS yn nodi: Dyddiad geni'r disgybl + 25 mlynedd, mae penderfyniad wedi bod o fewn Gwasanaeth ADYaCh Integredig yw cadw am 35 mlynedd o ddyddiad geni'r plentyn)</p> <p>Gwybodaeth angen ei drosglwyddo o ysgol gynradd i uwchradd</p>	ADOLYGU NODER: Y cyfnod cadw hwn yw'r cyfnod cadw lleiaf y dylid cadw unrhyw ffeil disgybl. Mae rhai awdurdodau'n dewis cadw ffeiliau ADY am gyfnod hirach i amddiffyn eu hunain yn erbyn achos "methiant i ddarparu addysg ddigonol". Mae elfen o ddadansoddi risg fusnes yn gysylltiedig ag unrhyw benderfyniad i gadw'r cofnodion am gyfnod hwy na'r cyfnod cadw lleiaf a dylai hyn gael ei ddogfennu.
5.3.2	Datganiad a gedwir dan adran 234 Deddf Addysg 1990 ac unrhyw newidiadau a wnaed i'r datganiad	Oes	Deddf Addysg 1996 Deddf Anghenion Addysgol Arbennig ac Anableddau 2001 Adran 1	<p>Dyddiad geni'r disgybl + 35 mlynedd [Fel arfer, byddai hwn yn cael ei gadw yn ffeil y disgybl]</p> <p>(Er gwybodaeth: Er bod Toolkit yr IRMS yn nodi: Dyddiad geni'r disgybl + 25 mlynedd, mae penderfyniad wedi bod o fewn Gwasanaeth ADYaCh Integredig yw cadw am 35 mlynedd o ddyddiad geni'r plentyn)</p>	GWAREDU'N DDIOGEL oni bai fod y ddogfen yn destun "legal hold".

5.3.3	Cyngor a gwybodaeth a ddarperir i rieni ynghylch anghenion addysgol (e.e. Adroddiadau Iechyd a gwasanaethau arbenigol)	Oes	Deddf Anghenion Addysgol Arbennig ac Anableddau 2001 Adran 2	<p>Dyddiad geni'r disgybl + 35 mlynedd [Fel arfer, byddai hwn yn cael ei gadw yn ffeil y disgybl]</p> <p>(Er gwybodaeth: Er bod Toolkit yr IRMS yn nodi: Dyddiad geni'r disgybl + 25 mlynedd, mae penderfyniad wedi bod o fewn Gwasanaeth ADYaCh Integredig yw cadw am 35 mlynedd o ddyddiad geni'r plentyn)</p>	GWAREDU'N DDIOGEL oni bai fod y ddogfen yn destun "legal hold".
5.3.4	Strategaeth Hygyrchedd Unigolyn (e.e. Aseidiadau Risg / Cynlluniau meddygol/ PEEP)	Oes	Deddf Anghenion Addysgol Arbennig ac Anableddau 2001 Adran 14	<p>Dyddiad geni'r disgybl + 35 mlynedd [Fel arfer, byddai hwn yn cael ei gadw yn ffeil y disgybl]</p> <p>(Er gwybodaeth: Er bod Toolkit yr IRMS yn nodi: Dyddiad geni'r disgybl + 25 mlynedd, mae penderfyniad wedi bod o fewn Gwasanaeth ADYaCh Integredig yw cadw am 35 mlynedd o ddyddiad geni'r plentyn)</p>	GWAREDU'N DDIOGEL oni bai fod y ddogfen yn destun "legal hold".

6. Rheoli Cwricwlwm

6.1 Gwybodaeth Ystadegol a Rheoli					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
6.1.1	Dychweliadau Cwricwlwm (E.e. Taflenni canlyniadau diwedd flwyddyn)	Nag oes		Y flwyddyn gyfredol + 3 blynedd	GWAREDU'N DDIOGEL
6.1.2	Canlyniadau Arholiadau (Copi Ysgolion)	Oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL
	Cofnodion Profion Cenedlaethol	Oes			
	Canlyniadau			Dylai canlyniadau'r Profion Cenedlaethol gael eu cofnodi ar ffeil addysgiadol y plentyn ac felly byddant yn cael eu cadw hyd nes y bydd y plentyn yn 25 mlwydd oed. Efallai y bydd yr ysgol yn dymuno cadw cofnod cyfansawdd o ganlyniadau Profion Cenedlaethol flwyddyn gyfan. Gellid eu cadw am y flwyddyn gyfredol + 6 blynedd fel y gellir gwneud cymariaethau addas.	GWAREDU'N DDIOGEL
	Papurau Arholiad / Profion Cenedlaethol			Dylid cadw'r papurau arholiad hyd nes y bydd unrhyw brosesau apêl/dilysu wedi'u cwblhau	GWAREDU'N DDIOGEL
6.1.3	Adroddiadau Nifer Derbyn Cyhoeddedig (PAN) (Mynediad)	Oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL

6.1.4	Data Ychwanegu Gwerth a Chydestunol (E.e. ffeiliau asesu / monitro cynnydd)	Oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL
6.1.5	Ffurflenni Hunan Werthuso (Hunan arfarnu)	Oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL

6.2 Gweithredu'r Cwricwlwm					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
6.2.1	Cynlluniau Gwaith	Nag oes		Y flwyddyn gyfredol + blwyddyn	Gall fod yn briodol adolygu'r cofnodion hyn ar ddiwedd pob blwyddyn a phennu cyfnod cadw ychwanegol neu WAREDU'N DDIOGEL
6.2.2	Amserlen	Nag oes		Y flwyddyn gyfredol + blwyddyn	
6.2.3	Llyfrau Cofnod Dosbarth	Nag oes		Y flwyddyn gyfredol + blwyddyn	
6.2.4	Llyfrau Marcio	Nag oes		Y flwyddyn gyfredol + blwyddyn	
6.2.5	Cofnod o'r Gwaith Cartref a osodwyd	Nag oes		Y flwyddyn gyfredol + blwyddyn	
6.2.6	Gwaith Disgyblion	Nag oes		Dewis yr ysgol yw rhyddhau enghreifftiau o waith plant i rieni ar ôl derbyn ceisiadau ysgrifenedig amdanynt ar ôl cyfnod o flwyddyn gyfredol + bedwar mis ar hugain. Bydd y pennaeth yn gyfrifol am sicrhau bod gwaith o'r fath wedi ei farcio yn unol â pholisi'r ysgol, a'i archwilio er mwyn sicrhau na ellir ei ddefnyddio fel tystiolaeth mewn	GWAREDU'N DDIOGEL

				unrhyw gamau cyfreithiol y gellid eu cymryd yn y dyfodol. Os nad yw hyn yn bolisi gan yr ysgol yna ei gwaredu ar ôl flwyddyn gyfredol + blwyddyn	
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7. Gweithgareddau Allgyrsiol

7.1 Ymweliadau Addysgiadol y tu allan i'r Ystafell Ddosbarth					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
7.1.1	Cofnodion a grëwyd gan ysgolion i gael cymeradwyaeth i gynnal Ymweliad Addysgiadol y tu allan i'r Ystafell Ddosbarth – Ysgolion Cynradd	Nag oes	Gwefan <i>Outdoor Education Advisers' Panel National Guidance</i> http://oeapng.info yn enwedig Adran 3 – “ <i>Legal Framework and Employer Systems</i> ” ac Adran 4 – “ <i>Good Practice</i> ”	Dyddiad yr ymweliad + 14 mlynedd	GWAREDU’N DDIOGEL
7.1.2	Cofnodion a grëwyd gan ysgolion i gael cymeradwyaeth i gynnal Ymweliad Addysgiadol y tu allan i'r Ystafell Ddosbarth – Ysgolion Uwchradd	Nag oes	Gwefan <i>Outdoor Education Advisers' Panel National Guidance</i> http://oeapng.info yn enwedig Adran 3 – “ <i>Legal Framework and Employer Systems</i> ” ac Adran 4 – “ <i>Good Practice</i> ”	Dyddiad yr ymweliad + 10 mlynedd	GWAREDU’N DDIOGEL
7.1.3	Ffurflenni Caniatâd gan Rienï ar gyfer tripiâu ysgolion ble na fu unrhyw ddigwyddiad mawr	Oes		Hyd at ddiwedd y trip	Er y gellid cadw'r ffurflenni caniatâd am Dyddiad Geni + 22 mlynedd, mae'r disgwyliad y bydd eu hangen yn isel ac nid oes gan y mwyafrif o ysgolion gapasiti storio i gadw pob ffurflen ganiatâd unigol a ddsbarthwyd gan yr ysgol ar gyfer y cyfnod hwn o amser.
7.1.4	Ffurflenni Caniatâd gan Rienï ar gyfer tripiâu ysgolion ble y bu digwyddiad mawr	Oes	Deddf Cyfyngiadau 1980 (Adran 2)	Dyddiad Geni'r disgybl oedd ynghlwm â'r digwyddiad + 25 mlynedd. Mae angen cadw'r ffurflenni caniatâd ar gyfer pob disgybl oedd ar y trip er mwyn dangos fod y rheolau wedi'u dilyn ar	

				gyfer pob disgybl	
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7.2 Bws Cerdded					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
7.2.1	Cofrestrai Bws Cerdded	Oes		Dyddiad y gofrestr + 3 blynedd. Mae hyn yn cymryd ystyriaeth o'r ffaith os bydd digwyddiad sy'n gofyn am adroddiad damwain, bydd y gofrestr yn cael ei chyflwyno gyda'r adroddiad damwain ac yn cael ei chadw am y cyfnod o amser sydd ei angen er mwyn adrodd am ddamwain	GWAREDU'N DDIOGEL [Os bydd y cofnodion hyn yn cael eu cadw'n electronig, dylid dinistrio unrhyw gopiau wrth gefn ar yr un pryd]

7.3 Swyddogion Cyswllt Teulu a Chymorthyddion Cyswllt Addysg yn y Cartref					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
7.3.1	Llyfrau Dydd	Oes		Y flwyddyn gyfredol + 2 flynedd ac yna adolygu	
7.3.2	Adroddiadau i asiantaethau allanol – pan fo'r adroddiad wedi'i gynnwys ar y ffeil achos a grëwyd gan yr asiantaeth allanol	Oes		Pan fo'r plentyn yn mynychu'r ysgol ac yna dylid eu dinistrio	
7.3.3	Ffurflenni cyfeirio	Oes		Pan fo'r cyfeiriad yn gyfredol	
7.3.4	Taflenni Manylion Cyswllt	Oes		Y flwyddyn gyfredol ac yna adolygu, os nad yw'r cyswllt yn parhau'n weithredol dylid eu dinistrio	

7.3.5	Cofnodion ar y gronfa ddata o gysylltiadau	Oes		Y flwyddyn gyfredol ac yna adolygu, os nad yw'r cyswllt yn parhau'n weithredol dylid eu dinistrio	
7.3.6	Cofrestrai Grŵp	Oes		Y flwyddyn gyfredol + 2 flynedd	

7.4 TRAC					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
7.4.1	Llyfrau Dydd	Oes	Prosiect Ewrop	2024	GWAREDU'N DDIOGEL
7.4.2	Adroddiadau i asiantaethau allanol – pan fo'r adroddiad wedi'i gynnwys ar y ffeil achos a grëwyd gan yr asiantaeth allanol	Oes		Dinistrio yn ddiogel yn dilyn y disgybl ymadael ar brosiect.	GWAREDU'N DDIOGEL
7.4.3	Ffurflenni cyfeirio	Oes	Prosiect Ewrop	2024	GWAREDU'N DDIOGEL
7.4.4	Taflenni Manylion Cyswllt	Oes	Prosiect Ewrop	2024	GWAREDU'N DDIOGEL
7.4.5	Cofnodion ar y gronfa ddata o gysylltiadau	Oes	Prosiect Ewrop	2024	GWAREDU'N DDIOGEL
7.4.6	Cofrestrai Grŵp	Oes	Prosiect Ewrop	2024	GWAREDU'N DDIOGEL

8. Llywodraeth Ganolog a'r Awdurdod Lleol

Mae'r adran hon yn ymddrin â chofnodion a grëwyd pan fo'r ysgol a'r awdurdod lleol yn rhyngweithio.

8.1 Awdurdod Lleol					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
8.1.1	Taflenni Trosglwyddo Uwchradd (Cynradd)	Oes		Y flwyddyn gyfredol + 2 flynedd	GWAREDU'N DDIOGEL
8.1.2	Dychweliadau Presenoldeb	Oes		Y flwyddyn gyfredol + blwyddyn	GWAREDU'N DDIOGEL
8.1.3	Dychweliadau Cyfrifiad Ysgol	Nag oes		Y flwyddyn gyfredol + 5 mlynedd	GWAREDU'N DDIOGEL
8.1.4	Cylchlythyrau ac unrhyw wybodaeth arall a anfonwyd o'r Awdurdod Lleol	Nag oes		Defnydd gweithredol	GWAREDU'N DDIOGEL

8.2 Llywodraeth Ganolog					
	Disgrifiad Cyffredinol o'r Ffeil	Materion Diogelu Data	Darpariaethau Statudol	Cyfnod Cadw [Gweithredol]	Gweithred ar ddiwedd oes weinyddol y cofnod
8.2.1	Adroddiadau a phapurau ESTYN	Nag oes		Oes yr adroddiad ac yna ADOLYGU	GWAREDU'N DDIOGEL
8.2.2	Dychweliadau i lywodraeth ganolog	Nag oes		Y flwyddyn gyfredol + 6 blynedd	GWAREDU'N DDIOGEL
8.2.3	Cylchlythyrau a gwybodaeth arall a anfonwyd o lywodraeth ganolog	Nag oes		Defnydd gweithredol	GWAREDU'N DDIOGEL

Atodiad 4

Defnydd Delweddau Digidol / Fideo

Defnydd gan yr ysgol

Bydd yr ysgol yn cydymffurfio gyda deddfwriaeth Diogelu Data ac yn gofyn caniatâd rhieni / gofalwyr cyn tynnu lluniau o ddisgyblion. Byddem hefyd yn sicrhau pan fydd delweddau yn cael eu cyhoeddi, nad all adnabod y bobl ifanc wrth ddefnyddio eu henwau.

Bydd delweddau hefyd yn cael eu defnyddio i ddathlu llwyddiannau wrth gyhoeddi hynny mewn cylchlythyrau, ar wefan yr ysgol ac, ar brydiau, ar wefannau cymdeithasol.

Byddwn yn storio'r lluniau/delweddau mewn man diogel am gyfnod o 5 mlynedd o ddyddiad y ffurflen yma, ar ôl hynny bydd y delweddau yn cael eu dinistrio

Mae gennych yr hawl i dynnu eich caniatâd yn ôl ar unrhyw adeg yn ystod y cyfnod yma.

Defnydd personol gan rieni

Yn unol ag arweiniad gan Swyddfa'r Comisiynydd Gwybodaeth, mae croeso i rieni / gofalwyr dynnu delweddau fideo a digidol o'u plant mewn digwyddiadau'r ysgol ar gyfer defnydd personol (gan nad yw'r fath ddefnydd yn cael ei grybwyll mewn deddfwriaeth Diogelu Data). I barchu preifatrwydd pawb, ac mewn rhai achosion i amddiffyn, ni ddylai'r delweddau yma gael eu cyhoeddi / gwneud yn gyhoeddus ar wefannau rhwydweithio cymdeithasol, ac ni ddylai rhieni / gofalwyr wneud sylwad ar unrhyw weithgareddau sy'n cynnwys disgyblion yn y delweddau digidol / fideo.

Gofynnir i rieni / gofalwyr arwyddo'r ffurflen caniatâd isod i ganiatáu'r ysgol i gymryd a thynnu delweddau o'u plant ac i'r rhieni / gofalwyr gytuno.

Ffurflen Caniatâd Delweddau Digidol / Fideo

Enw Rhiant / Gofalwr

Enw Myfyriwr / Disgybl

Fel rhiant / gofalwr y *myfyriwr / disgybl* uchod, rwyf yn cytuno i'r ysgol gymryd a defnyddio delweddau digidol / fideo o'm mhlentyn / plant. Rwyf yn deall mai dim ond i gefnogi gweithgareddau dysgu neu mewn cyhoeddusrwydd sydd yn dathlu llwyddiant ac yn hyrwyddo gwaith yr ysgol yn rhesymol defnyddir y delweddau yma.

Ydw/
Nac ydw

Os ydw i'n tynnu delweddau digidol neu fideo mewn, neu o, - ddigwyddiadau'r ysgol sydd yn cynnwys delweddau o blant, heblaw am rai fi, rwyf yn cytuno byddaf yn cadw i'r canllawiau yma wrth ddefnyddio'r delweddau.

Ydw/
Nac ydw

Arwyddwyd

Dyddiad

Atodiad 5

Defnyddio Systemau Biometrig

Mae'r ysgol yn defnyddio systemau biometrig i adnabod plant unigol trwy'r dulliau canlynol (*dylai'r ysgol ddisgrifio yma sut mae'n defnyddio'r system fiometrig*).

Mae gan dechnolegau biometrig fanteision penodol dros systemau adnabod awtomatig eraill, oherwydd nid oes angen i ddisgyblion ddod ag unrhyw beth (*i'r ffreutur neu lyfrgell yr ysgol*) felly ni ellir colli dim byd, megis cerdyn allwedd.

Mae'r ysgol wedi cwblhau asesiad o'r effaith ar breifatrwydd ac mae'n hyderus fod y defnydd o dechnolegau o'r fath yn effeithiol ac wedi'i gyfiawnhau yng nghyd-destun yr ysgol.

Ni chaiff delweddau cyflawn o olion *bysedd / cledrau* dwylo eu storio, ac ni ellir ail-greu'r ddelwedd wreiddiol o'r data. Hynny yw, ni ellir ail-greu ôl bys disgybl neu hyd yn oed darlun o ôl bys gan ddefnyddio'r hyn sydd yn ei hanfod yn rhes o rifau.

Gofynnir i rieni / gofalwyr am ganiatâd i'w plentyn ddefnyddio technoleg biometreg.

Enw Rhiant / Gofalwr

Enw Myfyriwr / Disgybl

Fel rhiant / gofalwr y disgybl / myfyriwr uchod, rwy'n cytuno y gall yr ysgol ddefnyddio'r systemau adnabod biometrig a ddisgrifir uchod. Deallaf na ellir defnyddio'r delweddau hyn i greu print ôl bys / cledr llaw cyflawn fy mhlentyn, ac ni chaiff y delweddau hyn eu rhannu ag unrhyw un y tu allan i'r ysgol.

Ydw /
Nac ydw

Llofnod

Dyddiad

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Appendix 1	Schedules of the Act
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Appendix 4	Photographs consent form
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1. Introduction

In order to operate efficiently, Ysgol Babanod Morfa Nefyn has to collect and use information about people with whom it works. These may include members of the public, current, past and prospective employees, pupils and suppliers. In addition, it may be required by law to collect and use information in order to comply with the requirements of central government.

The school is committed to ensuring that personal information is properly managed and that it ensures compliance with data protection legislation. The School will make every effort to meet its obligations under the legislation and will regularly review procedures to ensure that it is doing so.

Definitions

Personal Data is information which relates to an identifiable living individual that is processed as data. Processing means collecting, using, disclosing, retaining, or disposing of information. The data protection principles apply to all information held electronically or in structured files that tells you something about an identifiable living individual.

The principles also extend to all information in education records. Examples would be names of staff and pupils, dates of birth, addresses, national insurance numbers, school marks, medical information, exam results, SEN assessments and staff development reviews.

Special Category Data is information that relates to race and ethnicity, political opinions, religion, trade union membership, health, genetics, sexuality, sex life, and biometric data.

The difference between processing personal data and special category data is that there are greater legal restrictions on the latter as they are more sensitive.

Criminal Data - Article 10 of the General Data Protection Regulation (GDPR) sets out the regulations to process criminal data.

2. Scope

This policy applies to all employees, governors, contractors, agencies and representatives and temporary staff working for or on behalf of the school.

This policy applies to all personal information created or held by the School in whatever format (e.g. paper, electronic, email, film) and however it is stored, (for example ICT system/database, shared drive filing structure, email, filing cabinet, personal filing shelves and drawers).

DPL does not apply to access to information about deceased individuals.

3. Responsibilities

The Governors have overall responsibility for compliance with DPL.

The Headteacher is responsible for ensuring compliance with DPL and this policy within the day to day activities of the school. The Headteacher is responsible for ensuring that appropriate training is provided for all staff.

All members of staff or contractors who hold or collect personal data are responsible for their own compliance with DPL and must ensure that personal information is kept and processed in line with DPL.

All members of staff should demonstrate that they have read, understood and accepted this Policy.

4. The Requirements

DPL stipulates that anyone processing personal data must comply with six principles of good practice; these principles are legally enforceable. In the context of personal information, the principles require the following:

Article 5 GDPR

- a) Information should be processed in a legal, fair and transparent manner
- b) Information should only be acquired for one or more specific, clear and lawful purposes, and it should not be further processed in any manner incompatible with that purpose or those purposes;
- c) Information will be adequate, relevant and non-excessive in relation to the purpose or purposes for which it is processed;
- d) Information will be accurate, and where appropriate, completely up-to-date;
- e) Information should not be kept for longer than needed for that purpose or those purposes;
- f) Information will be processed safely, i.e. protected by an appropriate degree of security.

5. Annual fee

It is required to pay an annual fee to the Information Commissioner's Office. Failure to do so could lead to a financial penalty.

6. Privacy Notices

Whenever information is collected about individuals, the school will provide the following information:

- The identity of the data controller, e.g. the school;
- The purpose that the information is being collected for;
- The lawful basis for collecting the information
- Any other purposes that it may be used for;
- With who the information will or may be shared with;
- How long the information is kept
- Details about the rights of individuals
- Details about the Data Protection Officer

This must happen at the time that information first starts to be gathered on an individual.

For example:

xxxx school will collect information about pupils in order to track their educational progress. It will not be used for any other purpose.

This is done as part of its public task.

It will share the information with the Local Education Authority and Welsh Government.

Information will not be transferred abroad/Information will be transferred abroad.

The information will be retained for years.

You may have rights in relation to receiving, correcting, objecting, deleting or transporting personal information. Contact the Data Protection Officer for details.

The Data Protection Officer's contact details are xxxxxxxxxxxxxx

If information is directly collected from a child, the privacy notice must be age appropriate.

7. Conditions for Processing

Processing of personal information may only be carried out where one of the conditions of Article 6, GDPR has been satisfied.

Processing of special category data may only be carried out if a condition in Article 9, GDPR is met as well as one in Article 6.

See [Appendix 1](#) for a list of the conditions.

8. Disclosure of Data

It is a criminal offence to knowingly or recklessly obtain or disclose information about an individual without legitimate cause. Relevant, confidential data should only be given to:

- *other staff members on a need to know basis;*
- *relevant parents/guardians;*
other organisations if it is necessary in the public interest, e.g. prevention of crime;
- *other authorities, such as the Local Education Authority and schools to which a pupil may move, where there are legal requirements*
- *organisations that collaborate with the school or that are part of an information sharing protocol*

The school should not disclose anything on a pupil's record which would be likely to cause serious harm to their physical or mental health or that of anyone else.

Where there is doubt or statutory requirements conflict, advice should be sought.

When giving information to an individual, particularly by telephone, it is most important that the individual's identity is verified. If in doubt, questions should be asked of the individual, to which only he/she is likely to know the answers. Information should not be provided to other parties, even if they are related. For example: in the case of divorced parents it is important that information regarding one party is not given to the other party to which he/she is not entitled.

9. Individuals' rights

Access to information about themselves

Anyone has the right, to request a copy of all information retained about them by the school (or information about a child they are responsible for).

When a request is received, it must be dealt with promptly; an answer must be presented as soon as possible within a month. The period can be extended by up to two months if a request is complex or numerous.

No fee can be charged. However, if a request is unfounded, excessive and has been submitted previously, there is a right to charge an administrative fee.

When providing information, the school must also provide the same details to the individuals as those provided in a privacy notice.

See [Appendix 2](#) for the procedure on how to deal with these requests.

Up to £50 (on a sliding scale for photocopying fees) can be charged for access to a pupil's educational record.

(ii) Provision of data to children

In relation to the capacity of a child to make a request, guidance provided by the Information Commissioner's Office states that by the age of 12 a child can be expected to have sufficient maturity to understand the nature of the

request. A child may of course reach sufficient maturity earlier; each child should be judged on a case by case basis.

If the child does not understand the nature of the request, someone with parental responsibility for the child, or a guardian, is entitled to make the request on behalf of the child and receive a response.

Pupils who submit requests to access their educational records should be allowed to do so unless it is obvious that they do not understand what they are asking for.

(iii) Parents' rights

An adult with parental responsibility can access the information about their child, provided that the child is not considered to be sufficiently mature. They must be able to prove their parental responsibility and the School is entitled to request relevant documentation to evidence this as well as the identities of the person making the request and the child.

In addition, parents have their own independent right under The Education (Pupil Information) (Wales) Regulations 2004 to access to the official education records of their children. Students do not have a right to prevent their parents from obtaining a copy of their school records.

10. The right to request that inaccurate information is corrected

Every individual has the right to inform the school if they believe that information about them has been recorded incorrectly.

Up to one month is allowed to respond to requests, however, this could be extended by up to a further two months if the application is bulky or complicated;

It may be possible that one will be unable to change or delete the information on every occasion, but anything that is factually incorrect should be corrected;

In the meantime, a notice should be placed on the person's file to note that there is doubt regarding accuracy.

11. The right to request that information is deleted

Every individual, in some circumstances, has the right to make a request to delete information about themselves. The school will consider every request on an individual basis.

12. The right to object to or restrict processing

Every individual has the right to object to their information being processed under the following circumstances:

- We have processed their information on the basis of lawful interests or an official public/authority task;
- Where there is public marketing;
- Processing due to research or statistics.

The school will comply with the request unless:

- There are strong, lawful reasons for processing;
- There is a need to establish, exercise or defend legal claims.

In terms of limiting processing, there is a right to do so if individuals insist that data is incorrect and therefore, it must be limited during the investigation; where individuals have objected; where processing is illegal and where the school does not require the data but individuals require it in order to defend a legal claim.

There will be a need to inform any third party that has received the data of the need to limit processing, and to inform the individual of the identity of these third parties.

13. Security

Paper records

Whenever possible, storage rooms, strong cabinets, and other lockable storage systems should be used to store paper records. Papers containing confidential personal information should not be left on office and classroom desks, on staffroom tables or pinned to noticeboards where there is general access. Particular care should be taken if documents have to be taken out of school

Electronic Records

All portable electronic devices should be kept as securely as possible. If they contain personal information, they should be kept under lock and key when not in use.

Encryption software should be used to protect all portable devices and removable media, such as laptops and USB devices (or another form of memory storage not part of the computer itself), which hold confidential personal information. All devices must be password protected.

Data must be disposed of securely once it has been transferred or is no longer required.

Strong passwords, i.e. at least eight characters long and containing special symbols, should be encouraged if any electronic equipment holds confidential personal information. Different passwords should be used for separate systems and devices.

Disposal

If any confidential information is held on paper records, they should be shredded; electronic memories should be erased or destroyed.

Data Breach

A data breach means that personal information has been compromised or lost which could be as a result of a cyber incident; data left in insecure location; data posted to the wrong recipient; loss or theft of paperwork or insecure device etc.

The school will investigate any such breaches and take appropriate remedial action. Serious data breaches will be reported to the Information Commissioner's Office.

14. Data Retention

Out of date information should be disposed of if no longer relevant. Information should only be kept as long as needed, for legal or business purposes.

[Appendix 3](#) sets out the relevant periods for school records.

15. Data Recording

Records should be kept in such a way that the individual concerned can inspect them. It should also be borne in mind that at some time in the future the data may be inspected by the courts or any legal official. It should therefore be correct, unbiased, unambiguous and clearly decipherable/readable. Where information is obtained from an outside source, details of the source and date obtained should be recorded.

16. Website

Any person whose details, or child's details, are to be included on the school's website will be required to give written consent. At the time the information is included, all such individuals will be properly informed about the consequences of their data being disseminated worldwide.

17. Photographs

Photos taken for official school use may be covered by DPL and the School will advise pupils and students why they are being taken.

Photos taken purely for personal use are exempt from DPL.

A consent form for photographs is provided in [Appendix 4](#).

18. Sharing Information

When sharing personal information, the school will ensure that:

- it is allowed to share it;
- adequate security (taking into account the nature of the information) is in place to protect it; and
- it will provide an outline in a privacy statement of who receives personal information from the school.

Any personal data passed to a third party for processing (namely an external company) will be covered by a data processing agreement.

19. CCTV

Capturing and/or recording images of identifiable individuals is an example of processing personal information and therefore needs to comply with DPL.

The school will notify staff, pupils and visitors why it is collecting personal information in the form of CCTV images. The school will ensure that it has a set retention period based on the possible need to review the footage and will consider who is allowed access to this footage and why.

Individuals and law enforcement agencies will have the right to request access to the images. All such requests will be logged.

See the Information Commissioner's Office's guide on CCTV here:

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

20. Biometric Information (fingerprinting) - OPTIONAL

The Protection of Freedoms Act 2012 includes measures relating to the use of biometric identification systems, i.e. fingerprinting and facial recognition systems.

Under the GDPR, it is recognised that this type of data is special category data

- For every school pupil under the age of 18, the school will obtain the written consent of parents before recording and processing their child's biometric details.
- All such data must be handled appropriately and in accordance with DPL principles.
- Alternative methods of service provision must be identified if a parent or pupil refuses to provide consent.

A consent form for biometric information is provided in [Appendix 5](#).

21. Breach of the policy

Non-compliance with the requirements of DPL by the members of staff could lead to serious action being taken by third parties against the school authorities. Non-compliance by a member of staff is therefore considered a disciplinary matter which, depending on the circumstances, could lead to dismissal. It should be noted that an individual can commit a criminal offence under the Act, for example, by obtaining and/or disclosing personal data for his/her own purposes without the consent of the data controller.

Useful Resources

A pack specifically for schools from the Information Commissioner's Office:

<https://ico.org.uk/for-organisations/education/>

Hwb

National resources on on-line safety:

<https://hwb.gov.wales/resources/resource/def9bffd-1fba-4902-9834-3ecca60bb7e7/cy>

Guidance on information management for schools, including retention periods:

<https://www.shropshirelg.net/media/442737/IRMS-Toolkit-for-Schools-2016.pdf>

Article 6 Conditions (summary)

- 6(1)(a) – Individual's consent;
- 6(1)(b) – Processing is necessary for a contract;
- 6(1)(c) – Processing is necessary to comply with a legal duty;
- 6(1)(d) – Processing is necessary for the individual's vital interests;
- 6(1)(e) – Processing is necessary as it undertakes a task in the public's interest
- 6(1)(f) – Processing is necessary for the purposes of legitimate interests of the data controller or third party

Article 9 Conditions (summary)

- 9(2)(a) – Processing with the specific consent of the individual;
- 9(2)(b) – Processing is necessary under employment law;
- 9(2)(c) – Processing is necessary to protect the individual's vital interests;
- 9(2)(d) – Processing for the use of a special category group (Not-for-profit organisation with a political or religious aim or a trade union)
- 9(2)(e) – Processing relates to information made public by the individual;
- 9(2)(f) – Processing is necessary so that the establishment can defend legal claims;
- 9(2)(g) – Processing is necessary for reasons of substantial public interests based on law;
- 9(2)(h) – Processing is necessary to respond to the needs of Occupational Health and Social Care;
- 9(2)(i) – Processing is necessary for Public Health reasons;
- 9(2)(j) – Processing is necessary for archiving purposes in the public interest; or for scientific or historical research purposes; or for statistical purposes.

Further Special Category conditions are included in Schedule 1 of the Data Protection Act 2018.

The right to have access to information

There are two distinct rights of access to information held by schools about students.

1. Under data protection legislation, any individual has the right to make a request to access the personal information held about them.
2. The right of those entitled to have access to curricular and educational records as defined within the Education (Pupil Information) (Wales) Regulations 2004.

Actioning a request

- 1) Requests for information must be made in writing; which includes email, and be addressed to the Headteacher. If the initial request does not clearly identify the information required, then further enquiries will be made.
- 2) The identity of the person making the request must be established before the disclosure of any information, and checks should also be carried out regarding proof of relationship to the child.

Evidence of identity can be established by requesting production of:

- Passport
- driving licence
- utility bills with the current address
- Birth / Marriage certificate
- P45/P60
- Credit Card or Mortgage statement

This list is not exhaustive.

3) Any individual has the right of access to information held about them. However with children, this is dependent upon their capacity to understand (normally age 12 or above) and the nature of the request. The Headteacher should discuss the request with the child and take their views into account when making a decision. A child with competency to understand can refuse to consent to the request for their records. Where the child is not deemed to be competent, an individual with parental responsibility or guardian shall make the decision on behalf of the child.

4) The school may make a charge for the provision of information, dependent upon the following:

- Should the information requested contain the educational record, then the amount charged will be dependant upon the number of pages provided.
- Should the information requested be personal information that does not include any information contained within educational records, no fee is charged.

- if the information requested is only the educational record, viewing will be free, but a charge for the cost of photocopying the information can be made by the Headteacher.

5) The response time for subject access requests, once officially received, is one month (**not working or school days but calendar days, irrespective of school holiday periods**). However, the one month will not commence until after receipt of fees or clarification of information sought.

If it is deemed that the request is complex or there are numerous requests, the school will inform the person making the request within a month that the request period will be extended and the reasons why. Under such circumstances, an addition of up to two months is permitted to respond to the request.

Clearly, if requests are unfounded or excessive (especially if they are repetitive), the school will charge a reasonable fee for administrative costs or refuse to deal with the request.

6) DPL allows exemptions as to the provision of some information; **therefore, all information will be reviewed prior to disclosure.**

7) Third party information is that which has been provided by another, such as the Police, Local Authority, Health Care professional or another school. Before disclosing third party information consent should normally be obtained. There is still a need to adhere to the timescale.

8) Any information which may cause serious harm to the physical or mental health or emotional condition of the student or another should not be disclosed. Information that would reveal that the child is at risk of abuse, or information relating to court proceedings should not be disclosed either.

9) If there are concerns over the disclosure of information then additional advice should be sought.

10) Where redaction (information blacked out/removed) has taken place then a full copy of the information provided should be retained in order to establish, if a complaint is made, what was redacted and why.

11) Information disclosed should be clear, thus any codes or technical terms will need to be clarified and explained. If information contained within the disclosure is difficult to read or illegible, then it should be retyped.

12) Information can be provided at the school with a member of staff on hand to help and explain matters if requested, or provided at face to face handover. The views of the applicant should be taken into account when considering the method of delivery. If postal systems have to be used then registered/recorded mail must be used.

Complaints

Complaints about the above procedures should be made to the Chairperson of the Governing Body who will decide whether it is appropriate for the complaint to be dealt with in accordance with the school's complaint procedure. Complaints which are not appropriate to be dealt with through the school's complaint procedure can be dealt with by the Information Commissioner. Contact details of both will be provided with the disclosure information.

Contacts

If you have any queries or concerns regarding these policies / procedures then please contact the Headteacher. Further advice and information can be obtained from the Information Commissioner's Office ('ICO'), www.ico.gov.uk

Appendix 3

1. School Management

This section contains retention periods connected to the general management of the school. This covers the work of the Governing Body, the Headteacher and the senior management team, the admissions process and operational administration.

1.1 Governing Body					
	Basic File Description	Data Protection Issues	Legal Requirements	Retention Period [Operational]	Action at the end of the administrative life of the record
1.1.1	Agendas for Governing Body meetings	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		One copy should be retained with the master set of minutes. All other copies can be disposed of. PERMANENT	SECURE DISPOSAL ⁷
1.1.2	Minutes of Governing Body meetings:	There may be data protection issues if the meeting is dealing with confidential issues relating to staff		PERMANENT	
	Principal Set (signed)			PERMANENT	If the school is unable to store these then they should be offered to the County Archives Service
	Inspection Copies ⁸			Date of meeting + 3 years	If these minutes contain any sensitive, personal information they must be shredded.
1.1.3	Reports presented to the Governing Body	There may be data protection		Reports should be kept for a minimum of 6	SECURE DISPOSAL or retain with the signed set of the

⁷ In this context, SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross cut shredder.

⁸ These are the copies which the Clerk of Governors may wish to retain so that persons making a request can view all the appropriate information without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

		issues if the meeting is dealing with confidential issues relating to staff		years. However, if the minutes refer directly to individual reports then the reports should be kept permanently.	minutes
1.1.4	Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002	No	Education Act 2002, Section 33	Date of the meeting + a minimum of 6 years	SECURE DISPOSAL
1.1.5	Instruments of Government including Articles of Association	No		PERMANENT	These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes.
1.1.6	Trusts and Endowments managed by the Governing Body	No		PERMANENT	These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes.
1.1.7	Action plans created and administered by the Governing Body	No		Life of the action plan + 3 years	SECURE DISPOSAL
1.1.8	Policy documents created and administered by the Governing Body	No		Life of the policy + 3 years	SECURE DISPOSAL
1.1.9	Records relating to complaints dealt with by the Governing Body	Yes		Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes	SECURE DISPOSAL
1.1.10	Annual Reports created under the requirements of the Education Act 2002	No	Education Act 2002	Date of report + 10 years	SECURE DISPOSAL
1.1.11	Proposals concerning the change of status of a maintained school including	No		Date proposal accepted or declined + 3 years	SECURE DISPOSAL

	Specialist Status Schools and Academies				
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Please note that all information about the retention of records concerning the recruitment of Headteachers can be found in the Human Resources section below.

1.2 Headteacher and Senior Management Team					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.2.1	Log books of activity in the school maintained by the Headteacher (if relevant)	There may be data protection issues if the log book refers to individual pupils or members of staff		Date of last entry in the book + a minimum of 6 years then review	These could be of permanent historical value and should be offered to the County Archives Service if appropriate
1.2.2	Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies	There may be data protection issues if the minutes refers to individual pupils or members of staff		Date of the meeting + 3 years then review	SECURE DISPOSAL
1.2.3	Reports created by the Headteacher or the Senior Management Team	There may be data protection issues if the report refers to individual pupils or members of staff		Date of the report + a minimum of 3 years then review	SECURE DISPOSAL
1.2.4	Minutes created by headteachers, deputy headteachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the minutes refers to individual pupils or members of staff		Current academic year + 6 years then review	SECURE DISPOSAL
1.2.5	Correspondence created by headteachers, deputy headteachers, heads of year and other members of staff	There may be data protection issues if the correspondence refers to individual pupils		Date of correspondence + 3 years then review	SECURE DISPOSAL

	with administrative responsibilities	or members of staff			
1.2.6	Professional Development Plans	Yes		Life of the plan + 6 years	SECURE DISPOSAL
1.2.7	School Development Plans	No		Life of the plan + 3 years	SECURE DISPOSAL

1.3 Admissions Process					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
1.3.1	All records relating to the creation and implementation of the School Admissions' Policy	No	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal panels</i> December 2014	Life of the policy + 3 years then review	SECURE DISPOSAL
1.3.2	Admissions – if the admission is successful	Yes	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal panels</i> December 2014	Date of admission + 1 year	SECURE DISPOSAL
1.3.3	Admissions – if the appeal is unsuccessful	Yes	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal</i>	Resolution of case + 1 year	SECURE DISPOSAL

			<i>panels</i> December 2014		
1.3.4	Register of Admissions	Yes	<i>School Attendance: Departmental advice for maintained schools, academies, independent schools and local authorities</i> October 2014	Every entry in the admission register must be retained for a period of three years after the date on which the entry was made ⁹	REVIEW Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from former pupils to confirm the dates they attended the school.
1.3.5	Admissions – Secondary Schools – Casual	Yes		Current year + 1 year	SECURE DISPOSAL
1.3.6	Proofs of address supplied by parents as part of the admissions process	Yes	<i>School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeal panels</i> December 2014	Current year + 1 year	SECURE DISPOSAL
1.3.7	Supplementary Information form including additional information such as religion, medical conditions etc. (e.g. SIMS Pupil Information Collection Form	Yes		See below	
	For successful admissions			This information should be added to the pupil file (e.g. SIMS / file)	SECURE DISPOSAL
	For unsuccessful admissions			Until appeals process completed	SECURE DISPOSAL
1.4 Operational Administration					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record

1.4.1	General file series	No		Current year + 5 years then REVIEW	SECURE DISPOSAL
1.4.2	Records relating to the creation and publication of the school brochure or prospectus (if relevant)	No		Current year + 3 years	STANDARD DISPOSAL
1.4.3	Records relating to the creation and distribution of circulars to staff, parents or pupils (if relevant)	No		Current year + 1 year	STANDARD DISPOSAL
1.4.4	Newsletters and other items with a short operational use	No		Current year + 1 year	STANDARD DISPOSAL
1.4.5	Visitors' Books and Signing in Sheets	Yes		Current year + 6 years then REVIEW	SECURE DISPOSAL
1.4.6	Records relating to the creation and management of Parent Teacher Associations and/or Former Pupils Associations	No		Current year + 6 years then REVIEW	SECURE DISPOSAL

2. Human Resources

This section deals with all matters of Human Resources management within the school.

2.1 Recruitment					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.1.1	All records leading up to the appointment of a new headteacher	Yes		Date of appointment + 6 years (To be kept in Area Education Office – not be kept in the schools)	SECURE DISPOSAL
2.1.2	All records leading up to the appointment of a new member of staff – unsuccessful candidates	Yes		Date of appointment of successful candidate + 6 months (Area Education Office to keep a copy – school to dispose the information securely)	SECURE DISPOSAL
2.1.3	All records leading up to the appointment of a new member of staff – successful candidate	Yes		All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months.	SECURE DISPOSAL
2.1.4	Pre-employment vetting information – DBS Checks (Employment audit information)	Yes	<i>DBS Update Service Employer Guide June 2012: Keeping children safe in education.</i> July 2015 (Statutory Guidance from the Department of Education) Sections 73, 74	Copies of DBS certificates should not be kept.	
2.1.5	Proofs of identity collected as part of the process of	Yes		Copies of identification test documents should	

	checking "portable" enhanced DBS disclosure			not be kept as part of the advanced "portable" DBS disclosure check.	
2.1.6	Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ¹⁰	Yes	<i>An employer's guide to right to work checks</i> [The Home Office, May 2015]	Send the information to the authority	

2.2 Operational Staff Management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.2.1	Staff Personal File	Yes	Limitation Act 1980 (Section 2)	Termination of employment +25 (For information: Although the IRMS Toolkit notes: Termination of employment + 6 years, Gwynedd Council has undertaken a risk assessment and has decided to retain the personal files of any staff member who requires a DBS for 25 years following termination of employment)	SECURE DISPOSAL
2.2.2	Timesheets	Yes		Current year + 6 years	SECURE DISPOSAL
2.2.3	Annual appraisal / assessment records	Yes		Current year + 5 years	SECURE DISPOSAL

2.3 Management of Disciplinary and Grievance Processes

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.3.1	Allegation of a child protection	Yes	<i>"Keeping children safe in</i>	Until the person's normal retirement	SECURE DISPOSAL

¹⁰ Employers need to make a "clear copy" of the documents shown to them as part of this process.
Polisi Diogelu Data Ysgolion 2018 v1-0
Ysgol Babanod Morfa Nefyn

	nature against a member of staff including where the allegation is unfounded ¹¹		<i>education: Statutory guidance for schools and colleges, March 2015</i> ”; <i>“Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children, March 2015”</i>	age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned.	These records must be shredded.
2.3.2	Disciplinary Proceedings	Yes			
	Verbal Warning			Date of warning ¹² + 6 months	SECURE DISPOSAL [If warnings are placed on personal files then they must be weeded from the file]
	Written Warning – level 1			Date of warning + 6 months	
	Written Warning – level 2			Date of warning + 12 months	
	Final Warning			Date of warning + 18 months	
	Case not found			If the incident is child protection related then see above otherwise dispose of at the conclusion of the case	SECURE DISPOSAL

2.4 Health and Safety					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.4.1	Health and Safety Policy Statements	No		Life of policy + 3 years	SECURE DISPOSAL

11 This review took place as the Independent Inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention.

12 Where the warning relates to child protection issues see above. If the disciplinary proceedings relate to a child protection matter please contact your Safeguarding Children Officer for further advice.

2.4.2	Health and Safety Risk Assessments	No		Life of risk assessment + 3 years (Details below in regards to risk assessment that are sent with HS11)	SECURE DISPOSAL
2.4.3	Records relating to accident / injury at work	Yes		Date of incident + 12 years. In the case of serious accidents a further retention period will need to be applied	SECURE DISPOSAL
2.4.4	Accident Reporting (e.g. HS11)	Yes	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980		
	Adults			Date of the incident + 6 years	SECURE DISPOSAL
	Children			DOB of the child + 25 years ADYaCH: Date Of Birth +35 years	SECURE DISPOSAL
2.4.5	Control of Substances Hazardous to Health (COSHH)	No	Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18(2)	Current year + 40 years	SECURE DISPOSAL
2.4.6	Process of monitoring of areas where employees and persons are likely to have become in	No	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	Last action + 40 years	SECURE DISPOSAL

	contact with asbestos				
2.4.7	Process of monitoring of areas where employees and persons are likely to have become in contact with radiation	No		Last action + 50 years	SECURE DISPOSAL
2.4.8	Fire Precautions Log Books	No		Current year + 6 years	SECURE DISPOSAL

2.5 Payroll and Pensions

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
2.5.1	Maternity Pay Records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	Current year + 3 years	SECURE DISPOSAL
2.5.2	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	SECURE DISPOSAL

3 Financial Management of the School

This section deals with all aspects of the financial management of the school including the administration of school meals.

3.1 Risk Management and Insurance

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
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3.1.1	Employer's Liability Insurance Certificate	No		Closure of the school + 40 years	SECURE DISPOSAL
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3.2 Asset Management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.2.1	Inventories of furniture and equipment	No		Current year + 6 years	SECURE DISPOSAL
3.2.2	Burglary, theft and vandalism report forms	No		Current year + 6 years	SECURE DISPOSAL

3.3 Accounts and Statements including Budget Management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.3.1	Annual Accounts	No		Current year + 6 years	STANDARD DISPOSAL
3.3.2	Loans and grants managed by the school	No		Date of last payment on the loan + 12 years and then REVIEW	SECURE DISPOSAL
3.3.3	Student Grant Applications	Yes		Current year + 3 years	SECURE DISPOSAL
3.3.4	All records relating to the creation and management of budgets including the Annual Budget statement and background papers	No		Life of the budget + 6 years (For information: Although the IRMS Toolkit notes: Life of the budget + 3 years, Gwynedd Council recommends retaining them for 6 years to correspond with the retention periods of other budgetary material)	SECURE DISPOSAL
3.3.5	Invoices, receipts, order books, delivery notes	No		The current financial year + 6 years	SECURE DISPOSAL
3.3.6	Records relating to the collection and banking of money	No		The current financial year + 6 years	SECURE DISPOSAL

3.3.7	Records relating to the identification and collection of debts	No		The current financial year + 6 years	SECURE DISPOSAL
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3.4 Contracts Management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.4.1	All records relating to management of contracts under seal	No	Limitation Act 1980	Final payment on the contract + 12 years	SECURE DISPOSAL
3.4.2	All records relating to management of contracts under hand	No	Limitation Act 1980	Final payment on the contract + 6 years	SECURE DISPOSAL
3.4.3	All records relating to management of contracts	No		Current year + 2 years	SECURE DISPOSAL

3.5 School Fund

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.1.5	School Fund - Cheque Books	No		Current year + 6 years	SECURE DISPOSAL
3.5.2	School Fund - Paying in books	No		Current year + 6 years	SECURE DISPOSAL
3.5.3	School Fund - Ledger	No		Current year + 6 years	SECURE DISPOSAL
3.5.4	School Fund - Invoices	No		Current year + 6 years	SECURE DISPOSAL
3.5.5	School Fund - Receipts	No		Current year + 6 years	SECURE DISPOSAL
3.5.6	School Fund - Bank Statements	No		Current year + 6 years	SECURE DISPOSAL
3.5.7	School Fund – School Trips	No		Current year + 6 years	SECURE DISPOSAL

3.6 School Meals Management

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
3.6.1	Free School Meals Registers	Yes		Current year + 6 years	SECURE DISPOSAL
3.6.2	School Meals Registers	Yes		Current year + 3 years	SECURE DISPOSAL
3.6.3	School Meals Summary Sheets	No		Current year + 3 years	SECURE DISPOSAL

4. Property Management

This section covers the management of buildings and property.

4.1 Property Management					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
4.1.1	Title deeds of properties belonging to the school	No		PERMANENT These should follow the property unless	

				the property has been registered with the Land Registry	
4.1.2	Plans of property belonging to the school	No		These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold.	
4.1.3	Leases of property leased by or to the school	No		Expiry of lease + 6 years	SECURE DISPOSAL
4.1.4	Records relating to the letting of school premises	No		The current financial year + 6 years	SECURE DISPOSAL
4.2 Maintenance					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
4.2.1	All records relating to the maintenance of the school carried out by contractors	No		Current year + 6 years	SECURE DISPOSAL
4.2.2	All records relating to the maintenance of the school carried out by school employees including maintenance log books	No		Current year + 6 years	SECURE DISPOSAL

5. Pupil Management

This section includes all records which are created during the time a pupil spends at the school. For information about accident reporting see under Health and Safety above.

5.1 Pupil's Educational Record					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.1.1	Pupil's Educational Record required	Yes	The Education (Pupil		

	by The Education (Pupil Information) (England) Regulations 2005		Information) (England) Regulations 2005 SI 2005 No. 1437		
	Nursery			Retain whilst the child remains at the nursery	The file should follow the pupil when he/she leaves the nursery to the primary / relevant school
	Primary			Retain whilst the child remains at the primary school (E.g. Results, Parent Reports, Targets, National / Internal Assessments / Tests, Foundation assessment)	<p>The file should follow the pupil when he/she leaves the primary school. This will include:</p> <ul style="list-style-type: none"> • moving to another primary school • moving to a secondary school • moving to a pupil referral unit • if the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. <p>If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention period.</p> <p>Primary Schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the Local Authority as it is more likely that the pupil will request the</p>

					record from the Local Authority.
	Secondary		Limitation Act 1980 (Section 2)	DOB of the pupil + 25 years (ADYach / Child Protection details below)	SECURE DISPOSAL
5.1.2	Examination Results – Pupil Copies	Yes			
	Public			This information should be added to the pupil file	All uncollected certificates should be returned to the examination board.
	Internal			This information should be added to the pupil file	
<p>This review took place as the Independent Inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention.</p>					
5.1.3	Child Protection information held on pupil file	Yes	<i>“Keeping children safe in education: Statutory guidance for schools and colleges, March 2015”; “Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children, March 2015”</i>	If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file. (There is a need to transfer the file to the new / secondary school)	SECURE DISPOSAL – these records MUST be shredded
5.1.4	Child Protection information held in separate files	Yes	<i>“Keeping children safe in education: Statutory guidance for schools and colleges, March 2015”; “Working together to safeguard children. A guide to inter-agency working to</i>	DOB of the child + 25 years. This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the master copy of this information will be found on the	SECURE DISPOSAL – these records MUST be shredded

			<i>safeguard and promote the welfare of children, March 2015"</i>	Local Authority Social Services record	
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Retention periods relating to allegations made against adults can be found in the Human Resources section of this retention schedule.

5.2 Attendance					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.2.1	Attendance Registers	Yes	<i>School Attendance: Departmental advice for maintained schools, academies, independent schools and local authorities</i> October 2014	End of the current academic year + 3 years. (For information, the toolkit notes: Every entry in the admission register must be retained for a period of three years after the date on which the entry was made)	SECURE DISPOSAL
5.2.2	Correspondence relating to authorized absence		Education Act 1996 Section 7	The current financial year + 2 years	SECURE DISPOSAL

5.3 Special Educational Needs / ADyCh					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
5.3.1	Special Educational Needs files, reviews and Individual Education Plans	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil +35 (For information: Although the IRMS Toolkit notes: DOB of the pupil + 25 years, a decision has been made by the Integrated ADyCh Service that it should be retained for 35	REVIEW NOTE: This retention period is the minimum retention period that any 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

				years from the pupil's date of birth) The information needs to be transferred from primary school to secondary school.	element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented.
5.3.2	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	DOB of the pupil + 35 years [This would normally be retained on the pupil file] (For information: Although the IRMS Toolkit notes: DOB of the pupil + 25 years, a decision has been made by the Integrated ADYaCh Service that it should be retained for 35 years from the pupil's date of birth)	SECURE DISPOSAL unless the document is subject to a "legal hold".
5.3.3	Advice and information provided to parents regarding educational needs (e.g. Specialist health and safety reports)	Yes	Special Educational Needs and Disability Act 2001 Section 2	DOB of the pupil + 35 years [This would normally be retained on the pupil file] (For information: Although the IRMS Toolkit notes: DOB of the pupil + 25 years, a decision has been made by the Integrated ADYaCh Service that it should be retained for 35 years from the pupil's date of birth)	SECURE DISPOSAL unless the document is subject to a "legal hold".
5.3.4	Individual Accessibility Strategy	Yes	Special Educational Needs and	DOB of the pupil + 35 years [This would normally be	SECURE DISPOSAL unless the document

	(e. g Risk Assessments / Medical plans / PEEP)		Disability Act 2001 Section 14	retained on the pupil file] (For information: Although the IRMS Toolkit notes: DOB of the pupil + 25 years, a decision has been made by the Integrated ADYaCh Service that it should be retained for 35 years from the pupil's date of birth)	is subject to a "legal hold".
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6. Curriculum Management

6.1 Statistical and Management Information					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
6.1.1	Curriculum Returns (E.g. End year results sheets)	No		Current year + 3 years	SECURE DISPOSAL
6.1.2	Examination Results (Schools Copy)	Yes		Current year + 6 years	SECURE DISPOSAL
	National Tests records	Yes			
	Results			The National Tests results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The	SECURE DISPOSAL

				school may wish to keep a composite record of all the whole year National Tests results. These could be kept for current year + 6 years to allow suitable comparison.	
	Examination Papers/ National Tests			The examination papers should be kept until any appeals/validation process is complete	SECURE DISPOSAL
6.1.3	Published Admission Number (PAN) Reports (Access)	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.4	Value Added and Contextual Data (E.g. . Assessments forms / monitoring progress)	Yes		Current year + 6 years	SECURE DISPOSAL
6.1.5	Self Evaluation Forms	Yes		Current year + 6 years	SECURE DISPOSAL

6.2 Implementation of Curriculum

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
6.2.1	Schemes of Work	No		Current year + 1 year	It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL
6.2.2	Timetable	No		Current year + 1 year	
6.2.3	Class Record Books	No		Current year + 1 year	
6.2.4	Mark Books	No		Current year + 1 year	
6.2.5	Record of homework set	No		Current year + 1 year	
6.2.6	Pupils' Work	No		The school's choice is to release examples of children's work to parents after receiving written requests from them after a period of a current year + twenty four	SECURE DISPOSAL

				months. The head teacher will be responsible for ensuring that such work is marked in accordance with the school's policy, and audited to ensure that it can not be used as evidence in any legal action that could be taken in the future. If this is not a policy by the school then you will be disposed of after a current year + year	
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7. Extra Curricular Activities

7.1 Educational Visits outside the Classroom					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
7.1.1	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 – “Legal Framework and Employer Systems” and Section 4 – “Good Practice”	Date of visit + 14 years	SECURE DISPOSAL
7.1.2	Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools	No	Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 – “Legal Framework and Employer Systems” and Section 4 – “Good Practice”	Date of visit + 10 years	SECURE DISPOSAL

7.1.3	Parental Consent forms for school trips where there has been no major incident	Yes		Conclusion of the trip	Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time.
7.1.4	Parental Consent forms for school trips where there has been a major incident	Yes	Limitation Act 1980 (Section 2)	DOB of the pupil involved in the incident + 25 years. The consent forms for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	

7.2 Walking Bus

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
7.2.1	Walking Bus Registers	Yes		Date of register + 3 years. This takes into account the fact that if there is an incident requiring an accident report, the register will be submitted with the accident report and kept for the period of time required for accident reporting	SECURE DISPOSAL [If these records are retained electronically any back up copies should be destroyed at the same time]

7.3 Family Liaison Officers and Home School Liaison Assistants

	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record

7.3.1	Day Books	Yes		Current year + 2 years then review	
7.3.2	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		Whilst child is attending school and then destroy	
7.3.3	Referral forms	Yes		While the referral is current	
7.3.4	Contact Data Sheets	Yes		Current year then review, if contact is no longer active then destroy	
7.3.5	Contact database entries	Yes		Current year then review, if contact is no longer active then destroy	
7.3.6	Group Registers	Yes		Current year + 2 years	

7.4 TRAC					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
7.4.1	Day Books	Yes	European Funding	2024	SECURE DISPOSAL
7.4.2	Reports for outside agencies - where the report has been included on the case file created by the outside agency	Yes		once the pupil leaves the project	SECURE DISPOSAL
7.4.3	Referral forms	Yes	European Funding	2024	SECURE DISPOSAL
7.4.4	Contact Data Sheets	Yes	European Funding	2024	SECURE DISPOSAL
7.4.5	Contact database entries	Yes	European Funding	2024	SECURE DISPOSAL
7.4.6	Group Registers	Yes	European Funding	2024	SECURE DISPOSAL

8. Central Government and Local Authority

This section covers records created in the course of interaction between the school and the local authority.

8.1 Local Authority					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
8.1.1	Secondary Transfer Sheets (Primary)	Yes		Current year + 2 years	SECURE DISPOSAL
8.1.2	Attendance Returns	Yes		Current year + 1 year	SECURE DISPOSAL
8.1.3	School Census Returns	No		Current year + 5 years	SECURE DISPOSAL
8.1.4	Circulars and any other information sent from the Local Authority	No		Operational use	SECURE DISPOSAL

8.2 Central Government					
	Basic File Description	Data Protection Issues	Statutory Provisions	Retention Period [Operational]	Action at the end of the administrative life of the record
8.2.1	ESTYN reports and papers	No		Life of the report and then REVIEW	SECURE DISPOSAL
8.2.2	Returns to central government	No		Current year + 6 years	SECURE DISPOSAL
8.2.3	Circulars and other information sent from central government	No		Operational use	SECURE DISPOSAL

Use of Digital / Video Images

Use by school

The school will comply with Data Protection legislation and ask for parents / guardians' consent before taking photographs of pupils. When images will be published, we will also ensure that no-one will be able to identify the young people by not using their names.

Images will also be used to celebrate successes when they will be announced in newsletters, on the school website and, at times, on social media.

We will store photographs/images in a safe place for a period of xxxx years from the date of this form; images will be destroyed following this period.

You have the right to withdraw your consent at any time during this period.

Personal use by parents

In accordance with the Information Commissioner's Office, parents / guardians are welcome to take video and digital images of their children in school events for personal use (as such use is not covered by data protection legislation). In order to respect everyone's privacy, and in some protection cases, these images should not be published / made public on social network websites, and parents / guardians / carers should not make any observation on any activity that includes pupils in the digital / video images.

Parents / guardians are asked to sign the following consent form to allow the school to take photographs of their children and for the parents / guardians to agree.

Digital / Video Images Consent Form

Name of Parent / Guardian

Name of Student / Pupil

As the parent / guardian of *name of student / pupil* above, I agree to the school taking and using digital / video images of my child / children. I understand that these images will only be used to support learning activities or for publicity to celebrate successes and to reasonably promote the school's work.

Yes/
No

If I take digital or video images in, or of, school activities which include images of children, besides my own, I agree that I will adhere to these guidelines when using the images.

Yes/
No

Signed

Date

Use of Biometric Systems

The school uses biometric systems to identify individual children by means of the following methods (*the school should describe how it uses the biometric system here*).

Biometric technologies have specific advantages over other automatic identification systems, as there is no need for the pupils to bring anything (*to the school canteen or library*) , therefore, nothing can be lost, such as a key card.

The school has completed a privacy impact assessment and is confident that using such technologies is effective and has been justified in the school context.

Full images of *fingerprints / palm prints* will not be stored, and the original image cannot be re-created from the data. That is, a pupil's fingerprint or even an image of a fingerprint cannot be re-created using, what is in essence, a row of numbers.

Parents / guardians will be asked for their consent for their child to use biometric technology.

Name of Parent / Guardian

Name of Student / Pupil

As the parent / guardian of the above pupil / student, I agree that the school can use the biometric identification systems described above. I understand that these images cannot be used to create my child's full fingerprint / palm print, and that these images will not be shared with anyone outside the school.

Yes / No

Signature

Date

