



Hopping Hill Primary School

Data Protection Policy

School supported by:



GDPR DPO Service provided by The ICT Service

dpo@theictservice.org.uk | 0300 300 0000
www.theictservice.org.uk/gdpr-dpo-service

Training available upon request

Person responsible for the policy	<i>Jo Fantarrow</i>
Date approved	<i>November 2025</i>
Approved by	<i>Governing Board</i>
Review date	<i>November 2026</i>

Contents

1. Aims.....	3
2. Legislation and guidance	3
3. Definitions	4
4. The data controller	5
5. Roles and responsibilities	5
5.1 Governing board	5
5.2 Data protection officer	5
5.3 Headteacher.....	5
5.4 All staff.....	6
6. Data protection principles	6
7. Collecting personal data	7
7.1 Lawfulness, fairness and transparency	7
7.2 Limitation, minimisation and accuracy.....	8
8. Sharing personal data	8
9. Subject Access Requests and other rights of individuals	9
9.1 Subject Access Requests	9
9.2 Children and subject access requests.....	10
9.3 Responding to Subject Access Requests.....	10
9.4 Other data protection rights of the individual	11
10. Parental requests to see the Educational Record.....	11
11. CCTV	12
12. Photographs and videos	12
15. Data protection by design and default	13
16. Data security and storage of records	14
17. Disposal of records	14
18. Personal data breaches	15
19. Training	15
20. Monitoring arrangements	15
21. Links with other policies	15
Appendix 1: Personal data breach procedure	17
Actions to minimise the impact of data breaches.....	19
Appendix 2: Retention Schedule.....	20
Contact details.....	22

1. Aims

Our school aims to ensure that all personal data collected about staff, pupils, parents, governors, visitors and other individuals is collected, stored and processed in accordance with UK data protection law: [**Data Protection Act 2018 \(DPA 2018\)**](#)

This policy applies to all personal data, regardless of whether it is in paper or electronic format.

All the key items for reference are emboldened and highlighted in **green**.

2. Legislation and guidance

This policy meets the requirements of the:

- UK General Data Protection Regulation (UK GDPR) – the EU GDPR was incorporated into UK legislation, with some amendments, by [**The Data Protection, Privacy and Electronic Communications \(Amendments etc\) \(EU Exit\) Regulations 2020**](#)
- [**Data Protection Act 2018 \(DPA 2018\)**](#)
- References: [**Data \(Use and Access\) Act 2025: data protection and privacy changes - GOV.UK**](#) and [**The Data Use and Access Act 2025 \(DUAA\) - what does it mean for organisations? | ICO**](#) (introduced June 2025)

It is based on guidance published by the Information Commissioner's Office (ICO) on [**The UK GDPR | ICO**](#) and guidance from the Department for Education for Education (DfE) on [**Generative artificial intelligence in education**](#).

It also reflects the ICO's [**guidance**](#) for the use of surveillance cameras and personal information. Additional information around CCTV and organisational arrangements is available [**here**](#).

In addition, this policy complies with regulation 5 of the [**Education \(Pupil Information\) \(England\) Regulations 2005**](#), which gives parents the right of access to their child's Educational Record: [**Accessing pupils' information | ICO**](#).

3. Definitions

Term	Definition
Personal data	<p>Any information relating to an identified, or identifiable, living individual.</p> <p>This may include the individual's:</p> <ul style="list-style-type: none"> ▪ Name (including initials) ▪ Identification number ▪ Location data ▪ Online identifier, such as a username <p>It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural, or social identity.</p>
Special categories of personal data	<p>Personal data, which is more sensitive and so needs more protection, including information about an individual's:</p> <ul style="list-style-type: none"> ▪ Racial or ethnic origin ▪ Political opinions ▪ Religious or philosophical beliefs ▪ Trade union membership ▪ Genetics ▪ Biometrics (such as fingerprints, retina, and iris patterns), where used for identification purposes ▪ Health – physical or mental ▪ Sex life or sexual orientation
Processing	<p>Anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing, or destroying.</p> <p>Processing can be automated or manual.</p>
Data subject	<p>The identified or identifiable individual whose personal data is held or processed.</p>
Data controller	<p>A person or organisation that determines the purposes and the means of processing of personal data.</p>
Data processor	<p>A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.</p>
Personal data breach	<p>A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.</p>

4. The data controller

Our school processes personal data relating to parents, pupils, staff, governors, visitors and others, and therefore is a data controller.

The school is registered with the ICO and has paid its data protection fee to the ICO, as legally required. For reference, please check the following link: [Register of fee payers and certificate downloads | ICO](#)

5. Roles and responsibilities

This policy applies to **all staff** employed by our school, and to external organisations or individuals working on our behalf. Staff who do not comply with this policy may face disciplinary action.

5.1 Governing board

The governing board has overall responsibility for ensuring that our school complies with all relevant data protection obligations.

5.2 Data protection officer

The data protection officer (DPO) is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guidelines where applicable.

They will provide an annual report of their activities directly to the governing board and, where relevant, report to the board their advice and recommendations on school data protection issues.

For routine enquiries about this policy, contact the school's data protection representative in the first instance, Head Teacher, head@hopping.northants-ecl.gov.uk

The DPO is also a point of contact for individuals whose data the school processes, and the first point of contact for the ICO.

Full details of the DPO's responsibilities are set out in their job description.

Our DPO is **The ICT Service** and is contactable via dpo@theictservice.org.uk

5.3 Headteacher

The headteacher acts as the representative of the data controller on a day-to-day basis.

5.4 All staff

Staff are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy
- Informing the school of any changes to their personal data, such as a change of address
- Contacting the DPO in the following circumstances:
 - With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure.
 - If they have any concerns that this policy is not being followed.
 - If they are unsure whether or not they have a lawful basis to use personal data in a particular way.
 - If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the United Kingdom.
 - If there has been a data breach
 - Whenever they are engaging in a new activity that may affect the privacy rights of individuals
 - If they need help with any contracts or sharing personal data with third parties

6. Data protection principles

The UK GDPR is based on data protection principles that our school must comply with.

The principles say that personal data must be:

- Processed lawfully, fairly and in a transparent manner.
- Collected for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed.
- Accurate and, where necessary, kept up to date.
- Kept for no longer than is necessary for the purposes for which it is processed.
- Processed in a way that ensures it is appropriately secure.

This policy sets out how the school aims to comply with these principles.

7. Collecting personal data

7.1 Lawfulness, fairness and transparency

We will only process personal data where we have one of 6 'lawful bases' (legal reasons) to do so under UK data protection law:

- The data needs to be processed so that the school can **fulfil a contract** with the individual, or the individual has asked the school to take specific steps before entering into a contract.
- The data needs to be processed so that the school can **comply with a legal obligation**.
- The data needs to be processed to ensure the **vital interests** of the individual or another person i.e. to protect someone's life.
- The data needs to be processed so that the school, as a public authority, can **perform a task in the public interest or exercise its official authority**.
- The data needs to be processed for the **legitimate interests** of the school (where the processing is not for any tasks the school performs as a public authority) or a third party, provided the individual's rights and freedoms are not overridden.
- The individual (or their parent/carer when appropriate in the case of a pupil) has freely given clear **consent**.

For special categories of personal data, we will also meet one of the special category conditions for processing under data protection law:

- The individual (or their parent/carer when appropriate in the case of a pupil) has given **explicit consent**.
- The data needs to be processed to perform or exercise obligations or rights in relation to **employment, social security or social protection law**.
- The data needs to be processed to ensure the **vital interests** of the individual or another person, where the individual is physically or legally incapable of giving consent.
- The data has already been made **manifestly public** by the individual.
- The data needs to be processed for the establishment, exercise or defence of **legal claims**.
- The data needs to be processed for reasons of **substantial public interest** as defined in legislation.
- The data needs to be processed for **health or social care purposes**, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law.
- The data needs to be processed for **public health reasons**, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law.
- The data needs to be processed for **archiving purposes**, scientific or historical research purposes, or statistical purposes, and the processing is in the public interest.

For criminal offence data, we will meet both a lawful basis and a condition set out under data protection law. Conditions include:

- The individual (or their parent/carer when appropriate in the case of a pupil) has given **consent**.

- The data needs to be processed to ensure the **vital interests** of the individual or another person, where the individual is physically or legally incapable of giving consent.
- The data has already been made **manifestly public** by the individual.
- The data needs to be processed for or in connection with legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of **legal rights**.
- The data needs to be processed for reasons of **substantial public interest** as defined in legislation.

Whenever we first collect personal data directly from individuals, we will provide them with the relevant information required by data protection law.

We will always consider the fairness of our data processing. We will ensure we do not handle personal data in ways that individuals would not reasonably expect or use personal data in ways which have unjustified adverse effects on them.

7.2 Limitation, minimisation and accuracy

We will only collect personal data for specified explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data.

If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so and seek consent where necessary.

Staff must only process personal data where it is necessary to do their jobs.

We will keep data accurate and, where necessary, up to date. Inaccurate data will be rectified or erased when appropriate.

In addition, when staff no longer need the personal data they hold, they must ensure it is deleted or anonymised.

Please refer to [Item 17](#) which links to our school's retention arrangements.

8. Sharing personal data

We will not normally share personal data with anyone else without consent, but there are certain circumstances where we may be required to do so. These include, but are not limited to, situations where:

- There is an issue with a pupil or parent/carer that puts the safety of our staff at risk.
- We need to liaise with other agencies – we will seek consent as necessary before doing this.
- Our suppliers or contractors need data to enable us to provide services to our staff and pupils – for example, IT companies. When doing this, we will:
 - Only appoint suppliers or contractors which can provide sufficient guarantees that they comply with UK data protection law.
 - Establish a contract with the supplier or contractor to ensure the fair and lawful processing of any personal data we share.

- Only share data that the supplier or contractor needs to carry out their service.

We will also share personal data with law enforcement and government bodies where we are legally required to do so.

We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

Where we transfer personal data internationally, we will do so in accordance with UK data protection law.

9. Subject Access Requests and other rights of individuals

9.1 Subject Access Requests

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them. This includes:

- Confirmation that their personal data is being processed.
- Access to a copy of the data.
- The purposes of the data processing.
- The categories of personal data concerned.
- Who the data has been, or will be, shared with.
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period.
- Where relevant, the existence of the right to request rectification, erasure or restriction, or to object to such processing.
- The right to lodge a complaint with the ICO or another supervisory authority.
- The source of the data, if not the individual.
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual.
- The safeguards provided if the data is being transferred internationally.

Subject access requests can be submitted in any form, but we may be able to respond to requests more quickly if they are made in writing and include:

- Name of individual
- Correspondence address.
- Contact number and email address.
- Details of the information requested.

If staff receive a subject access request in any form, they must immediately forward it to the person responsible for data protection in their school: Head Teacher, head@hopping.northants-ecl.gov.uk

9.2 Children and subject access requests

Personal data about a child belongs to that child, and not the child's parents or carers. For a parent or carer to make a subject access request with respect to their child, the child must either be unable to understand their rights and the implications of a subject access request or have given their consent.

Children below the age of 13 are generally not regarded to be mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents or carers of pupils at our school may be granted without the express permission of the pupil. This is not a rule and a pupil's ability to understand their rights will always be judged on a case-by-case basis.

9.3 Responding to Subject Access Requests

When responding to requests, we:

- May ask the individual to provide 2 forms of identification.
- May contact the individual via phone to confirm the request was made.
- Will respond without delay and within 1 month of receipt of the request (or receipt of the additional information needed to confirm identity, where relevant).
- Will provide the information free of charge.
- May tell the individual we will comply within 3 months of receipt of the request, where a request is complex or numerous. We will inform the individual of this within 1 month and explain why the extension is necessary.

We may not disclose information for a variety of reasons, such as if it:

- Might cause serious harm to the physical or mental health of the pupil or another individual.
- Would reveal that the child is being or has been abused, or is at risk of abuse, where the disclosure of that information would not be in the child's best interests.
- Would include another person's personal data that we cannot reasonably anonymise, and we don't have the other person's consent, and it would be unreasonable to proceed without it.
- Is part of certain sensitive documents, such as those related to crime, immigration, legal proceedings or legal professional privilege, management forecasts, negotiations, confidential references, or exam scripts.

If the request is unfounded or excessive, we may refuse to act on it or charge a reasonable fee to cover administrative costs. We will consider whether the request is repetitive in nature when making this decision.

When we refuse a request, we will tell the individual why and tell them they have the right to complain to the ICO or they can seek to enforce their subject access right through the courts.

9.4 Other data protection rights of the individual

In addition to the right to make a subject access request (see above), and to receive information when we are collecting their data about how we use and process it (see Section 7), individuals also have the right to:

- Withdraw their consent to processing at any time.
- Ask us to rectify, erase or restrict processing of their personal data (in certain circumstances).
- Prevent use of their personal data for direct marketing.
- Object to processing which has been justified on the basis of public interest, official authority or legitimate interests.
- Challenge decisions based solely on automated decision making or profiling (i.e. making decisions or evaluating certain things about an individual based on their personal data with no human involvement)
- Be notified of a data breach (in certain circumstances).
- Make a complaint to the ICO.
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).

Individuals should submit any request to exercise these rights to the contact the school's data protection representative in the first instance Head Teacher, head@hopping.northants-ecl.gov.uk

If staff receive such a request, they must immediately forward it to contact the school's data protection representative or the DPO.

10. Parental requests to see the Educational Record

Parents, or those with parental responsibility, have a legal right to free access to their child's educational record (which includes most information about a pupil) within 15 school days of receipt of a written request.

If the request is for a copy of the educational record, the school may charge a fee to cover the cost of supplying it.

This right applies as long as the pupil concerned is aged under 18.

For additional guidance please refer to the following: [Accessing pupils' information | ICO](#)

There are certain circumstances in which this right can be denied, such as if releasing the information might cause serious harm to the physical or mental health of the pupil or another individual, or if it would mean releasing exam marks before they are officially announced.

11. CCTV

We use CCTV in various locations around the school site to ensure it remains safe. We will follow the [guidance](#) for the use of and comply with data protection principles.

We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.

Any enquiries about the CCTV system should be directed to Head Teacher, head@hopping.northants-ecl.gov.uk

12. Photographs and videos

As part of our school activities, we may take photographs and record images of individuals within our school.

We will obtain written consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to both the parent/carer and pupil.

Any photographs and videos taken by parents/carers at school events for their own personal use are not covered by data protection legislation. However, we will ask that photos or videos with other pupils are not shared publicly on social media for safeguarding reasons, unless all the relevant parents/carers have agreed to this.

Where the school takes photographs and videos uses may include:

- Within school on notice boards and in school magazines, brochures, newsletters, etc.
- Outside of school by external agencies such as the school photographer, newspapers, campaigns
- Online on our school website or social media pages
- On Class Dojo as part of home school communication

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

When using photographs and videos in this way we will not accompany them with any other personal information about the child, to ensure they cannot be identified.

Please refer to the following guidance for more information: [Taking photos in schools | ICO](#)

14. Artificial Intelligence (AI)

Artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google

Bard. Hopping Hill Primary School recognises that AI has many uses to help pupils learn but also poses risks to sensitive and personal data.

To ensure that personal and sensitive data remains secure, no one will be permitted to enter such data into unauthorised generative AI tools or chatbots.

If personal and/or sensitive data is entered into an unauthorised generative AI tool, Hopping Hill Primary School will treat this as a data breach and will follow the personal data breach procedure outlined in [Appendix 1](#).

For more information on AI in schools please refer to the following guidance: [Generative artificial intelligence \(AI\) in education - GOV.UK](#)

15. Data protection by design and default

We will put measures in place to show that we have integrated data protection into all of our data processing activities, including:

- Appointing a suitably qualified DPO, and ensuring they have the necessary resources to fulfil their duties and maintain their expert knowledge.
- Only processing personal data that is necessary for each specific purpose of processing, and always in line with the data protection principles set out in relevant data protection law (see section 6).
- Completing data protection impact assessments where the school's processing of personal data presents a high risk to rights and freedoms of individuals, and when introducing new technologies (the DPO will advise on this process).
- Integrating data protection into internal documents including this policy, any related policies and privacy notices.
- Regularly training members of staff on data protection law, this policy, any related policies and any other data protection matters; we will also keep a record of attendance.
- Regularly conducting reviews and audits to test our privacy measures and make sure we are compliant.
- Appropriate safeguards being put in place if we transfer any personal data outside of the United Kingdom, where different data protection laws will apply. (Where applicable).

Maintaining records of our processing activities, including:

- For the benefit of data subjects, making available the name and contact details of our school and DPO and all information we are required to share about how we use and process their personal data (via our privacy notices).
- For all personal data that we hold, maintaining an internal record of the type of data, type of data subject, how and why we are using the data, any third-party recipients, any transfers outside of the United Kingdom and the safeguards for those, retention periods and how we are keeping the data secure.

16. Data security and storage of records

We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing, or disclosure, and against accidental or unlawful loss, destruction or damage.

In particular:

- Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data, are kept under lock and key when not in use.
- Papers containing confidential personal data must not be left on office and classroom desks, on staffroom tables, or left anywhere else where there is general access.
- Where personal information needs to be taken off site, staff must sign it in and out from the school office.
- Passwords containing letters and numbers are used to access school computers, laptops and other electronic devices. Staff and pupils are reminded that they should not reuse passwords from other sites.
- Staff, pupils or governors who store personal information on their personal devices are expected to follow the same security procedures as for school-owned equipment
- Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected (see section 8).
- All access to mobile and static devices is via Microsoft 365 network
- The use of USB is discouraged for storage of data and should only be used to print and scan documents or share curriculum material. Data should be wiped from any USB after use.

17. Disposal of records

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.

For example, we will shred or incinerate paper-based records and overwrite or delete electronic files. We may also use a third party to safely dispose of records on the school's behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law.

All data will be kept in accordance with our Retention Schedule: Appendix 2

18. Personal data breaches

The school will make all reasonable endeavours to ensure that there are no personal data breaches.

In the unlikely event of a suspected data breach, we will follow the procedure set out in [Appendix 1](#).

When appropriate, we will report the data breach to the ICO within 72 hours after becoming aware of it. Such breaches in a school context may include, but are not limited to:

- A non-anonymised dataset being published on the school website which shows the exam results of pupils eligible for the pupil premium.
- Safeguarding information being made available to an unauthorised person.
- The theft of a school laptop containing non-encrypted personal data about pupils.

19. Training

All staff and governors are provided with data protection training as part of their induction process.

Data protection will also form part of continuing professional development, where changes to legislation, guidance or the school's processes make it necessary.

There are some useful webinars available here: [E-learning | ICO](#)

20. Monitoring arrangements

The Headteacher and DPO are responsible for monitoring and reviewing this policy.

This policy will be reviewed annually and approved by the full governing board.

Note: the annual review frequency here reflects the Department for Education's recommendation in its: [Maintained schools governance guide - Statutory policies for maintained schools - Guidance - GOV.UK](#)

21. Links with other policies

[Add and adapt to the list below reflect your school's existing policies]

This data protection policy is linked to our:

- [Freedom of information publication scheme](#)
- [Safeguarding and Child Protection Policy](#)
- [Online safety Policy](#)
- [Acceptable Use Policy](#)

- **E-Safety Policy**
- **CCTV Policy**
- **Artificial Intelligence (AI) Policy**

Appendix 1: Personal data breach procedure

This procedure is based on [Breach response and monitoring | ICO](#) produced by the Information Commissioner's Office (ICO).

- On finding or causing a breach, or potential breach, the staff member or data processor must immediately notify the school's data protection representative **[Insert School Contact Name]** who will inform the DPO.
- The school's data protection representative and DPO will investigate the report and determine whether a breach has occurred. To decide, they will consider whether personal data has been accidentally or unlawfully:
 - Lost.
 - Stolen.
 - Destroyed.
 - Altered.
 - Disclosed or made available where it should not have been.
 - Made available to unauthorised people.
- Staff and governors will cooperate with the investigation (including allowing access to information and responding to questions). The investigation will not be treated as a disciplinary investigation.
- The school's data protection representative and DPO will alert the Headteacher and the Chair of Governors.
- The school's data protection representative and the DPO will make all reasonable efforts to contain and minimise the impact of the breach, assisted by relevant staff members or data processors where necessary. (Actions relevant to specific data types are set out at the end of this procedure).
- The data protection representative and DPO will assess the potential consequences (based on how serious they are and how likely they are to happen) before and after the implementation of steps to mitigate the consequences.
- The data protection representative and DPO will work out whether the breach must be reported to the ICO and the individuals affected using the ICO's [self-assessment tool](#)
- The DPO will work out whether the breach must be reported to the ICO. This must be judged on a case-by-case basis. To decide, the DPO will consider whether the breach is likely to negatively affect people's rights and freedoms, and cause them any physical, material or non-material damage (e.g. emotional distress), including through:
 - Loss of control over their data
 - Discrimination
 - Identify theft or fraud
 - Financial loss
 - Unauthorised reversal of pseudonymisation (for example, key-coding)
 - Damage to reputation
 - Loss of confidentiality
 - Any other significant economic or social disadvantage to the individual(s) concerned.

If it's likely that there will be a risk to people's rights and freedoms, the DPO must notify the ICO.

- The school's data protection representative and DPO will document the decision (either way), in case it is challenged at a later date by the ICO, or an individual affected by the breach. Documented decisions are stored on the school's computer network.
- Where the ICO must be notified, the DPO will do this via the ['report a breach' page](#) of the ICO website, or through its breach report line (0303 123 1113), within 72 hours of the school's awareness of the breach. As required, the DPO will set out:
 - A description of the nature of the personal data breach including, where possible:
 - The categories and approximate number of individuals concerned.
 - The categories and approximate number of personal data records concerned.
 - The name and contact details of the DPO.
 - A description of the likely consequences of the personal data breach.
 - A description of the measures that have been, or will be taken, to deal with the breach and mitigate any possible adverse effects on the individual(s) concerned.
- If all the above details are not yet known, the DPO will report as much as they can within 72 hours of the school's awareness of the breach. The report will explain that there is a delay, the reasons why, and when the DPO expects to have further information. The DPO will submit the remaining information as soon as possible.
- Where the school is required to communicate with individuals whose personal data has been breached, the DPO will tell them in writing. This notification will set out:
 - A description, in clear and plain language, of the nature of the personal data breach
 - The name and contact details of the DPO.
 - A description of the likely consequences of the personal data breach.
 - A description of the measures that have been, or will be, taken to deal with the data breach and mitigate any possible adverse effects on the individual(s) concerned.
- The school's data protection representative will notify any relevant third parties who can help mitigate the loss to individuals – for example, the police, insurers, banks, or credit card companies.
- The school's data protection representative will document each breach, irrespective of whether it is reported to the ICO. For each breach, this record will include the:
 - Facts and cause
 - Effects
 - Action taken to contain it and ensure it does not happen again (such as establishing more robust processes or providing further training for individuals)

Records of all breaches will be stored on the school's computer network in an appropriate log format.

- The school's data protection representative and DPO will review what happened and how it can be stopped from happening again. This review will happen as soon as reasonably possible.
- The school's data protection representative and Headteacher will meet regularly to assess recorded data breaches and identify any trends or patterns requiring action by the school to reduce the risk of future breaches.

Actions to minimise the impact of data breaches

We set out below the steps we might take to try and mitigate the impact of different types of data breach if they were to occur, focusing especially on breaches involving particularly risky or sensitive information. We will review the effectiveness of these actions and amend them as necessary after any data breach.

Sensitive information being disclosed via email (including safeguarding records)

- If special category data (sensitive information) is accidentally made available via email to unauthorised individuals, the sender must attempt to recall the email as soon as they become aware of the error.
- Members of staff who receive personal data sent in error must alert the sender and the school's data protection representative as soon as they become aware of the error.
- If the sender is unavailable or cannot recall the email for any reason, the school's data protection representative will ask the [ICT department/external IT support provider] to attempt to recall it from external recipients and remove it from the school's email system.
- In any cases where the recall is unsuccessful, the school's data protection representative will contact the relevant unauthorised individuals who received the email, explain that the information was sent in error, and request that those individuals delete the information and do not share, publish, save, or replicate it in any way.

Other types of breach that you might want to consider could include:

- Details of pupil premium interventions for named children being published on the school website.
- Non-anonymised pupil exam results or staff pay information being shared with governors.
- A school laptop containing non-encrypted sensitive personal data being stolen or hacked.
- The school's cashless payment provider being hacked, and parents' financial details stolen.
- Hardcopy reports sent to the wrong families.

Appendix 2: Retention Schedule



UK GDPR Data Retention Schedule

School supported by:



GDPR DPO Service provided by The ICT Service

dpo@theictservice.org.uk | 0300 300 0000
www.theictservice.org.uk/gdpr-dpo-service

Training available upon request

All items have been extracted from various suppliers (however, is primarily sourced from the IRMS). This schedule is NOT statutory, it is for 'guidance' purposes only. Schools and Academies can adopt/edit/add to meet their organisational requirements. Please note that we will no longer be producing 'separate' schedules (Maintained/Academies), we will ensure all requirements are included in one resource.

This schedule will be reviewed annually or as required. The reference numbers included are for our reference purposes and will allow us to easily identify what items have been edited or updated.

Contents

Contracts	23
1: Contracts.....	23
Education Management	25
2: Education Management – Management Information	25
3: Education Management – Policies and Frameworks	25
4: Education Management – Strategy	27
5: Examinations	28
6: Extra Curriculum and Miscellaneous Activities	30
Finance	31
7: Finance - Funding	31
8: Finance - Operational	33
9: Finance – Risk Management and Insurance	34
10: Finance – School Fund	37
11: Finance – School Meals.....	38
12: Finance – Strategic Finance	38
Governing Bodies	40
13: Governing Bodies – Activities.....	40
14: Governing Bodies – Governance	40
15: Governing Bodies – Governors, Directors and Trustees.....	44
16: Governing Bodies – Meetings	46
Miscellaneous Categories	50
17: Health and Safety	50
18: Liaison with LEA - DfE.....	53

19: Parent Teacher Association	54
20: Property	54
21: Pupils and Students	55
22: School Admissions	57
23: School Assets	60
24: School Management	61
25: Special Education Needs and Disabilities.....	65
Teachers and Staff.....	66
26: Teachers and Staff Disciplinary.....	66
27: Teachers and Staff Pay and Pensions	69
28: Teachers and Staff Recruitment.....	75
29: Teachers and Staff Safeguarding	79
30: Teachers and Staff – Staff Management	79
31: Teaching and the Curriculum.....	82
32: Transport Educational.....	83
33: Welfare	85
Additional Tables for items not already included in this schedule.	88

Contracts

1: Contracts

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
1.01	All records relating to the management of contracts under seal	No	Last payment on the contract + 12 years or end of contract + 12 years, whichever is the longer	Limitation Act 1980	SECURE DISPOSAL
Notes					
1.02	All records relating to the management of contracts under signature	No	Last payment on the contract + 6 years or end of contract + 6 years whichever is the longer	Limitation Act 1980	SECURE DISPOSAL
Notes					
1.03	Records relating to the management of contracts with external providers	No	End of contract + 6 years or date of last payment on contract + 6 years whichever is the longer		SECURE DISPOSAL
Notes					
1.04	Records relating to the monitoring of contracts	No	End of the contract or until the final payment has been made whichever is the longer		SECURE DISPOSAL
Notes					
1.05	All records relating to the maintenance of the school carried out by contractors	No	Current year + 6 years. This may vary on the type of maintenance. Records relating to rewiring, major alterations etc must be retained in the health and safety file whilst the building belongs to the school and must		SECURE DISPOSAL

			be passed onto any new owners if the building is leased or sold.		
Notes					
1.06	All records relating to the maintenance of the school carried out by school employees, including maintenance logbooks	No	Life of equipment + 6 years. Alterations to wiring and major modifications must be entered into the health and safety file		SECURE DISPOSAL
Notes					
1.07	Records relating to the management of software licences	No	Date licence expires + 6 years		SECURE DISPOSAL
Notes					

Education Management

2: Education Management – Management Information

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
2.01	Published Admission Number (PAN) reports	Yes	Current year + 6 years		SECURE DISPOSAL
Notes					
2.02	Curriculum returns	No	Current year + 3 years		SECURE DISPOSAL
Notes					
2.03	Self-evaluation forms	Yes	Current year + 6 years		SECURE DISPOSAL
Notes					
2.04	Self Evaluation Forms - External moderation	Yes	Until superseded		SECURE DISPOSAL
Notes					
2.05	Self Evaluation Forms - Internal moderation	Yes	Academic year plus one academic year		SECURE DISPOSAL
Notes					
2.06	Value added and contextual data	Yes	Current year + 6 years		SECURE DISPOSAL
Notes					

3: Education Management – Policies and Frameworks

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
3.01	Complaints Policy	No	Life of the policy or policy superseded + 3 years. If major		SECURE DISPOSAL

			changes are made to the policy then an archive copy of previous policies should be retained		
Notes					
3.02	Data Protection Policy	No	Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained		SECURE DISPOSAL
Notes					
3.03	Freedom of Information Policy	No	Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained		SECURE DISPOSAL
Notes					
3.04	Information Security Breach Policy	No	Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained		SECURE DISPOSAL
Notes					
3.05	Special Educational Needs Policy	No	Life of the policy or policy superseded + 3 years. If major changes are made to the policy then an archive copy of previous policies should be retained		SECURE DISPOSAL

Notes					
3.06	Equality Information and Objectives (public sector equality duty). Statement for publication	No	Life of statement or date statement superseded + 3 years		SECURE DISPOSAL
Notes					
3.07	Risk and Control Framework	No	Life of framework or framework superseded + 3 years. If major changes are made to the framework then an archive copy of previous policies should be retained		SECURE DISPOSAL
Notes					
3.08	Rules and Bylaws	No	Life of rules or bylaws or rules or bylaws superseded + 3 years. If major changes are made to the rules or bylaws then an archive copy of previous policies should be retained		SECURE DISPOSAL
Notes					

4: Education Management – Strategy

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
4.01	Strategic Review	No	Life of the review or until review superseded + 3 years. If major changes are made to the review then an archive		SECURE DISPOSAL

			copy of previous review should be retained		
Notes					
4.02	Strategic Plan [also known as School Development Plans]	No	Life of plan or until plan superseded + 3 years.If major changes are made to the plan then an archive copy of previous plans should be retained		SECURE DISPOSAL
Notes					
4.03	Accessibility Plan	No	Life of plan or plan superseded + 3 years the review. If major changes are made to the plan then an archive copy of previous policies should be retained	Equality Act 2010	SECURE DISPOSAL
Notes					

5: Examinations

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
5.01	SATs records Examination papers	Yes	The examination papers should be kept until any appeals/validation process is complete		SECURE DISPOSAL
Notes					
5.02	SATs records Results	Yes	The SATS results should be recorded on the pupils educational file and will therefore be retained until the		SECURE DISPOSAL

			pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison		
Notes					
5.03	Examination Results Pupil Copies: Public	Yes	This information should be added to the pupil file		Schools should follow the instructions of the Examination Board about disposing of uncollected certificates
Notes					
5.04	Examination results pupil copies: Internal	Yes	This information should be added to the pupil file		
Notes					
5.05	Examination results (schools' copy)	Yes	Current year + 6 years		SECURE DISPOSAL
Notes					
5.06	Management of examination registrations	Yes	The examination board will usually mandate how long these records need to be retained		SECURE DISPOSAL
Notes					

6: Extra Curriculum and Miscellaneous Activities

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
6.01	Records created by schools in order to obtain approval to run an educational visit outside the classroom - Primary schools	No	Date of Visit + 15 years	Limitation Act 1980	SECURE DISPOSAL
Notes					
6.02	Records created by schools in order to obtain approval to run an educational visit outside the classroom - Secondary schools	No	Date of Visit + 15 years	Limitation Act 1980	SECURE DISPOSAL
Notes					
6.03	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 date of birth + 25 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		SECURE DISPOSAL
Notes	One-off or blanket consent: The Department for Education (DfE) has prepared a one-off consent form to be signed by the parent on enrolment of their child in a school. This form is intended to cover all types of visits and activities where parental consent is required. The form is available on the DfE website for establishments to adopt and adapt, as appropriate, at https://www.gov.uk/government/publications/consent-for-school-trips-and-other-off-site-activities . A similar form could be used for other establishments, such as Early Years Foundation Stage (EYFS) providers and youth groups, or at the start of programmes for young people.				

6.04	Parental permission slips for school trips where there has been a major incident	Yes	Date of birth of the pupil involved in the incident + 25 years or 15 years after the incident whichever is the longer. The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils	Limitation Act 1980	SECURE DISPOSAL
Notes					
6.05	Records relating to residential trips	Yes	Date of birth of youngest pupil involved + 25 years or if there is a major incident then date of incident + 15 years whichever is the longer	Limitation Act 1980	SECURE DISPOSAL
Notes					

Finance

7: Finance - Funding

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
7.01	Funding Agreement with Secretary of State and supplemental funding agreements [Where there is multi-Academy governance.]	No	Date of last payment of funding + 6 years		SECURE DISPOSAL
Notes					

7.02	Funding Agreement Termination of the funding agreement	No	Date of last payment of funding + 6 years		SECURE DISPOSAL
Notes	Either party may give not less than 7 financial years written notice to terminate the Agreement, such notice to expire on 31 August. Or, where the Academy has significant financial issues or is insolvent, the Agreement can be terminated by the Secretary of State to take effect on the date of the notice.				
7.03	Funding Records Capital Grant	No	Date of last payment of funding + 6 years		SECURE DISPOSAL
Notes					
7.04	Funding Records Earmarked Annual Grant (EAG)	No	Date of last payment of funding + 6 years		SECURE DISPOSAL
Notes					
7.05	Funding Records General Annual Grant (GAG)	No	Date of last payment of funding + 6 years		SECURE DISPOSAL
Notes					
7.06	Per pupil funding records	No	Date of last payment of funding + 6 years		SECURE DISPOSAL
Notes					
7.07	Funding records	No	Date of last payment of funding + 6 years		SECURE DISPOSAL
Notes	Funding agreement which says that the Academy can receive donations and can only charge where the law allows maintained schools to charge [see Charging and Remission Policy].				
7.08	Gift Aid and Tax Relief	Yes	Date of last payment of funding + 6 years		SECURE DISPOSAL
Notes					
7.09	Exclusions agreement	No	Date of last payment of funding + 6 years		SECURE DISPOSAL
Notes	The Academy can enter into an arrangement with a Local Authority (LA), so that payment will flow between the Academy and the LA, in the same way as it would do were the Academy a maintained school.				

7.10	Records relating to loans	No	Date of last payment on loan + 6 years if the loan is under 10,000 or date of last payment on loan + 12 years if the loan is over 10,000		SECURE DISPOSAL
Notes					
7.11	Management of Endowment Funds	No	Life of the fund + 6 years		SECURE DISPOSAL
Notes					
7.12	Investment policies	No	Life of the investment + 6 years		SECURE DISPOSAL
Notes					
7.13	Pupil Premium Fund records	Yes	Date pupil leaves the provision + 6 years		SECURE DISPOSAL
Notes					
7.14	Student Grant applications	Yes	Current year + 3 years		SECURE DISPOSAL
Notes					

8: Finance - Operational

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
8.01	Invoices, receipts, order books and requisitions, delivery notices	No	Current financial year + 6 years		SECURE DISPOSAL
Notes					
8.02	Records relating to the collection and banking of monies	No	Current financial year + 6 years		SECURE DISPOSAL
Notes					

8.03	Records relating to the identification and collection of debt	Yes	Payment or write off of debt + 6 years		SECURE DISPOSAL
Notes					

9: Finance – Risk Management and Insurance

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
9.01	Employers Liability Insurance Certificate	No	Year of issue + 40 years. Pass to the Local Authority if the school closes	EXPLANATORY NOTE (This note is not part of the Regulations) These Regulations amend the Employers' Liability (Compulsory Insurance) Regulations 1998 (the 1998 Regulations). Regulation 2(1) omits paragraphs (4) and (5) from regulation 4 of the 1998 Regulations. Paragraph (4) required an employer to retain a copy of its employer liability insurance certificate for 40 years. Paragraph (5) was a consequential provision to paragraph (4), providing for the retention of certificates, and is therefore also being omitted. Paragraph (3) substitutes paragraphs (1) and (2) of regulation 5 of the 1998 Regulations. Under the new provisions,	SECURE DISPOSAL

				the requirements for the display of the certificate will be satisfied if the certificate is made available in electronic form and is reasonably accessible to the relevant employees. Paragraph (4) makes a consequential amendment to regulation 6(b) of the 1998 Regulations.	
Notes					
9.02	Insurance policies	No	Date the policy expires + 6 years except Public Liability insurance - day of issue + 40 years	EXPLANATORY NOTE (This note is not part of the Regulations) These Regulations amend the Employers' Liability (Compulsory Insurance) Regulations 1998 (the 1998 Regulations). Regulation 2(1) omits paragraphs (4) and (5) from regulation 4 of the 1998 Regulations. Paragraph (4) required an employer to retain a copy of its employer liability insurance certificate for 40 years. Paragraph (5) was a consequential provision to paragraph (4), providing for the retention of certificates, and is therefore also being omitted. Paragraph (3)	SECURE DISPOSAL

				substitutes paragraphs (1) and (2) of regulation 5 of the 1998 Regulations. Under the new provisions, the requirements for the display of the certificate will be satisfied if the certificate is made available in electronic form and is reasonably accessible to the relevant employees. Paragraph (4) makes a consequential amendment to regulation 6(b) of the 1998 Regulations.	
Notes					
9.03	Records relating to the settlement of insurance claims	Yes	Date claim settled + 6 years		SECURE DISPOSAL
Notes					
9.04	Burglary, theft and vandalism report forms	Yes	Current year + 6 years		SECURE DISPOSAL
Notes					
9.05	Audit Committee and appointment of responsible officers	No	As long as necessary		SECURE DISPOSAL
Notes	Life of Academy. Under the Companies Act members can have their details removed after a certain time. Details should be removed on request.				

10: Finance – School Fund

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
10.01	School Fund Ledger	Yes [ledger may contain names of people in receipt of grants]	Current financial year + 6 years		SECURE DISPOSAL
Notes					
10.02	Whole of government accounts returns	No	Current financial year + 6 years		SECURE DISPOSAL
Notes					
10.03	School Fund Journey books	No	Current financial year + 6 years		SECURE DISPOSAL
Notes					
10.04	School Fund Invoices	No	Current financial year + 6 years		SECURE DISPOSAL
Notes					
10.05	School Fund Receipts	No	Current financial year + 6 years		SECURE DISPOSAL
Notes					
10.06	School Fund Bank statements	No	Current financial year + 6 years		SECURE DISPOSAL
Notes					
10.07	School Fund Cheque books	No	Current financial year + 1 year		SECURE DISPOSAL
Notes					
10.08	School Fund Paying in books	No	Current financial year + 6 years		SECURE DISPOSAL

Notes	
--------------	--

11: Finance – School Meals

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
11.01	Free school meals registers	Yes	Current financial year + 3 years		SECURE DISPOSAL
Notes					
11.02	School meals summary sheets	No	Current financial year + 6 years		SECURE DISPOSAL
Notes					
11.03	School meals registers	Yes	Current financial year + 3 years		SECURE DISPOSAL
Notes					

12: Finance – Strategic Finance

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
12.01	Annual accounts	No	Current year + 6 years		SECURE DISPOSAL
Notes					
12.02	All records relating to the creation and management of budgets, including the Annual Budget statement and background papers	No	Life of the budget + 3 years		SECURE DISPOSAL
Notes					

12.03	Statement of financial activities for the year	No	Current financial year + 6 years		SECURE DISPOSAL
Notes					
12.04	Financial Planning	No	Current financial year + 6 years		SECURE DISPOSAL
Notes					
12.05	Value for money statement	No	Current financial year + 6 years		SECURE DISPOSAL
Notes					
12.06	Borrowing powers	No	Until superseded + 6 years		SECURE DISPOSAL
Notes					
12.07	Charging and remissions policy	No	Date policy superseded + 3 years		SECURE DISPOSAL
Notes					
12.08	Independent Auditors report on regularity	No	Financial year report relates to + 6 years		SECURE DISPOSAL
Notes					
12.09	Independent Auditors report on financial statements	Yes	Financial year report relates to + 6 years		SECURE DISPOSAL
Notes					
12.10	Records relating to the management of VAT	No	Current financial year + 6 years		SECURE DISPOSAL
Notes					

Governing Bodies

13: Governing Bodies – Activities

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
13.01	Records relating to Governor Monitoring Visits	Yes	Date of the visit + 3 years		SECURE DISPOSAL
Notes					

14: Governing Bodies – Governance

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
14.01	Constitution	No	Date constitution superseded + 10 years. It may be appropriate to retain one copy of each constitution for archival purposes	Companies Act 2006 section 355	SECURE DISPOSAL
Notes	Companies Act 2006 Section 355: This section refers to Records of Resolutions and meetings etc. it does not mention Constitutions. Resolutions and minutes under this section to be retained for at least 10 years from date of meeting or decision as appropriate (Section 355 (2))				
14.02	Articles of Association	No	Life of the Academy		SECURE DISPOSAL
Notes					
14.03	Memorandum of Association	No	This can be disposed of once the Academy has been incorporated		SECURE DISPOSAL
Notes					
14.04	Memorandum of Understanding of Shared Governance among Schools	No	Life of Memorandum of Understanding + 6 years		SECURE DISPOSAL

Notes					
14.05	Governance Statement	No	Life of governance statement + 6 years. One copy of each iteration may need to be retained for archive purposes		SECURE DISPOSAL
Notes					
14.06	Written Scheme of Delegation	Yes	Life of Written Scheme of Delegation + 10 years	Companies Act 2006 section 355	SECURE DISPOSAL
Notes					
14.07	Special Resolutions to amend the Constitution	No	Date constitution superseded + 10 years. It may be appropriate to retain one copy of each constitution for archival purposes	Companies Act 2006 section 355	SECURE DISPOSAL
Notes	Companies Act 2006 section 355 Section 355: This section refers to. Records of Resolutions and meetings etc. it does not mention. Constitutions. Resolutions and minutes under this section to be retained for at least 10 years from date of meeting or decision as appropriate (Section 355 (2))				
14.08	Annual Report and Accounts	No	Date of report + 10 years	Companies Act 2006 section 355	SECURE DISPOSAL
Notes					
14.09	Annual Report Trustees Report	No	Date of report + 10 years	Companies Act 2006 section 355	SECURE DISPOSAL
Notes					
14.10	Annual Reports created under the requirements of the Education (Governors Annual Reports) (England) (Amendment) Regulations 2002	No	Date of report + 10 years		SECURE DISPOSAL

Notes					
14.11	Annual Return	No	Date of report + 10 years	Companies Act 2006 section 355	SECURE DISPOSAL
Notes					
14.12	Instruments of Government	No	For the life of the school		Consult local archives before disposal
Notes					
14.13	Register of Directors	Yes	Date Director resigns + 10 years	Companies Act 2006	SECURE DISPOSAL
Notes	Companies Act Section 121 Removal of entries relating to former members. An entry relating to a former member of the company may be removed from the register after the expiration of ten years from the date on which he / she ceased to be a member				
14.14	Scheme of Delegation and Terms of Reference for Committees	No	Until superseded or whilst relevant [Schools may wish to retain these records for reference purposes in case decisions need to be justified]		These could be offered to the archives if appropriate
Notes					
14.15	Trusts and Endowments managed by the Governing Body	Yes	Life of the Trust or Endowment + 6 years		SECURE DISPOSAL
Notes					
14.16	Records relating to complaints dealt with by the Governing Body Annual Report and Accounts	Yes	Date complaint resolved + 3 years then review. If the complaint relates to negligence or safeguarding then date the complaint resolved + 15 years. If the		SECURE DISPOSAL

			complaint relates to child sexual abuse then the complaint resolved + 75 years (this retention period will be reviewed once the government and the ICO have issued guidance about the implementation of the IICSA recommendations)		
Notes					
14.17	All records relating to the conversion of schools to Academy status	No	For the life of the organisation	Companies Act 2006 section 355	Consult local archives before disposal
Notes					
14.18	Policy documents created and administered by the Governing Body	No	Until superseded. The School should consider keeping all policies relating to safeguarding, child protection or other pupil related issues such as exclusion until the government and ICO have published guidance about the implementation of the recommendations made in the IICSA report		SECURE DISPOSAL
Notes					

15: Governing Bodies – Governors, Directors and Trustees

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
15.01	Appointment of Trustees and Governors and Directors	Yes	Life of appointment + 6 years	Companies Act 2006 section 355	SECURE DISPOSAL
Notes					
15.02	Records relating to the election of parent and staff governors not appointed by the governors	Yes	Date of election + 6 months		SECURE DISPOSAL
Notes					
15.03	Records relating to the appointment of co-opted governors	Yes	Provided that the decision has been recorded in the minutes the records relating to the appointment can be destroyed once the co-opted governor has finished their term of office except where there have been allegations concerning children. In this case retain for 25 years. Statutory Provisions		SECURE DISPOSAL
Notes					
15.04	Records relating to the terms of office of serving governors including evidence of appointment	Yes	Date appointment ceases plus 6 years except where there have been allegations concerning children. In this case retain for 25 years.		SECURE DISPOSAL
Notes					

15.05	Records relating to Governor Declaration against disqualification criteria	Yes	Date appointment ceases plus 6 years		SECURE DISPOSAL
Notes					
15.06	Governors Code of Conduct	No	This is expected to be a dynamic document, one copy of each version should be kept for the life of the organisation		SECURE DISPOSAL
Notes					
15.07	Records relating to DBS checks carried out on clerk and members of the governing body	Yes	Date of DBS check + 6 months (but need to retain a record of the date of the DBS check if you are renewing every 3-5 years depending on policy)		SECURE DISPOSAL
Notes					
15.08	Governor personnel files	Yes	Date appointment ceases plus 6 years except where there have been allegations concerning children. In this case retain for 25 years		SECURE DISPOSAL
Notes					
15.09	Records relating to the induction programme for new governors	Yes	Date appointment ceases plus 6 years		SECURE DISPOSAL
Notes					
15.10	Records relating to the training required and received by Governors	Yes	Date Governor steps down + 6 years		SECURE DISPOSAL
Notes					

15.11	Appointment and removal of Members	No	Life of appointment + 6 years		SECURE DISPOSAL
Notes					
15.12	Register of members	Yes	Date Member resigns + 10 years	Companies Act 2006	SECURE DISPOSAL
Notes					
15.13	Statement of Trustees Responsibilities	No	Life of statement + 6 years		SECURE DISPOSAL
Notes					
15.14	Register of Trustees interests	Yes	Date Trustee resigns + 10 years	Companies Act 2006	SECURE DISPOSAL
Notes					
15.15	Declaration of Interests Statements [Governors] [this is not a statutory register]	Yes	Date Governor resigns + 10 years		SECURE DISPOSAL
Notes					

16: Governing Bodies – Meetings

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
16.01	Board Meeting Minutes	Yes	Minutes must be kept for at least 10 years from the date of the meeting	Companies Act 2006 section 248	OFFER TO ARCHIVES
Notes					
16.02	Board Decisions	Could be if the decisions refer to living individuals	Date of the meeting + a minimum of 10 years		OFFER TO ARCHIVES
Notes					

16.03	Board Meeting: Annual Schedule of Business	No	Current year		SECURE DISPOSAL
Notes					
16.04	Board Meeting: Procedures for conduct of meeting	No	Date procedures superseded + 6 years	Limitation Act 1980 (Section 2)	SECURE DISPOSAL
Notes					
16.05	Records relating to the management of General Members Meetings	No	Minutes must be kept for at least 10 years from the date of the meeting	Companies Act 2006 section 248	OFFER TO ARCHIVES
Notes					
16.06	Minutes relating to any committees set up by the Board of Directors	Could be if the minutes refer to living individuals	Date of the meeting + a minimum of 10 years		OFFER TO ARCHIVES
Notes					
16.07	Records relating to the management of the Annual General Meeting	Could be if the minutes refer to living individuals	Minutes must be kept for at least 10 years from the date of the meeting	Companies Act 2006 section 248	OFFER TO ARCHIVES
Notes					
16.08	Meetings Schedule	No	Current year		STANDARD DISPOSAL
Notes					
16.09	Agendas for Governing Body meetings	May be data protection issues, if the meeting is dealing with confidential	One copy should be retained with the master set of minutes. All other copies can be disposed of		SECURE DISPOSAL

		issues relating to staff			
Notes					
16.10	Agendas Additional Copies	No	Date of meeting		STANDARD DISPOSAL
Notes					
16.11	Minutes of, and papers considered at, meetings of the Governing Body and its committees: Principal Set (signed)	May be data protection issues, if the meeting is dealing with confidential issues relating to staff	Date of meeting + 10 years		OFFER TO ARCHIVES
Notes					
16.12	Minutes of, and papers considered at, meetings of the Governing Body and its committees: Inspection Copies	Yes - May have names and personal issues unless redacted	Date of meeting + 10 years		SECURE DISPOSAL
Notes					
16.13	Reports presented to the Governing Body	Yes	Date of meeting the report was presented to + 10 years		SECURE DISPOSAL or retain with the signed set of minutes
Notes					
16.14	Reports made to the Governors Meeting which are referred to in the minutes	Potential	Although generally kept for the life of the organisation, the Local Authority is only required to make these	Companies Act 2006	Consult local archives before disposal

			available for 10 years from the date of the meeting.		
Notes					
16.15	Register of attendance at Full Governing Board meetings	Yes	Date of last meeting in the book + 6 years		SECURE DISPOSAL
Notes					
16.16	Papers relating to the management of the Annual Parents Meeting	Yes	Date of meeting + 6 years		SECURE DISPOSAL
Notes					

Miscellaneous Categories

17: Health and Safety

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
17.01	Health and Safety policy statements	No	Life of policy + 3 years		SECURE DISPOSAL
Notes					
17.02	Health and safety file to show current state of building including all alterations (wiring, plumbing, building works etc) and to be passed on in the case of change of ownership)	No	Pass to new owner on sale or transfer of building		
Notes					
17.03	Fire precautions log books	No	Current year + 6 years		SECURE DISPOSAL
Notes					
17.04	Fire risk assessments	No unless containing Personal Emergency Evacuation plans	Life of the risk assessment + 3 years	Fire Service Order 2005	SECURE DISPOSAL
Notes					
17.05	Accident reporting: Adults	Yes	Date of last entry in the accident book + 3 years but if there is possibility of negligence allegation then date of incident + 15 years or date of settlement + 6 years	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration	SECURE DISPOSAL

				Act 1992 Section 8. Limitation Act 1980	
Notes	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as below 17.09 Do not keep completed entries in the book. They must be removed and kept in a locked location.				
17.06	Records relating to accident/injury at work including incident reports	Yes	Date of incident plus 6 years unless the injury is serious - broken limb, more than 3 days in hospital etc then date of incident plus 15 years (Negligence)		SECURE DISPOSAL
Notes					
17.07	Accident reporting: Children	Yes	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as below 17.09 Do not keep completed entries in the book. They must be removed and kept in a locked location.	Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980	SECURE DISPOSAL
Notes	The official Accident Book must be retained for 3 years after the last entry in the book. The book may be in paper or electronic format The incident reporting form may be retained as below [see also the incident reporting form]				
17.08	Control of Substances Hazardous to Health (COSHH)	No	COSHH sheets should be kept whilst the substance is in use + 6 years COSHH policy documents should be kept		SECURE DISPOSAL

			until the policy is superseded + 6 years		
Notes					
17.09	Records relating to any reportable death, injury, disease or dangerous occurrence (RIDDOR)	Yes	Date of incident + 3 years provided that all records relating to the incident are held on personnel file. See 17.05 and 17.07	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 SI 2013 No 1471 Regulation 12(2)	SECURE DISPOSAL
Notes	17.09 For more information see: http://www.hse.gov.uk/RIDDOR/ https://www.hse.gov.uk/pubns/edis1.htm concerns schools				
17.10	Health and Safety risk assessments	No	Life of risk assessment + 3 years		SECURE DISPOSAL
Notes					
17.11	Process of monitoring of areas where employees and persons have or are likely to have come into contact with asbestos	Yes	Last action + 40 years	Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19	SECURE DISPOSAL
Notes					
17.12	Process of monitoring of areas where employees and persons are likely to have come into contact with radiation: Dose assessment and recording	No	2 years from the date on which the examination was made and that the record includes the condition of the equipment at the time of the examination. To keep the records made and maintained or a copy of these records until the person to whom the record	The Ionising Radiations Regulation 2017	SECURE DISPOSAL

			relates has or would have attained the age of 75 years but in any event for at least 30 years from when the record was made		
Notes					

18: Liaison with LEA - DfE

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
18.01	OFSTED reports and papers	No	Life of the report then REVIEW		SECURE DISPOSAL
Notes					
18.02	Returns made to central government	No	Current year + 6 years		SECURE DISPOSAL
Notes					
18.03	School census returns	No	Current year + 5 years		SECURE DISPOSAL
Notes					
18.04	Circulars and other information sent from the Local Authority	No	Operational use		SECURE DISPOSAL
Notes					
18.05	Circulars and other information sent from central government	No	Operational use		SECURE DISPOSAL
Notes					
18.06	Attendance returns	Yes	Academic year + 1 year		SECURE DISPOSAL
Notes					
18.07	Secondary transfer sheets (Primary)	Yes	Academic year + 2 years		SECURE DISPOSAL

Notes	
--------------	--

19: Parent Teacher Association

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
19.01	Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations	Yes	Current year + 6 years then REVIEW		SECURE DISPOSAL
Notes					

20: Property

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
20.01	Title deeds of properties belonging to the school	No	These should follow the property, unless the property has been registered with the Land Registry		Transfer to new owner
Notes					
20.02	Plans of property belonging to the school, including any alterations. This is also a health and safety requirement and includes rewiring diagrams and additional fire safety features	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		Pass to next owner
Notes					

20.03	Leases of property leased by or to the school	No	Expiry of lease + 6 years		SECURE DISPOSAL
Notes					
20.04	Business continuity and disaster recovery plans	Yes	These are dynamic documents which should be kept up to date		SECURE DISPOSAL OF OLD PLANS
Notes					
20.05	Records relating to the letting of school premises	No	Current financial year + 6 years		SECURE DISPOSAL
Notes					

21: Pupils and Students

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
21.01	Pupils Educational Record required by The Education (Pupil Information) (England) Regulations 2005: Primary	Yes	Retain whilst the child remains at the primary school	The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437	The file should follow the pupil when they leave the primary school. This will include: To another primary school To a secondary school To a pupil referral unit If the pupil dies whilst at primary school, the file should be returned to the LA to be retained for the

					statutory retention period. If the pupil transfers to an independent school, transfers to home schooling or leaves the country, the school should discuss with the local authority about where the file should be stored for the remainder of its statutory retention
Notes					
21.02	Pupils Educational Record required by The Education (Pupil Information) (England) Regulations 2005: Secondary	Yes	Date of birth of the pupil + 30 years	Limitation Act 1980 (Section 2)	SECURE DISPOSAL
Notes	Section 2: Time limit for actions founded on tort. An action founded on tort shall not be brought after the expiration of 6 years from the date on which the cause of action accrued				
21.03	Attendance registers	Yes	Every entry in the attendance register must be preserved for a period of 6 years after the date on which the entry was made. Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates.	School attendance Guidance for maintained schools, academies, independent schools and local authorities [updated and re-published annually] School Attendance	SECURE DISPOSAL

				(Pupil Registration) (England) Regulations 2024	
Notes	Revokes SI 2006 No 1751; SI 2010 No 1725; SI 2011 No 1625; SI 2013 No 756; SI 2016 No 792; SI 2020 No 544; SI 2020 No 816; SI 2021 No 852				
21.04	Correspondence relating to any absence (authorised or unauthorised)	Potential	Current academic year + 2 years	Education Act 1996 Section 7	SECURE DISPOSAL
Notes					

22: School Admissions

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
22.01	All records relating to the creation and implementation of the School Admissions Policy	No	Life of the policy + 7 years. 15(2) of the regulation refers to the 7 preceding years	School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels	SECURE DISPOSAL
Notes					

22.02	Register of admissions	Yes	<p>Every entry in the attendance register must be preserved for a period of 6 years after the date on which the entry was made.</p> <p>Every back up copy of the register is to be preserved for 6 years after the end of the school year to which it relates.</p>	<p>School attendance: Departmental advice for maintained schools, Academies, independent schools and local authorities.</p> <p>School Attendance (Pupil Registration) (England) Regulations 2024</p>	REVIEW Schools may wish to consider keeping the admission register permanently, as often schools receive enquiries from past pupils to confirm the dates they attended the school
Notes	Revokes SI 2006 No 1751; SI 2010 No 1725; SI 2011 No 1625; SI 2013 No 756; SI 2016 No 792; SI 2020 No 544; SI 2020 No 816; SI 2021 No 852				
22.03	Admissions if the appeal is unsuccessful	Yes	Resolution of case + 1 year	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels	SECURE DISPOSAL
Notes					
22.04	Admissions if the admission is successful	Yes	Date of admission + 1 year	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels	SECURE DISPOSAL
Notes					

22.05	Admissions Secondary Schools Casual	Yes	Current academic year + 1 year		SECURE DISPOSAL
Notes					
22.06	Proofs of address supplied by parents as part of the admissions process	Yes	Current academic year + 1 year	School Admissions Code Statutory Guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels	SECURE DISPOSAL
Notes					
22.07	Supplementary information form, including additional information such as religion and medical conditions: For successful admissions	Yes	This information should be added to the pupil file		As per pupil file
Notes					
22.08	Supplementary information form, including additional information such as religion and medical conditions: For unsuccessful admissions.	Yes	Until appeals process completed		SECURE DISPOSAL
Notes					
22.09	Records relating to the management of exclusions	Yes	Date of birth of the pupil involved + 25 years		SECURE DISPOSAL
Notes					

23: School Assets

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
23.01	Community School leases for land	No	Date lease expires + 6 years		SECURE DISPOSAL
Notes					
23.02	Commercial transfer arrangements	No	Date of transfer + 6 years		SECURE DISPOSAL
Notes					
23.03	Transfer of land to the Academy Trust	No	Life of land ownership then transfer to new owner		SECURE DISPOSAL
Notes					
23.04	Transfers of freehold land	No	Life of land ownership then transfer to new owner		SECURE DISPOSAL
Notes					
23.05	Records relating to the leasing of shared facilities, such as sports centres	No	End of lease + 6 years		SECURE DISPOSAL
Notes					
23.06	Land and building valuations	No	Date valuation superseded + 6 years		SECURE DISPOSAL
Notes					
23.07	Disposal of assets	No	Date asset disposed of + 6 years		SECURE DISPOSAL
Notes					
23.08	Burglary, theft and vandalism report forms	No	Date of insurance settlement + 6 years		SECURE DISPOSAL
Notes					

23.09	Inventories of furniture and equipment	No	Life of equipment + 6 years. Equipment will have write-down value over several years - the time depending on the type of equipment		SECURE DISPOSAL
Notes					

24: School Management

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
24.01	Logbooks of activity in the school maintained by the Head Teacher	There may be data protection issues if the logbook 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
Notes					
24.02	Visitor Management Systems (including electronic systems, visitor's books and signing in sheets)	Yes	Academic Year + 1 year [Schools may decide to archive one copy]		SECURE DISPOSAL
Notes					
24.03	School Privacy Notice which is sent to parents	No	Life of the privacy notice/until the		SECURE DISPOSAL

	as part of GDPR compliance		privacy notice plus 6 years		
Notes					
24.04	Consents relating to school activities as part of GDPR compliance (for example, consent to be sent circulars or mailings)	Yes	Consents should be retained for as long as the consent is relied on.		SECURE DISPOSAL
Notes					
24.05	Records relating to the creation and distribution of circulars to staff, parents or pupils	No	Current year + 1 year		STANDARD DISPOSAL
Notes	Schools should decide whether items published on the school website are retained as an archive or whether they should be deleted at the same time as the master copy				
24.06	Minutes of Senior Management Team meetings and 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
Notes					
24.07	Reports created by the Head Teacher or the	There may be data protection issues if the	Date of the report + a minimum of 3 years then REVIEW		SECURE DISPOSAL

	Management Team	report refers to individual pupils or members of staff			
Notes					
24.08	Records created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the records refer to individual pupils or members of staff	Current academic year + 3 years then REVIEW		SECURE DISPOSAL
Notes					
24.09	Correspondence created by Head Teachers, Deputy Head Teachers, heads of year and other members of staff with administrative responsibilities	There may be data protection issues if the correspondence refers to individual pupils or members of staff	Date of correspondence + 3 years then REVIEW		SECURE DISPOSAL
Notes					
24.10	Management of complaints	Yes	Date complaint resolved + 3 years then review. If the complaint relates to negligence or safeguarding, then		SECURE DISPOSAL

			date the complaint resolved + 15 years. If the complaint relates to child sexual abuse, then the complaint resolved + 75 years (this retention period will be reviewed once the government and the ICO have issued guidance about the implementation of the IICSA recommendations)		
Notes					
24.11	Newsletters and other items with a short operational use	No	Current year + 1 year		SECURE DISPOSAL
Notes	Schools should decide whether items published on the school website are retained as an archive or whether they should be deleted at the same time as the master copy				
24.12	Records relating to the creation and publication of the school brochure or prospectus	No	Current year + 3 years. Schools should consider archiving one copy for historical reasons		STANDARD DISPOSAL
Notes					

25: Special Education Needs and Disabilities

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
25.01	Special Educational Needs files, reviews and Individual Education Plans	Yes	Date of birth of the pupil + 30 years	Limitation Act 1980	SECURE DISPOSAL
Notes					
25.02	Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement	Yes	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] unless the document is subject to a legal hold then 6 years after legal action ended	Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1	SECURE DISPOSAL
Notes	IICSA recommendations awaited. This would also apply to Educational Health Care Plans, however, timescales would be 30 years plus current. Item currently under review				
25.03	Advice and information provided to parents regarding educational needs	Yes	Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] unless the document is subject to a legal hold then date legal action ceases + 6 years	Special Educational Needs and Disability Act 2001 Section 2	SECURE DISPOSAL
Notes	This retention period will be reviewed once the government and the Information Commissioner have published guidance about implementing the recommendations made by IICSA.				
25.04	Accessibility strategy		Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] unless the document is subject to a legal hold then date legal action ceases + 6 years	Special Educational Needs and Disability Act 2001 Section 14	

Notes	This retention period will be reviewed once the government and the Information Commissioner have published guidance about implementing the recommendations made by IICSA.
--------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Teachers and Staff

26: Teachers and Staff Disciplinary

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
26.01	Disciplinary Proceedings: Oral warning	Yes	Date of warning + 6 months		SECURE DISPOSAL
Notes	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. Relevant to all disciplinary cases. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period. Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct five years down the line and defend him- or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim. Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.				
26.02	Disciplinary Proceedings: Written warning level 1	Yes	Date of warning + 6 months		SECURE DISPOSAL

<p>Notes</p>	<p>If warnings are placed on personal files, then they must be weeded from the file. 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. Relevant to all disciplinary cases. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period. Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct five years down the line and defend him- or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim. Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.</p>				
<p>26.03</p>	<p>Disciplinary Proceedings: Written warning level 2</p>	<p>Yes</p>	<p>Date of warning + 12 months</p>		<p>SECURE DISPOSAL</p>
<p>Notes</p>	<p>If warnings are placed on personal files, then they must be weeded from the file. 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. Relevant to all disciplinary cases. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period. Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct five years down the line and defend him- or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim. Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept.</p>				

26.04	Disciplinary Proceedings: Final warning	Yes	Date of warning + 18 months		SECURE DISPOSAL
Notes	<p>If warnings are placed on personal files, then they must be weeded from the file. 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. Relevant to all disciplinary cases. The ACAS code of practice on disciplinary and grievance procedures recommends that the employee should be told how long a disciplinary warning will remain current. However, this does not mean that the data itself should be destroyed at the end of the set period. Any disciplinary proceedings data will be a record of an important event in the course of the employer's relationship with the employee. Should the same employee be accused of similar misconduct five years down the line and defend him- or herself by saying "I would never do something like that", reference to the earlier proceedings may show that the comment should not be given credence. Alternatively, if the employee were to be dismissed for some later offence and then claim at tribunal that he or she had "fifteen years of unblemished service", the record of the disciplinary proceedings would be effective evidence to counter this claim. Employers should, therefore, be careful not to confuse the expiry of a warning for disciplinary purposes with a requirement to destroy all reference to its existence in the personnel file. One danger is that the disciplinary procedure itself often gives the impression that, at the end of the effective period for the warning, the warning will be "removed from the file". This or similar wording should be changed to make it clear that, while the warning will not remain active in relation to future disciplinary matters, a record of what has occurred will be kept</p>				
26.05	Disciplinary Proceedings: Case not found	Yes	If the incident is child protection related, then see IRMSTK29.1 otherwise dispose of at the conclusion of the case Statutory Provisions		SECURE DISPOSAL
Notes					

27: Teachers and Staff Pay and Pensions

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
27.01	Records relating to the agreement of pay and conditions	No	Date pay and conditions superseded + 6 years		SECURE DISPOSAL
Notes					
27.02	Payroll records	Yes	Date payroll run + 6 years		SECURE DISPOSAL
Notes					
27.03	Payroll reports	Yes	Current year + 6 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					
27.04	Payroll awards	Yes	Current year + 6 years		SECURE DISPOSAL
Notes					
27.05	Payroll gross / net weekly or monthly	Yes	Current year + 6 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					

27.06	Payslips copies	Yes	Current year + 6 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					
27.07	Pay packet receipt by employee	Yes	Current year + 2 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					
27.08	Maternity pay records	Yes	Current year + 3 years	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI1999/567)	SECURE DISPOSAL
Notes					
27.09	Part time fee claims	Yes	Current year + 6 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					
27.10	Overtime	Yes	Current year + 3 years		SECURE DISPOSAL
Notes					
27.11	National Insurance	Yes	Current year + 6 years		SECURE DISPOSAL

	Schedule of payments				
Notes					
27.12	Insurance	Yes	Current year + 6 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					
27.13	Car allowance claims	Yes	Current year + 3 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					
27.14	Car mileage output	Yes	Current year + 6 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					
27.15	Car loans	Yes	Completion of loan + 6 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					

27.16	Time sheets /clock cards / flexitime	Yes	Current year + 3 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					
27.17	Bonus sheets	Yes	Current year + 3 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					
27.18	Staff returns	Yes	Current year + 3 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					
27.19	Sickness Records	Yes	Current year + 3 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					
27.20	Tax forms P6 /P11 / P11D / P35 / P45/ P46 / P48	Yes	Current year + 6 years		SECURE DISPOSAL
Notes					

27.21	Personal bank details	Yes	Current year + 6 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					
27.22	Income tax form P60	Yes	Current year + 6 years. Employees should keep your records for at least 22 months from the end of the tax year they relate to. The tax year runs from 6 April to the following 5 April, so keep paperwork until at least 31 January nearly two years later. For example, you should keep records relating to the tax year 2022/23 (which ends 5 April 2023) until 31 January 2025 or longer if you are self-employed.	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes	There is no harm in keeping them longer than strictly required. In particular, it is possible to go back up to four tax years to claim some reliefs and to claim a tax refund. In order to make those claims you need supporting evidence, so it would be helpful to keep records for at least four years after the end of the tax year.				
27.23	Pension payroll	Yes	Current year + 6 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					
27.24	Superannuation adjustments	Yes	Current year + 6 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL

Notes					
27.25	Superannuation reports	Yes	Current year + 6 years		SECURE DISPOSAL
Notes					
27.26	Members Allowance register	Yes	Current year + 6 years	Taxes Management Act 1970; Income and Corporation Taxes 1988	SECURE DISPOSAL
Notes					
27.27	Records relating to pension registrations	Yes	Date of last payment on the pension + 6 years		SECURE DISPOSAL
Notes					
27.28	Management of the Teachers' Pension Scheme	Yes	Date of last payment on the pension + 6 years		SECURE DISPOSAL
Notes					
27.29	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes	From the end of the year in which the accounts were signed for a minimum of 6 years	Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103) Regulation 15	SECURE DISPOSAL
Notes					

28: Teachers and Staff Recruitment

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
28.01	All records leading up to the appointment of a new Head Teacher	Yes	Length of appointment + 6 years		SECURE DISPOSAL
Notes	Academies do not necessarily have to employ people with qualified teacher status; only the SEN and designated LAC teacher must be qualified.				
28.02	All records leading up to the appointment of a new member of staff successful candidate	Yes	All relevant information should be added to the Staff Personal File (see below) and all other information retained for 6 months		SECURE DISPOSAL
Notes					
28.03	All records leading up to the appointment of a new member of staff unsuccessful candidates	Yes			SECURE DISPOSAL
Notes					

28.04	Pre-employment vetting information DBS Checks	Yes	<p>Schools do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the single central record. When a school chooses to retain a copy, there should be a valid reason for doing so and it should not be kept for longer than six months. When the information is destroyed, it must be done securely. Once a recruitment (or other relevant) decision has been made, we do not keep certificate information (e.g. DBS number) for any longer than is necessary. This retention will allow for the consideration and resolution of any disputes or complaints, or be for the purpose of completing safeguarding audits. If the school disposes of the certificate the</p>	<p>https://www.gov.uk/government/publications/dbs-update-service-employer-guide/dbs-update-service-employer-guide DBS Update Service Employer Guide June 2014; Keeping Children Safe in Education.2018 (Statutory Guidance from Dept. of Education) Sections 73, 74</p>	SECURE DISPOSAL
--------------	-----------------------------------------------	-----	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------

			<p>following information should be retained in line with the DBS Code of Practice: Retain the following after the certificate is destroyed - 1. The date of issue of a disclosure; 2. The name of the subject; 3. The type of the disclosure requested; the position for which the Disclosure was requested; 4. The unique reference number of the Disclosure; 5. The details of the recruitment decision taken.</p>		
Notes	Academies are bound by the legislation that applies to independent schools NOT maintained schools.				
28.05	Proofs of identity collected as part of the process of checking portable enhanced DBS disclosure	Yes	Where possible, these should be checked, and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation, then this should be added to the Staff Personal File		SECURE DISPOSAL

Notes					
28.06	Pre-employment vetting information. Evidence proving the right to work in the United Kingdom	Yes	Where possible, these copies of documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years	An employers guide to right to work checks [Home Office May 2015] Last updated 27 April 2022.	SECURE DISPOSAL
Notes	Employers are required to take a clear copy of the documents which they are shown as part of this process				
28.07	Records relating to the employment of overseas teachers	Yes	Where possible, these documents should be added to the Staff Personal File, but if they are kept separately, then the Home Office requires that the documents are kept for termination of employment plus not less than 2 years		SECURE DISPOSAL

29: Teachers and Staff Safeguarding

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
29.01	Allegation which is child protection in nature against a member of staff, including where the allegation is unfounded	Yes	Until the persons normal retirement age or 10 years from the date of the allegation, whichever is longer, then REVIEW	See Notes	SECURE DISPOSAL
Notes	<p>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 July 2018 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf. Keeping children safe in education Statutory guidance September 2021. Sections 132, 133 The updated guidance (see below) does not mention a time limit for retention, but GDPR must be borne in mind - for only as long as necessary Keeping children safe in education Statutory guidance for schools and colleges Part 1: Information for all school and college staff September 2018 Section 35. Record keeping All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy)</p> <p>The retention period will be reviewed once the guidance by the government and ICO about implementing the recommendations made by IICSA has been published.</p>				

30: Teachers and Staff – Staff Management

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
30.01	Staff Personal File, including employment contract and staff training records	Yes	Termination of employment + 6 years	Limitation Act 1980	SECURE DISPOSAL
Notes					

30.02	Timesheets	Yes	Current year + 3 years		SECURE DISPOSAL
Notes					
30.03	Absence record	Yes	Current year + 3 years		SECURE DISPOSAL
Notes					
30.04	Sickness Absence Monitoring	Yes		Sickness records are categorised as sensitive data. There is a legal obligation under statutory sickness pay to keep records for sickness monitoring. Sickness records should be kept separate from accident records' (2003) It could be argued that where sickness pay is not paid then current year + 3 years is acceptable whilst if sickness pay is made then it becomes a financial record and current year + 6 years applies. The actual retention may depend on the internal auditors. Most seem to accept current year+ 3 years as being acceptable as this gives them, 'Benefits' and Inland Revenue time to investigate if they need to.	SECURE DISPOSAL
Notes					
30.05	Annual appraisal/assessment records	Yes	Current year + 3 years		SECURE DISPOSAL
Notes					

30.06	Records relating to the TUPE process	Yes	Date last member of staff transfers or leaves the organisation + 6 years		SECURE DISPOSAL
Notes					
30.07	Training needs analysis	No	Current year + 1 year		SECURE DISPOSAL
Notes					
30.08	Staff Training where the training leads to Continuing Professional Development	Yes	Length of time required by the professional body		SECURE DISPOSAL
Notes					
30.09	Staff Training except where dealing with children, e.g. First Aid or Health and Safety	Yes	This should be retained on the personnel file [see 30.01 above]		SECURE DISPOSAL
Notes					
30.10	Staff Training where the training relates to children (e.g. safeguarding or other child related training)	Yes	Date of the training + 40 years		SECURE DISPOSAL
Notes	This retention period will be reviewed when the government and ICO have published guidance about how to implement the recommendations made by IICSA.				
30.11	Professional Development Plans	Yes	Life of the plan or plan superseded + 6 years		SECURE DISPOSAL
Notes					

31: Teaching and the Curriculum

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
31.01	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
Notes					
31.02	Timetable	No	Academic 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
Notes					
31.03	Class record books	No	Academic 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
Notes					
31.04	Mark books	No	Academic 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
Notes					

31.05	Record of homework set	No	Academic 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
Notes					
31.06	Pupils work	Yes		Where possible, work should be returned to the pupil at the end of the academic year. If this is not the school's policy, then current year + 1 year	SECURE DISPOSAL
Notes					

32: Transport Educational

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
32.01	The process of acquisition and disposal of vehicles through lease or purchase, e.g., contracts/leases, quotes, approvals	No	Disposal of the vehicle + 6 years	Limitation Act 1980	SECURE DISPOSAL
Notes					
32.02	The process of managing allocation and maintenance of vehicles, e.g., lists of who was driving the vehicles and when, and maintenance	No	Disposal of the vehicle + 6 years	Limitation Act 1980	SECURE DISPOSAL

Notes					
32.03	Service logs and vehicle logs	No	Life of the vehicle, then either to be retained for 6 years by school or to be returned to lease company	Limitation Act 1980	SECURE DISPOSAL
Notes					
32.04	GPS tracking data relating to the vehicles	No	Current year + 12 months	Limitation Act 1980	SECURE DISPOSAL
Notes					
32.05	Tachograph: Analogue and electronic including driver's cards	Yes	Current year + 12 months	Transport Act 1968 Chapter 73 Sections 96, 98, 99, 103. Passenger and Goods Vehicles (Recording Equipment) Regulations 2005 SI 2005 No 1904. Passenger and goods Vehicles (Recording Equipment) (downloading and Retention of Data) Regulations 2008 SI 2008 No 198. EC Regulation 561/2006 EC or AETR rules may also apply includes digital recording equipment	SECURE DISPOSAL
Notes					
32.06	Driver's records book	Yes	12 months from date of return of book to employer or in the case of owner driver 12 months from date of completion of book or it	Transport Act 1968 Chapter 73 Sections 96, 98, 99, 103. Drivers' Hours (Goods Vehicles) (Keeping of Records)	SECURE DISPOSAL

			ceased to be used Driver to retain book for 14 days after all weekly record sheets have been used.	Regulations 1987. SI 1987 No.1421. Regulation 11 Preservation of driver's record books.	
Notes					
32.07	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]
Notes					

33: Welfare

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
33.01	Family Liaison Officers and Home School Liaison Assistants: Day Books	Yes	Current year + 2 years then review		SECURE DISPOSAL
Notes					
33.02	Family Liaison Officers and Home School Liaison Assistants: Reports for outside agencies - where the report has been	Yes	Whilst child is attending school and then destroy		SECURE DISPOSAL

	included on the case file created by the outside agency				
Notes					
33.03	Family Liaison Officers and Home School Liaison Assistants: Referral forms	Yes	While the referral is current		SECURE DISPOSAL
Notes					
33.04	Family Liaison Officers and Home School Liaison Assistants: Contact data sheets	Yes	Current year then review, if contact is no longer active then destroy		SECURE DISPOSAL
Notes					
33.05	Family Liaison Officers and Home School Liaison Assistants: Contact database entries	Yes	Current year then review, if contact is no longer active then destroy		SECURE DISPOSAL
Notes					
33.06	Family Liaison Officers and Home School Liaison Assistants: Group Registers	Yes	Current year + 2 years		SECURE DISPOSAL
Notes					
33.07	Accessibility Plan relating to individual pupils	Yes	The plan should be included on the pupil file	Limitation Act 1980	SECURE DISPOSAL
Notes					

33.08	Child protection information held on pupil file	Yes	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	Keeping children safe in education Statutory guidance for schools and colleges 2018; Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018	SECURE DISPOSAL
Notes	This retention period will be reviewed when the government and ICO have published guidance about the implementation of the recommendations made by IICSA.				
33.09	Child protection information held in separate files	Yes	Date of birth of the child + 25 years then REVIEW This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the LA Social Services record	Keeping children safe in education Statutory guidance for schools and colleges 2018; Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children 2018	SECURE DISPOSAL these records MUST be shredded
Notes	This retention period will be reviewed when the government and ICO have published guidance about the implementation of the recommendations made by IICSA.				
33.10	Correspondence relating to authorised absence	Yes	Current academic year + 2 years	Education Act 1996 Section 7	SECURE DISPOSAL
Notes					

Additional Tables for items not already included in this schedule.

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
Notes					
Notes					
Notes					
Notes					
Notes					
Notes					

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
Notes					
Notes					
Notes					
Notes					

Notes					
Notes					
Notes					

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
Notes					
Notes					
Notes					
Notes					
Notes					
Notes					

Reference number	Retention Period Description	Personal Information	Retention Period	Statutory Provisions	Disposal
Notes					
Notes					
Notes					

Notes					
Notes					
Notes					
Notes					

This policy was created by:

The Data Protection Consultancy Team

The ICT Service

South Cambridgeshire Hall

Cambourne Business Park

Great Cambourne

Cambourne

Cambridge

CB23 6EA

Email: dpo@theictservice.org.uk

Telephone: 0300 300 00 00 option 4

Helpdesk: [Portal](#)

Website: [DPO Service \(UK GDPR\) - The ICT Service : The ICT Service](#)

ICO Registration: [Cambridgeshire County Council | ICO](#)