



Data Protection Policy (based on HCC Model)

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**Member of staff responsible
for this policy in consultation
with staff and governors:**

Nicki Pagden

**Governing Body Committee
responsible for review:**

FGB

Date of next review:

Spring 2026

Ratified by Governing Body:

Spring 2025

Partnership
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1. Introduction

The schools collect and use personal information (referred to in the UK General Data Protection Regulation (UK GDPR) as personal data) about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable the provision of education and other associated functions. In addition, the schools may be required by law to collect, use and share certain information.

The schools are the Data Controllers, of the personal data that they collect and receive for these purposes.

The schools have a Data Protection Officer, who may be contacted at The Westfields Federation.

The schools issue Privacy Notices (also known as Fair Processing Notices) to all pupils/parents and staff. These summarise the personal information held about pupils and staff, the purpose for which it is held and who it may be shared with. It also provides information about an individual's rights in respect of their personal data.

2. Purpose

This policy sets out how the schools deal with personal information correctly and securely and in accordance with the UK GDPR, and other related legislation.

This policy applies to all personal information however it is collected, used, recorded and stored by the schools and whether it is held on paper or electronically.

3. What is Personal Information/ Data?

Personal information or data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly by reference to details such as a name, an identification number, location data, an online identifier or by their physical, physiological, genetic, mental, economic, cultural or social identity. Personal data includes (but is not limited to) an individual's, name, address, date of birth, photograph, bank details and other information that identifies them.

4. Data Protection Principles

The UK GDPR establishes six principles as well as a number of additional duties that must be adhered to at all times:

- **Lawfulness, fairness and transparency.** Personal data shall be processed lawfully, fairly and in a transparent manner. In order for personal data to be processed lawfully, it must be processed on the basis of one of the legal grounds set out in the UK GDPR. These include (amongst other relevant conditions) where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority exercised by the school.

Where the special categories of personal data are processed, this shall include (amongst other relevant conditions) where processing is necessary for reasons of substantial public interest.

When processing personal data and special category data in the course of school business, the school will ensure that these requirements are met where relevant.

- **Purpose limitation.** Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (subject to exceptions for specific archiving purposes). The school will only process personal data for specific purposes and will notify those purposes to the data subject when it first collects the personal data or as soon as possible thereafter.
- **Data minimisation.** Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive. Personal data which is not necessary for the purpose for which it is obtained will not be collected.
- **Accuracy.** Personal data shall be accurate and where necessary, kept up to date; Personal data should be reviewed and updated as necessary and should not be retained unless it is reasonable to assume that it is accurate. Individuals should notify the school of any changes in circumstances to enable records to be updated accordingly. The schools will be responsible for ensuring that updating or records takes place where appropriate.
- **Storage limitation.** Personal data shall be kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. The school will not keep personal data for longer than is necessary for the purpose or purposes for which they were collected and will take reasonable steps to destroy or erase from its systems all data which is no longer required.
- **Integrity and confidentiality.** Personal data shall be processed in a manner that ensures appropriate security of the personal data and which includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

5. Duties

Personal data shall not be transferred to a country or territory outside the UK and the European Union (EU)/European Economic Area (EEA), unless that country or territory ensures an adequate level of data protection.

Data Controllers have a General Duty of accountability for personal data.

6. Commitment

The schools are committed to maintaining the principles and duties in the UK GDPR at all times. Therefore the schools will:

- Inform individuals of the identity and contact details of the data controller.
- Inform individuals of the contact details of the Data Protection Officer.
- Inform individuals of the purposes that personal information is being collected and the basis for this.
- Inform individuals when their information is shared, and why and with whom unless the UK GDPR provides a reason not to do this.
- If the schools plan to transfer personal data outside the UK and the EU/EEA they will inform individuals and provide them with details of where they can obtain details of the safeguards for that information.

- Inform individuals of their data subject rights.
- Inform individuals that the individual may withdraw consent (where relevant) and that if consent is withdrawn that the school will cease processing their data although that will not affect the legality of data processed up until that point.
- Provide details of the length of time an individual's data will be kept.
- Should the schools decide to use an individual's personal data for a different reason to that for which it was originally collected they shall inform the individual and where necessary seek consent.
- Check the accuracy of the information it holds and review it at regular intervals.
- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in.
- Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded.
- Ensure that personal information is not retained longer than it is needed.
- Ensure that when information is destroyed that it is done so appropriately and securely.
- Share personal information with others only when it is legally appropriate to do so.
- Comply with the duty to respond to requests for access to personal information (known as Subject Access Requests).
- Ensure that personal information is not transferred outside the UK and the EU/EEA without the appropriate safeguards.
- Ensure that all staff and governors are aware of and understand these policies and procedures.

7. Retention and Disposal of Personal Data

The school will dispose of personal data in a way which protects the rights and privacy of data subjects (e.g. shredding, disposal as confidential waste, secure electronic deletion) as appropriate.

The school maintains a Retention Schedule that is specific and relevant to the specific types of information retained. The schedule outlines the appropriate periods for retention in each case.

8. Complaints

Complaints will be dealt with in accordance with the school's Complaints Policy. Complaints relating to the handling of personal information may be referred to the Information Commissioner who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at www.ico.gov.uk

9. Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every two years. The policy review will be undertaken by the Data Protection Officer, Executive Headteacher, or nominated representative.

10. Contacts

If you have any enquires in relation to this policy, please contact the Data Protection Officer via the school office or email on dpo@westfieldsfederation.org.uk, who will also act as the contact point for any data protection issues.

Appendix 1 - School Records Retention Schedule

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
1.0	School Governors					
1.1	Instruments of government, including Articles of Association	No		Permanent	Permanent Retain in school while current; transfer to HALS when no longer required	
1.2	Records for all full governing body, committee and panel meetings, including: <ul style="list-style-type: none"> a) agendas b) any report, statutory policy (including Admissions Policy) or other paper considered at governing body meeting c) signed minutes 	Yes*	School Governance (England) Regulations (2013)	Permanent	Permanent, or as below Single copy of signed minutes, agenda and papers: retain in school for 6 years from date of meeting then transfer to HALS Inspection copies: retain in school for current year + 3 then destroy as confidential waste or delete securely Additional copies: destroy as confidential waste or delete securely from electronic systems	<i>*If meeting deals with confidential staff issues</i>

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
1.3	Governors application forms - successful candidates	Yes		End of term of office + 1 year	Destroy Destroy as confidential waste or delete securely from electronic systems	
1.4	Governors application forms - unsuccessful candidates	Yes		Date of election + 6 months	Destroy Destroy as confidential waste or delete securely from electronic systems	
1.5	Governor election voting forms	Yes		Date of election + 6 months	Destroy Destroy as confidential waste or delete securely from electronic systems	
1.6	Governors - registers and declarations of pecuniary interests	Yes		Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
1.7	Trusts and endowments managed by the governing body	No		Permanent	Permanent Retain in school whilst operationally required, then transfer to HALS	
1.8	Action plans created and / or administered by the governing body	No		Life of action plan + 3 years	Destroy Destroy as confidential waste or delete securely from electronic systems*	<i>*Consider offering to HALS if school has been through difficult period</i>
1.9	Records relating to complaints dealt with by the governing body	Yes		Date of resolution of complaint + 7 years	Destroy Destroy as confidential waste or delete securely from electronic systems*	<i>*It may be appropriate to review for further retention in the case of contentious disputes</i>
1.10	Annual parents' meetings			Permanent	Permanent, or as below	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
					<p>Retain in school for 6 years from date of meeting then:</p> <p>Minutes and reports: transfer to HALS</p> <p>All other records: destroy as confidential waste or delete securely from electronic systems*</p>	

2.0	Management and Administration					
2.1	Log books of activity in the school, maintained by teachers	Yes ¹		Permanent	Permanent Retain in school whilst operationally required, then transfer to HALS	
2.2	Head teacher's official diary	Yes ¹		Current academic year + 3 years	Destroy Delete securely or destroy as confidential waste*	*Unless used as retrospective record of events, in which case offer to HALS

¹ Since 1 January 2005 subject access has been permitted into unstructured filing systems, including log books and other records created within the school, containing details about the activities of individual pupils. As such members of staff are subject to the Data Protection Act 1998.

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
2.3	Minutes of the senior management team and other internal administrative bodies	Yes ¹		Permanent	Permanent, or as below Retain in school for 5 years from date of meeting then: Minutes dealing with strategic or policy matters: transfer to HALS All other records: destroy as confidential waste or delete securely from electronic systems	
2.4	Reports made by the head teacher or the management team	Yes ¹		Retain in school for date of report + 3 years	Permanent Transfer to HALS	
2.5	Correspondence and general filing created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes ¹		Closure of file + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems*	*Offer files on important events (e.g. reorganisation) to HALS
2.6	Professional development plans	Yes		Closure of file + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
2.7	School development plans	No		Retain in school for closure of file + 6 years	Transfer to archive Offer to HALS to review for historic interest	
2.8	Employers' liability certificate	No		Permanent while school is operational	Destroy Destroy as confidential waste or delete securely from electronic systems once school closes	
2.9	School brochure/prospectus	No		Retain in school for current academic year + 3 years	Transfer to archive Offer to HALS to review for historic interest	
2.10	Circulars to staff and pupils	No		Current academic year + 3 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
2.11	Newsletters to parents	No		Retain in school for current academic year + 3 years	Transfer to archive Offer to HALS to review for historic interest	
2.12	Visitors' books and signing in sheets	Yes		Current academic year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
2.13	PTA (Parent Teacher Association) / old pupils' associations records	Yes		Retain in school for current academic year + 6 years	Transfer to archive or as below Minutes, newsletters and membership registers: offer to HALS to review for historic interest All other records: destroy as confidential waste or delete securely from electronic systems	

3.0	LEA (Local Education Authority)					
3.1	Secondary transfer sheets (primary)	Yes		Current academic year + 2 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
3.2	Attendance returns	Yes		Current academic year + 1 year	Destroy Destroy as confidential waste or delete securely from electronic systems	
3.3	Circulars from the LEA	No		Whilst operationally required	Destroy Destroy as confidential waste or delete securely from electronic systems	

4.0	DfE (Department for Education)					
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No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
4.1	HMI reports	No		Permanent	Permanent Retain in school whilst operationally required, then transfer to HALS	<i>These are no longer produced</i>
4.2	OFSTED reports	No		Retain in school while current; replace former report with any new inspection report	Permanent Transfer to HALS*	*Reports should be available on the OFSTED website. Retain at least two previous reports if not available online.
4.3	OFSTED-related papers	No		Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
4.4	Returns to the DfE	No		Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
4.5	Circulars from the DfE	No		Whilst operationally required	Destroy Destroy as confidential waste or delete securely from electronic systems	
4.6	School census returns	Yes	Education (School Performance Information) (England) Regulations 2007	Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	

5.0	Pupils
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No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.1	Records relating to the creation and implementation of the school's Admissions Policy	No	School Admissions Code (2014)	Retain in school for life of the policy + 3 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
5.2	Admission forms: unsuccessful or withdrawn applications (including supplementary information e.g. proof of address, religion, medical conditions etc.)	Yes	School Admissions Code (2014)	a) If no appeal, 1 year from receipt b) If appealed, 1 year from resolution of case*	Destroy Destroy as confidential waste or delete securely from electronic systems	*Records relating to appeals retained by Appeals Panel for 22 years from date of birth of pupil
5.3	Admission forms: successful applications	Yes	School Admissions Code (2014)	Date of admission + 1 year	Destroy Destroy as confidential waste or delete securely from electronic systems	Ensure that supplementary information e.g. proof of address, religion, medical conditions is added to the pupil's file
5.4	Admission registers	Yes	Education (Pupil Registration) (England) Regulations 2006	Retain in school until date of last entry in the book (or file) + 3 years	Permanent Transfer to HALS	<i>If held electronically, a printout should be made at least annually. Any corrections made to electronic data should be clearly shown in the printout.</i>
5.5	Attendance registers	Yes	Education (Pupil Registration) (England) Regulations 2006	Date of register + 3 years	Destroy Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.6	Pupil absence letters / leave forms / correspondence relating to authorised absence	Yes		Date of absence + 2 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
5.7	Absence books	Yes		Current year + 6 years from last entry in book	Destroy Destroy as confidential waste or delete securely from electronic systems	
5.8	Telephone message books for recording absences (sickness) or changes to pick up arrangements, etc.	Yes		Current year + 6 years from last entry in book	Destroy Destroy as confidential waste or delete securely from electronic systems	
5.9	Child protection files <ul style="list-style-type: none"> Primary 	Yes	DfE 'Keeping Children Safe in Education' (2016), Annex B, p.61	Retain while the pupil remains at the primary school*	Follow guidelines in 5.13 for pupils transferring to another school	*CP information must be kept separate from the main pupil file. Where children leave the school or college ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit. Confirmation of receipt should be obtained.

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.10	Child protection files <ul style="list-style-type: none"> Secondary 	Yes	DfE 'Keeping Children Safe in Education' (2016), Annex B, p.61	Date of birth of pupil + 25 years*	Destroy or as below If the child leaves the school: follow guidelines in 5.13 for pupils transferring to another school If the retention period is reached: destroy as confidential waste or delete securely from electronic systems	*CP information must be kept separate from the main pupil file. Both the educational record and CP information must be retained for 25 years from DOB. Where children leave the school or college ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit. Confirmation of receipt should be obtained.

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.11	Pupil's educational record (pupil file) Pupils with Special Educational Needs (SEN) <ul style="list-style-type: none"> Primary 	Yes	Retain while pupil remains at the primary school	Retain while the pupil remains at the primary school*	Follow guidelines in 5.13 for pupils transferring to another school	Includes: <ul style="list-style-type: none"> SEN reviews Individual Education Plans (IEPs) / pupil profiles Health questionnaires Parental consent forms Health care plans Records of medicine administered
5.12	Pupil's educational record (pupil file) Pupils with Special Educational Needs (SEN) <ul style="list-style-type: none"> Secondary 	Yes		Date of birth of pupil + 22 years*	Destroy or as below If the child leaves the school: follow guidelines in 5.13 for pupils transferring to another school If the retention period is reached: destroy as confidential waste or delete securely from electronic systems	*Unless child protection applies, in which case retain for 25 years from DOB; see 5.10. Includes: <ul style="list-style-type: none"> SEN reviews Individual Education Plans (IEPs) / pupil profiles Health questionnaires Parental consent forms Health care plans Records of medicine administered Work experience agreements

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.13	<p>Pupil's educational record (pupil file)</p> <p>All other pupils</p> <ul style="list-style-type: none"> Primary 	Yes	The Education (Pupil Information) (England) Regulations 2005	<p>Retain while the pupil remains at the primary school, then:</p> <p>a) Pupil transfers to a known Local Authority primary or secondary school in Hampshire</p> <p>b) Pupil transfers to a known Local Authority or independent primary / secondary school which is another county within the UK; or transfers to an independent school within Hampshire</p> <p>c) Pupil transfers to a known primary / secondary school outside of the UK</p>	<p>The file should follow the pupil when he/she leaves primary school:</p> <p>a) Send pupil record to new school²</p> <p>b) Send pupil record to new school, retaining a copy or summary until pupil is 22 years old, then destroy confidentially or delete securely</p> <p>c) Send a copy of pupil record to new school, retaining original pupil record until pupil is 22 years old, then destroy confidentially or delete securely</p>	<p>Includes:</p> <ul style="list-style-type: none"> Health questionnaires Parental consent forms Health care plans Records of medicine administered

² In the case of exclusion it may be appropriate to transfer the record to the Education and Inclusion Service

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
				d) Pupil transfers to an unknown school	d) Retain pupil file until pupil is 22 years old, then destroy confidentially or delete securely	
5.14	Pupil's educational record (pupil file) All other pupils <ul style="list-style-type: none"> • Secondary 	Yes	Limitation Act (1980)	Date of birth of pupil + 22 years*	Destroy Destroy as confidential waste or delete securely from electronic systems	*Unless child protection applies, in which case retain for 25 years from DOB; see 5.10. Includes: <ul style="list-style-type: none"> • Health questionnaires • Parental consent forms • Health care plans • Records of medicine administered • Work experience agreements
5.15	Pupil's educational record (pupil file) <ul style="list-style-type: none"> • Deceased pupils 	Yes		Date of death + 7 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
5.16	Images of pupils - signed consent forms by parent / guardian	Yes		Date of signing + 5 years; or at end of project; or when pupil leaves the school	Destroy Destroy as confidential waste or delete securely from electronic systems	Images should not be reused outside of the time period or for other projects other than that specified on the form

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.17	Activity / visit / trip consent forms - signed by parent or guardian where no incident occurs	Yes		Date of event + 1 year	Destroy Destroy as confidential waste or delete securely from electronic systems	
5.18	Activity / visit / trip consent forms - signed by parent or guardian where a major incident occurs	Yes	Limitation Act 1980	Date of birth of child involved in incident + 22 years	Destroy Destroy as confidential waste or delete securely from electronic systems	Important: consent forms for ALL pupils for an event where a major incident occurs must be retained, not just that of the child involved
5.19	Punishment books	Yes		Books no longer maintained in schools	Permanent Transfer to HALS	
5.20	SATS papers (completed)	Yes	Department for Education (DfE) recommendation	Current year + 1 year	Destroy Destroy as confidential waste or delete securely from electronic systems	
5.21	SATS results for individual pupils	Yes			Add to the main pupil file and follow retention period for 5.14	
5.22	Internal and external examination papers (completed)	Yes		Current academic year + 6 years or until any appeals / validation process is complete	Destroy Destroy as confidential waste or delete securely from electronic systems	
5.23	Internal and external examination results for individual pupils	Yes			Add to the main pupil file and follow retention period for 5.14*	*Uncollected GCSE and A Level certificates should be returned to the relevant examination board

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.24	Examination results - summaries or other statistical information created by the school	Yes		Current academic year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
5.25	Any other records created in the course of contact with pupils maintained for teachers' own use (i.e. NOT part of the educational record)	Yes		Current academic year + 3 years	Review Review by school and EITHER allocate further retention period OR destroy as confidential waste or delete securely from electronic systems	
6.0	Curriculum					
6.1	Curricula records	No		Whilst operationally required	Destroy Destroy as confidential waste or delete securely from electronic systems	May include: <ul style="list-style-type: none"> • curriculum development records • lesson plans • syllabuses • schemes of work • timetables • mark books • records of homework set

7.0	Human Resources					
7.1	Interview notes and recruitment records (including pre-employment vetting information) <ul style="list-style-type: none"> • unsuccessful candidates 	Yes	HCC corporate guidelines	Date of interview + 1 year	Destroy Destroy as confidential waste or delete securely from electronic systems	Includes: <ul style="list-style-type: none"> • proof of identity • proof of right to work in the UK
7.2	Interview notes and recruitment records (including pre-employment vetting information) <ul style="list-style-type: none"> • successful candidates 	Yes		Follow retention period for 7.4	All recruitment information to be added to staff personnel file, except DBS checks (for DBS see 7.3)	
7.3	Pre-employment vetting information <ul style="list-style-type: none"> • successful candidates' DBS checks* 	Yes	DfE 'Keeping Children Safe in Education' guidance (regularly updated)	Maximum of date of check + 6 months	Destroy Destroy as confidential waste or delete securely from electronic systems by the designated member of staff	*Formerly CRB checks Schools are not required to retain copies of DBS certificates. If the school chooses to do so, the copy must NOT be retained for longer than 6 months
7.4	Staff files (main personnel file)	Yes	Limitation Act (1980)	End of employment + 7 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
7.5	Staff annual appraisal / assessment records	Yes		Current appraisal year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
7.6	Staff timesheets	Yes	Financial regulations	Current academic year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	May be held on SAP
7.7	Staff sickness records, excluding ill-health referrals (self-certification, doctor's certificates)	Yes		Current academic year + 3 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
7.8	Staff sickness records <ul style="list-style-type: none"> ill health referrals 	Yes	Limitation Act (1980)		Add to main personnel file and follow retention period for 7.4	
7.9	Staff maternity and paternity pay records	Yes	Statutory Maternity Pay Regulations (1986) (as amended)	Current academic year + 3 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
7.10	Disciplinary proceedings* <ul style="list-style-type: none"> warnings 	Yes			Add to main personnel file and follow retention period for 7.4	*for child protection / safeguarding disciplinary proceedings, see 7.13
7.11	Disciplinary proceedings* <ul style="list-style-type: none"> substantiated or unsubstantiated 	Yes		a) outcome letter: end of employment + 7 years b) all other records: close of case + 7 years	Destroy Destroy as confidential waste or delete securely from electronic systems	*for child protection / safeguarding disciplinary proceedings, see 7.13
7.12	Disciplinary proceedings* <ul style="list-style-type: none"> false or malicious 	Yes		a) outcome letter: end of employment + 7 years b) all other records: shred at close of case	Destroy Destroy as confidential waste or delete securely from electronic systems	*for child protection / safeguarding disciplinary proceedings, see 7.13

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
7.13	Disciplinary proceedings* <ul style="list-style-type: none"> safeguarding / child protection related 	Yes	DfE 'Keeping Children Safe in Education' guidance (regularly updated)	Until normal pension age, or for 10 years from date of allegation, whichever is longer	Destroy Destroy as confidential waste or delete securely from electronic systems	*including where the allegation is unsubstantiated
7.14	Records of industrial tribunals, disciplinary panels, appeals	Yes	Limitation Act 1980 can apply		a) outcome letter: add to personnel file and follow retention period for 7.4 b) all other records: shred 7 years from end of process	
7.15	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		End of employment + 7 years	Destroy Destroy as confidential waste or delete securely from electronic systems	

8.0	Health and Safety (H&S)					
8.1	Health and safety policies	No		Life of policy + 7 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
8.2	Risk assessments: general	No	Limitation Act (1980)	Date of risk assessment + 7 years (update regularly)	Destroy Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
8.3	Risk assessments: exposure to noise, vibration, lead, asbestos, chemicals and biohazards (including COSHH)	No	Control of Substances Hazardous to Health Regulations (2002), Regulation 11 Control of Asbestos at Work Regulations (2012), Regulation 19	Date of risk assessment + 40 years (update regularly)	Destroy Destroy as confidential waste or delete securely from electronic systems	
8.4	Risk assessments: exposure to radiation	No	Ionising Radiation Regulations 1999 (SI 1999/3232)	Date of risk assessment + 50 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
8.5	Accident reporting: adults a) accident books b) F2508-RIDDOR forms c) local accident investigation records	Yes	Social Security (Claims and Payments) Regulations (1979), Regulation 25 Social Security Administration Act (1992), Section 8. Limitation Act (1980)	(a) Current year + 3 (b) Current year + 3 (c) Current year + 3	Destroy Destroy as confidential waste or delete securely from electronic systems	Since April 2016 accident reporting has been completed online and all copies are held electronically

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
8.6	Accident reporting: children a) accident books b) F2508-RIDDOR forms c) local accident investigation records	Yes	Social Security (Claims and Payments) Regulations (1979), Regulation 25 Social Security Administration Act (1992), Section 8. Limitation Act (1980)	(a) Keep books until youngest child entered has reached age 22 (b) Date of birth of child + 22 years (c) Date of birth of child + 22 years	Destroy Destroy as confidential waste or delete securely from electronic systems	Since April 2016 accident reporting has been completed online and all copies are held electronically
8.7	Violent incident reporting (VIR)	Yes	Limitation Act (1980)	Current year + 3 years	Destroy Destroy as confidential waste or delete securely from electronic systems	Since April 2016 violent incident reporting has been completed online and all copies are held electronically
8.8	Physical intervention forms	Yes		Date of birth of child + 22 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
8.9	Fire precaution log books (e.g. records of drills and tests)	No	Limitation Act (1980)	Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
8.10	Accessibility plans	Yes	Equalities Act (2010)	Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
8.11	Health and safety training records	Yes		While current + 6 years, unless records apply for limited period (e.g. First Aid Certificates)	Destroy Destroy as confidential waste or delete securely from electronic systems	
8.12	Maintenance records for any work equipment, including ladders, trolleys, PPE, PAT etc.	No		Current year + 10 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
8.13	Health and safety inspection records, including: <ul style="list-style-type: none"> • site inspections • playground inspections 	No		Current year + 3 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
9.0	Finance					
9.1	Annual accounts	No		Retain in school for current year + 6 years	Transfer to archive Offer to HALS to review for historic interest	
9.2	Annual budget and background papers	No		Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
9.3	Budget reports and budget monitoring records	No		Current year + 3 years	Destroy Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
9.4	Records covered by various financial regulations Including: invoices, receipts, order books, requisitions, delivery notices, petty cash records, records relating to the collection and banking of monies, records relating to the identification and collection of debt	No	Financial regulations	Current financial year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
9.5	Copy orders	No		Current year + 2 years, or current year + 6 years if included with delivery notes, invoices and receipts, etc.	Destroy Destroy as confidential waste or delete securely from electronic systems	
9.6	Loans and grants managed by the school	No	Financial regulations	Date of last payment on loan + 12 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
9.7	School Fund records Including: cheque books, paying-in books, ledgers, invoices, receipts, bank statements, journey books	No	Financial regulations	Current financial year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
9.8	Contracts: under seal		Limitation Act (1980)	Contract completion date + 13 years	Destroy Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
9.9	Contracts: under signature		Limitation Act (1980)	Contract completion date + 7 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
9.10	Contracts: monitoring records			Current year + 2 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
9.11	Free school meals records	Yes	Financial regulations	Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
9.12	School meals registers	Yes		Current year + 3 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
9.13	School meals summary sheets	No		Current year + 3 years	Destroy Destroy as confidential waste or delete securely from electronic systems	<i>Formerly known as M1 forms</i>
9.14	Applications for free school meals, travel, uniforms etc.	Yes	Financial regulations	Whilst child at school or current year + 6 years, whichever is the longest	Destroy Destroy as confidential waste or delete securely from electronic systems	
9.15	Payroll records where school administers own payroll	Yes	Financial regulations	Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
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9.16	Records relating to individuals' pension details	Yes	Financial regulations	End of employment + 7 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
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10.0	Property					
10.1	Title deeds of all properties belonging to the school	No		Permanent	Permanent Retain in school whilst operational; offer to HALS to review for historic interest when no longer required	
10.2	Plans of all properties belonging to the school	No		Permanent	Permanent Retain in school whilst operational; offer to HALS to review for historic interest when no longer required	
10.3	Leases of properties leased by or to the schools	No		Expiry of lease + 7 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
10.4	Records relating to the letting of school premises	No		Current year + 3 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
10.5	Burglary, theft and vandalism report forms			Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
10.6	All records relating to the maintenance of the school, including maintenance log books	No		Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
10.7	Inventories of equipment and furniture			Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
10.8	Insurance papers			While current	Destroy Destroy as confidential waste or delete securely from electronic systems	

11.0	Adult and Community Learning and Activities					
11.1	Annual funding agreements with Learning and Skills Council (LSC), Adult and Community Learning Unit, or colleges			Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
11.2	Enrolment forms, fee receipts, refund records, course registers, banking records			Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
11.3	LSC capital grants, expenditure records			Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
11.4	Community management agreements			Life of agreement + 7 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
11.5	Minutes of governors' management committees			Permanent	Permanent Retain in school for 6 years from date of meeting then transfer to HALS	
11.6	Annual Community Service plans			While current + 6 years	Transfer to archive Offer to HALS to review for historic interest	
11.7	Income records for centre-run activities			Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
11.8	Notice of successful applications for external funding, and conditions attached to grants			Period of funding or length of funding agreement (e.g. capital schemes) + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
11.9	Adult learning course programmes and brochures			Current year + 3 years	Transfer to archive Offer to HALS to review for historic interest	
11.10	Records relating to the letting of school facilities to community or other groups, including after-school and holiday clubs	Yes	Statute of Limitations 1980	Current year + 6 years	Destroy Destroy as confidential waste or delete securely from electronic systems	
12.0	Miscellaneous					

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
12.1	School magazines			While useful	Transfer to archive Offer to HALS to review for historic interest	
12.2	Scrapbooks			While useful	Transfer to archive Offer to HALS to review for historic interest	
12.3	Photo albums			While useful	Transfer to archive Offer to HALS to review for historic interest	
12.4	School histories			While useful	Transfer to archive Offer to HALS to review for historic interest	
12.5	Audio and video recordings			While useful	Transfer to archive Offer important or informative recordings to Wessex Film and Sound Archive	