



DATA PROTECTION POLICY

(This Policy includes the Hazelwood School Nursery)

1. General Policy Statement

1.1 The School is required to have a legitimate reason to hold and process relevant personal data regarding members of staff, pupils and their parents/guardians as part of its operation to provide educational services including to safeguard the welfare of its pupils and staff. All reasonable steps will be taken to do so in accordance with this Policy.

2.2 This Policy also incorporates the requirements introduced by the Data (Use and Access) Act 2025, which received Royal Assent on 19 June 2025. The School is committed to ensuring compliance with the updated legislative framework, including provisions relating to subject access requests, complaints handling, automated decision-making, and the protection of children's data.

1.2 Processing may include obtaining, recording, holding, disclosing, destroying or otherwise using data. In this Policy any reference to pupils includes prospective, current or past pupils.

1.3 The School has appointed the Head of Operations as the Nominated Person who oversees the management of the School's General Data Protection Regulation (GDPR) responsibilities. The Head, Governors and Senior Leadership Team (SLT) fully support the Head of Operations to ensure that the Principles of this Policy are maintained.

2. The Principles

The School shall, so far as is reasonably practicable, comply with Article 5 of GDPR where it states that personal data must be:

- Processed fairly, lawfully and in a transparent manner in relation to the data subject.
- Collected for specified, explicit and legitimate purposes and not further processed for other purposes incompatible with those purposes.
- Adequate, relevant and limited to what is necessary in relation to the purposes for which data is processed.
- Accurate and, where necessary, kept up to date.
- Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
- Processed in a way that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

3. Personal Data

Personal data covers both facts and opinions about an individual. The School may process

a wide range of personal data of staff, pupils, their parents or guardians as part of its operation. This personal data may include, but is not limited to, names and addresses, bank details, academic, disciplinary, admissions, and attendance records, references, examination scripts and marks.

4. Processing of Personal Data

Consent may be required for the processing of personal data unless the processing is necessary for the School to undertake its obligations (for which legitimate reason has been established through the School's Privacy Notices) to pupils and their parents or guardians. Any information which falls under the definition of personal data, and is not otherwise exempt, will remain confidential and will only be disclosed to third parties with the consent of the appropriate individual or under the terms of this Policy.

5. Sensitive Personal Data

The School may, from time to time, be required to process sensitive personal data regarding a pupil, their parents or guardians. Sensitive personal data includes medical information and data relating to religion, race or criminal records and proceedings. Where sensitive personal data is processed by the School, the explicit consent of the appropriate individual will generally be required in writing.

The School recognises the statutory protection afforded to children's personal data under DUAA. Risk assessments and data protection impact assessments will explicitly consider the child's reduced awareness of risks and rights.

6. Digital Verification Services (DVS) - tools or platforms used to confirm the authenticity of information, such as identities, qualifications, attendance, and safeguarding data. These systems help improve security, compliance, and efficiency.

Under DUAA, DVS can be used in areas such as:

- Admissions: Verifying the identity of parents or guardians during online Application processes.
- Parental Access: Confirming identity for access to school portals, reports, or communication platforms.
- Safeguarding: Ensuring that individuals interacting with pupils (e.g. volunteers, contractors) are who they claim to be.
- Remote Services: Supporting secure access to online learning platforms or virtual meetings.

7. Rights of Access

7.1 Individuals have a right to access information held by the School. Any individual wishing to access their personal data should put their request in writing to the Head of Operations. The School will endeavour to respond to any such written requests as soon as is reasonably practicable and, in any event, within 21 days to provide a reply to such a request and within 30 days for physical access to records. Under 2018 GDPR no fee is chargeable for this service.

7.2 Where clarification is reasonably required due to the volume or complexity of data held, the 30-day response period will be paused until the requester provides the necessary clarification. The School will conduct a reasonable and proportionate search once clarification is received.

7.3 You should be aware that certain data is exempt from the right of access under the Data Protection Act. This may include information which identifies other individuals, information which the school reasonably believes is likely to cause damage or distress, or information which is subject to legal professional privilege. The School is not required to disclose any pupil examination scripts.

7.4 The School will also treat as confidential any reference given by the School for the

purpose of education, training or employment, or prospective education, training or employment of any pupil. The School acknowledges that an individual may have the right to access a reference relating to them received by the School. However, such a reference will only be disclosed if such a disclosure will not identify the source of the reference or where, notwithstanding this, the reference has given their consent or if disclosure is reasonable in all circumstances.

8. Rights of Ownership

8.1 The School has obtained parental consent to process data relating to pupils unless, given the nature of the processing in question, and the pupil's age and understanding, it is unreasonable in all circumstances to rely on the parent's consent. For those pupils in Years 7 and 8 additional consent has been obtained from the child.

8.2 The School will only grant the pupil direct access to their personal data if in the School's reasonable belief, the pupil understands the nature of the request.

8.3 Pupils agree that the School may disclose their personal data to their parents or guardian.

8.4 Where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents or guardian, the School will maintain confidentiality unless it has reasonable grounds to believe that the pupil does not fully understand the consequences of withholding their consent, or where the School believes disclosure will be in the best interests of the pupil or other pupils.

9. Recognised Legitimate Interests

The School may rely on "recognised legitimate interests" for certain data processing activities, as clarified under DUAA. This includes processing for safeguarding, attendance, and reporting to authorities.

10. Exemptions

Certain data is exempted from the provisions of the GDPR which include the following examples:

- National security
- Public security
- The protection of judicial independence and proceedings
- The enforcement of civil law matters

11. Disclosure of Information

11.1 The School may receive requests from third parties to disclose personal data it holds about pupils, their parents or guardians. The School confirms that it will not generally disclose information unless the individual has given their consent or one of the specific exemptions under the GDPR applies. However, the School does intend to disclose such data as is necessary to third parties for the following purposes:

- To give a confidential reference relating to a pupil to any educational institution which it is proposed that the pupil may attend.
- To give information relating to outstanding fees or payment history to any educational institution which it is proposed that the pupil may attend.
- To publish the results of public examinations or other achievements of pupils of the School.
- To disclose details of a pupil's medical condition where it is in the pupil's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips.

11.2 Where the School receives a disclosure request from a third party it will take

reasonable steps to verify the identity of that third party before making any disclosure.

12. Use of Personal Information by the School

12.1 The School will, from time to time, make use of personal data relating to pupils, their parents or guardians in the following ways:

- To make use of photographic images of pupils in School publications and on the School website. However, the School will not publish photographs of individual pupils with their names on the School website.
- For fundraising, marketing or promotional purposes and to maintain relationships with pupils of the School, including transferring information to any association society or club set up for the purpose of establishing or maintaining contact with pupils for fundraising, marketing or promotional purposes.

12.2 The use of pupil images, and the parents' permission to do so, is governed by the Use of Pupil Images Consent Form.

13. Accuracy

13.1 The School will endeavour to ensure that all personal data held in relation to an individual is accurate.

13.2 Individuals must notify the School of any changes to information held about them. An individual has the right to request that inaccurate information about them is erased or corrected. From time to time the School will circulate forms to parents requesting that information is updated.

14. Security

14.1 The School will take reasonable steps to ensure that members of staff will only have access to personal data relating to pupils, their parents or guardians where it is necessary for them to do so. All staff will be made aware of this Policy and their duties under GDPR. The School will ensure that all personal information is held securely and is not accessible to unauthorised people.

14.2 The School will regularly review the security surrounding the storage and circulation of data so that:

- files containing data are not left accessible and are kept securely
- passwords to access online storage are changed at least annually
- that sharing of information is monitored, and recipients of data are made aware of the need to store or delete received information in accordance with this Policy.

In addition, an ICT Penetration Test will be conducted every two years.

14.3 The School will securely retain data until it is legally required to destroy it. This requirement may differ for different types of information (e.g. pupil records versus prospective employee application). All information will be destroyed in an effective and secure manner both in hard copy and electronic format. See 18. Data Storage and Retention.

15. Enforcement

15.1 If an individual believes that the School has not complied with this Policy or acted otherwise than in accordance with the GDPR they should notify the Head of Operations and if necessary, thereafter utilise the School Complaints procedure.

15.2 In accordance with Section 164A of the Data Protection Act 2018 (as amended by DUAA), individuals must first raise data protection complaints directly with the School.

The School will:

- Acknowledge complaints within 30 days
- Investigate and respond without undue delay
- Inform the complainant of the outcome
- Facilitate complaints via accessible methods (e.g. electronic submission)

16. Security breaches

16.1 Article 31 of the GDPR requires that as soon as the Head of Operations becomes aware a personal data breach has occurred the Information Commissioners Office (IOC) must be informed without undue delay and not later than 72 hours after becoming aware of it. Where this cannot be achieved within 72 hours, an explanation of the reasons for the delay should accompany the notification to the IOC.

16.2 Data subjects should be notified without undue delay if the personal data breach is likely to result in a high risk to their rights and freedoms to allow them to take the necessary precautions.

16.3 Any data breach incidents are recorded in the Operational Incident folder.

17. Artificial Intelligence (AI)

The school recognises that Artificial Intelligence (AI) technologies are increasingly used in education to support teaching, learning, and administrative processes. Where AI systems are used, the school is committed to ensuring that all processing of personal data complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The school will:

- Only use AI tools that have been approved following a risk assessment and, where required, a Data Protection Impact Assessment (DPIA).
- Ensure there is a lawful basis for any processing of personal data by AI systems and that such data is not transferred outside the UK without appropriate safeguards.
- Prohibit staff from entering personal, sensitive, or confidential information into external or publicly available AI systems without prior authorisation.
- Review the use of AI regularly to ensure compliance, fairness, and transparency.
- Ensure that any use of AI in decision-making about individuals is subject to meaningful human oversight.
- Provide staff with guidance and training on the responsible and secure use of AI.

The school does not permit the use of AI tools for automated decision-making or profiling that would have a significant effect on pupils or staff without appropriate human involvement and approval.

18. Data Storage and Retention

18.1 The School generally seeks to balance the benefits of keeping detailed and complete records for the purposes of good practice, archives or general reference with practical considerations of storage, space and accessibility. The below legal considerations in respect of the retention of records and documents are adhered to:

- statutory duties and government guidance relating to schools, including safeguarding.
- disclosure requirements for potential future litigation.
- contractual obligations.
- the law of confidentiality and privacy.
- GDPR.

18.2 "Record" means any document or item of data which contains evidence or information relating to the School, its staff or pupils. Some of this material, but not all, will

contain personal data of individuals. An example of personal data would be the Single Central Record or a pupil file; however, a "record" of personal data could arise simply by holding an email on the School's systems.

18.3 Many, if not most, new and recent records will be created, received and stored electronically. Others (such as Certificates, Registers, or older records) will be original paper documents.

Digital records

Access to sensitive data or any large quantity of data is password-protected and held on a limited number of devices only, with passwords provided on a need-to-know basis and regularly changed. All 'cloud' storage is digitally encrypted. The school provides central storage for historical parent emails. This is managed by the Head's PA.

Paper records

The security of paper records is of upmost importance especially if the materials contain legally or financially sensitive data, as well as personal data to individuals. Storage conditions must be sound i.e. dry, cool, reasonable ventilation, no direct sunlight; avoid storing with metals, rubber or plastic which might deteriorate or damage the paper).

It is also vitally important that all staff bear in mind when creating documents and records of any sort (and particularly email), that at some point in the future those documents and records could be disclosed whether because of litigation or investigation, or because of a subject access request. The watchwords of record-keeping are therefore accuracy, clarity, professionalism and objectivity.

For confidential, sensitive or personal information to be considered securely disposed of, it must be in a condition where it cannot either be read or reconstructed. Skips and 'regular' waste disposal are not used.

Paper records are shredded using a cross-cutting shredder; CDs / DVDs / diskettes are cut into pieces. Hard-copy images, AV recordings and hard disks are dismantled and destroyed.

Where third party disposal experts are used, they operate under adequate contractual obligations to the School to process and dispose of the information.

This policy was approved by the Compliance Committee on Friday 21 November 2025

Appendix – Retention Guidelines for Schools

The table below provides the School's procedure on the retention of documents/records. SMT, with support from the Administrative Teams on both sites, are responsible for the implementation of these retention periods.

1. Records relating to child protection

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
1.1	Child protection files	Yes	Education Act 2002, s175, related guidance "Safeguarding Children in Education", September 2004	Date of birth + 25 years	Secure disposal
1.2	Allegation of child protection nature against a member of staff, including where the allegation is unfounded	Yes	Employment Practices Code: Supplementary Guidance 2.13.1 (Records of Disciplinary and Grievance). Education Act 2002 Guidance "Dealing with Allegations of Abuse against Teachers and Other Staff" November 2005	Until the person's normal retirement age, or 10 years from the date of the allegation whichever is the longer	Secure disposal

2. Records relating to governors

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
2.1	Minutes -				
2.1a	Principal set (signed)	No		Permanent	Must be available in school for 6 years from the meeting. Can then be archived/stored elsewhere.
2.1b	Inspection copies	No		Date of meeting + 3 years	Secure disposal
2.2	Agendas	No		Date of meeting	Secure disposal
2.3	Reports	No		Date of report + 6 years	Retain in school for 6 years from report date. Can consider archiving/storing anything important.
2.4	Annual parents' meeting papers	No		Date of meeting + 6 years	Retain in school for 6 years from meeting date. Can consider archiving/storing anything important.
2.5	Instruments of Government	No		Permanent	Retain in school whilst school open. Can then be archived/stored elsewhere.
2.6	Trusts and Endowments	No		Permanent	Retain in school whilst operationally required. Can then be archived/stored elsewhere.
2.7	Action plans	No		Date of action plan + 3 years	Secure disposal
2.8	Policy documents	No		Expiry of policy	Retain in school whilst policy operational (this includes if the

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
					expired policy is part of a past decision-making process).
2.9	Complaints files	Yes		Date of resolution of complaint + 6 years	Review for further retention in the case of contentious disputes. Secure disposal.
2.10	Annual reports required by Dept of Education	No	Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002.SI2002 No1171	Date of report + 10 years	Secure disposal
2.11	Proposals for schools to become or be established as Specialist Status schools	No		Current year + 3 years	Secure disposal

3. Records relating to school management

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
3.1	Log books	Yes		Date of last entry in book + 6 years	Secure disposal
3.2	Minutes of the senior management team and other internal administrative bodies	Yes		Date of meeting + 5 years	Retain in school for 5 years from meeting date. Can consider archiving/storing anything important.
3.3	Reports made by the head teacher or management team	Yes		Date of report + 3 years	Retain in school for 3 years from report date. Can consider archiving/storing anything important.
3.4	Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes		Closure of file + 6 years	Secure disposal
3.5	Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	No/Yes		Date of correspondence + 3 years	Secure disposal
3.6	Professional development plans	Yes		Closure + 6 years	Secure disposal
3.7	School development plans	No		Closure + 6 years	Review for further retention. Secure disposal.
3.8	Admissions - if the admission is successful	Yes		Admission + 1 year	Secure disposal
3.9	Admissions - if the appeal is unsuccessful	Yes		Resolution of case + 1 year	Secure disposal

3.10	Admissions - secondary schools - casual	Yes		Current year + 1 year	Secure disposal
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	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
3.11	Proof of address supplied by parents as part of the admissions process	Yes		As the corresponding admission record	Secure disposal
3.12	Supplementary information form including additional information such as religion, medical conditions supplied as part of the admissions process	Yes		As the corresponding admission record	Secure disposal

4. Records relating to pupils

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
4.1	Admission registers	Yes		Entry + 7 years	Retain in school for 7 years from entry. Can consider archiving these records if have the facility.
4.2	Attendance registers	Yes		Date of register + 3 years	Secure disposal
4.3	Pupil files retained in schools	Yes			
4.3a	Primary	Yes		Retain for time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school.
4.3b	Secondary	Yes	Limitation Act 1980	Date of birth + 25 years	Transfer to another secondary school if required. In the case of exclusion it may be appropriate to transfer the record to the Pupil Referral Unit. Secure disposal
4.4	Pupil files	Yes			
4.4a	Primary	Yes		Retain for time which the pupil remains at the primary school	Transfer to the secondary school (or other primary school) when the child leaves the school.
4.4b	Secondary	Yes	Limitation Act 1980	Date of birth + 25 years	Transfer to another secondary school if required. In the case of exclusion it may be appropriate to transfer the record to the Pupil Referral Unit. Secure disposal
4.5	Special Educational Needs files, reviews and individual education plans	Yes		Date of birth + 25 years	Secure disposal

4.6	Correspondence relating to authorised absence and issues	Yes		Date of absence + 2 years	Secure disposal
4.7	Examination results				
4.7a	Public	No		Year of examination + 6 years	Secure disposal

Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
4.7b	Internal examination results	Yes		Current year + 5 years	Secure disposal
4.8	Any other records created in the course of contact with pupils	Yes/No		Current year + 3 years	Review at the end of 3 years and retain with pupil file if necessary. Secure disposal
4.9	Statement maintained under the Education Act 1996 Section 324	Yes	Special Educational Needs and Disability Act 2001 Section 1	Date of birth + 30 years	Secure disposal unless legal action is pending
4.10	Proposed statement or amended statement	Yes	Special Educational Needs and Disability Act 2001 Section 1	Date of birth + 30 years	Secure disposal unless legal action is pending
4.11	Advice and information to parents regarding educational needs	Yes	Special Educational Needs and Disability Act 2001 Section 2	Closure + 12 years	Secure disposal unless legal action is pending
4.12	Accessibility strategy	Yes	Special Educational Needs and Disability Act 2001 Section 14	Closure + 12 years	Secure disposal unless legal action is pending
4.13	Parental permission slips for school trips, where there has been no major incident	Yes		Conclusion of the trip	Secure disposal unless legal action is pending
4.14	Parental permission slips for school trips, where there has been a major incident	Yes	Limitation Act 1980	Date of birth of pupil involved in the incident + 25 years	Secure disposal. Permission slips for all pupils on trip need to be retained for period to show that the rules had been followed for all pupils.
4.15	Records created by schools to obtain approval to run an educational visit outside the classroom, primary schools	No	3-part supplement of the Health & Safety of Pupils on Educational Visits (HASPEV) (1998)	Date of visit + 14 years	Secure disposal
4.16	Records created by schools to obtain approval to run an educational visit outside the classroom, secondary schools	No	3-part supplement of the Health & Safety of Pupils on Educational Visits (HASPEV) (1998)	Date of visit + 10 years	Secure disposal

4.17	Walking bus registers	Yes		Date of register + 3 years	This takes into account that if an incident requiring an accident report, the register will be submitted with the accident report and kept for the retention time for accident reporting. Secure disposal
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5. Records relating to child Curriculum

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
5.1	School development plan	No		Current year + 6 years	Secure disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
5.2	Curriculum returns	No		Current year + 3 years	Secure disposal
5.3	Schemes of work	No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.4	Timetable	No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.5	Class record books	Yes/No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.6	Mark books	Yes/No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.7	Record of homework set	No		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.8	Pupils' work	Yes		Current year + 1 year	It may be appropriate to review these records at end of each year and allocate a new retention period. Secure disposal.
5.9	Examination results	Yes		Current year + 6 years	Secure disposal
5.10	SATs records, examination papers and results	Yes		Current year + 6 years	Secure disposal
5.11	PAN reports	Yes		Current year + 6 years	Secure disposal
5.12	Value added and contextual data	Yes		Current year + 6 years	Secure disposal
5.13	Self evaluation forms	Yes		Current year + 6 years	Secure disposal

6. Records relating to personnel records

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
6.1	Timesheets, sick pay	Yes	Financial Regulations	Current year + 6 years	Secure disposal
6.2	Staff personnel files	Yes		Termination + 25 years	Secure disposal
6.3	Interview notes and recruitment records	Yes		Date of interview notes + 6 months if unsuccessful. If successful place in personnel file.	Secure disposal
6.4	Pre-employment vetting information (including CRB checks)	Yes	CRB guidelines	Date of check + 6 months	Secure disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
6.5	Disciplinary proceedings	Yes	Where the warning relates to child protection issues see 1.2		
6.5a	Oral warning	Yes		Date of warning + 6 months	Secure disposal
6.5b	Written warning - level one	Yes		Date of warning + 6 months	Secure disposal
6.5c	Written warning - level one	Yes		Date of warning + 12 months	Secure disposal
6.5d	Final warning	Yes		Date of warning + 18 months	Secure disposal
6.5e	Case not found	Yes		If child protection see 1.2, otherwise destroy immediately	Secure disposal
6.6	Records relating to accident/injury at work	Yes		Date of incident + 12 years	In case of serious accidents a further retention period will need to be applied. Secure disposal
6.7	Annual appraisal and assessment records	Yes		Current year + 5 years	Secure disposal
6.8	Salary cards	Yes		Last date of employment + 85 years	Secure disposal
6.9	Maternity pay records	Yes	Statutory Maternity Pay (General) Regulations 1986 (SI1986/1960), revised 1999 (SI 1999/567)	Current year + 3 years	Secure disposal
6.10	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		Current year + 6 years	Secure disposal

6.11	Proofs of identity collected as part of the process for checking "portable" enhanced CRB disclosure	Yes		Where possible these should be checked and a note/copy of what was checked placed on personnel file. If felt necessary to keep any documentation this should also be placed in personnel file.	Secure disposal of notes/copies and return of originals.
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7. Records relating to health and safety

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
7.1	Accessibility plans	Yes	Disability Discrimination Act	Current year + 6 years	Secure disposal
7.2	Accident reporting		Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security		Secure disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
			Administration Act 1992 Section 8. Limitation Act 1980		
7.2a	Adults	Yes		Date of incident + 7 years	Secure disposal
7.2b	Children	Yes		Date of birth of child + 7 years	Secure disposal
7.3	COSHH			Current year + 10 years	Where appropriate an additional retention period may be allocated. Secure disposal
7.4	Incident reports	Yes		Current year + 20 years	Secure disposal
7.5	Policy statements			Date of expiry + 1 year	Secure disposal
7.6	Risk assessments			Current year + 3 years	Secure disposal
7.7	Process of monitoring areas where employees and persons are likely to have come in contact with asbestos			Last action + 40 years	Secure disposal

7.8	Process of monitoring areas where employees and persons are likely to have come in contact with radiation			Last action + 50 years	Secure disposal
7.9	Fire precautions log book			Current year + 6 years	Secure disposal

8. Administrative records

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
8.1	Employer's liability certificate			Closure of school + 40 years	Secure disposal
8.2	Inventories of equipment and furniture			Current year + 6 years	Secure disposal
8.3	General file series			Current year + 5 years	Review to see if further retention period required. Secure disposal
8.4	School brochure or prospectus			Current year + 3 years	Disposal

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
8.5	Circulars (staff, parents, pupils)			Current year + 1 year	Review to see if further retention period required. Secure disposal
8.6	Newsletters, ephemera			Current year + 1 year	Review to see if further retention period required. Secure disposal
8.7	Visitors book			Current year + 2 year	Review to see if further retention period required. Secure disposal
8.8	PTA/Old Pupils Associations			Current year + 6 years	Review to see if further retention period required. Secure disposal

9. Records relating to Finance

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
9.1	Annual accounts		Financial Regulations	Current year + 6 years	Secure disposal
9.2	Loans and grants		Financial Regulations	Date of last payment on loan + 12 years	Secure disposal
9.3	Contracts				
9.3a	Under seal			Contract completion date + 12 years	Secure disposal
9.3b	Under signature			Contract completion date + 6 years	Secure disposal

9.3c	Monitoring records			Current year + 2 years	Secure disposal
9.4	Copy orders			Current year + 2 years	Secure disposal
9.5	Budget reports, budget monitoring etc.			Current year + 3 years	Secure disposal
9.6	Invoice, receipts and other records covered by the Financial Regulations		Financial Regulations	Current year + 6 years	Secure disposal
9.7	Annual budget and background papers			Current year + 6 years	Secure disposal
9.8	Order books and requisitions			Current year + 6 years	Secure disposal
9.9	Delivery documentation			Current year + 6 years	Secure disposal
9.10	Debtors' records		Limitations Act	Current year + 6 years	Secure disposal
9.11	Petty cash books			Current year + 6 years	Secure disposal

10. Records relating to property

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
10.1	Title deeds			Permanent	These should follow the property

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
10.2	Plans			Permanent	Retain in school whilst operational. Can then be archived/stored elsewhere.
10.3	Maintenance and contractors		Financial Regulations	Current year + 6 years	Secure disposal
10.4	Leases			Expiry of lease + 6 years	Secure disposal
10.5	Lettings			Current year + 3 years	Secure disposal
10.6	Burglary, theft and vandalism report forms			Current year + 6 years	Secure disposal
10.7	Maintenance log books			Last entry + 10 years	Secure disposal
10.8	Contractors' reports			Current year + 6 years	Secure disposal

11. Records relating to the Department of Education

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
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12.1	HMI reports			These do not need to be kept any longer	Secure disposal
12.2	OFSTED and ISI reports and papers			Replace former report with new inspection report	Review to see if further retention period required. Secure disposal
12.3	Returns			Current year + 6 years	Secure disposal
12.4	Circulars from Department of Education			Whilst required operationally	Review to see if further retention period required. Disposal

Ratified by the Compliance Committee on 22 November 2024