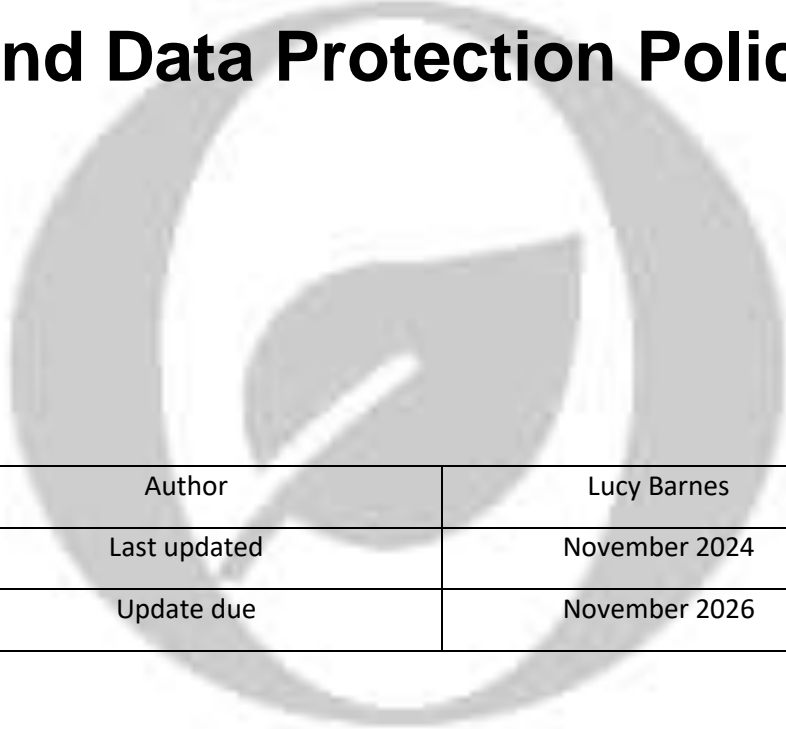


Beech Lodge

Records and Information Retention and Data Protection Policy



Author	Lucy Barnes
Last updated	November 2024
Update due	November 2026

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Data Protection Policy

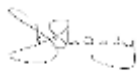
This policy applies to the whole school and is publicly available on the school website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the School Office.

Document Details

Information Sharing Category	Public Domain
Authorised by (if required)	Proprietor and Headteacher
Review Update:	November 2026
Responsible area	Senior Leadership and Safeguarding Team

Monitoring and Review: This policy is subject to continuous monitoring, refinement and audit by the Headteacher. They will undertake a full review of this policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged. This discussion will be formally documented in writing. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay.

Signed:



D. Shanly

Proprietor

Signed:



D. Gillespie

Headteacher

This policy will be reviewed no later than November 2026 or earlier if changes in legislation, regulatory requirements or best practice guidelines so require. The Designated Data Protection Officer of Beech Lodge School is Sarah Radford – Administration and Development Manager who can be contacted on 01628 879384, sradford@beechlodeschool.co.uk.

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1. Aims

Our school aims to ensure that all personal data collected about staff, pupils parents, advisors, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR and the Data Protection Act 2018 (DPA 2018). This policy applies to all personal data, regardless of whether it is in paper or electronic format.

2. Legislation and Guidance

This policy meets the requirements of the GDPR and the expected provisions of the DPA 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the [GDPR](#) and the ICO's [code of practice for subject access requests](#).

It meets the requirements of the [Protection of Freedoms Act 2012](#) when referring to our use of biometric data. It also reflects the ICO's [code of practice](#) for the use of surveillance cameras and personal information.



3. Definitions

Term	Definition
Personal Data	Any information relating to an identified, or identifiable individual. This may include the individual's: Name Identification number Location data Online Identifier, such as a username It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.
Special categories of personal data	Personal data which is more sensitive and so needs more protection, including information about an individual's; Racial or ethnic origin Political opinions Religious or philosophical beliefs Trade union membership Genetic Biometrics (such as fingerprints, retina and iris patterns), Where used for identification purposes Health – physical or mental Sex life or orientation
Processing	Anything done to personal data, such as collecting, recording, organizing, structuring, storing adapting, altering, retrieving, using, disseminating, erasing or destroying. Processing can be automated or manual.
Data Subject	The identified or identifiable individual whose personal data is held or processed.
Data Controller	A person or organisation that determines the purposes and the means of processing of personal data.
Data Processor	A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.
Personal Data Breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

4. The Data Controller

Beech Lodge School processes personal data relating to parents, pupils, staff, advisors, visitors and others, and therefore is a data controller. The school is registered as a data controller with the ICO and will renew this registration annually or as otherwise legally required. The school's registration numbers are Beech Lodge School Limited – ZA352736 Beech Lodge School (The Charity) – ZA352717.

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.

a. Proprietary Body

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

b. 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. In Beech Lodge School the DPO is Sarah Radford, the Administration and Development Manager.

c. Headteacher

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

d. 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 question 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 European Economic Area.
 - If there has been a data breach. See the Beech Lodge School Data Breach Procedure.
 - 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 details with third parties.
 -

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6. Data Protection Principles

The GDPR is based on data protection principles that our school must comply with. The principles say that the 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 basis' (legal reasons) to do so under 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 so that the school, as a public authority, can perform a task in the public interest, and carry out its official functions.
- The data needs to be processed for the legitimate interests of the school 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 which are set out in the GDPR and Data Protection Act 2018.

If we offer online services to pupils, such as classroom apps which require use of personal data, and we intend to rely on consent as a basis for processing, we will get parental consent where the pupil does not have capacity (usually under 12) except for online counselling and preventative services).

Whenever we first collect personal data directly from individuals, we will provide them with a copy of the privacy policy which details the relevant information required by data protection law

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 in order to do their jobs. When staff no longer need the personal data they hold, they must ensure it is deleted or anonymised. This will be done in accordance with the Information and Records Management Society's toolkit for schools.

8. Sharing Personal Data

We will not normally share personal data with anyone else, but may do so 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.
- 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 data protection law.
 - Establish a data sharing agreement with the supplier or contractor, either in the contract or as a standalone agreement 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, and information necessary to keep them safe while working with us.

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

- The prevention or detection of crime and/or fraud.
- The apprehension or prosecution of offenders.
- The assessment or collection of tax owed to HMRC.
- In connection with legal proceedings.
- Where the disclosure is required to satisfy our safeguarding obligations.
- Research and statistical purposes, as long as personal data is sufficiently anonymised or consent has been provided.

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 to a country or territory outside the European Economic Area, we will do so in accordance with 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.

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- 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.
- 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.

Subject Access requests must be submitted in writing, either by letter, email or a submitted with a subject access request form to the DPO. They should include

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the information requested
- If staff receive subject access request they must immediately forward it to the DPO.

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 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 aged 12 and above are generally 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 not 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
- 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 will not disclose information if it:

- Might cause serious harm to the physical or mental health of the pupil or another individual.
- Would reveal that the child is at risk of abuse, where the disclosure of that information would not be in the child's best interest.
- Is contained in adoption or parental order records.

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- Is given to a court in proceedings concerning the child
- Where there is any other applicable exemption.

If the request is unfounded or excessive, we may refuse to act on it, or charge a reasonable fee which takes into account administrative costs. A request will be deemed to be unfounded or excessive if it is repetitive, or asks for further copies of the same information. When we refuse a request, we will tell the individual why, and tell them they have the right to complain to the ICO.

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, or object to the processing of it (in certain circumstances)
- Prevent use of their personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest.
- Request a copy of agreements under which their personal data is transferred outside of the European Economic Area.
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect them).
- Prevent processing that is likely to cause damage or distress
- 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 DPO. If staff receive such a request they must immediately forward it to the DPO.

10. CCTV

Closed Circuit Television Cameras (CCTV) are installed on its premises for the sole purpose of surveillance for security reasons. The school believes that CCTV offers improved security protection for both pupils and staff, although it is by no means considered to be the school's only means of security surveillance.

We use CCTV in various locations around the school site to ensure it remains safe. We will adhere to the ICO's [code of practice for the use of CCTV](#).

CCTV is not installed in classrooms, changing rooms or toilets. The Facilities Manager and Headteacher oversee all aspects of the use of surveillance CCTV within the school. Parents are assured that the school does not stream images collected via CCTV to any third parties or outside agencies. Please note, however, that the school may be legally required to provide CCTV footage to the Police or other law enforcement agencies if requested.

We do not need to ask individual's 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 the Headteacher.

11. Photographs and videos

As part of our school activities, we may take photographs and record images of individuals within our school. We will obtain annual written consent from parents / carers / pupils (16+) for photographs and videos to be taken of pupils for communication, marketing and promotional materials, these forms will be present when filming/photoshoot is taking place. Where we need parental consent, we will clearly explain how the photograph and/or video will be used to both the parent/carer and pupil. Where we do not need parental consent, we will clearly explain to the pupil how the photograph and/or video will be used. Within reasonable expectations all photographs and videos will be reviewed by SLT prior to release.

Uses may include:

Within school on notice boards, school posters, prospectus and newsletters etc.

Outside of school by external agencies such as the school photographer, newspapers, campaigns (these will be accompanied whilst filming / photographing by the DPO or a nominated person in their absence.

Online in our school website or social media pages

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete / erase the image in the photograph or video to the best of our ability 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. Pupils over the age of 16 years will be asked for their own individual consent.

12. 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 privacy 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

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, data subject, how and why we are using the data, any third-party recipients, how and why we are storing the data, retention periods and how we are keeping the data secure.

13. 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, pinned to notice/display boards, or left anywhere else where this is general access.

Where personal information needs to be taken off site it must be safeguarded, papers should be carried in locked briefcases. The use by staff of removable media eg USB sticks is not permitted.

Passwords that are at least 8 characters long containing letters and numbers are used to access school computers, laptops and other electronic devices. Staff and pupils are automatically reminded to change their passwords at regular intervals.

Staff or pupils who store personal information on their personal devices are expected to follow the same security procedure as for school-owned equipment (see our Online safety policy and Acceptable use agreements)

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)

14. 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 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.

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15. 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 to the ICP within 72 hours. As example, 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 pupil eligible for the pupil premium.
- Safeguarding information being made available to an unauthorised person.
- The theft of a school laptop containing personal data about pupils.

16. Training

All staff are provided with data protection briefings as part of their induction process. Data protection will also form part of continuing professional development, where changes to legislation, guidance of the school's processes make it necessary.

17. Monitoring arrangements

The DPO is responsible for monitoring and reviewing this policy.

This policy will be reviewed every 2 years and shared with the full proprietary board.

18. Links with other policies

This data protection policy is linked to our:

- Online safety policy
- Acceptable use of ICT agreements
- Child protection and Safeguarding policies

Retention Guidelines for Schools (RGS)

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 Advisory Board

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
2.1	Minutes -	No		Permanent	Must be available in school for 6 years from the meeting. Can then be archived/stored elsewhere.
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	Action plans	No		Date of action plan + 3 years	Secure disposal
2.5	Policy documents	No		Expiry of policy	Retain in school whilst policy operational (this includes if the expired policy is part of a past decision making process).
2.6	Complaints files	Yes		Date of resolution of complaint + 6 years	Review for further retention in the case of contentious disputes. 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	Admission files - if the admission is successful	Yes		Admission + 1 year	Secure disposal
3.9	Admissions files - if the application is unsuccessful	Yes		Current year + 1 year	Secure disposal
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

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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 + 10 years	Secure disposal
4.3	Pupil files retained in schools	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	Special Educational Needs files, reviews and individual education plans	Yes		Date of birth + 25 years	Secure disposal
4.5	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
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	Closure + 12 years	Secure disposal unless legal action is pending

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Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
			Disability Act 2001 Section 2		
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

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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
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
5.12	Value added and contextual data	Yes		Current year + 6 years	Secure disposal
5.13	Self evaluation forms	Yes		Current year + 6 years	Secure disposal

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6. Records relating to personnel records

Basic File Description		Data Protection 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
6.5	Disciplinary proceedings	Yes	Where the warning relates to child protection issues see 1.2		
6.5a	Oral warning	Yes		Date of warning + 1 year	Secure disposal
6.5b	Written warning - level one	Yes		Date of warning + 1 year	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
6.9	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	Yes		Current year + 6 years	Secure disposal

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Basic File Description		Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
	Benefits Schemes (Information Powers) Regulations 1995				
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.

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 Administration Act 1992 Section 8. Limitation Act 1980		Secure disposal
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

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	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
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
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

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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	School fund - Cheque books			Current year + 3 years	Secure disposal
9.12	School fund - Paying in books			Current year + 6 years	Secure disposal
9.13	School fund - Ledger			Current year + 6 years	Secure disposal
9.14	School fund - Invoices			Current year + 6 years	Secure disposal
9.15	School fund - Receipts			Current year + 6 years	Secure disposal

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	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
9.16	School fund - Bank statements			Current year + 6 years	Secure disposal
9.17	School fund - School journey books			Current year + 6 years	Secure disposal
9.18	Student grant applications	Yes		Current year + 3 years	Secure disposal
9.19	Free school meals registers	Yes		Current year + 6 years	Secure disposal
9.20	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
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

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11. Records relating to local authorities

	Basic File Description	Data Protection Issue	Statutory Provisions	Retention Period	Action at End of Administrative Life of Record
11.2	Attendance returns	Yes		Current year + 1 year	Secure disposal
11.3	Circulars from LEA	Yes		Whilst required operationally	Review to see if further retention period required. Disposal

12. 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
12.1	HMI reports			These do not need to be kept any longer	Secure disposal
12.2	OFSTED 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

Appendix 2

Subject Access Request

I write to make a formal Subject Access Request in respect of my personal information. I am entitled to make this request under data protection laws. The request is made in accordance with section 45 of the Data Protection Act 2018 and Article 15 of the retained EU General Data Protection Regulation 2016/679 (UK GDPR). You can identify my records using the information that is listed below.

Requester (Data Subject Information) Full Name	
Date of Birth	
Address	
Email address	
Proof of identity	
Requested Information	
.....	
.....	
.....	
.....	
.....	

Signed: Date:

Printed Name:

If the data requested is for a pupil aged 12 or older they will also need to approve this request.

Pupil Signature:

Printed Name:

Date Request Received:

All subject access requests are to be submitted to the Data Processing officer and will be processed within the required one month period.

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