



pathfield
SCHOOL

Inspiring interaction

Data Protection Policy

| | |
|----------------------------------|------------------------------------|
| Adopted by Governors | Rosemary Mitchell |
| Date | 12.07.18 |
| Review Date: (Annual) | Summer 2019 |
| Policy/Procedure checked by/date | Avril Burrows July 2018 |

Pathfield School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

This policy will support, promote and be applied with due regard to the requirements of the **SENTIENT TRUST**
inspire • empower • enable

Data Protection Policy

Version 1.0

Document Date: 3 July 2018
Pathfield School
Abbey Road, Barnstaple EX31 1JU

If you require help in the interpretation of this policy, contact Avril Burrows (Data Protection Officer)

If this document has been printed, please note that it may not be the most up-to-date version. For the current version please check the School Server

1. Introduction

1.1 This policy outlines the framework that governs how Pathfield School and its staff must handle personal data to ensure compliance with the EU General Data Protection Regulation (GDPR) and associated data protection laws applicable in the UK.

2. Scope

2.1 This policy applies to the processing of personal data which is defined by article 4 of the GDPR, and to the processing of special categories of personal data defined by article 9 of the GDPR.

2.2 This policy and its supporting guidance shall apply to all Pathfield School employees, agency and temporary staff, contractors, members and third-party staff, who have access to information systems or information used for School purposes.

2.3 Where this policy reads “staff”, it should be read to include all the entities in paragraph 2.2.

3. Legislation

3.1 Pathfield School processes a variety of personal data to enable us to deliver a range of education services. Therefore, Pathfield School is required to comply with the GDPR as well as other supporting legislation which governs the processing of personal data.

3.2 When handling and managing information the School and its staff shall comply with other legislation in addition to the GDPR, to include but not limited to:

- [Computer Misuse Act 1990](#)
- [Copyright Designs and Patents Act 1988](#)
- [Environmental Information Regulations 2004](#)
- [Equality Act 2010](#)
- [Freedom of Information Act 2000](#)
- [Human Rights Act 1998](#)
- [Local Government Act 1972](#)
- [Local Government Act 2000](#)
- [Regulation of Investigatory Powers Act 2016](#)
- [Re-use of Public Sector Information Regulations 2005](#)

4. Breach of this policy

4.1 All reckless or deliberate breaches of this policy will be investigated and may be referred to the Human Resources Department who will consider whether disciplinary action should be taken against the member of staff concerned. Alleged breaches of this policy will also be investigated by the Data Protection Officer as an information security incident in accordance with the Security Incident Management procedure and may also be referred to Human Resources and senior management as considered necessary.

5. Policy review

5.1 This policy will be reviewed by the Data Protection Officer on an annual basis. Formal requests for changes should be sent to the Data Protection Officer.

6. Responsibilities

6.2 Responsibility for GDPR compliance rests with the Head Teacher. The Data Protection Policy and its supporting guides and standards are managed, maintained and communicated to staff by the Data Protection Officer.

6.3 The School's Information Asset Owners and Information Asset Administrators are responsible for ensuring that appropriate structures and procedures are in place to manage their information effectively. They are also responsible for ensuring that staff are made aware of, and comply with this policy, its associated standards and procedures. All staff are personally responsible for complying with this policy and supporting standards.

7. The data protection principles

7.1 The GDPR is underpinned by six common-sense principles which governs the way that Pathfield School must process personal data. These principles are outlined in article 5 of the GDPR and are summarised below.

- *Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency').*
- *Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.*
- *Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')*
- *Personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy')*
- *Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.*
- *Personal data shall be processed in a manner 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 ('integrity and confidentiality').*

7.2 Sections 8 - 20 outlines the steps that staff must follow when processing personal data to ensure compliance with each of the principles listed above.

8. Lawful processing of personal data

8.1 Pathfield School and its staff must process personal data fairly and will not process personal data or special categories of personal data unless one or more of the lawful grounds listed on the [Inside Devon website](#) apply.

9. Privacy notices

9.1 Pathfield School is committed to protect the confidentiality of all pupils, their families, staff and governors. In line with our commitment, privacy notices are displayed on the School website and hard copies are available on request. There are specific notices for staff as well as Pupils and Parents. This may also be referenced on data capture forms, directly referenced on documentation or provided verbally. If Pathfield School receives personal data from third parties, we will ensure that the information contained in a privacy notice, is made available to a data subject as soon as practical. This will usually be at the first point we are required to communicate with the data subject.

9.2 For more detailed assistance contact the Data Protection Officer.

10. Consent

10.1 Pathfield School is only required to obtain someone's consent if there is no other legal basis for processing their personal data. If we are required to obtain consent, we will ensure that the following requirements are met;

- The consent is freely given
- The person giving consent understands fully, what they are consenting to
- There must be a positive indication of consent (opt-in as opposed to opt-out)
- The person giving consent must be able to withdraw their consent at any time
- Consent should be documented so that it may be referred to in the future, if necessary

10.2 Children under the age of 13 merit specific protection regarding their personal data. Such specific protection should apply to the use of personal data of children for the purposes of marketing or creating personality or user profiles and the collection of personal data regarding children when using services offered directly to a child. If Pathfield School is required to deliver such services to children, it will ensure that the requirements of article 8 of GDPR are met.

11. Rights of data subjects

11.1 Chapter 3 of the GDPR outlines the rights afforded individuals in respect of the processing of their personal data. These rights are summarised below;

- The right to transparency in respect of the processing of their personal data
- The right of subject access
- The right to rectification
- The right to erasure
- The right to restriction of processing
- The right to data portability
- The right to object to processing
- The right to request human intervention if processing is by automated means

11.2 Requests to exercise any of these rights are managed by the Data Protection Officer. The School's procedures for managing such requests are available on the shared drive and shall be adhered to whenever Pathfield School receives a request from someone wishing to exercise these rights.

11.3 When designing, implementing or procuring systems or services, Pathfield School must ensure that those systems or services can allow members of the public to exercise any of the rights listed in section 11.1. Any systems or services found to be incapable of managing such requests, should be referred to the Data Protection Officer and must be subject to a privacy impact assessment.

12. Privacy by design

12.1 Article 29 of the GDPR creates a statutory obligation on Pathfield School to ensure that a privacy impact assessment is undertaken on all new systems, processes or procedures that intend to process personal data, prior to their implementation. Such assessments are to be carried out by or in consultation with the Data Protection Officer. All assessments undertaken will be carried out in accordance with the School's Privacy Impact Assessment Procedure.

12.2 Compliance risks identified following a privacy impact assessment will be presented to relevant Information Asset Owners, Information Asset Administrators and or the Senior Information Risk Owner (SIRO) in accordance with the School's Information Assurance arrangements.

12.3 If following the completion of a privacy impact assessment, Pathfield School identifies processing activities assessed as high risk that cannot be mitigated to an acceptable level, the School will consult with the Information Commissioner's Office prior to implementing the proposed processing activity, system or process.

13.0 GDPR and procurement

13.1 Pathfield School is committed to upholding the confidentiality, availability and integrity of information that is processed by our contractors on our behalf. Underpinning this commitment, we will ensure that the following measures are followed when procuring goods and services that involve the processing of personal data.

- A privacy impact assessment is undertaken prior to any procurement which involves the processing of personal data
- A security questionnaire is completed to ascertain the technical and organisational measures that prospective contractors will put in place to protect the data that they will processing on behalf of Pathfield School. The results of which will inform on the final decision as to whether the School contracts with that organisation.
- When procuring goods and services that requires a formal procurement exercise, we will ensure that contractual provision is in place which clearly identifies the following; who is the data controller; what data is being processed; a record of processing activity (in accordance with article 30 of the GDPR); arrangements for how personal data will be disposed of or returned to the School at the end of the contract; contractual clauses which mandate conformance to the GDPR.
- When procuring goods or services that do not require a formal procurement exercise, and which involve the processing of personal data, staff must ensure that they follow the Devon County Council [School's Guide to security during procurement](#).

13.2 Where risks are identified during a formal or informal procurement process, these will be managed in accordance with the School's Information Assurance arrangements.

14. Records of processing activity

14.1 Information Asset Owners will ensure that records of the processing activity are maintained for all information assets under their direct responsibility. Such records will include the information required in article 30 of the GDPR. Such records are to be made available to members of the public, the Information Commissioner's Office (or other supervisory authority as required) or the European Data Protection Board on request.

14.2 Pathfield School will have measures in place to ensure that data processors responsible for processing personal data on behalf of the School, will maintain records of processing as required by article 30 of the GDPR.

15. Security incident management and notification

15.1 An information security incident can occur when the confidentiality, availability and or integrity of personal data is put at risk. Examples of activities considered an information security incident might include; information being at risk of or being lost; stolen; disclosed to the wrong recipients (accidentally or deliberately); accessed or attempted to be accessed unlawfully and/or without the permission of the School; sold or used without the permission of the School or a system containing personal data or sensitive business data malfunctions and the information is irretrievable indefinitely or for a long period of time.

15.2 Pathfield School has a Security Incident Management procedure in place which governs how the School and its staff must report and handle incidents. This procedure must be followed at all times.

15.3 In accordance with article 33 of the GDPR, Pathfield School is committed to notifying the Information Commissioner's Office or relevant supervisory authority within 72 hours, of being notified of an information security incident that might adversely affect the rights and freedoms of a data subject. Notifications of this nature are the responsibility of the Data Protection Officer, who will ensure that the risks associated with information security incidents are recorded, monitored and where appropriate escalated in accordance with the School's Information Assurance arrangements.

16. The Data Protection Officer

16.1 Article 37 of the GDPR requires that Pathfield School appoints a Data Protection Officer to undertake the tasks outlined in article 39 of the GDPR. Contact details for the Data Protection Officer will be made publicly available and will be referred to in all privacy notices.

16.2 Pathfield School will commit to ensure that the Data Protection Officer is sufficiently resourced to undertake the tasks assigned to them under article 39 of the GDPR. The School will also ensure that the Data Protection Officer is consulted on all matters which concern the processing of personal data.

16.3 The Data Protection Officer will act as the single point of contact for the Information Commissioner's Office or other relevant supervisory authorities and will ensure that compliance risks are reported to the highest level of management within Pathfield School as required.

17. Transfers outside the European Economic Area

17.1 Pathfield School will not transfer personal data to countries outside of the European Economic Area (EEA) unless one or more of the following qualifying criteria are met;

- 1) An adequacy decision has been made in accordance with article 45 of the GDPR
- 2) The transfer is the subject of appropriate safeguards in accordance with article 46 of GDPR
- 3) The transfer is the subject of binding corporate rules in accordance with article 47 of the GDPR
- 4) If one or more of the special circumstances outlined in article 49 of the GDPR are met

17.2 Any transfers of personal data to countries outside of the EEA will be subject of a privacy impact assessment prior to the transfer taking place. Decisions taken in respect of any transfers will be made in accordance with the School's Information Assurance arrangements.

18. Information and cyber-security

18.1 The Data Protection Officer is responsible for the creation and communication of guidance on information security. This guidance will be routinely reviewed to ensure accuracy, with amended and new guidance communicated to staff on a regular basis.

18.2 Staff who are required to process personal data, in whatever format, must ensure that they follow the relevant guidance on information security. If it is found that this guidance has not been followed, this will be treated as an information security incident and will be investigated in accordance with the Security Incident Management procedure. Where such actions are considered negligent, reckless or malicious, this will be referred to Human Resources for consideration as to the merits of disciplinary action.

18.3 Should it be considered necessary for staff to be excused from following the requirements outlined in any guidance on information security, these requests will be the subject of a privacy impact assessment.

19. Sharing personal information

19.1 Pathfield School will only share personal data contained in its records with individuals who have a legitimate and legal right to view or receive it. Disclosures of personal data shall be proportionate and necessary and made in line with the School's policies and procedures. All disclosures shall comply with the GDPR and associated data protection legislation, Human Rights Act 1998 and Common Law Duty of Confidence.

20. Information assurance, compliance and reporting

20.1 Pathfield School will have in place, an information assurance framework to aid in the identification, management and ownership of information risks. This framework is outlined in the School's Information Assurance arrangements.

20.2 All information risks identified when working with services, following privacy impact assessments or from information security investigations, will be managed in accordance with the Information Assurance arrangements. Compliance risks that are identified will be monitored by the Data Protection Officer and reported on a regular basis, to Information Asset Owners, Information Asset Administrators and to the Senior Information Risk Owner (SIRO).

21. Policy History

21.1 This Policy is maintained by the Data Protection Officer and will be reviewed on an annual basis. For help in interpreting this policy, contact Avril Burrows (Data Protection Officer).

| Policy Date | Summary of Change | Contact | Implementation Date |
|-------------|--------------------|---------------|---------------------|
| 01/05/2018 | New policy created | Avril Burrows | [Insert date] |

Appendix One: Confidentiality

The school will ensure that:

- All staff receive confidentiality training as part of their induction programme
- All staff agree to be bound by the principles of the Data Protection Policy and recognise that the implication of a breach is a disciplinary matter.
- All other personnel who represent the school in any way will adhere to this policy,
- All databases are individually password protected, and paper records are securely locked away with restricted access.

This policy covers not only the written word but also the following areas where breaches of confidentiality could occur.

- Spoken Word

The school recognises that staff, parents and others from time to time will have to discuss sensitive matters. All personnel undertaking such dialogue must have due regard for the confidentiality of the person being discussed.

It is unacceptable for conversations to occur where persons who should not be allowed to hear the information can overhear.

Such breaches of confidentiality will always be treated as serious and may be subject to disciplinary procedures.

- Home Working

Staff and others who have information on school matters including Part 2 Governors' minutes must treat this information in the same way as if this work and any such documents are in school. All documents should be brought back to school for filing or shredding. Safe disposal is of paramount importance.

Sensitive, personal information must not be kept on home computers, unencrypted memory sticks, or other data storage devices.

Staff who are provided with school equipment to allow them to work away from school must return any such equipment at the end of their employment, term of office for governors, or when it is no longer needed. Any equipment remains the property of the school and all users must complete an acceptable usage agreement before equipment is issued. This agreement also applies for staff who have remote access to school computer infrastructure.

Appendix Two: Data Subject Access Requests

1. Article 21 of the GDPR outlines that a data subject has the right to object to processing. Requests to exercise this right are managed by the School's Data Protection Officer or their deputy who will ensure requests are logged on the School's information rights recording system and acknowledged within 3 working days.
2. The School reserves the right to request proof of identification from those wishing to exercise this right. The type of documentation we are prepared to accept in this instance is outlined on the Devon County Council's [Access to Information pages](#) online.
3. Once the School is satisfied of the identity of the person making a request to exercise this right, the requests will be sent to the relevant direct report to Head Teacher and relevant service lead for a decision as to whether the right to erasure can be complied with or whether there are other legitimate legal reasons to refuse this request. Where necessary, advice will be sought from the Data Protection Officer. Contentious matters will be referred to the relevant Head Teacher for a decision where necessary.
4. The School will respond to any requests to exercise this right within one calendar month of receipt. Our response will clearly outline the decision taken by the School and will detail how the data subject can appeal any decision. We will also endeavour to keep the data subject updated with progress of their request and will write to notify them of any delay in responding.

Appendix Three: Requests under the Freedom of Information Act 2000

The school follows the Information Commissioner's Office guidance on handling Freedom of Information Act requests.

| Obligation | Published guidance |
|--|--|
| Apply exemptions appropriately | Read the ICO's guidance on Refusing a request |
| Maintain a publication scheme | Read the ICO's guidance on Publication schemes |
| Refusing a request appropriately | Read the ICO's guidance on Refusing a request |
| Respond to requests within 20 working days | Read the ICO's guidance on Handling a request |

Appendix Four: Security Incident Management

What is a security incident?

1. An information security incident can occur when the confidentiality, availability and or integrity of the School's information is put at risk. Examples of activities considered an information security incident might include; information being at risk of or being lost; stolen; disclosed to the wrong recipients (accidentally or deliberately); accessed or attempted to be accessed unlawfully and/or without the permission of the School; sold or used without the permission of the School or a system containing personal data or sensitive business data malfunctions and the information is irretrievable indefinitely or for a long period of time.

Other examples of information security incidents might include;

- losing paper files or documents containing personal or sensitive business data, when travelling to or from meetings;
 - faxing or emailing personal or sensitive business data to the wrong recipients
 - posting personal or sensitive business data to the wrong recipients
 - deliberately or accidentally disclosing personal or sensitive business data to people who are not legally entitled to the information
 - using or selling personal or sensitive business data without the permission of the School
 - deliberately or accidentally sharing a password or entry code to an office, computer system or files containing personal or sensitive business data, to someone who is not ordinarily entitled to see the information.
 - computer equipment containing personal or sensitive business data is lost or stolen.
 - a business critical system containing personal or sensitive business data malfunctions and the information cannot be retrieved quickly
 - computer viruses, malware attacks or phishing scams against the School's IT systems
 - Unauthorised access or attempted access to IT systems or secure areas
2. An information security incident can compromise business operations resulting in embarrassment to the School or loss of trust in the organisation, by clients or members of the public. Information security incidents involving personal data can also result in a breach of the General Data Protection Regulation (GDPR) and other relevant data protection laws, which can lead to the School being fined up to 20 million euros or 4% of our turnover by the Information Commissioners Office. Such breaches can also adversely affect someone's privacy causing them damage and/or distress, which can lead to successful law suits as a result. The School therefore takes all security incidents very seriously.
 3. The School has a robust Security Incident Management process which is administered by the Data Protection Officer (DPO); the School Business Manager acts as deputy if the DPO is absent.

Appendix Five: Document Retention Schedule

The School has adopted the retention schedule provided by the Information and Records Management Society (IRMS) and recommended by Devon County Council.

Records must be stored in accordance with the retention schedule and disposed of appropriately when no longer needed.

Management of the School

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

| 1.1 Governing Body | | | | | |
|--------------------|--|--|--------------------------------|---|---|
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 1.1.1 | Agendas for Governing Body meetings | There may be data protection issues if the meeting is dealing with confidential issues relating to staff | | One copy should be retained with the master set of minutes. All other copies can be disposed of | SECURE DISPOSAL ¹ |
| 1.1.2 | Minutes of Governing Body meetings | There may be data protection issues if the meeting is dealing with confidential issues relating to staff | | | |
| | Principal Set (signed) | | | PERMANENT | If the school is unable to store these then they should be offered to the County Archives Service |
| | Inspection Copies ² | | | Date of meeting + 3 years | If these minutes contain any sensitive, personal information they must be shredded. |
| 1.1.3 | Reports presented to the Governing Body | There may be data protection issues if the report deals with confidential issues relating to staff | | Reports should be kept for a minimum of 6 years. However, if the minutes refer directly to individual reports then the reports should be kept permanently | SECURE DISPOSAL or retain with the signed set of the minutes |
| 1.1.4 | Meeting papers relating to the annual parents' meeting held under section 33 of the Education Act 2002 | No | Education Act 2002, Section 33 | Date of the meeting + a minimum of 6 years | SECURE DISPOSAL |

¹ In this context SECURE DISPOSAL should be taken to mean disposal using confidential waste bins, or if the school has the facility, shredding using a cross cut shredder.

² These are the copies which the clerk to the Governor may wish to retain so that requestors can view all the appropriate information without the clerk needing to print off and collate redacted copies of the minutes each time a request is made.

1.1 Governing Body

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|--------|---|------------------|--|--|--|
| 1.1.5 | Instruments of Government including Articles of Association | No | | PERMANENT | These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes. |
| 1.1.6 | Trusts and Endowments managed by the Governing Body | No | | PERMANENT | These should be retained in the school whilst the school is open and then offered to County Archives Service when the school closes. |
| 1.1.7 | Action plans created and administered by the Governing Body | No | | Life of the action plan + 3 years | SECURE DISPOSAL |
| 1.1.8 | Policy documents created and administered by the Governing Body | No | | Life of the policy + 3 years | SECURE DISPOSAL |
| 1.1.9 | Records relating to complaints dealt with by the Governing Body | Yes | | Date of the resolution of the complaint + a minimum of 6 years then review for further retention in case of contentious disputes | SECURE DISPOSAL |
| 1.1.10 | Annual Reports created under the requirements of the Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 | No | Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI 2002 No 1171 | Date of report + 10 years | SECURE DISPOSAL |
| 1.1.11 | Proposals concerning the change of status of a maintained school including Specialist Status Schools and Academies | No | | Date proposal accepted or declined + 3 years | SECURE DISPOSAL |

Please note that all information about the retention of records concerning the recruitment of Head Teachers can be found in the Human Resources section below.

1.2 Head Teacher and Senior Management Team

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|-------|--|---|----------------------|---|--|
| 1.2.1 | Log books of activity in the school maintained by the Head Teacher | There may be data protection issues if the log book refers to individual pupils or members of staff | | Date of last entry in the book + a minimum of 6 years then review | These could be of permanent historical value and should be offered to the County Archives Service if appropriate |
| 1.2.2 | Minutes of Senior Management Team meetings and the meetings of other internal administrative bodies | There may be data protection issues if the minutes refers to individual pupils or members of staff | | Date of the meeting + 3 years then review | SECURE DISPOSAL |
| 1.2.3 | Reports created by the Head Teacher or the Management Team | There may be data protection issues if the report refers to individual pupils or members of staff | | Date of the report + a minimum of 3 years then review | SECURE DISPOSAL |
| 1.2.4 | Records created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities | There may be data protection issues if the records refer to individual pupils or members of staff | | Current academic year + 6 years then review | SECURE DISPOSAL |
| 1.2.5 | Correspondence created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities | There may be data protection issues if the correspondence refers to individual pupils or members of staff | | Date of correspondence + 3 years then review | SECURE DISPOSAL |
| 1.2.6 | Professional Development Plans | Yes | | Life of the plan + 6 years | SECURE DISPOSAL |
| 1.2.7 | School Development Plans | No | | Life of the plan + 3 years | SECURE DISPOSAL |

1.3 Admissions Process

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|-------|--|------------------|--|--|--|
| 1.3.1 | All records relating to the creation and implementation of the School Admissions' Policy | No | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Life of the policy + 3 years then review | SECURE DISPOSAL |
| 1.3.2 | Admissions – if the admission is successful | Yes | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Date of admission + 1 year | SECURE DISPOSAL |
| 1.3.3 | Admissions – if the appeal is unsuccessful | Yes | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Resolution of case + 1 year | SECURE DISPOSAL |
| 1.3.4 | Register of Admissions | Yes | School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014 | Every entry in the admission register must be preserved for a period of three years after the date on which the entry was made. ³ | REVIEW Schools may wish to consider keeping the admission register permanently as often schools receive enquiries from past pupils to confirm the dates they attended the school. |
| 1.3.5 | Admissions – Secondary Schools – Casual | Yes | | Current year + 1 year | SECURE DISPOSAL |
| 1.3.6 | Proofs of address supplied by parents as part of the admissions process | Yes | School Admissions Code Statutory guidance for admission authorities, governing bodies, local authorities, schools adjudicators and admission appeals panels December 2014 | Current year + 1 year | SECURE DISPOSAL |

³ School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014 p6

1.3 Admissions Process

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|-------|--|------------------|----------------------|--|--|
| 1.3.7 | Supplementary Information form including additional information such as religion, medical conditions etc | Yes | | | |
| | For successful admissions | | | This information should be added to the pupil file | SECURE DISPOSAL |
| | For unsuccessful admissions | | | Until appeals process completed | SECURE DISPOSAL |

1.4 Operational Administration

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|-------|---|------------------|----------------------|------------------------------------|--|
| 1.4.1 | General file series | No | | Current year + 5 years then REVIEW | SECURE DISPOSAL |
| 1.4.2 | Records relating to the creation and publication of the school brochure or prospectus | No | | Current year + 3 years | STANDARD DISPOSAL |
| 1.4.3 | Records relating to the creation and distribution of circulars to staff, parents or pupils | No | | Current year + 1 year | STANDARD DISPOSAL |
| 1.4.4 | Newsletters and other items with a short operational use | No | | Current year + 1 year | STANDARD DISPOSAL |
| 1.4.5 | Visitors' Books and Signing in Sheets | Yes | | Current year + 6 years then REVIEW | SECURE DISPOSAL |
| 1.4.6 | Records relating to the creation and management of Parent Teacher Associations and/or Old Pupils Associations | No | | Current year + 6 years then REVIEW | SECURE DISPOSAL |

2. Human Resources

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

| 2.1 Recruitment | | | | | |
|-----------------|--|------------------|--|---|--|
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 2.1.1 | All records leading up to the appointment of a new headteacher | Yes | | Date of appointment + 6 years | SECURE DISPOSAL |
| 2.1.2 | All records leading up to the appointment of a new member of staff – unsuccessful candidates | Yes | | Date of appointment of successful candidate + 6 months | SECURE DISPOSAL |
| 2.1.3 | All records leading up to the appointment of a new member of staff – successful candidate | Yes | | All the relevant information should be added to the staff personal file (see below) and all other information retained for 6 months | SECURE DISPOSAL |
| 2.1.4 | Pre-employment vetting information – DBS Checks | No | DBS Update Service Employer Guide June 2014: Keeping children safe in education. July 2015 (Statutory Guidance from Dept. of Education) Sections 73, 74 | The school does not have to keep copies of DBS certificates. If the school does so the copy must NOT be retained for more than 6 months | |
| 2.1.5 | Proofs of identity collected as part of the process of checking “portable” enhanced DBS disclosure | Yes | | Where possible these should be checked and a note kept of what was seen and what has been checked. If it is felt necessary to keep copy documentation then this should be placed on the member of staff’s personal file | |
| 2.1.6 | Pre-employment vetting information – Evidence proving the right to work in the United Kingdom ⁴ | Yes | An employer’s guide to right to work checks [Home Office May 2015] | Where possible these documents should be added to the Staff Personal File [see below], but if they are kept separately then the Home Office requires that the documents are kept for termination of Employment plus not less than two years | |

2.2 Operational Staff Management

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|-------|--------------------------------------|------------------|---------------------------------|-------------------------------------|--|
| 2.2.1 | Staff Personal File | Yes | Limitation Act 1980 (Section 2) | Termination of Employment + 6 years | SECURE DISPOSAL |
| 2.2.2 | Timesheets | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 2.2.3 | Annual appraisal/ assessment records | Yes | | Current year + 5 years | SECURE DISPOSAL |

2.3 Management of Disciplinary and Grievance Processes

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|-------|--|------------------|--|--|---|
| 2.3.1 | Allegation of a child protection nature against a member of staff including where the allegation is unfounded ⁵ | Yes | "Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015" | Until the person's normal retirement age or 10 years from the date of the allegation whichever is the longer then REVIEW. Note allegations that are found to be malicious should be removed from personnel files. If found they are to be kept on the file and a copy provided to the person concerned | SECURE DISPOSAL These records must be shredded |
| 2.3.2 | Disciplinary Proceedings | Yes | | | |
| | oral warning | | | Date of warning ⁶ + 6 months | |
| | written warning – level 1 | | | Date of warning + 6 months | SECURE DISPOSAL |
| | written warning – level 2 | | | Date of warning + 12 months | [If warnings are placed on personal files then they must be weeded from the file] |
| | final warning | | | Date of warning + 18 months | |
| | case not found | | | If the incident is child protection related then see above otherwise dispose of at the conclusion of the case | SECURE DISPOSAL |

2.4 Health and Safety

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|-------|--|------------------|--|--|--|
| 2.4.1 | Health and Safety Policy Statements | No | | Life of policy + 3 years | SECURE DISPOSAL |
| 2.4.2 | Health and Safety Risk Assessments | No | | Life of risk assessment + 3 years | SECURE DISPOSAL |
| 2.4.3 | Records relating to accident/injury at work | Yes | | Date of incident + 12 years In the case of serious accidents a further retention period will need to be applied | SECURE DISPOSAL |
| 2.4.4 | Accident Reporting | Yes | Social Security (Claims and Payments) Regulations 1979 Regulation 25. Social Security Administration Act 1992 Section 8. Limitation Act 1980 | | |
| | Adults | | | Date of the incident + 6 years | SECURE DISPOSAL |
| | Children | | | DOB of the child + 25 years | SECURE DISPOSAL |
| 2.4.5 | Control of Substances Hazardous to Health (COSHH) | No | Control of Substances Hazardous to Health Regulations 2002. SI 2002 No 2677 Regulation 11; Records kept under the 1994 and 1999 Regulations to be kept as if the 2002 Regulations had not been made. Regulation 18 (2) | Current year + 40 years | SECURE DISPOSAL |
| 2.4.6 | Process of monitoring of areas where employees and persons are likely to have become in contact with asbestos | No | Control of Asbestos at Work Regulations 2012 SI 1012 No 632 Regulation 19 | Last action + 40 years | SECURE DISPOSAL |
| 2.4.7 | Process of monitoring of areas where employees and persons are likely to have become in contact with radiation | No | | Last action + 50 years | SECURE DISPOSAL |
| 2.4.8 | Fire Precautions log books | No | | Current year + 6 years | SECURE DISPOSAL |

⁴ Employers are required to take a "clear copy" of the documents which they are shown as part of this process

2.5 Payroll and Pensions

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

3. Financial Management of the School

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

3.1 Risk Management and Insurance

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|-------|--|------------------|----------------------|----------------------------------|--|
| 3.1.1 | Employer's Liability Insurance Certificate | No | | Closure of the school + 40 years | SECURE DISPOSAL |

3.2 Asset Management

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

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

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

3.3 Accounts and Statements including Budget Management

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|-------|--|------------------|----------------------|---|--|
| 3.3.1 | Annual Accounts | No | | Current year + 6 years | STANDARD DISPOSAL |
| 3.3.2 | Loans and grants managed by the school | No | | Date of last payment on the loan + 12 years then REVIEW | SECURE DISPOSAL |
| 3.3.3 | Student Grant applications | Yes | | Current year + 3 years | SECURE DISPOSAL |
| 3.3.4 | All records relating to the creation and management of budgets including the Annual Budget statement and background papers | No | | Life of the budget + 3 years | SECURE DISPOSAL |
| 3.3.5 | Invoices, receipts, order books and requisitions, delivery notices | No | | Current financial year + 6 years | SECURE DISPOSAL |
| 3.3.6 | Records relating to the collection and banking of monies | No | | Current financial year + 6 years | SECURE DISPOSAL |
| 3.3.7 | Records relating to the identification and collection of debt | No | | Current financial year + 6 years | SECURE DISPOSAL |

3.4 Contract Management

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|-------|---|------------------|----------------------|---|--|
| 3.4.1 | All records relating to the management of contracts under seal | No | Limitation Act 1980 | Last payment on the contract + 12 years | SECURE DISPOSAL |
| 3.4.2 | All records relating to the management of contracts under signature | No | Limitation Act 1980 | Last payment on the contract + 6 years | SECURE DISPOSAL |
| 3.4.3 | Records relating to the monitoring of contracts | No | | Current year + 2 years | SECURE DISPOSAL |

3.5 School Fund

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|-------|-------------------------------|------------------|----------------------|--------------------------------|--|
| 3.5.1 | School Fund - Cheque books | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.2 | School Fund - Paying in books | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.3 | School Fund – Ledger | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.4 | School Fund – Invoices | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.5 | School Fund – Receipts | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.6 | School Fund - Bank statements | No | | Current year + 6 years | SECURE DISPOSAL |
| 3.5.7 | School Fund – Journey Books | No | | Current year + 6 years | SECURE DISPOSAL |

3.6 School Meals Management

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

4. Property Management

This section covers the management of buildings and property.

| 4.1 Property Management | | | | | |
|-------------------------|---|------------------|----------------------|--|--|
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 4.1.1 | Title deeds of properties belonging to the school | No | | PERMANENT These should follow the property unless the property has been registered with the Land Registry | |
| 4.1.2 | Plans of property belong to the school | No | | These should be retained whilst the building belongs to the school and should be passed onto any new owners if the building is leased or sold. | |
| 4.1.3 | Leases of property leased by or to the school | No | | Expiry of lease + 6 years | SECURE DISPOSAL |
| 4.1.4 | Records relating to the letting of school premises | No | | Current financial year + 6 years | SECURE DISPOSAL |
| 4.2 Maintenance | | | | | |
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 4.2.1 | All records relating to the maintenance of the school carried out by contractors | No | | Current year + 6 years | SECURE DISPOSAL |
| 4.2.2 | All records relating to the maintenance of the school carried out by school employees including maintenance log books | No | | Current year + 6 years | SECURE DISPOSAL |

5. Pupil Management

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

| 5.1 Pupil's Educational Record | | | | | |
|--------------------------------|---|------------------|---|---|---|
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 5.1.1 | Pupil's Educational Record required by The Education (Pupil Information) (England) Regulations 2005 | Yes | The Education (Pupil Information) (England) Regulations 2005 SI 2005 No. 1437 | | |
| | Primary | | | Retain whilst the child remains at the primary school | <p>The file should follow the pupil when he/she leaves the primary school. This will include:</p> <ul style="list-style-type: none"> • to another primary school • to a secondary school • to a pupil referral unit • If the pupil dies whilst at primary school the file should be returned to the Local Authority to be retained for the statutory retention period. <p>If the pupil transfers to an independent school, transfers to home schooling or leaves the country the file should be returned to the Local Authority to be retained for the statutory retention period. Primary Schools do not ordinarily have sufficient storage space to store records for pupils who have not transferred in the normal way. It makes more sense to transfer the record to the Local Authority as it is more likely that the pupil will request the record from the Local Authority</p> |
| | Secondary | | Limitation Act 1980 (Section 2) | Date of Birth of the pupil + 25 years | SECURE DISPOSAL |
| 5.1.2 | Examination Results – Pupil Copies | Yes | | | |
| | Public | | | This information should be added to the pupil file | All uncollected certificates should be returned to the examination board. |
| | Internal | | | This information should be added to the pupil file | |

5.1 Pupil's Educational Record

| Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|---|------------------|--|---|--|
| <p>This review took place as the Independent Inquiry on Child Sexual Abuse was beginning. In light of this, it is recommended that all records relating to child abuse are retained until the Inquiry is completed. This section will then be reviewed again to take into account any recommendations the Inquiry might make concerning record retention</p> | | | | |
| 5.1.3 Child Protection information held on pupil file | Yes | "Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015" | If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file. | SECURE DISPOSAL – these records MUST be shredded |
| 5.1.4 Child protection information held in separate files | Yes | "Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children March 2015" | DOB of the child + 25 years then review This retention period was agreed in consultation with the Safeguarding Children Group on the understanding that the principal copy of this information will be found on the Local Authority Social Services record | SECURE DISPOSAL – these records MUST be shredded |

Retention periods relating to allegations made against adults can be found in the Human Resources section of this retention schedule.

| 5.2 Attendance | | | | | |
|----------------|---|------------------|--|--|--|
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 5.2.1 | Attendance Registers | Yes | School attendance: Departmental advice for maintained schools, academies, independent schools and local authorities October 2014 | Every entry in the attendance register must be preserved for a period of three years after the date on which the entry was made. | SECURE DISPOSAL |
| 5.2.2 | Correspondence relating to authorized absence | | Education Act 1996 Section 7 | Current academic year + 2 years | SECURE DISPOSAL |

| 5.3 Special Educational Needs | | | | | |
|-------------------------------|---|------------------|---|---|--|
| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
| 5.3.1 | Special Educational Needs files, reviews and Individual Education Plans | Yes | Limitation Act 1980 (Section 2) | Date of Birth of the pupil + 25 years | REVIEW NOTE: This retention period is the minimum retention period that any pupil file should be kept. Some authorities choose to keep SEN files for a longer period of time to defend themselves in a "failure to provide a sufficient education" case. There is an element of business risk analysis involved in any decision to keep the records longer than the minimum retention period and this should be documented. |
| 5.3.2 | Statement maintained under section 234 of the Education Act 1990 and any amendments made to the statement | Yes | Education Act 1996 Special Educational Needs and Disability Act 2001 Section 1 | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold |
| 5.3.3 | Advice and information provided to parents regarding educational needs | Yes | Special Educational Needs and Disability Act 2001 Section 2 | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold |
| 5.3.4 | Accessibility Strategy | Yes | Special Educational Needs and Disability Act 2001 Section 14 | Date of birth of the pupil + 25 years [This would normally be retained on the pupil file] | SECURE DISPOSAL unless the document is subject to a legal hold |

6. Curriculum Management

6.1 Statistics and Management Information

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|-------|--|------------------|----------------------|---|--|
| 6.1.1 | Curriculum returns | No | | Current year + 3 years | SECURE DISPOSAL |
| 6.1.2 | Examination Results (Schools Copy) | Yes | | Current year + 6 years | SECURE DISPOSAL |
| | SATS records – Results | Yes | | The SATS results should be recorded on the pupil's educational file and will therefore be retained until the pupil reaches the age of 25 years. The school may wish to keep a composite record of all the whole year SATs results. These could be kept for current year + 6 years to allow suitable comparison | SECURE DISPOSAL |
| | Examination Papers | | | The examination papers should be kept until any appeals/validation process is complete | SECURE DISPOSAL |
| 6.1.3 | Published Admission Number (PAN) Reports | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 6.1.4 | Value Added and Contextual Data | Yes | | Current year + 6 years | SECURE DISPOSAL |
| 6.1.5 | Self Evaluation Forms | Yes | | Current year + 6 years | SECURE DISPOSAL |

6.2 Implementation of Curriculum

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|-------|------------------------|------------------|----------------------|---|--|
| 6.2.1 | Schemes of Work | No | | Current year + 1 year | It may be appropriate to review these records at the end of each year and allocate a further retention period or SECURE DISPOSAL |
| 6.2.2 | Timetable | No | | Current year + 1 year | |
| 6.2.3 | Class Record Books | No | | Current year + 1 year | |
| 6.2.4 | Mark Books | No | | Current year + 1 year | |
| 6.2.5 | Record of homework set | No | | Current year + 1 year | |
| 6.2.6 | Pupils' Work | No | | Where possible pupils' work should be returned to the pupil at the end of the academic year if this is not the school's policy then current year + 1 year | SECURE DISPOSAL |

7. Extra Curricular Activities

7.1 Educational Visits outside the Classroom

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|-------|---|------------------|--|---|---|
| 7.1.1 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Primary Schools | No | Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice". | Date of visit + 14 years | SECURE DISPOSAL |
| 7.1.2 | Records created by schools to obtain approval to run an Educational Visit outside the Classroom – Secondary Schools | No | Outdoor Education Advisers' Panel National Guidance website http://oeapng.info specifically Section 3 - "Legal Framework and Employer Systems" and Section 4 - "Good Practice". | Date of visit + 10 years | SECURE DISPOSAL |
| 7.1.3 | Parental consent forms for school trips where there has been no major incident | Yes | | Conclusion of the trip | Although the consent forms could be retained for DOB + 22 years, the requirement for them being needed is low and most schools do not have the storage capacity to retain every single consent form issued by the school for this period of time. |
| 7.1.4 | Parental permission slips for school trips – where there has been a major incident | Yes | Limitation Act 1980 (Section 2) | DOB of the pupil involved in the incident + 25 years The permission slips for all the pupils on the trip need to be retained to show that the rules had been followed for all pupils | |

7.2 Walking Bus

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

7.3 Family Liaison Officers and Home School Liaison Assistants

| | Basic file description | Data Prot Issues | Statutory Provisions | Retention Period [Operational] | Action at the end of the administrative life of the record |
|-------|--|------------------|----------------------|---|--|
| 7.3.1 | Day Books | Yes | | Current year + 2 years then review | |
| 7.3.2 | Reports for outside agencies - where the report has been included on the case file created by the outside agency | Yes | | Whilst child is attending school and then destroy | |
| 7.3.3 | Referral forms | Yes | | While the referral is current | |
| 7.3.4 | Contact data sheets | Yes | | Current year then review, if contact is no longer active then destroy | |
| 7.3.5 | Contact database entries | Yes | | Current year then review, if contact is no longer active then destroy | |
| 7.3.6 | Group Registers | Yes | | Current year + 2 years | |

8. Central Government and Local Authority

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

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

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