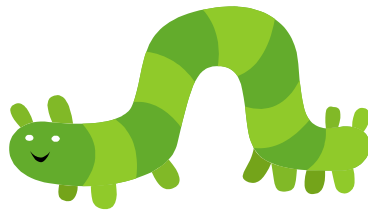




**and**



**Abbots Farm Preschool**

**Data Retention Policy**

**March 2026**

**Review by March 2027**

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## Statement of intent

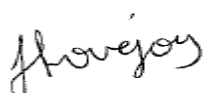
Abbots Farm Infant School and Abbots Farm Preschool are committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible to the appropriate individuals. In line with the requirements of the UK GDPR, the school also has a responsibility to ensure that all records are only kept for as long as is necessary to fulfil the purpose(s) for which they were intended. Maintaining good records helps us to provide the evidence needed to protect the legal rights and interests of our school, and for us to demonstrate our performance and accountability.

This policy applies to all records created, received or maintained by permanent and temporary staff of the school in the course of carrying out its functions. Also, by any agents, contractors, consultants or third parties acting on behalf of the school.

Records are defined as all documents which facilitate the business carried out by the school and which are thereafter retained to provide evidence of transactions or activities. These records may be created, received or maintained in hard copy or electrical format e.g. paper documents, scanned documents, e-mails, audio and video recordings, text messages, notes of telephone, spreadsheets, word processing documents, presentations, etc.

This document complies with the requirements set out in the UK GDPR and Data Protection Act 2018.

Signed by:



Headteacher

Date: 20/1/26



Chair of  
Governors

Date: 20/1/26

# 1. Legal framework

This policy has due regard to legislation including, but not limited to, the following:

- UK General Data Protection Regulation (GDPR)
- EU GDPR
- Freedom of Information Act 2000
- Limitation Act 1980 (as amended by the Limitation Amendment Act 1980)
- Data Protection Act 2018

This policy also has due regard to the following guidance:

- DfE (2024) 'Data protection in schools'
- DfE (2018) 'Data protection: a toolkit for schools'
- Information Records Management Society (IRMS) (2019) 'Information Management Toolkit for Schools'
- ICO (2024) 'How do we document our processing activities?'
- ICO (2024) 'Controllers checklist'

This policy will be implemented in accordance with the following school policies and procedures:

- Archived Files Log
- Acceptable Use Policy
- Cyber Security Policy
- Data Protection Policy
- Disposal of Records Log
- Freedom of Information Policy

This policy operates in conjunction with the following privacy notices:

- Parents and pupils
- Staff
- Governors
- Visitors
- Recruitment

## 2. Roles and responsibilities

The whole school has a responsibility for maintaining its records and record-keeping systems in line with statutory requirements.

The headteacher holds the overall responsibility for this policy and for ensuring it is implemented correctly.

### 2.1 The Governing Body

The Governing Body of the school has a statutory responsibility to ensure the school's records and record keeping systems are maintained in accordance with the regulatory

framework of the school.

## **2.2 Data Champion(s)**

Jeanette Lovejoy (Headteacher) and Lydia Mortimer (School Business Manager) will provide guidance on good records management practices within the school and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way.

The Data Champion(s) will monitor compliance with this policy by ensuring that the 'Annual Review of School Records Checklist' is completed **at least** annually.

## **2.3 All Staff**

It is the responsibility for all members of staff to ensure that our school does not keep personal information for longer than is necessary for the purpose or purposes for which it was collected.

Our school will manage and document its records disposal process in line with the guidance provided by the IRMS Toolkit for Schools.

It is the responsibility of all members of staff to ensure that they:

- Manage school records consistently in accordance with our schools' policies and procedures;
- Properly document their actions and decisions;
- Hold personal information securely;
- Only share personal information appropriately and do not disclose it to an unauthorised third party;
- Dispose of records securely in accordance with the guidance set out in the IRMS Toolkit for Schools and school's Records Retention Schedule which can be found online:  
<https://irms.org.uk/page/SchoolsToolkit>

Staff who do not comply with this policy may face disciplinary action.

This policy does not form part of any employee's contract of employment and may be amended at any time.

## **3. Management of pupil records**

Pupil records are specific documents that are used throughout a pupil's time in the education system – they are passed to each school that a pupil attends and include all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievements.

The following information is stored on the front of a pupil record, and will be easily accessible:

- Forename, surname, and date of birth
- Unique pupil number

- Note of the date when the file was opened

The following information is stored in the pupil record in Arbor, and is easily accessible:

- Any preferred names
- Emergency contact details and the name of the pupil's doctor
- Any allergies or other medical conditions that are important to be aware of
- Names of people with parental responsibility, including their home address(es) and telephone number(s)
- Content of admissions form
- Details of any Special Educational Needs and/or Disabilities (SEND)
- Any other agency involvement, e.g. Speech and Language Therapy
- Details of previous settings

The following information is stored on a pupil's SEND record, and will be easily accessible:

- Notes relating to major incidents and accidents involving the pupil
- Any information about an Education Health and Care Plan (EHCP) and support offered in relation to the EHCP
- Any correspondence with parents or external agencies relating to major issues, e.g. mental health

The following information is stored separately in a personal file for the pupil in the **school office**:

- Admissions form including parental consent forms for educational visits, photographs and videos, etc.
- Information received from a previous setting
- Attendance registers and information
- Medical information relevant to the pupil's on-going education and behaviour
- Consent to administer medication and administration records
- Evidence that the pupil's birth certificate, passport, etc. have been seen.
- Correspondence with parents about minor issues, e.g. behavior
- Any information relating to exclusions
- Data collection forms
- Annual written reports to parents
- Assessment information

Hard copies of disclosures and reports relating to child protection are stored in a securely locked drawer in the **headteacher's office** – this is indicated by a sticky dot on the pupil's file.

Hard copies of complaints made by parents or pupils are stored in a file in the

### **headteacher's office.**

Actual copies of accident and incident information are stored separately on the Warwickshire County Council (WCC) accident reporting system and held in line with the retention periods outlined in this policy – a note indicating this is marked on the pupil's file. An additional copy may be placed in the pupil's file in the event of a major accident or incident.

The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend. The only exception is if any records placed on the pupil's file have a shorter retention period and may need to be removed. In such cases, the Data Protection Officer (DPO) will remove these records.

Electronic records relating to a pupil's record will also be transferred to the pupil's next school.

Pupils' educational records will follow them when they leave the school; however the school may keep hold of information about pupils for a short period to allow for any queries or reports to be completed or where linked records in the school information management system have not yet reached the end of their retention period and deleting the records would cause problems.

Certain elements of pupils' records may be retained for longer, e.g. if litigation is pending, or for transfer to the Local Record Office, in accordance with the retention schedule.

In circumstances where an Independent Inquiry into Child Sexual Abuse (IICSA) is ongoing, any records relating to the IICSA will be subject to a separate indication of the appropriate retention periods. The school will never destroy any records relating to an IICSA whilst the inquiry is ongoing and will abide by the appropriate retention periods.

The school will, wherever possible, avoid sending a pupil record by post. Where a pupil record must be sent by post, it will be sent by registered post, with an accompanying list of the files included. The school it is sent to is required to sign a copy of the list to indicate that they have received the files and return this to the school.

If the receiving school does not wish to have a hard copy of the pupil records, they will confirm this in writing and all documents will be shredded.

## **4. Retention of pupil records and other pupil-related information**

The table below outlines the school's retention periods for individual pupil records and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will be destroyed in line with the

retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Personal identifiers, contacts and personal characteristics</b>		
Images used for identification purposes	For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month	Securely disposed of
Images used in displays	Whilst the pupil is at school	Securely disposed of
Images used for marketing purposes	In line with the consent period	Securely disposed of
Postcodes, names and characteristics	Whilst the pupil is at school, plus five years	Securely disposed of
House number and road	For the duration of the event/activity, plus one month	Securely disposed of
<b>Admissions</b>		
Register of admissions	Every entry in the admissions register will be preserved for a period of three years after the date on which the entry was made	Information is reviewed and the register may be kept permanently
Admissions (where the admission is successful)	Date of admission, plus one year	Securely disposed of
Proof of address (supplied as part of the admissions process)	Current academic year, plus one year	Securely disposed of
Supplementary information submitted, including religious and medical information etc. (where the admission was successful)	Information added to the pupil file	Securely disposed of
All records relating to the creation and implementation of the Admissions Policy	Life of the policy, plus three years and then review	Securely disposed of
<b>Pupils' educational records</b>		

Pupils' educational records	Whilst the pupil remains at the school	<p>Transferred to the next destination – if this is an independent school, home-schooling or outside of the UK, the file will be kept by the LA and retained for the statutory period</p> <p>The IRMS advises that information can be retained for a short period to allow for any queries or reports to be completed or where linked records in the school information management system have not yet reached the end of their retention period and deleting would cause problems</p>
DfE assessment results	Added to the pupil's record and transferred to next school	Securely disposed of
Internal examination results	Added to the pupil's record and transferred to next school	Reviewed and securely disposed of if no longer needed
Behaviour records	<p>Added to the pupil's record and transferred to the next school</p> <p>Copies are held whilst the pupil is at school, plus one year</p>	Securely disposed of
Exclusion records	<p>Added to the pupil's record and transferred to the next school</p> <p>Copies are held whilst the pupil is at school, plus one year</p>	Securely disposed of

Child protection records held in a separate file	Electronic copy 25 years after the pupil's date of birth Paperwork securely transferred to next school Records also subject to any instruction given by the Independent Inquiry into Child Sex Abuse (IICSA)	Securely disposed of – shredded
Assessment information	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Pupils' work	Returned to pupil at the end of current academic year  If this is not possible, hold for the current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Education destinations data	Whilst the pupil is at the school, plus at least three years	Securely disposed of
<b>Attendance</b>		
Attendance registers	Every entry is retained for a period of three years after the date on which the entry was made	Securely disposed of
Correspondence relating to any absence (authorised or unauthorised)	Current academic year, plus two years	Securely disposed of
<b>Medical information and administration</b>		
Permission slips	For the duration of the period that medication is given, plus one month	Securely disposed of

Medical conditions – ongoing management	Added to the pupil's record and transferred to the next school  Copies held whilst the pupil is at school, plus one year	Securely disposed of
Medical incidents that have a behavioural or safeguarding influence	Added to the pupil's record and transferred to the next school  Copies held whilst the pupil is at school, plus 25 years	Securely disposed of
<b>SEND</b>		
SEND files, reviews and EHC plans, including advice and information provided to parents regarding educational needs and accessibility strategy	25 years after the pupil's date of birth, (as stated on the pupil's record, minimum until child's 30 <sup>th</sup> birthday)  For children with an EHCP pupil's date of birth, plus 31 years	Securely disposed of
<b>Curriculum management</b>		
DfE assessment results	25 years after the pupil's date of birth (as stated on the pupil's record)  A composite of the whole year's results may be held for the current year plus six years, for comparative purposes	Securely disposed of
Published Admission Number (PAN) reports	Current academic year, plus six years	Securely disposed of
Valued added and contextual data	Current academic year, plus six years	Securely disposed of

Self-evaluation forms (internal moderation)	Current academic year, plus one year	Securely disposed of
Self-evaluation forms (external moderation)	Retained until superseded	Securely disposed of
Pupils' work – in books	Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year	Securely disposed of
Pupils' work – on Class Dojo	Archived on Class Dojo at the end of the academic year. Retained for the pupils time at AFIS	Deleted from App
<b>Extra-curricular activities</b>		
Field file – information taken on school trips	<p>Until the conclusion of the trip, plus one month</p> <p>Where a minor incident occurs (medical incident treated as if 'within school'), field files are added to the core system as appropriate</p> <p>Where a major incident occurs (needing external agency), entire file to be retained until youngest child becomes 25</p>	Securely disposed of
Trip packs – information taken on school trips	<p>Until the end of the visit</p> <p>Where a minor incident occurs (medical incident treated as if 'within school'), files are added to the core system as appropriate</p>	Shredded upon return to school

	Where a major incident occurs (needing external agency), entire file to be retained until youngest child becomes 25	
Financial information relating to school trips	Whilst the pupil remains at school, plus six years	Securely disposed of
Parental consent forms for school trips where no major incident occurred	Until the conclusion of the trip, unless a school risk assessment decides the forms are likely to be required for any reason, in which case they should be retained for 22 years after the pupil's date of birth	Securely disposed of – shredded
Parental consent forms for school trips where a major incident occurred	25 years after the pupil's date of birth on the pupil's record (permission slips of all pupils on the trip will also be held to show that the rules had been followed for all pupils)	Securely disposed of – shredded
Educational visitors in school – sharing of personal information	Until the conclusion of the visit, plus one month	Securely disposed of
<b>Catering and free school meal management</b>		
Meal administration	Whilst the pupil is at school, plus one year	Securely disposed of
Meal eligibility	Whilst the pupil is at school, plus five years	Securely disposed of
School meal registers	Current year plus three years	Securely disposed of
Free school meal registers (where used as a basis for funding)	Current year plus six years	Securely disposed of
School meals summary sheets	Current year plus three years	Securely disposed of

## 5. Retention of staff records

The table below outlines the school's retention period for staff records and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Operational</b>		
Staff members' personnel file	Termination of employment, plus six years, unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file will be retained until the IICSA enquiries are complete	Securely disposed of
Annual appraisal and assessment records	Current academic year, plus six years	Securely disposed of
Sickness absence monitoring (where sickness pay is not paid)	Current academic year, plus three years	Securely disposed of
Sickness absence monitoring (where sickness pay is paid)	Current academic year, plus six years	Securely disposed of
Staff training (where training leads to CPD)	Length of time required by the CPD professional body	Securely disposed of
Staff training (except where the training relates to dealing with pupils, e.g. first aid or health and safety)	Retained in the personnel file	Securely disposed of
Staff training (where the training relates to pupils, e.g. safeguarding or other pupil-related training)	Date of the training, plus 40 years	Securely disposed of
<b>Recruitment</b>		
Records relating to the appointment of a new headteacher (unsuccessful attempts)	Date of appointment, plus six months.	Securely disposed of

Records relating to the appointment of a new headteacher (successful appointments)	Added to personnel file and retained until the end of appointment, plus six years, except in cases of negligence or claims of child abuse, then records are retained for at least 15 years	Securely disposed of
Records relating to the appointment of new members of staff or governors (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	Securely disposed of
Pre-employment vetting information (successful candidates)	For the duration of the employee's employment, plus six years	Securely disposed of
DBS certificates	Up to six months	Securely disposed of
Proof of identify as part of the enhanced DBS check	If it is necessary to keep a copy, it will be placed in the staff member's personnel file	Securely disposed of
Evidence of right to work in the UK	Added to staff personnel file or, if kept separately, termination of employment, plus no longer than two years	Securely disposed of
<b>Disciplinary and grievance procedures</b>		
Child protection allegations, including where the allegation is unproven	<p>Added to staff personnel file, and until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer</p> <p>If allegations are malicious, they are removed from personal files</p> <p>If allegations are found, they are kept on the personnel file and a copy is provided to the person concerned</p>	Reviewed and securely disposed of – shredded

	unless the member of staff is part of any case which falls under the terms of reference of the IICSA. If this is the case, the file is retained until IICSA enquiries are complete	
Oral warnings	Date of warning, plus six months	Securely disposed of – if placed on staff personnel file, removed from file
Written warning – level 1	Date of warning, plus six months	Securely disposed of – if placed on staff personnel file, removed from file
Written warning – level 2	Date of warning, plus 12 months	Securely disposed of – if placed on staff personnel file, removed from file
Final warning	Date of warning, plus 18 months	Securely disposed of – if placed on staff personnel file, removed from file
Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related, then it is disposed of as <a href="#">above</a>	Securely disposed of

## 6. Retention of governance records

The table below outlines the school's retention periods for governance records, and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Governance</b>		
Agendas for governing body meetings	One copy alongside the original set of minutes – all others disposed of without retention	Local archives consulted before secure disposal
Original, signed copies of the minutes of governing body meetings	Permanent – or at least for 10 years from the date of the meeting	Shredded if they contain any sensitive or personal information, but the local archives will be consulted first

Reports presented to the governing body that are referred to in the minutes	Permanent – all others disposed of without retention	Local archives consulted and then securely disposed of
Instruments of government	Permanent	Local archives consulted and then securely disposed of
Action plans created and administered by the governing body	Until superseded or whilst relevant	Securely disposed of
Policy documents created and administered by the governing body	Until superseded or whilst relevant	Securely disposed of
Records relating to complaints dealt with by the governing body or headteacher	Date of resolution of complaint, plus six years  If negligence is involved, records are retained for the current academic year, plus 15 years  If child protection or safeguarding issues are involved, the records are retained for the current academic year, plus 40 years	Reviewed for further retention in case of contentious disputes, then securely disposed of
Proposals concerning changing the status of the school	Date proposal accepted or declined, plus three years	Securely disposed of
Records relating to the appointment of co-opted governors	Date of election, plus six months	Securely disposed of
Records relating to the election of the chair of the governing body and the vice chair	Destroyed after the decision has been recorded in the minutes	Securely disposed of
Scheme of delegation and terms of reference for committees	Until superseded or whilst relevant	Reviewed and offered to the local archives if appropriate
Meeting schedule	Current academic year	Standard disposal
Register of attendance at full governing body meetings	Date of last meeting in the book, plus six years	Securely disposed of

Records relating to governor monitoring visits	Date of the visit, plus three years	Securely disposed of
Correspondence sent and received by the governing body or headteacher	Current academic year, plus three years	Securely disposed of
Records relating to the appointment of the clerk to the governing body	Date on which the clerk's appointment ends, plus six years	Securely disposed of
Records relating to the terms of office of serving governors, including evidence of appointment	Date on which the governor's appointment ends, plus six years	Securely disposed of
Records relating to governor declaration against disqualification criteria	Date on which the governor's appointment ends, plus six years	Securely disposed of
Register of business interests	Date the governor's appointment ends, plus six years	Securely disposed of
Governor code of conduct	Dynamic document – kept permanently	Securely disposed of
Records relating to the training required and received by governors	Date the governor steps down, plus six years	Securely disposed of
Records relating to the induction programme for new governors	Date on which the governor's appointment ends, plus six years	Securely disposed of
Records relating to DBS checks carried out on the clerk and members of the governing board	Date of the DBS check, plus six months	Securely disposed of
Governor personnel files	Date on which the governor's appointment ends, plus six years	Securely disposed of

## 7. Retention of senior leadership and management records

The table below outlines the school's retention periods for senior leadership and management records, and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Headteacher and SLT</b>		
Minutes of meetings	Date of the meeting, plus three years	Reviewed annually and securely disposed of if not needed
Reports created by the headteacher or SLT	Date of the report, plus a minimum of three years	Reviewed annually and securely disposed of if not needed
Records created by the headteacher, deputy headteacher, subject leaders and other members of staff with administrative responsibilities	Current academic year, plus six years	Reviewed annually and securely disposed of if not needed
Correspondence created by the headteacher, deputy headteacher, teachers and other members of staff with administrative responsibilities	Date of correspondence, plus three years	Securely disposed of
Professional development plan	Held on the individual's personnel record. If not, then it is retained for the duration of the plan, plus six years	Securely disposed of
LIP	Duration of the plan, plus three years	Securely disposed of

## 8. Retention of health and safety records

The table below outlines the school's retention periods for health and safety records, and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Health and safety</b>		
Health and safety policy statements	Duration of policy, plus three years	Securely disposed of
Health and safety risk assessments	Duration of risk assessment, plus three years provided that a copy of the risk	Securely disposed of

	assessment is stored with the accident report if an incident has occurred	
Records relating to any reportable death, injury, disease or dangerous occurrence under RIDDOR	Date of incident, plus three years provided that all records relating to the incident are held on the personnel file	Securely disposed of
Accident reporting – adults	WCC online reporting - Three years after the last entry	Securely disposed of
Accident reporting – pupils	WCC online reporting - Three years after the last entry	Securely disposed of
Records kept under the Control of Substances Hazardous to Health Regulations	Date of incident, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with asbestos (on ATLAS)	Date of last action, plus 40 years	Securely disposed of
Fire precautions log books	Current academic year, plus three years	Securely disposed of
Health and safety documents (on ATLAS) to show current state of buildings, including all alterations (wiring, plumbing, building works etc.) to be passed on in the case of change of ownership	Permanent	Passed to new owner on sale or transfer of building

## 9. Retention of financial records

The table below outlines the school's retention periods for financial records and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Payroll and pensions</b>		
Maternity pay records	Current academic year, plus three years	Securely disposed of
Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Current academic year, plus six years	Securely disposed of
Timesheets	Current academic year, plus three years	Securely disposed of
Absence record	Current academic year, plus three years	Securely disposed of
Insurance	Current academic year, plus six years	Securely disposed of
National insurance – schedule of payments	Current academic year, plus six years	Securely disposed of
Overtime	Current academic year, plus three years	Securely disposed of
Part-time fee claims	Current academic year, plus six years	Securely disposed of
Payroll awards	Current academic year, plus six years	Securely disposed of
Payroll (gross/net weekly or monthly)	Current academic year, plus six years	Securely disposed of

Payroll reports	Current academic year, plus six years	Securely disposed of
Pension payroll	Current academic year, plus six years	Securely disposed of
Personal bank details	Until superseded, plus three years	Securely disposed of
Sickness records	Current academic year, plus three years	Securely disposed of
Staff returns	Current academic year, plus three years	Securely disposed of
Superannuation adjustments	Current academic year, plus six years	Securely disposed of
Superannuation reports	Current academic year, plus six years	Securely disposed of
Tax forms	Current academic year, plus six years	Securely disposed of
<b>Risk management and insurance</b>		
Employer's liability insurance certificate	Closure of the school, plus 40 years	Securely disposed of  Passed to the LA if the school closes
<b>Asset management</b>		
Inventories of furniture and equipment	Current academic year, plus six years	Securely disposed of

Burglary, theft and vandalism report forms	Current academic year, plus six years	Securely disposed of
<b>Accounts and statements including budget management</b>		
Annual accounts	Current academic year, plus six years	Disposed of against common standards
Loans and grants managed by the school	Date of last payment, plus 12 years	Information is reviewed then securely disposed of
All records relating to the creation and management of budgets	Duration of the budget, plus three years	Securely disposed of
Invoices, receipts, order books, requisitions and delivery notices	Current financial year, plus six years	Securely disposed of
Records relating to the collection and banking of monies	Current financial year, plus six years	Securely disposed of
Records relating to the identification and collection of debt	Final payment, plus six years	Securely disposed of
<b>Contract management</b>		
All records relating to the management of contracts under seal	Last payment on the contract, plus 12 years	Securely disposed of
All records relating to the management of contracts under signature	Last payment on the contract, plus six years	Securely disposed of
All records relating to the monitoring of contracts	Life of the contract, plus six or 12 years	Securely disposed of
<b>School fund</b>		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Securely disposed of
<b>School meals</b>		
FSM registers (where the register is used as a basis for funding)	Current academic year, plus six years	Securely disposed of
School meals registers	Current academic year, plus three years	Securely disposed of

School meals summary sheets	Current academic year, plus three years	Securely disposed of
<b>Pupil finance</b>		
Pupil premium fund records	Date the pupil leaves the school, plus six years	Securely disposed of

## 10. Retention of other school records

The table below outlines the school's retention periods for any other records held by the school, and the action that will be taken after the retention period, in line with any requirements.

Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Retention period	Action taken after retention period ends
<b>Property management</b>		
Title deeds of properties belonging to the school	Permanent	Transferred to new owners if the building is leased or sold
Plans of property belonging to the school	For as long as the building belongs to the school	Transferred to new owners if the building is leased or sold
Records relating to the letting of school premises	Current financial year, plus six years	Securely disposed of
<b>Maintenance</b>		
All records relating to the maintenance of the school carried out by contractors	For as long as the school owns the building and then passed onto any new owners if the building is leased or sold	Securely disposed of
All records relating to the maintenance of the school carried out by school employees	For as long as the school owns the building and then passed onto any new owners if the building is leased or sold	Securely disposed of
<b>Operational administration</b>		
Records relating to the creation and publication of the school brochure and/or prospectus	Current academic year, plus three years	If a copy is not preserved by the school, standard disposal

Records relating to the creation and distribution of circulars to staff, parents or pupils	Current academic year, plus one year	Disposed of against common standards
Newsletters and other items with short operational use	Current academic year, plus one year	One copy archived, other copies standard disposal
Visitors' books and signing-in sheets	Last entry in the logbook, plus six years	Reviewed then securely disposed of
Records relating to the creation and management of parent-teacher associations	Current academic year, plus six years	Reviewed then securely disposed of
School privacy notice which is sent to parents	Until superseded, plus six years	Standard disposal
Consents relating to school activities	While pupil attends the school	Secure disposal

## 11. Retention of emails

Group email addresses will have an assigned member of staff who takes responsibility for managing the account and ensuring the correct disposal of all sent and received emails. All staff members with an email account will be responsible for managing their inbox.

Emails can act as evidence of the school's activities, i.e. in business and fulfilling statutory duties, so all relevant emails, e.g. invoices, will be retained for at least **12 months**. Invoices received and sent in emails will be printed off and retained in accordance with Section 8 of this policy.

The school's expectations of staff members in relation to their overall conduct when sending and receiving emails is addressed in the school's Online Safety Policy. All emails will be automatically deleted after **12 months**, unless stated otherwise.

Correspondence created by the SLT and other members of staff with administrative responsibilities will be retained for **three** years before being reviewed and, if necessary, securely disposed of.

Staff members will not, under any circumstances, create their own email archives, e.g. saving emails on to personal hard drives. Staff members will be aware that the emails they send could be required to fulfil a Subject Access Request (SAR) or Freedom of Information (FOI) request. Emails will be drafted carefully, and staff members will review the content before sending.

Individuals, including children, have the right to submit an SAR to gain access to

their personal data to verify the lawfulness of the processing – this includes accessing emails.

All SARs will be handled in accordance with the school's Data Protection Policy. FOI requests will be handled in accordance with the school's Freedom of Information Policy.

When handling a request for information, the DPO will speak to the requestor to clarify the scope of the request and whether emails will be required to fulfil the SAR or FOI request. Where an SAR has been made electronically, the information will be provided in a commonly used electronic format. All requests will be responded to without delay and at the latest, within one month of receipt.

If a request is manifestly unfounded, excessive or repetitive, a fee will be charged. All fees will be based on the administrative cost of providing the information.

Where a request is manifestly unfounded or excessive, the school holds the right to refuse to respond to the request. The individual will be informed of this decision and the reasoning behind it, as well as their right to complain to the supervisory authority and to a judicial remedy, within one month of the refusal.

Staff members will discuss any queries regarding email retention with the DPO.

## **12. Storing and protecting information**

The DPO works with Warwickshire County Council (WCC) to ensure a back-up of information is conducted at least on a termly basis to ensure that all data can still be accessed in the event of a security breach, e.g. a virus, and prevent any loss or theft of data. Backed-up information is stored off the school premises, using a central back-up cloud service operated by the local authority (LA).

Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access. Any room or area where personal or sensitive data is stored will be locked when unattended. Confidential paper records are not left unattended or in clear view when held in a location with general access.

Digital data is coded, encrypted or password-protected, both on a local hard drive and on a network drive that is regularly backed-up off-site. Where data is saved on removable storage or a portable device, the device is kept in a locked filing cabinet, drawer or safe when not in use. Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.

All electronic devices are password-protected to protect the information on the device in case of theft. All members of staff are provided with their own secure login and password, and we recommend that users change their password regularly.

Emails containing sensitive or confidential information are password-protected or sent via a secure encrypted or data transfer system to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a separate email. Personal information is never put in the subject line of an email.

Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.

Where deemed necessary when personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with the UK GDPR, either in an electronic or paper format, staff take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data and has had permission from the Headteacher.

If documents that have been taken off the school premises will be left unattended, the staff member will leave the documents in the locked boot of a car or keep them on their person.

Before sharing data, staff always ensure that:

- They have consent from data subjects to share it.
- Adequate security is in place to protect it.
- The data recipient has been outlined in a privacy notice.

The school has data sharing agreements with all data processors and third parties with whom data is shared. These agreements are developed by the DPO and cover information about issues such as access controls and permissions.

All staff members implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information is stored in a securely locked filing cabinet, drawer or safe with restricted access.

Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times.

Staff are required to use their individual login details to use photocopiers and printers.

The physical security of the school's buildings and storage systems, and access to them, is reviewed termly by the caretaker. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the headteacher and extra measures to secure data storage will be put in place.

All systems that allow staff to remotely access information from the school's network whilst they are not physically at the school have security controls in place which are reviewed termly by the DPO.

The DPO decides what restrictions are necessary to prevent information or records being downloaded, transferred or printed while the user is not on the school site.

The school takes its duties under the UK GDPR seriously and any unauthorised

disclosures may result in disciplinary action.

The DPO is responsible for ensuring continuity and recovery measures are in place to ensure the security of protected data. Any damage to or theft of data will be managed in accordance with the school's Data and Cyber-security Breach Prevention and Management Plan.

As a result of the UK's exit of the EU data controllers and processors follow the UK GDPR, and the Data Protection Act 2018, where:

- As UK data controllers, they collect, store or process the personal data of individuals residing in the UK.
- As non-UK data controllers, they offer goods or services to, or monitor the behaviour of, UK residents.

Data controllers and processors follow the EU GDPR where:

- They collect, store or process the personal data of individuals residing in the EU.
- As non-EU data controllers, they offer goods or services to, or monitor the behaviour of, EU residents.

### **13. Disposal of data**

Where disposal of information is outlined as standard disposal, this will be recycled appropriate to the form of the information, e.g. paper recycling, electronic recycling.

All records containing personal or sensitive information will be made either unreadable or unreconstructable.

Where secure disposal of information is required, physical documents will be shredded. Electronic information will be securely erased and, where appropriate, deleted, archived, or digitised.

Where the disposal action is indicated as reviewed before it is disposed, the DPO will review the information against its administrative value – if the information should be kept for administrative value, the DPO will keep a record of this.

If, after the review, it is determined that the data should be disposed of, it will be destroyed in accordance with the disposal action outlined in this policy.

Where information has been kept for administrative purposes, the DPO will review the information again after three years and conduct the same process. If it needs to be destroyed, it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every three subsequent years.

Where information must be kept permanently, this information is exempt from the normal review procedures.

Records and information that might be of relevant to the Independent Inquiry into Child Sexual Abuse (IICSA) will not be disposed of or destroyed.

## **14. Monitoring and review**

This policy will be reviewed on an annual basis by the **Headteacher, School Business manager** and **Governing Body**. The next scheduled review date for this policy is **March 2027**.

Any changes made to this policy will be communicated to all members of staff.