

SCHOOL POLICY

**Turton
School**

Record Management Policy

Reviewed by:	Resources Committee.
Signed (Governing Body):	
Date:	April 2025
Next Review due:	April 2026

Produced by Turton School

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Statement of intent

Turton School is 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.

The school has created this policy to outline how records are stored, accessed, monitored, retained and disposed of to meet the school's statutory requirements. This document complies with the requirements set out in the UK GDPR and Data Protection Act 2018.

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 (2023) 'Data protection in schools'
- DfE (2018) 'Data protection: a toolkit for schools'
- DfE (2023) 'Careers guidance and access for education and training providers'
- Information Records Management Society (IRMS) (2019) 'Information Management Toolkit for Schools'
- IRMS (2019) 'Academies Toolkit'
- ICO (2023) 'How do we document our processing activities?'
- ICO (2023) 'Controllers checklist'

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

- Data Protection Policy
- Cyber-security Policy

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 will hold the overall responsibility for this policy and for ensuring it is implemented correctly.

The DPO will be responsible for:

- The management of records at the school.
- Promoting compliance with this policy and reviewing the policy on a three yearly basis, in conjunction with the headteacher.
- Ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy, and are disposed of safely and correctly.

All staff members will be responsible for ensuring that any records they are responsible for (including emails) are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy.

Staff will be responsible for ensuring that when pupils use personal data for projects or coursework, they do so appropriately. This includes being compliant when storing personal data.

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 electronically and will be easily accessible:

- Forename, surname, and date of birth
- Unique pupil number
- Note of the date when the file was opened
- 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)
- Any other agency involvement, e.g. speech and language therapist
- Reference to any other linked files
- Details of any SEND
- Annual written reports to parents
- Notes relating to major incidents and accidents involving the pupil
- Any information about an EHC plan and support offered in relation to the EHC plan
- Medical information relevant to the pupil's on-going education and behaviour
- Any notes indicating child protection disclosures and reports
- Any information relating to exclusions
- Any correspondence with parents or external agencies relating to major issues, e.g. mental health
- Records of complaints made by parents or the pupil
- Attendance registers and information
- Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos, etc.
- Accident forms
- Consent to administer medication and administration records
- Correspondence with parents about minor issues, e.g. behaviour
- Pupil work

Disclosures and reports relating to child protection are stored on cpoms.

Copies of complaints made by parents or pupils are electronically stored by the headteacher's PA.

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 for a pupil have a shorter retention period and may need to be removed. In such cases, the DPO will remove these records.

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

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.

If any pupil attends the school until statutory school leaving age, the school will keep the pupil's records until the pupil reaches the age of 25 years.

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.

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
Personal identifiers, contacts and personal characteristics		
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
Biometric data	For the duration of the event/activity, or whilst the pupil remains at school, whichever is less, plus one month	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
Admissions		
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
Admissions appeals (where the appeal is unsuccessful)	Resolution of the case, plus one year	Securely disposed of
In-year secondary school admissions	Whilst the pupil remains at the school, 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
Supplementary information submitted, including religious and medical information etc. (where the admission was not successful)	Retained until the appeals process is complete	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
Pupils' educational records		
Pupils' educational records	25 years after the pupil's date of birth	Reviewed and securely disposed of if no longer needed
Public examination results	Added to the pupil's record and transferred to next school	All uncollected certificates returned to the examination board
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	Added to the pupil's record and transferred to the next school Copies are held whilst the pupil is at school, plus one year	Securely disposed of
Exclusion records	Added to the pupil's record and transferred to the next school	Securely disposed of

	Copies are held whilst the pupil is at school, plus one year	
Child protection information held on a pupil's record	<p>Stored in a sealed envelope for the same length of time as the pupil's record</p> <p>Records also subject to any instruction given by the Independent Inquiry into Child Sex Abuse (IICSA)</p>	Securely disposed of – shredded
Child protection records held in a separate file	<p>25 years after the pupil's date of birth</p> <p>Records also subject to any instruction given by the IICSA</p>	Securely disposed of – shredded
Curriculum returns	Current academic year, plus three years	Review and allocate a further retention period or securely dispose of
Schemes of work	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Timetable	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Class record books	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Mark books	Current academic year, plus one year	Review at the end of each year and allocate a further retention period or securely dispose of
Record of homework set	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	Review at the end of each year and allocate a further retention period or

	If this is not possible, hold for the current academic year, plus one year	securely dispose of
Careers advice and subsequent agreed decisions	Whilst the pupil is at the school, plus three years	Securely disposed of
Education, training or employment destinations data	Whilst the pupil is at the school, plus at least three years or from the end of KS4, whichever is earliest	Securely disposed of
Attendance		
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
Medical information and administration		
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
SEND		
SEND files, reviews and EHC plans, including advice and information provided to parents regarding educational needs and accessibility strategy	The pupil's date of birth, plus 31 years	Securely disposed of
Curriculum management		

Examination papers	Until the appeals/validation process has been completed	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	Returned to pupils at the end of the academic year, or retained for the current academic year, plus one year	Securely disposed of
Extra-curricular activities		
Field file – information taken on school trips	Until the conclusion of the trip, plus one month Where a minor incident occurs, field files are added to the core system as appropriate	Securely disposed of
Trip packs – information taken on school trips	Until the end of the visit Where a minor incident occurs, files are added to the core system as appropriate	Shredded upon return to school
Financial information relating to school trips	Whilst the pupil remains at school, plus one year	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
Walking bus registers	Date of the register being taken plus six years	Securely disposed of If held electronically, all copies should be destroyed at the same time
Mentors and attendance officers		
Day books	Current academic year, plus two years	Reviewed and securely destroyed if no longer required
Reports for outside agencies	Duration of the pupil's time at school	Securely disposed of
Referral forms	Whilst the referral is current	Securely disposed of
Contact data sheets	Current academic year	Reviewed and securely destroyed if no longer active
Contact database entries	Current academic year	Reviewed and securely destroyed if no longer required
Group registers	Current academic year, plus two years	Securely disposed of
Catering and free school meal management		
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
Operational		
Staff members' personnel file	Termination of employment plus 25 years as per BMBC LA guidelines.	Securely disposed of
Annual appraisal and assessment records	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
Recruitment		
Records relating to the appointment of a new headteacher (unsuccessful attempts)	Date of appointment, plus twelve months.	Securely disposed of
Records relating to the appointment of a new headteacher (successful appointments)	Added to the personnel file and retained until the end of appointment, plus 25 years as per BMBC LA guidelines.	Securely disposed of
Records relating to the appointment of new members of staff or governors (unsuccessful candidates)	Date of appointment of successful candidate, plus twelve months	Securely disposed of
Pre-employment vetting information (successful candidates)	Termination of employment plus 25 years as per BMBC guidelines.	Securely disposed of
DBS certificates	Not saved as per BMBC guidelines	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 personnel file and retained until the end of appointment, plus 25 years as per BMBC guidelines.	Securely disposed of
Disciplinary and grievance procedures		
Child protection allegations, including where the allegation is unproven	Termination of employment plus 25 years as per BMBC guidelines.	Securely disposed of
Verbal warnings	Date of warning, plus six months. However, remains indefinitely on the personnel file until termination of employment plus 25 years as per BMBC guidelines.	Securely disposed of
First Written warning	Date of warning, plus twelve months. However, remains indefinitely on the personnel file until termination of employment plus 25 years as per BMBC guidelines.	Securely disposed of
Final warning	Date of warning, plus twelve months. However, remains indefinitely on the personnel file until termination of employment plus 25 years as per BMBC guidelines.	Securely disposed of
Records relating to unproven incidents	Termination of employment plus 25 years as per BMBC guidelines.	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
Governance		
Agendas for governing board 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 board 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 board that are referred to in the minutes	Permanent – all others disposed of without retention	Local archives consulted and then securely disposed of
Meeting papers relating to the annual parents' meeting	Date of meeting, plus a minimum of six years	Securely disposed of
Instruments of government	Permanent	Local archives consulted and then securely disposed of
Trusts and endowments managed by the governing board	Permanent	Local archives consulted and then securely disposed of
Action plans created and administered by the governing board	Date of action plan plus 3 years	Securely disposed of
Policy documents created and administered by the governing board	Until superseded or whilst relevant	Securely disposed of
Records relating to complaints dealt with by the governing board 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	Reviewed for further retention in case of contentious disputes, then securely disposed of

	If child protection or safeguarding issues are involved, the records are retained for the current academic year, plus 40 years	
Annual reports required by the DfE	Date of report, plus 10 years	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 board 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 board 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 board or headteacher	Current academic year, plus three years	Securely disposed of
Records relating to the appointment of the clerk to the governing board	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
Headteacher and SLT		
Log books of activity in the school maintained by the headteacher	Date of last entry, plus a minimum of six years	Reviewed and offered to the local archives if appropriate
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus five 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, heads of year 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, heads of year 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
SDP	Duration of the plan, plus six 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
Health and safety		
Health and safety risk assessments	Duration of risk assessment, plus three years provided that a copy of the risk assessment is stored with the accident report if an incident has occurred	Securely disposed of
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	Three years after the last entry in the accident reporting book	Securely disposed of
Accident reporting – pupils	Three years after the last entry in the accident reporting book	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	Date of last action, plus 40 years	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with radiation (maintenance records or controls, safety features and PPE)	Two years from the date on which the examination was made	Securely disposed of
Information relating to areas where employees and persons are likely to come into contact with radiation (dose assessment and recording)	Until the person to whom the record relates would have reached 75-years-old, but in any event for at least 30 years from when the record was made	Securely disposed of
Fire precautions log books	Current academic year, plus six years	Securely disposed of
Health and safety file 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

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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
Payroll and pensions		
Absence record	Current academic year, plus three years	Securely disposed of
Car allowance claims	Current academic year, plus three years	Securely disposed of
Overtime	Current academic year, plus three years	Securely disposed of
Risk management and insurance		

Employer's liability insurance certificate	Closure of the school, plus 40 years	Securely disposed of Passed to the LA if the school closes
Asset management		
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
Accounts and statements including budget management		
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
Contract management		
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
School fund		
Cheque books, paying in books, ledgers, invoices, receipts, bank statements and journey books	Current academic year, plus six years	Securely disposed of
School meals		

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
Pupil finance		
Student grant applications	Current academic year, plus three years	Securely disposed of
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
Property management		
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
Leases of property leased by or to the school	Expiry of lease, plus six years	Securely disposed of
Records relating to the letting of school premises	Current financial year, plus six years	Securely disposed of
Maintenance		
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

Operational administration		
General file series	Current academic year, plus five years	Reviewed and securely disposed of
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 and/or old pupil associations	Current academic year, plus six years	Reviewed then securely disposed of
Walking bus registers	Date of register, plus six years	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

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 stored in Mstore and retained in accordance with Section 8 of this policy.

Personal emails, i.e. emails that do not relate to work matters or are from family members, will be deleted as soon as they are no longer needed.

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 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

12. IDENTIFYING INFORMATION

Under the UK GDPR, all individuals have the right to data minimisation and data protection by design and default – as the data controller, the school ensures appropriate measures are in place for individuals to exercise this right.

Wherever possible, the school uses pseudonymisation, also known as the 'blurring technique', to reduce the risk of identification.

Once an individual has left the school, if identifiers such as names and dates of birth are no longer required, these are removed or less specific personal data is used, e.g. the month of birth rather than specific date – the data is blurred slightly.

Where data is required to be retained over time, e.g. attendance data, the school removes any personal data not required and keeps only the data needed – in this example, the statistics of attendance rather than personal information.

13. STORING AND PROTECTING INFORMATION

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.

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

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 IT disaster plan.

14. 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 disposal of information is outlined as secure disposal, this will be shredded or pulped. Electronic information will be scrubbed clean and, where possible, cut, archived or digitalised.

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.

15. SCHOOL CLOSURES AND RECORD KEEPING

Academy conversion

If the school closes and subsequently becomes an academy, all records relating to pupils who are transferring to the academy will be transferred.

If the school will retain the existing building when it converts to an academy, all records relating to the management of the buildings will be transferred.

All other records created and managed when the school was part of the LA will become the responsibility of the LA.

Sale or re-use of the site

If the school site is being sold or re-allocated to another use, the LA will take responsibility for the records from the date the school closes.

Merger of schools

If the school merges with another school to create one school, the new school will be responsible for retaining all current records originating from the former schools.

The DPO will determine the outcome of each group of records; these outcomes are as follows:

- Securely destroy all records that are expired and due for disposal, in accordance with the retention periods outlined in this policy.
- Transfer to the successor school or academy all records that are current and that will be required by the new school or academy.
- Transfer to the LA all records that are dormant but still need to be retained to comply with legal and business retention requirements.
- Transfer to the local record office any records with historical value.

Managing records

The DPO will identify which records need to be destroyed or transferred to the relevant body – they will allocate personnel as necessary to sort through records.

The DPO will notify the other organisations as soon as possible so that necessary disposal, storage and transfer arrangements can be made. The school's ICT provider will also be notified so that arrangements can be made to ensure the safe transfer or deletion of electronic records, including all back-up copies.

When sorting records, the DPO and their team will:

- Review all records held within the school as soon as notification of closure is received, including paper and electronic records.
- Use the retention periods outlined in this policy to categorise the records into those to be destroyed and those that need to be transferred.
- Contact the relevant body to make arrangements for the safe and secure transfer of records.
- Sort, list and box the records in preparation for the transfer, ensuring records are stored in a safe environment whilst awaiting collection.
- Plan how the disposal of records will be undertaken.

- Sort expired records in readiness for confidential disposal, ensuring they are stored securely whilst awaiting disposal.

All forms of storage will be completely emptied before the building is vacated or before disposal. Records awaiting transfer will be held in a secure area. The identity of any third parties collecting or disposing of records will be checked and a collection receipt will be obtained.

Records will be disposed of in line with the '[Disposal of data](#)' section of this policy. Electronic records will be either transferred to the new body or deleted. All ICT equipment will be decommissioned in accordance with the school's ICT Acceptable Use Policy. No records will be left behind once the school building is vacated.