Dream Big, Aim High
& Make a Difference

Potley Hill Primary School

Data Protection Policy

The school collects and uses personal information (referred to in the UK General Data Protection Regulation (UK GDPR) as personal data) about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable the provision of education and other associated functions. In addition, the school may be required by law to collect, use and share certain information.

The school is the Data Controller, of the personal data that it collects and receives for these purposes.

The school has a Data Protection Officer, Mrs V Conroy who may be contacted at adminoffice@potleyhill.hants.sch.uk or by phoning 01252 876106

The school issues Privacy Notices to all pupils/parents and staff. These summarise the personal information held about pupils and staff, the purpose for which it is held and who it may be shared with. It also provides information about an individual's rights in respect of their personal data.

Purpose

This policy sets out how the school deals with personal information correctly and securely and in accordance with the UK GDPR, and other related legislation.

This policy applies to all personal information however it is collected, used, recorded and stored by the school and whether it is held on paper or electronically.

What is Personal Information/ data?

Personal information or data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly by reference to details such as a name, an identification number, location data, an online identifier or by their physical, physiological, genetic, mental, economic, cultural or social identity. Personal data includes (but is not limited to) an individual's, name, address, date of birth, photograph, bank details and other information that identifies them.

Data Protection Principles

The UK GDPR establishes six principles as well as a number of additional duties that must be complied with at all times:

1. **Lawfulness, fairness and transparency.**

Personal data shall be processed lawfully, fairly and in a transparent manner. In order for personal data to be processed lawfully, it must be processed on the basis of one of the legal grounds set out in the UK GDPR. These include (amongst other relevant conditions) where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority exercised by the school.

Where the special categories of personal data are processed, this shall include (amongst other relevant conditions) where processing is necessary for reasons of substantial public interest.

When processing personal data and special category data in the course of school business, the school will ensure that these requirements are met where relevant.

2. **Purpose limitation.**

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (subject to exceptions for specific archiving purposes). The school will only process personal data for specific purposes and will notify those purposes to the data subject when it first collects the personal data or as soon as possible thereafter.

3. **Data minimisation**.

Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive. Personal data which is not necessary for the purpose for which it is obtained will not be collected.

4. **Accuracy.**

Personal data shall be accurate and where necessary, kept up to date; Personal data should be reviewed and updated as necessary and should not be retained unless it is reasonable to assume that it is accurate. Individuals should notify the school of any changes in circumstances to enable records to be updated accordingly. The school will be responsible for ensuring that updating of records takes place where appropriate.

5. **Storage limitation.**

Personal data shall be kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. The school will not keep personal data for longer than is necessary for the purpose or purposes for which they were collected and will take reasonable steps to destroy or erase from its systems all data which is no longer required.

6. **Integrity and confidentiality**.

Personal data shall be processed in a manner that ensures appropriate security of the personal data and which includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Duties

Personal data shall not be transferred to a country or territory outside the UK unless that country or territory ensures an adequate level of data protection.

Data Controllers have a General Duty of accountability for personal data.

Commitment

The school is committed to always maintaining the principles and duties in the UK GDPR.

Therefore the school will:

- Inform individuals of the identity and contact details of the data controller.
- Inform individuals of the contact details of the Data Protection Officer
- Inform individuals of the purposes that personal information is being collected and the basis for this.
- Inform individuals when their information is shared, and why and with whom unless the UK GDPR provides a reason not to do this.
- If the school plans to transfer personal data outside the UK the school will inform individuals and provide them with details of where they can obtain details of the safeguards for that information.
- Inform individuals of their data subject rights.
- Inform individuals that the individual may withdraw consent (where relevant) and that if consent is withdrawn that the school will cease processing their data although that will not affect the legality of data processed up until that point.
- Provide details of the length of time an individual's data will be kept

- Should the school decide to use an individual's personal data for a different reason to that for which it was originally collected the school shall inform the individual and where necessary seek consent.
- Check the accuracy of the information it holds and review it at regular intervals.
- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in.
- Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded.
- Ensure that personal information is not retained longer than it is needed.
- Ensure that when information is destroyed that it is done so appropriately and securely.
- Share personal information with others only when it is legally appropriate to do so.
- Comply with the duty to respond to requests for access to personal information (known as Subject Access Requests).
- Ensure that personal information is not transferred outside the UK without the appropriate safeguards.
- Ensure that all staff and governors are aware of and understand these policies and procedures.

Retention and Disposal of Personal Data

The school will dispose of personal data in a way which protects the rights and privacy of data subjects (e.g. shredding, disposal as confidential waste, secure electronic deletion) as appropriate.

The school maintains a Retention Schedule that is specific and relevant to the specific types of information retained. The schedule outlines the appropriate periods for retention in each case.

Complaints

Complaints relating to the handling of personal information will be handled by Mrs V Conroy (DPO) contact details adminoffice@potleyhill.hants.sch.uk or by phoning 01252 876106. The school will aim to resolve such complaints, however if individuals are not happy with the school's response, then they may raise their concern with the Information Commissioner who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at https://ico.org.uk/make-a-complaint/

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 2 years. The policy review will be undertaken by the Data Protection Officer, Head teacher, or nominated representative.

Contacts

If you have any enquires in relation to this policy, please contact Headteacher who will also act as the contact point for any queries.

Reviewed: October 2026

Next Review: October 2028

Appendix 1 – School Retention Schedule

Hampshire County Council
Records Management Service

School Records Retention Schedule Table of contents

1. About the schedule 6
2. How the schedule is arranged 6
3. What to do at the end of the retention period 7
4. Storage, display and handling of school records 9
5. Contact information 11
School Records Retention Schedule 13

About the schedule

The school records retention schedule has been drawn up in response to requests for assistance on recordkeeping from Hampshire schools. This guidance is intended for maintained schools, not academies.

The schedule contains guidelines on how long to keep records created and maintained by schools in the course of their business, and how those records should be disposed of at the end of their administrative life. Records may be held in any format, including paper, electronic (including databases), microform and audiovisual.

Disposing of records at the right time in accordance with clearly established policies will help schools to ensure they meet recordkeeping requirements set out in the Data Protection Act (DPA) 2018 and Freedom of Information Act (FOI) 2000, particularly the ICO Section 46 Code of Practice – Records Management.

How the schedule is arranged

The schedule is arranged by type of record. The 'Retention Period' specifies how long the record should be kept and the 'Final Action' describes how they should be disposed

of. If records need to be kept for legal reasons, the relevant statute is cited in the 'Legal Status' column. If no legal status is given, the retention period is based on best practice, considering administrative, audit and legal requirements.

N.B. In the 'Retention Period' column, 'current' year' refers to the current financial year, unless otherwise specified.

The column headed 'DPA applies?' indicates whether records contain personal information. Such records are subject to the Data Protection Act 2018 and should be stored securely, and safe from unauthorised access.

This schedule may need to be adapted to suit the requirements of your particular school. Hampshire County Council's Records Management Service can offer advice as needed; contact details are given below.

What to do at the end of the retention period

Note re disposal: You may be aware of the Independent Inquiry into Child Sexual Abuse (IICSA). While this inquiry is being carried out, schools have been asked to retain records relating to children, or individuals who have worked with children, until further notice.

For more information, please see the letter from the Chair of the Inquiry to local authorities on the IICSA website: https://www.iicsa.org.uk/keydocuments/82/view/letter-to-local-authority-ceos.pdf

Destroy

Where records have been identified for destruction they should be disposed of in an appropriate way:

- All paper records containing personal information, or sensitive policy information, should be disposed of as confidential waste. Contact County Supplies for advice on the availability of confidential shredding in your area (tel. 01962 826999). Details of local commercial shredding services can be found online.

- All confidential electronic records should be deleted securely from electronic systems, including databases. N.B. Simply deleting data is unlikely to be sufficient, as records that are no longer visible may still be recoverable; remember that back-ups will need to be destroyed too. Refer to HCC's Schools IT team at HantsITSchools@hants.gov.uk for more information.

- Non-confidential records should be bundled up and disposed of to a waste- paper merchant or recycled in other appropriate ways.

It is recommended that schools maintain lists of records which have been destroyed, giving file references, titles, dates of destruction and name of authorising officer. An Excel spreadsheet or other database format could be used for this.

Review

Records are marked for review in cases where there is no longer a statutory or financial requirement for retention but where the decision to destroy is not clear cut.

Assess the record's continuing administrative or historical worth. Consider keeping files that relate to:

- Major events or important developments in the life of the school
- Major policies and / or long-term strategies
- Claims (or possible claims) for compensation

You will likely dispose of:

- Routine papers and correspondence
- Papers that refer to events of short-term relevance and minor interest.

Records of historical value which are no longer required in school can be offered to Hampshire Archives and Local Studies (HALS) as a permanent addition to the county's archives. HALS are happy to advise on the possible historical value of records if you are unsure (see below).

Transfer records to Hampshire Archives and Local Studies (HALS)

Some records including log books, admission registers and managers' minutes, have been identified as worth keeping permanently for historical reasons. These are marked 'Transfer to HALS' and, ideally, should be transferred to HALS when they are no longer needed for administrative purposes. Where they continue to be retained in the school

they should be looked after carefully, following the guidelines below about storage, display and handling of archival records.

Once records have been transferred to HALS they will form a part of the county's archives and will generally be held on 'permanent loan'. This means they are deposited with HALS indefinitely, are stored safely in our purpose-built strongrooms, but remain the property of the school. The records may be withdrawn on a temporary basis by the school, with written permission from the Head, but may not be removed by anyone else (advance warning of at least a week is desirable).

School records placed in the care of HALS may be consulted by the public in our supervised search room unless they contain sensitive or personal information which may relate to living persons (less than 100 years old). Records containing such information will be subject to access restrictions. The HALS catalogue, including descriptions of deposited school records, is available through Hampshire County Council's website so that anyone can see what is held with us. Any requests by the public to see restricted material will be dealt with on a case by case basis and will be referred back to the school if necessary.

If you intend to pass any material on to the historical archive, please contact HALS first to let them know roughly the type and quantity of material you have, and when HALS can expect it. Ask for the **Accessioning Archivist**. Items can be sent via the Hampshire County Council courier service, or delivered to HALS' rear entrance, approached via Station Hill.

Storage, display and handling of school records

These general guidelines on the storage, display and handling of archives should be followed to help ensure the long-term preservation of school records regarded as historically significant.

Keep documents out of direct sunlight and avoid extremes of temperature and humidity:

- For paper records a temperature of 13-20°C is ideal, with a relative humidity (RH) of between 35-60%. (RH is read by a hygrometer[1].)
- Audio tapes require cool, dry conditions (40-60% RH, 13-16°C).

[1] Inexpensive, easy-to-use, hand-held electronic hygrometers can be bought from Preservation Equipment ltd., Vinces Road, Diss, Norfolk, IP22 4HQ (tel. 01379 647400) www.preservationequipment.com

- Try not to store records near radiators where the air will be too hot and dry.
- Records which do not need to be referred to regularly should ideally be stored in a room where staff are not required to work.

Ensure that storage is on well-ventilated shelving and that storage areas are kept clean • Don't pack records together too tightly as lack of air flow encourages mould. Mould-affected items should be separated out.

- Ventilate storage rooms well.
- Keep storage areas clean, as dust and dirt can accelerate decay and encourage pests.

Use good quality storage materials

- 'Archival quality' packaging materials are free of acids and other chemicals which will make paper brittle and cause inks to fade. They are available commercially, and although expensive, need only be used for those items which are to be kept permanently. Names and addresses of some commercial suppliers are given at the end of this guidance note.
- If possible, use archive-quality boxes, made from rigid container board with non-rusting staples and well-fitting lids. Strong cardboard boxes lined with acid-free paper, and with a lid to keep out dust, are a cheaper alternative.
- Written records can be protected by wrapping them in archival quality paper or card. Photographs should be placed in clear polyester sleeves if kept loose, or mounted using photo corners if they are in an album. Alternatively, use good quality envelopes with the gummed flap removed, and card folders or large sheets of cartridge paper folded to size.
- For all records, use good quality fastenings, e.g. wide cotton tape, brass staples, brass paper clips, and plastic treasury tags. Number documents or pages, if necessary, in pencil only.

Use good inks and papers:

- When you are creating paper records which you know will need to be kept long term, use good quality permanent ink and acid-free paper if you can, and avoid ball point pens, particularly blue and red, which fade quickly.

Avoid the following, all of which are detrimental to your archives if they are to be kept long-term:

- steel pins and paperclips; plastic bags; photo albums using cheap PVC overlays and adhesives to secure photos; PVC wallets; sellotape; pink document tape; elastic bands.

Displaying and handling records always puts them at risk

- Displaying potentially valuable items leaves them open to the risk of vandalism or theft. Look after your archives at all times and display them only in

lockable showcases. (HALS is able to lend lockable showcases free of charge, subject to availability.)

- Inks and colours can fade if exhibited in bright light for too long, and the spines and bindings of volumes can be weakened by prolonged use or opening in the same position. Aim therefore to display records away from direct heat and sunlight. Support volumes, ideally on cushions, so that they are not open too wide, using strips of clear polyester to secure pages if necessary. Never use sellotape, drawing pins or metal staples to fasten documents being displayed.
- If records are used in the classroom, keep control of them. Make sure you know what you have and where it should be when not in use. Ask those who borrow the records to handle them with care, to use only pencil when making notes from them, and to supervise their use at all times. Photocopied extracts from the records could be used as a substitute to protect originals from overhandling.

Archival-quality paper, boxes and packaging materials can be purchased from:

Conservation Resources (UK) Ltd. (Conservation Resources (UK) Ltd)

Unit 2, Ashville Way, off Watlington Road, Cowley, Oxford, OX4 6TU Tel. 01865 747755

Preservation Equipment Ltd. (Preservation Equipment Ltd)

Vinces Road, Diss, Norfolk, IP22 4HQ Tel. 01379 647400

Conservation By Design Ltd. (CXD (cxdinternational.com))

2 Wolseley Road, Kempston, Bedford, Conservation By Design, MK42 7AD

Contact information

For updates or advice regarding the retention schedule itself, please contact:

Hampshire County Council Records Management Service:

Records Management Service, Unit 9A Herald Industrial Estate, Hedge End, SO30

2JW

Tel: (01962) 833033

Email: records.management@hants.gov.uk

For enquiries about historic records, please contact:

Hampshire Archives and Local Studies (HALS)

Sussex Street, Winchester, SO23 8TH

Tel: (01962) 846154

Email: enquiries.archives@hants.gov.uk

For more information about Hampshire Archives and Local Studies, including opening hours, please see the website: Archives and Local Studies at Hampshire Record Office.

School Records Retention Schedule

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
1.0	**School Governors**					
1.1	Instruments of government, including Articles of Association	No		Permanent	**Permanent** Retain in school while current; transfer to HALS when no longer required	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
1.2	Records for all full governing body, committee and panel meetings, including: a) agendas b) any report, statutory policy (including Admissions Policy) or other paper considered at governing body meeting c) signed minutes	Yes*	School Governance (England) Regulations (2013)	Permanent	**Permanent, or as below** Single copy of signed minutes, agenda and papers: retain in school for 6 years from date of meeting then transfer to HALS Inspection copies: retain in school for current year + 3 then destroy as confidential waste or delete securely Additional copies: destroy as confidential waste or delete securely	*If meeting deals with confidential staff issues
					from electronic systems	
1.3	Governors application forms - successful candidates	Yes		End of term of office + 1 year	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
1.4	Governors application forms - unsuccessful candidates	Yes		Date of election + 6 months	**Destroy** Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
1.5	Governor election voting forms	Yes		Date of election + 6 months	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
1.6	Governors - registers and declarations of pecuniary interests	Yes		Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
1.7	Trusts and endowments managed by the governing body	No		Permanent	**Permanent** Retain in school whilst operationally required, then transfer to HALS	
1.8	Action plans created and / or administered by the governing body	No		Life of action plan + 3 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems*	*Consider offering to HALS if school has been through difficult period
1.9	Records relating to complaints dealt with by the governing body	Yes		Date of resolution of complaint + 7 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems*	*It may be appropriate to review for further retention in the case of contentious disputes
1.10	Annual parents' meetings			Permanent	**Permanent, or as**	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
					below Retain in school for 6 years from date of meeting then: Minutes and reports: transfer to HALS All other records: destroy as confidential waste or delete securely from electronic systems*	
2.0	**Management and Administration**					
2.1	Log books of activity in the school, maintained by teachers	Yes[2]		Permanent	**Permanent** Retain in school whilst operationally required, then transfer to HALS	
2.2	Head teacher's official diary	Yes[1]		Current academic year + 3 years	**Destroy** Delete securely or destroy as confidential waste*	*Unless used as retrospective record of events, in which case offer to HALS

[2] Since 1 January 2005 subject access has been permitted into unstructured filing systems, including log books and other records created within the school, containing details about the activities of individual pupils. As such members of staff are subject to the Data Protection Act 2018.

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
2.3	Minutes of the senior management team and other internal administrative bodies	Yes[1]		Permanent	**Permanent, or as below** Retain in school for 5 years from date of meeting then: Minutes dealing with strategic or policy matters: transfer to HALS All other records: destroy as confidential waste or delete securely from electronic systems	
2.4	Reports made by the head teacher or the management team	Yes[1]		Retain in school for date of report + 3 years	**Permanent** Transfer to HALS	
2.5	Correspondence and general filing created by head teachers, deputy head teachers, heads of year and other members of staff with administrative responsibilities	Yes[1]		Closure of file + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems*	*Offer files on important events (e.g. reorganisation) to HALS

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
2.6	Professional development plans	Yes		Closure of file + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
2.7	School development plans	No		Retain in school for closure of file + 6 years	**Transfer to archive** Offer to HALS to review for historic interest	
2.8	Employers' liability certificate	No		Permanent while school is operational	**Destroy** Destroy as confidential waste or delete securely from electronic systems once school closes	
2.9	School brochure/prospectus	No		Retain in school for current academic year + 3 years	**Transfer to archive** Offer to HALS to review for historic interest	
2.10	Circulars to staff and pupils	No		Current academic year + 3 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
2.11	Newsletters to parents	No		Retain in school for current academic year + 3 years	**Transfer to archive** Offer to HALS to review for historic interest	
2.12	Visitors' books and signing in sheets	Yes		Current academic year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
2.13	PTA (Parent Teacher Association) / old pupils' associations records	Yes		Retain in school for current academic year + 6 years	**Transfer to archive or as below** Minutes, newsletters and membership registers: offer to HALS to review for historic interest All other records: destroy as confidential waste or delete securely from electronic systems	
3.0	**LEA (Local Education Authority)**					
3.1	Secondary transfer sheets (primary)	Yes		Current academic year + 2 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
3.2	Attendance returns	Yes		Current academic year + 1 year	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
3.3	Circulars from the LEA	No		Whilst operationally required	**Destroy** Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
4.0	**DfE (Department for Education)**					
4.1	HMI reports	No		Permanent	**Permanent** Retain in school whilst operationally required, then transfer to HALS	These are no longer produced
4.2	OFSTED reports	No		Retain in school while current; replace former report with any new inspection report	**Permanent** Transfer to HALS*	*Reports should be available on the OFSTED website. Retain at least two previous reports if not available online.
4.3	OFSTED-related papers	No		Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
4.4	Returns to the DfE	No		Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
4.5	Circulars from the DfE	No		Whilst operationally required	**Destroy** Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
4.6	School census returns	Yes	Education (School Performance Information) (England) Regulations 2007	Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
5.0	**Pupils**					
5.1	Records relating to the creation and implementation of the school's Admissions Policy	No	School Admissions Code (2014)	Retain in school for life of the policy + 3 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
5.2	Admission forms: unsuccessful or withdrawn applications (including supplementary information e.g. proof of address, religion, medical conditions etc.)	Yes	School Admissions Code (2014)	a) If no appeal, 1 year from receipt b) If appealed, 1 year from resolution of case*	**Destroy** Destroy as confidential waste or delete securely from electronic systems	*Records relating to appeals retained by Appeals Panel for 22 years from date of birth of pupil
5.3	Admission forms: successful applications	Yes	School Admissions Code (2014)	Date of admission + 1 year	**Destroy** Destroy as confidential waste or delete securely from electronic systems	Ensure that supplementary information e.g. proof of address, religion, medical conditions is added to the pupil's file

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.4	Admission registers	Yes	Education (Pupil Registration) (England) Regulations 2006	Retain in school until date of last entry in the book (or file) + 3 years	**Permanent** Transfer to HALS	If held electronically, a printout should be made at least **annually**. Any corrections made to electronic data should be clearly shown in the printout.
5.5	Attendance registers	Yes	Education (Pupil Registration) (England) Regulations 2006	Date of register + 3 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
5.6	Pupil absence letters / leave forms / correspondence relating to authorised absence	Yes		Date of absence + 2 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
5.7	Absence books	Yes		Current year + 6 years from last entry in book	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
5.8	Telephone message books for recording absences (sickness) or changes to pick up arrangements, etc.	Yes		Current year + 6 years from last entry in book	**Destroy** Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.9	Child protection files • **Primary**	Yes	DfE 'Keeping Children Safe in Education' (2016), Annex B, p.61	Retain while the pupil remains at the primary school*	Follow guidelines in 5.13 for pupils transferring to another school	*CP information must be kept separate from the main pupil file. Where children leave the school or college ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit. Confirmation of receipt should be obtained.

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.10	Child protection files • **Secondary**	Yes	DfE 'Keeping Children Safe in Education' (2016), Annex B, p.61	Date of birth of pupil + 25 years*	**Destroy or as below** If the child leaves the school: follow guidelines in 5.13 for pupils transferring to another school If the retention period is reached: destroy as confidential waste or delete securely from electronic systems	*CP information must be kept separate from the main pupil file. Both the educational record and CP information must be retained for 25 years from DOB. Where children leave the school or college ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit. Confirmation of receipt should be obtained.

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.11	Pupil's educational record (pupil file) **Pupils with Special Educational Needs (SEN)** • **Primary**	Yes	Retain while pupil remains at the primary school	Retain while the pupil remains at the primary school*	Follow guidelines in 5.13 for pupils transferring to another school	Includes: • SEN reviews • Individual Education Plans (IEPs) / pupil profiles • Health questionnaires • Parental consent forms • Health care plans • Records of medicine administered
5.12	Pupil's educational record (pupil file) **Pupils with Special Educational Needs (SEN)** • **Secondary**	Yes		Date of birth of pupil + 22 years*	**Destroy or as below** If the child leaves the school: follow guidelines in 5.13 for pupils transferring to another school If the retention period is reached: destroy as confidential waste or delete securely from electronic systems	*Unless child protection applies, in which case retain for 25 years from DOB; see 5.10. Includes: • SEN reviews • Individual Education Plans (IEPs) / pupil profiles • Health questionnaires • Parental consent forms • Health care plans

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
						• Records of medicine administered • Work experience agreements
5.13	Pupil's educational record (pupil file) **All other pupils** • **Primary**	Yes	The Education (Pupil Information) (England) Regulations 2005	Retain while the pupil remains at the primary school, then: a) Pupil transfers to a known Local Authority primary or secondary school in Hampshire	**The file should follow the pupil when he/she leaves primary school:** a) Send pupil record to new school[3]	Includes: • Health questionnaires • Parental consent forms • Health care plans • Records of medicine administered

[3] In the case of exclusion it may be appropriate to transfer the record to the Education and Inclusion Service

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
				b) Pupil transfers to a known Local Authority or independent primary / secondary school which is another county within the UK; or transfers to an independent school within Hampshire	b) Send pupil record to new school, retaining a copy or summary until pupil is 22 years old, then destroy confidentially or delete securely	
				c) Pupil transfers to a known primary / secondary school outside of the UK	c) Send a copy of pupil record to new school, retaining original pupil record until pupil is 22 years old, then destroy confidentially or delete securely	
				d) Pupil transfers to an unknown school	d) Retain pupil file until pupil is 22 years old, then destroy confidentially or delete securely	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.14	Pupil's educational record (pupil file) **All other pupils** • **Secondary**	Yes	Limitation Act (1980)	Date of birth of pupil + 22 years*	**Destroy** Destroy as confidential waste or delete securely from electronic systems	*Unless child protection applies, in which case retain for 25 years from DOB; see 5.10. Includes: • Health questionnaires • Parental consent forms • Health care plans • Records of medicine administered • Work experience agreements
5.15	Pupil's educational record (pupil file) • Deceased pupils	Yes		Date of death + 7 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
5.16	Images of pupils - signed consent forms by parent / guardian	Yes		Date of signing + 5 years; or at end of project; or when pupil leaves the school	**Destroy** Destroy as confidential waste or delete securely from electronic systems	Images should not be reused outside of the time period or for other projects other than that specified on the form
5.17	Activity / visit / trip consent forms - signed by parent or guardian where no incident occurs	Yes		Date of event + 1 year	**Destroy** Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
5.18	Activity / visit / trip consent forms - signed by parent or guardian where a major incident occurs	Yes	Limitation Act 1980	Date of birth of child involved in incident + 22 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	**Important:** consent forms for ALL pupils for an event where a major incident occurs must be retained, not just that of the child involved
5.19	Punishment books	Yes		Books no longer maintained in schools	**Permanent** Transfer to HALS	
5.20	SATS papers (completed)	Yes	Department for Education (DfE) recommendation	Current year + 1 year	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
5.21	SATS results for individual pupils	Yes			Add to the main pupil file and follow retention period for 5.14	
5.22	Internal and external examination papers (completed)	Yes		Current academic year + 6 years or until any appeals / validation process is complete	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
5.23	Internal and external examination results for individual pupils	Yes			Add to the main pupil file and follow retention period for 5.14*	*Uncollected GCSE and A Level certificates should be returned to the relevant examination board
5.24	Examination results - summaries or other	Yes		Current academic year + 6 years	**Destroy**	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
	statistical information created by the school				Destroy as confidential waste or delete securely from electronic systems	
5.25	Any other records created in the course of contact with pupils maintained for teachers' own use (i.e. NOT part of the educational record)	Yes		Current academic year + 3 years	**Review** Review by school and EITHER allocate further retention period OR destroy as confidential waste or delete securely from electronic systems	
6.0	**Curriculum**					
6.1	Curricula records	No		Whilst operationally required	**Destroy** Destroy as confidential waste or delete securely from electronic systems	May include: • curriculum development records • lesson plans • syllabuses • schemes of work • timetables • mark books • records of homework set

7.0	**Human Resources**					
7.1	Interview notes and recruitment records (including pre-employment vetting information) • unsuccessful candidates	Yes	HCC corporate guidelines	Date of interview + 1 year	**Destroy** Destroy as confidential waste or delete securely from electronic systems	Includes: • proof of identity • proof of right to work in the UK
7.2	Interview notes and recruitment records (including pre-employment vetting information) • successful candidates	Yes		Follow retention period for 7.4	All recruitment information to be added to staff personnel file, except DBS checks (for DBS see 7.3)	
7.3	Pre-employment vetting information • successful candidates' DBS checks*	Yes	DfE 'Keeping Children Safe in Education' guidance (regularly updated)	Maximum of date of check + 6 months	**Destroy** Destroy as confidential waste or delete securely from electronic systems by the designated member of staff	*Formerly CRB checks Schools are not required to retain copies of DBS certificates. If the school chooses to do so, the copy must NOT be retained for longer than 6 months
7.4	Staff files (main personnel file)*	Yes	Limitation Act (1980)	End of employment + 7 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	*Including volunteers' records

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
7.5	Staff annual appraisal / assessment records	Yes		Current appraisal year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
7.6	Staff timesheets	Yes	Financial regulations	Current academic year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	May be held on SAP
7.7	Staff sickness records, excluding ill-health referrals (self-certification, doctor's certificates)	Yes		Current academic year + 3 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
7.8	Staff sickness records • ill health referrals	Yes	Limitation Act (1980)		Add to main personnel file and follow retention period for 7.4	
7.9	Staff maternity and paternity pay records	Yes	Statutory Maternity Pay Regulations (1986) (as amended)	Current academic year + 3 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
7.10	Disciplinary proceedings* • warnings	Yes			Add to main personnel file and follow retention period for 7.4	*for child protection / safeguarding disciplinary proceedings, see 7.13

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
7.11	Disciplinary proceedings* • substantiated or unsubstantiated	Yes		a) outcome letter: end of employment + 7 years b) all other records: close of case + 7 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	*for child protection / safeguarding disciplinary proceedings, see 7.13
7.12	Disciplinary proceedings* • false or malicious	Yes		a) outcome letter: end of employment + 7 years b) all other records: shred at close of case	**Destroy** Destroy as confidential waste or delete securely from electronic systems	*for child protection / safeguarding disciplinary proceedings, see 7.13
7.13	Disciplinary proceedings* • safeguarding / child protection related	Yes	DfE 'Keeping Children Safe in Education' guidance (regularly updated)	Until normal pension age, or for 10 years from date of allegation, whichever is longer	**Destroy** Destroy as confidential waste or delete securely from electronic systems	*including where the allegation is unsubstantiated
7.14	Records of industrial tribunals, disciplinary panels, appeals	Yes	Limitation Act 1980 can apply		a) outcome letter: add to personnel file and follow retention period for 7.4 b) all other records: shred 7 years from end of process	
7.15	Records held under Retirement Benefits Schemes (Information Powers) Regulations 1995	Yes		End of employment + 7 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
8.0	**Health and Safety (H&S)**					
8.1	Health and safety policies	No		Life of policy + 7 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
8.2	Risk assessments: general	No	Limitation Act (1980)	Date of risk assessment + 7 years (update regularly)	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
8.3	Risk assessments: exposure to noise, vibration, lead, asbestos, chemicals and biohazards (including COSHH)	No	Control of Substances Hazardous to Health Regulations (2002), Regulation 11 Control of Asbestos at Work Regulations (2012), Regulation 19	Date of risk assessment + 40 years (update regularly)	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
8.4	Risk assessments: exposure to radiation	No	Ionising Radiation Regulations 1999 (SI 1999/3232)	Date of risk assessment + 50 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
8.5	Accident reporting: adults a) accident books b) F2508-RIDDOR forms c) local accident investigation records	Yes	Social Security (Claims and Payments) Regulations (1979), Regulation 25 Social Security Administration Act (1992), Section 8. Limitation Act (1980)	(a) Current year + 3 (b) Current year + 3 (c) Current year + 3	**Destroy** Destroy as confidential waste or delete securely from electronic systems	Since April 2016 accident reporting has been completed online and all copies are held electronically
8.6	Accident reporting: children a) accident books b) F2508-RIDDOR forms c) local accident investigation records	Yes	Social Security (Claims and Payments) Regulations (1979), Regulation 25 Social Security Administration Act (1992), Section 8. Limitation Act (1980)	(a) Keep books until youngest child entered has reached age 22 (b) Date of birth of child + 22 years (c) Date of birth of child + 22 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	Since April 2016 accident reporting has been completed online and all copies are held electronically
8.7	Violent incident reporting (VIR)	Yes	Limitation Act (1980)	Current year + 3 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	Since April 2016 violent incident reporting has been completed online and all

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
						copies are held electronically
8.8	Physical intervention forms	Yes		Date of birth of child + 22 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
8.9	Fire precaution log books (e.g. records of drills and tests)	No	Limitation Act (1980)	Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
8.10	Accessibility plans	Yes	Equalities Act (2010)	Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
8.11	Health and safety training records	Yes		While current + 6 years, unless records apply for limited period (e.g. First Aid Certificates)	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
8.12	Maintenance records for any work equipment, including ladders, trollies, PPE, PAT etc.	No		Current year + 10 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
8.13	Health and safety inspection records, including: • site inspections • playground inspections	No		Current year + 3 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
9.0	**Finance**					
9.1	Annual accounts	No		Retain in school for current year + 6 years	**Transfer to archive** Offer to HALS to review for historic interest	
9.2	Annual budget and background papers	No		Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
9.3	Budget reports and budget monitoring records	No		Current year + 3 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
9.4	Records covered by various financial regulations Including: invoices, receipts, order books, requisitions, delivery notices, petty cash records, records relating to the collection and banking of monies, records relating to the identification and collection of debt	No	Financial regulations	Current financial year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
9.5	Copy orders	No		Current year + 2 years, or current year + 6 years if included with delivery notes, invoices and receipts, etc.	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
9.6	Loans and grants managed by the school	No	Financial regulations	Date of last payment on loan + 12 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
9.7	School Fund records Including: cheque books, paying-in books, ledgers, invoices, receipts, bank statements, journey books	No	Financial regulations	Current financial year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
9.8	Contracts: under seal		Limitation Act (1980)	Contract completion date + 13 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
9.9	Contracts: under signature		Limitation Act (1980)	Contract completion date + 7 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
9.10	Contracts: monitoring records			Current year + 2 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
9.11	Free school meals records	Yes	Financial regulations	Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
9.12	School meals registers	Yes		Current year + 3 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
9.13	School meals summary sheets	No		Current year + 3 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	Formerly known as M1 forms

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
9.14	Applications for free school meals, travel, uniforms etc.	Yes	Financial regulations	Whilst child at school or current year + 6 years, whichever is the longest	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
9.15	Payroll records where school administers own payroll	Yes	Financial regulations	Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
9.16	Records relating to individuals' pension details	Yes	Financial regulations	End of employment + 7 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
10.0	**Property**					
10.1	Title deeds of all properties belonging to the school	No		Permanent	**Permanent** Retain in school whilst operational; offer to HALS to review for historic interest when no longer required	
10.2	Plans of all properties belonging to the school	No		Permanent	**Permanent** Retain in school whilst operational; offer to HALS to review for historic interest when no longer required	
10.3	Leases of properties leased by or to the schools	No		Expiry of lease + 7 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
10.4	Records relating to the letting of school premises	No		Current year + 3 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
10.5	Burglary, theft and vandalism report forms			Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
10.6	All records relating to the maintenance of the school, including maintenance log books	No		Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
10.7	Inventories of equipment and furniture			Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
10.8	Insurance papers			While current	**Destroy** Destroy as confidential waste or delete securely from electronic systems	

11.0	Adult and Community Learning and Activities

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
11.1	Annual funding agreements with Learning and Skills Council (LSC), Adult and Community Learning Unit, or colleges			Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
11.2	Enrolment forms, fee receipts, refund records, course registers, banking records			Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
11.3	LSC capital grants, expenditure records			Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
11.4	Community management agreements			Life of agreement + 7 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
11.5	Minutes of governors' management committees			Permanent	**Permanent** Retain in school for 6 years from date of meeting then transfer to HALS	
11.6	Annual Community Service plans			While current + 6 years	**Transfer to archive** Offer to HALS to review for historic interest	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
11.7	Income records for centrerun activities			Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
11.8	Notice of successful applications for external funding, and conditions attached to grants			Period of funding or length of funding agreement (e.g. capital schemes) + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
11.9	Adult learning course programmes and brochures			Current year + 3 years	**Transfer to archive** Offer to HALS to review for historic interest	
11.10	Records relating to the letting of school facilities to community or other groups, including after-school and holiday clubs	Yes	Statute of Limitations 1980	Current year + 6 years	**Destroy** Destroy as confidential waste or delete securely from electronic systems	
12.0	**Miscellaneous**					
12.1	School magazines			While useful	**Transfer to archive** Offer to HALS to review for historic interest	
12.2	Scrapbooks			While useful	**Transfer to archive** Offer to HALS to review for historic interest	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Final Action	Notes
12.3	Photo albums			While useful	**Transfer to archive** Offer to HALS to review for historic interest	
12.4	School histories			While useful	**Transfer to archive** Offer to HALS to review for historic interest	
12.5	Audio and video recordings			While useful	**Transfer to archive** Offer important or informative recordings to Wessex Film and Sound Archive	

No.	Basic File Description	DPA applies?	Statutory Provisions	Retention Period	Fina

Hampshire County Council

Records Management Service

Signed:
Sarah Gerrard (Records Manager)
Records Management Service

Signed:
Brian Pope
(Assistant Director, Education and Inclusion)
For Children's Services Department

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