



Northern Arch

LEARNING PARTNERSHIP

Trust – Data Retention and Destruction Policy

Accepted by: Board of Directors
Approving Body: Board of Directors
Committee: Standards
Review Cycle: 1 year
Date last reviewed: December 2023
Date for next review: April 2025

1. Statement of intent

- 1.1 Northern Arch Learning Partnership are committed to maintaining the confidentiality of its information and ensuring that all records within the school are only accessible by the appropriate individuals. In line with the requirements of the 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.
- 1.2 The school has created this policy to outline how records are stored, accessed, monitored, retained and disposed of, in order to meet the school's statutory requirements.
- 1.3 This document complies with the requirements set out in the GDPR, which is effective of 25 May 2018.

2. Legal framework

- 2.1 This policy has due regard to legislation including, but not limited to, the following:
 - General Data Protection Regulation
 - Freedom of Information Act 2000
 - Limitation Act 1980 (as amended by the Limitation Amendment Act 1980) This policy also has due regard to the following guidance:
 - Information Records Management Society (2016) 'Information Management Toolkit for Schools'
 - DfE (2023) 'Data protection in schools guidance'
- 2.2 This policy will be implemented in accordance with the following school policies and procedures:
 - GDPR Policy
 - Online Safety Policy

3. Responsibilities

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

- 3.2 The Principal/Head Teacher/Head of School holds overall responsibility for this policy and for ensuring it is implemented correctly.
- 3.3 The data protection officer (DPO) is responsible for the management of records at Northern Arch Learning Partnership

Our Data Protection Officer is:

Mrs S Jones,
Trust Operations & Business Manager
sjones@nalp.org.uk

- 3.4 The DPO is responsible for promoting compliance with this policy and reviewing the policy on an annual basis, in conjunction with the Principal/Head Teacher/Head of School and Schools/College ICT Managers.
- 3.5 The DPO is responsible for ensuring that all records are stored securely, in accordance with the retention periods outlined in this policy and are disposed of correctly.
- 3.6 All staff members are responsible for ensuring that any records for which they are responsible for are accurate, maintained securely and disposed of correctly, in line with the provisions of this policy/

4. Management of pupil records

- 4.1 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 includes all personal information relating to them, e.g. date of birth, home address, as well as their progress and achievement.
- 4.2 Pupil files may contain any or all of the following information:
- Forename, surname, gender and date of birth
 - Unique pupil number
 - Ethnic origin, religion and first language
 - Any preferred names
 - Position in their family, e.g. eldest sibling
 - 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 parents, including their home address(es) and telephone number(s)
 - Name of the school, admission number, the date of admission and the date of leaving, where appropriate
 - Any other agency involvement, e.g. speech and language therapist
 - Admissions form
 - Details of any SEND
 - If the pupil has attended an early years setting, the record of transfer
 - Annual written reports to parents
 - National curriculum and agreed syllabus record sheets
 - Notes relating to major incidents and accidents involving the pupil
 - Any information about an education, health and care (EHC) plan and support offered in relation to the EHC plan
 - Any information relating to exclusions
 - Any correspondence with parents or external agencies relating to major issues, e.g. mental health.
 - Notes indicating that records of complaints made by parents or the pupil are held

4.3 The following information will be stored separately in the school office:

- Absence notes
- Parental and, where appropriate, pupil consent forms for educational visits, photographs and videos (if applicable), etc.

4.4 Hard copies of disclosures and reports relating to child protection are held in a securely locked filing cabinet in a locked room.

4.5 Hard copies of complaints made by parents or pupils are stored in a file in a secure area within the school.

4.6 Actual copies of accident and incident information are stored separately on the school's system and held in line with the retention periods outlined in this policy. An additional copy may be placed in the pupil's file in the event of a major accident or incident.

4.7 The school will ensure that no pupil records are altered or amended before transferring them to the next school that the pupil will attend.

4.8 The only exception to the above is if any records placed on the pupil's file have a shorter retention period and may need to be removed. In such cases, the School Administration Manager or Principal/Head Teacher/Head of School will remove these records.

4.9 Electronic records relating to a pupil's record will also be transferred to the pupils' next school using the Department for Education Schools to Schools file transfer service.

4.10 Primary schools only (where applicable). The school will not keep any copies of information stored within a pupil's record, unless there is ongoing legal action at the time during which the pupil leaves the school. The responsibility for these records will then transfer to the next school that the pupil attends.

4.11 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.

4.12 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.

5. Retention of pupil records and other pupil-related information

5.1 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.

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

Type of file	Maximum Retention period	Action taken after retention period ends
Personal identifiers, contacts and personal characteristics		
Images used for identification purposes	Whilst the pupil remains at school, and up to the age of 25	Securely disposed of
Images used in displays in schools	Whilst the pupil is at school plus one year	Securely disposed of
Images used for marketing purposes, or other	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
Names, addresses, and characteristics	Whilst the pupil is at school, and up to age 25	Securely disposed of
Admissions		
Register of admissions	Whilst the pupil remains at the school, and up to age 25	Information is reviewed and the register may be kept permanently
Successful Admissions appeals	Whilst the pupil remains at school, and up to age 25	Securely disposed of
Unsuccessful school admissions	Until the appeal process is complete	Securely disposed of

Type of file	Maximum Retention period	Action taken after retention period ends
Primary Pupils' educational records	Whilst the pupil remains at the school	Transferred to the next destination – if this is an independent school, homeschooling or outside of the UK, the file will be kept by the LA and retained for the statutory period
Secondary Pupils' educational records	25 years after the pupil's date of birth	Securely disposed of
Public examination results	Added to the pupil's record and transferred to next school Whilst the pupil remains at the school, and up to age 25	Returned to the examination board
Internal examination results	Added to the pupil's record and transferred to next school Whilst the pupil remains at the school, and up to age 25	Securely disposed of
Behaviour records	Added to the pupil's record and transferred to next school Whilst the pupil remains at the school, and up to age 25	Securely disposed of
Exclusion records	Added to the pupil's record and transferred to the next school Whilst the pupil remains at the school, and up to age 25	Securely disposed of
Child protection records held in a separate file (if applicable)	25 years after the pupil's date of birth	Securely disposed of – shredded

Type of file	Maximum Retention period	Action taken after retention period ends
Attendance		
Attendance registers	<p>Whilst the pupil remains at school, plus one year</p> <p>Non-identifiable summary statistics are held after the initial retention period for 25 years after the pupil's date of birth</p>	Securely disposed of
Letters authorising absence	Whilst the pupil remains at the school, and up to age 25	Securely disposed of
Medical information and administration		
Permission slips	For the duration of the period that medication is given then added to student record	Securely disposed of
Medical conditions – ongoing management	<p>Added to the pupil's record and transferred to the next school</p> <p>Whilst the pupil remains at the school, and up to age 25</p>	Securely disposed of
Medical incidents that have a behavioural or safeguarding influence	<p>Added to the pupil's record and transferred to the next school</p> <p>Copies held whilst the pupil is at school, plus 25 years</p>	Securely disposed of

Type of file	Maximum Retention period	Action taken after retention period ends
SEND		
SEND files, reviews and individual education plans	25 years after the pupil's date of birth (as stated on the pupil's record)	Information is reviewed and the file may be kept for longer than necessary if it is required for the school to defend themselves in a 'failure to provide sufficient education' case
An EHC plan maintained under section 37 of the Children and Families Act 2014 (and any amendments to the statement or plan)	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of, unless it is subject to a legal hold
Information and advice provided to parents regarding SEND	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of, unless it is subject to a legal hold
Accessibility strategy	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of, unless it is subject to a legal hold
Curriculum management		
SATs results (if applicable)	25 years after the pupil's date of birth (as stated on the pupil's record)	Securely disposed of
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	Current academic year, plus six years	Securely disposed of

Type of file	Maximum Retention period	Action taken after retention period ends
Curriculum management		
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 system as appropriate	Securely disposed of
Financial information relating to school trips held on parent platforms	Whilst the pupil remains at school, plus one year	Securely disposed of
Parental consent forms for specific school trips (eg residential) where no major incident occurred	Until the conclusion of the trip	Securely disposed of
Annual parental consent forms and sporting activities consent forms	Current academic year	Securely disposed of
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)	Securely disposed of
Walking bus registers (if applicable)	Three years from the date of the register being taken	Securely disposed of
Educational visitors in school – sharing of personal information	Current academic year	Securely disposed of
Family liaison officers and home-school liaison assistants (if applicable)		
Day books	Current academic year, plus two years	Reviewed and destroyed if no longer required
Reports for outside agencies	Duration of the pupil's time at school	Securely disposed of

Type of file	Maximum Retention period	Action taken after retention period ends
Family liaison officers and home-school liaison assistants (if applicable)		
Referral forms	Whilst the referral is current	Securely disposed of
Contact data sheets	Current academic year	Reviewed and destroyed if no longer active
Contact database entries	Current academic year	Reviewed and 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	Current year plus 6 years	Securely disposed of
Computer Records		
Emails	5 Years from email sent	Securely disposed of
Electronic Documents	1 Year after pupil has Left	Securely disposed of

6. Retention of staff records

- 6.1 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.
- 6.2 Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Maximum Retention period	Action taken after retention period ends
Operational		
Staff members' personal file	Termination of employment, plus six years	Securely disposed of
Timesheets	Current academic year, plus six years	Securely disposed of
Annual appraisal and assessment records	Current academic year, plus five years	Securely disposed of
Recruitment		
Records relating to the appointment of a new Principal/Head Teacher/Head of School	Date of appointment, plus six years	Securely disposed of
Records relating to the appointment of new members of staff (unsuccessful candidates)	Date of appointment of successful candidate, plus six months	Securely disposed of
Records relating to the appointment of new members of staff (successful candidates)	Relevant information added to the member of staff's personal file. Other information retained for six months	Securely disposed of
Proof of identify as part of the enhanced DBS check	Relevant information added to staff personal file	Reviewed and a note kept of what was seen and what has been checked – if it is necessary to keep a copy this will be placed on the staff member's personal file
Evidence of right to work in the UK	Added to staff personal file	Securely disposed of

Type of file	Maximum Retention period	Action taken after retention period ends
Disciplinary and grievance procedures		
Child protection allegations, including where the allegation is unproven	Added to secure safeguarding files and until the individual's normal retirement age, or 10 years from the date of the allegation – whichever is longer If allegations are malicious, they are removed from personal files	Reviewed and securely disposed of – shredded
Oral warnings	Date of warning, plus six months	Securely disposed of – if placed on staff personal file, removed from file
Written warning – level 1	Date of warning, plus six months	Securely disposed of – if placed on staff personal file, removed from file
Written warning – level 2	Date of warning, plus 12 months	Securely disposed of – if placed on staff personal file, removed from file
Final warning	Date of warning, plus 18 months	Securely disposed of – if placed on staff personal file, removed from file
Records relating to unproven incidents	Conclusion of the case, unless the incident is child protection related and is disposed of as above	Securely disposed of
Computer Records		
Microsoft 365 Emails	5 Years from email sent	Securely disposed of
Microsoft 365 Electronic Documents – Personal Area	Date of leaving plus 12 months.	Securely disposed of
Electronic documents – Onsite storage Personal Area	Date of leaving plus 12 months.	Securely disposed of

7. Retention of senior leadership and management records

- 7.1 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.
- 7.2 Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Maximum Retention period	Action taken after retention period ends
Governing board		
Agendas for governing board meetings	One copy alongside the original set of minutes – all others disposed of without retention	Securely disposed of
Original, signed copies of the minutes of governing board meetings	Permanent	Stored securely
Inspection copies of the minutes of governing board meetings	Date of meeting, plus five years	Shredded if they contain any sensitive and personal information
Reports presented to the governing board	Minimum of six years, unless they refer to individual reports – these are kept permanently	Securely disposed of or, if they refer to individual reports, retained with the signed, original copy of minutes
Meeting papers relating to the annual parents' meeting (if applicable)	Date of meeting, plus a minimum of six years	Securely disposed of
Instruments of government, including articles of association	Permanent	Stored securely
Trusts and endowments managed by the governing board (if applicable)	Permanent	Retained in the school whilst it remains open
Action plans created and administered by the governing board	Duration of the action plan, plus three years	Securely disposed of
Policy documents created and administered by the governing board	Duration of the policy, plus three years	Securely disposed of

Type of file	Maximum Retention period	Action taken after retention period ends
Governing board		
Records relating to complaints dealt with by the governing board	Date of the resolution of the complaint, plus a minimum of six years	Reviewed for further retention in case of contentious disputes, then securely disposed of
Annual reports created under the requirements of The Education (Governors' Annual Reports) (England) (Amendment) Regulations 2002	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
Principal/Head Teacher/Head of School and Senior Leadership Team (SLT)		
Minutes of SLT meetings and the meetings of other internal administrative bodies	Date of the meeting, plus three years	Reviewed and securely disposed of
Reports created by the Principal/Head Teacher/Head of School or SLT (if applicable)	Date of the report, plus a minimum of three years	Reviewed and securely disposed of
Records created by the Principal/Head Teacher/Head of School deputy Head Teacher, heads of year and other members of staff with administrative responsibilities	Current academic year, plus six years	Reviewed and securely disposed of
Correspondence created by the Principal/Head Teacher/Head of School, deputy Head Teacher, heads of year and other members of staff with administrative responsibilities	Date of correspondence, plus three years	Reviewed and securely disposed of
Professional development plan	Duration of the plan, plus six years	Securely disposed of
School development plan	Duration of the plan, plus three years	Securely disposed of

8. Retention of health and safety records

- 8.1 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.
- 8.2 Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Maximum Retention period	Action taken after retention period ends
Health and safety		
Health and safety policy statements	Duration of policy, plus three years	Securely disposed of
Health and safety risk assessments	Duration of risk assessment, plus three years	Securely disposed of
Records relating to accidents and injuries at work	Date of incident, plus 12 years. In the case of serious accidents, a retention period of 15 years is applied	Securely disposed of
Accident reporting – adults	Date of the incident, plus six years	Securely disposed of
Accident reporting – pupils	25 years after the pupil's date of birth, on the pupil's record	Securely disposed of
Control of substances hazardous to health	Current academic year, 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	Date of last action, plus 50 years	Securely disposed of
Fire precautions log books	Current academic year, plus six years	Securely disposed of

9. Retention of financial records

- 9.1 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.
- 9.2 Electronic copies of any information and files will also be destroyed in line with the retention periods below.

Type of file	Maximum Retention period	Action taken after retention period ends
Risk management and insurance		
Employer's liability insurance certificate	40 years or closure of school plus 10 years	
Asset management		
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
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	Current financial year, 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 6 years	Securely disposed of
All records relating to the monitoring of contracts	Current academic year, plus six years	Securely disposed of

Type of file	Maximum Retention period	Action taken after retention period ends
School meals		
Free school meals registers(if applicable)	Current academic year, plus six years	Securely disposed of
School meals registers (if applicable)	Current academic year, plus three years	Securely disposed of
School meals summary sheets (if applicable)	Current academic year, plus three years	Securely disposed of

10. Retention of other school records

10.1 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.

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

Type of file	Maximum 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	Current academic year, plus six years	Securely disposed of
All records relating to the maintenance of the school carried out by school employees	Current academic year, plus six years	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	Disposed of against common standards
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

Type of file	Maximum Retention period	Action taken after retention period ends
Operational administration		
Newsletters and other items with short operational use	Current academic year plus one year	Disposed of against common standards
Visitors' books and signing-in sheets	Current academic year, 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

11. Identifying information

- 11.1 Under the 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 in order for individuals to exercise this right.
- 11.2 Wherever possible, the school uses pseudonymisation, also known as the 'blurring technique', to reduce risk of identification.
- 11.3 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.
- 11.4 Where data is required to be retained over time, e.g. attendance data, where possible 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.

12. Storing and protecting information

- 12.1 The DPO will undertake a risk analysis to identify which records are vital to school management and these records will be stored in the most secure manner.
- 12.2 The ICT support staff will conduct a back-up of information on a nightly basis to ensure that all data can still be accessed in the event of a security breach, e.g. a Security breach\virus\malicious user, and prevent any loss or theft of data.
- 12.3 Backed-up information will be stored on secured servers nightly then duplicated to Offline Cloud service providers to ensure that if the sites data is compromised that the data can be restored accordingly to the DFE Best practices.
- 12.4 Confidential paper records are kept in a locked filing cabinet, drawer or safe, with restricted access.

- 12.5 Confidential paper records are not left unattended or in clear view when held in a location with general access.
- 12.6 Digital data is securely stored on servers, access granted to only authorized personnel, specified by the individual schools and Executive Leadership Team. Only managed devices are permitted, these are password protected. Authorised portable devices are password protected and encrypted.
- 12.7 Memory sticks are not used to hold personal information unless they are password-protected and fully encrypted.
- 12.8 All electronic devices are password-protected to protect the information on the device in case of theft.
- 12.9 Where possible, the school enables electronic devices to allow the remote blocking or deletion of data in case of theft.
- 12.10 Staff and governors do not use their personal laptops or computers for school purposes unless they work remotely using encrypted memory sticks as storage devices and abide by the guidelines within the Bring Your Own Device policy.
- 12.11 All members of staff are provided with their own secure login and password, and every computer regularly prompts users to change their password.
- 12.12 Emails containing sensitive or confidential information are encrypted to ensure that only the recipient is able to access the information. The password will be shared with the recipient in a secure manner.
- 12.13 Circular emails to parents are sent blind carbon copy (bcc), so email addresses are not disclosed to other recipients.
- 12.14 When sending confidential information by fax, members of staff always check that the recipient is correct before sending.
- 12.15 Where personal information that could be considered private or confidential is taken off the premises, to fulfil the purpose of the data in line with the GDPR, either in an electronic or paper format, staff take extra care to follow the same procedures for security, e.g. keeping devices under lock and key. The person taking the information from the school premises accepts full responsibility for the security of the data.
- 12.16 Before sharing data, staff always ensure that:
- They have consent from data subjects to share it.
 - Adequate security is in place to protect it.
 - The data recipient has been outlined in a privacy notice.
- 12.17 All staff members will implement a 'clear desk policy' to avoid unauthorised access to physical records containing sensitive or personal information. All confidential information will be stored in a securely locked filing cabinet, drawer or safe with restricted access.

- 12.18 Under no circumstances are visitors allowed access to confidential or personal information. Visitors to areas of the school containing sensitive information are supervised at all times.
- 12.19 The physical security of the school's buildings and storage systems, and access to them, is continuously monitored and reviewed. If an increased risk in vandalism, burglary or theft is identified, this will be reported to the Principal/Head Teacher/Head of School and extra measures to secure data storage will be put in place.
- 12.20 The school takes its duties under the GDPR seriously and any unauthorised disclosure may result in disciplinary action.
- 12.21 The DPO is responsible for continuity and recovery and measures are in place to ensure the security of protected data.
- 12.22 Any damage to or theft of data will be managed in accordance with the school's GDPR Data Protection policy.

13. Accessing information

- 13.1 The School/Trust is transparent with data subjects, the information we hold and how it can be accessed.
- 13.2 All members of staff, parents of registered pupils and other users of the school, e.g. visitors and third-party clubs, are entitled to:
- Know what information the school holds and processes about them or their child and why.
 - Understand how to gain access to it.
 - Understand how to provide and withdraw consent to information being held.
 - Understand what the school is doing to comply with its obligations under the GDPR.
- 13.3 All members of staff, parents of registered pupils and other users of the school and its facilities have the right, under the GDPR, to access certain personal data being held about them or their child.
- 13.4 Personal information can be shared with pupils once they are considered to be at an appropriate age and responsible for their own affairs; although, this information can still be shared with parents.
- 13.5 Pupils who are considered to be at an appropriate age to make decisions for themselves are entitled to have their personal information handled in accordance with their rights.
- 13.6 The school will adhere to the provisions outlined in the school's Data Protection Policy when responding to requests seeking access to personal information.

14. Information audit

- 14.1 The school will conduct information audits on an annual basis against all information held by the school to evaluate the information the school is holding, receiving and using, and to ensure that this is correctly managed in accordance with the GDPR. This includes the following information:

- Paper documents and records
- Electronic documents and records
- Databases
- Microfilm or microfiche
- Sound recordings
- Video and photographic records
- Hybrid files, containing both paper and electronic information.

14.2 The information audit may be completed in a number of ways, including, but not limited to:

- Interviews with staff members with key responsibilities – to identify information and information flows, etc.
- Questionnaires to key staff members to identify information and information flows, etc.
- A mixture of the above

14.3 The DPO is responsible for completing the information audit. The information audit will include the following:

- The school's data needs
- The information needed to meet those needs
- The format in which data is stored
- How long data needs to be kept for
- Vital records status and any protective marking
- Who is responsible for maintaining the original document

14.4 The DPO will consult with staff members involved in the information audit process to ensure that the information is accurate.

14.5 Once it has been confirmed that the information is accurate, the DPO will record all details on the school's Information Asset Register.

14.6 The information displayed on the Information Asset Register will be shared with the Principal/Head Teacher/Head of School to gain their approval.

15. Disposal of data

15.1 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.

15.2 Where disposal of information is outlined as secure disposal, this will be shredded or pulped and electronic information will be scrubbed clean and, where possible, cut.

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

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

15.5 Where information has been kept for administrative purposes, the DPO will review the information again after three years and conduct the same process. If it needs to be destroyed,

it will be destroyed in accordance with the disposal action outlined in this policy. If any information is kept, the information will be reviewed every three subsequent years.

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

16. Monitoring and review

16.1 Any changes made to this policy will be communicated to all members of staff and the governing body.